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POSITIVE DISCIPLINE®

SUBJECT

Georgia Power

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POLICY: It is Company policy to enhance employee performance, to stimulate individual accountability and to foster self-discipline through the Positive Discipline Program by recognizing exemplary performance and by correcting performance problems through non-punitive means.

## GUIDELINE:

# I. GENERAL

A well disciplined work force is necessary to accomplish the Company's mission. Often times, however, traditional punitive discipline -- usually called "progressive discipline" -- does not work. It sometimes achieves employees' short-term compliance -- but not their longterm commitment.

Positive Discipline is a system in which the responsibility for good performance is properly placed on employees themselves. If their performance is good, it is recognized and applauded. If it is not, they are reminded of the need to meet job expectations and are asked to commit to improving their performance.

Punitive measures such as reprimands and disciplinary suspensions are replaced by non-punishing steps which avoid embarrassment and resentment, and are more consistent with treating employees as adults. Additionally, disciplinary steps remain active for a specified time, giving employees a strong incentive to improve.

Under Positive Discipline, supervisors must still ensure that Georgia Power's expectations of safety and efficiency are met. By working with employees in a nonthreatening way, supervisors can ensure our standards are met by gaining their employees' commitment to the Company's mission.

## II. THE POSITIVE DISCIPLINE SYSTEM

#### A. Recognition

Recognizing good performance is one of the best ways to manage performance. The supervisor should either talk informally with the employee or document his recognition with a memo that would go both to the employee and the personnel file. An employee is to be recognized for any of the following achievements:

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- 1. Doing something above and beyond expectations.
- Performing competently and diligently over an extended period of time.
- 3. Taking effective action in a crisis or emergency.
- Developing an idea that enhances safety or productivity.
- Providing special training or assistance to other employees.
- Maintaining an excellent attendance record over a significant period of time.
- Exhibiting a high spirit of teamwork that is demonstrated through specific actions.
- B. Coaching

Coaching is an effective method for the immediate supervisor to enhance performance or correct an emerging performance problem. Coaching is not a formal level of discipline. The purpose of coaching is to make the employee aware of a deficiency and jointly develop effective solutions.

Documentation

To help supervisors organize their thoughts for this and other corrective discussions, use of the Employee Discussion Guide (Form 705795) is recommended as preparation for the coaching discussion. The discussion guide may be kept by the supervisor but not placed in the employee's personnel file. More than one coaching session may be appropriate before initiating formal discipline. Ecwever, coaching is not required prior to formal discipline.

- C. Formal Levels of Discipline
  - 1. Level One -- Oral Reminder
    - a. Application

The Oral Reminder is the first level of formal discipline in the Fositive Discipline process. It is used either when an employee

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does not respond to coaching or when the seriousness of the behavior warrants this level of attention.

In an Oral Reminder, the immediate supervisor describes how the employee is not meeting the supervisor's expectations. The supervisor explains those expectations and the good business reasons for their existence. The employee is told that this is the first formal level of the disciplinary process and is asked for a commitment to correct the problem. At the conclusion of the discussion, the supervisor expresses confidence in the employee's ability to improve.

#### b. Approvals

Immediate supervisors have the authority to issue Oral Reminders without prior review by higher management.

c. Documentation

An Oral Reminder is documented by placing the Employee Discussion Guide in the employee's personnel file. The employee will be given a copy as well.

If the employee corrects the problem, the Employee Discussion Guide will be removed from the employee's personnel file and given to the employee six months later, with verbal recognition for the improvement. If the employee does not correct the problem, or another similar infraction occurs within the six months, discipline should be escalated to the next level.

#### 2. Level Two -- Written Reminder

a. Application

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A Written Reminder is the second level of formal discipline in the Positive Discipline process. It is administered when either the employee does not meet a commitment to improve following an Oral Reminder, or when a single infraction is serious enough to warrant that level of discipline.

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A Written Reminder is a formal memo to an employee from the immediate supervisor. It documents a discussion about unacceptable behavior or a performance problem, the supervisor's expectations, and what the employee intends to do to correct the problem. Supervisors should use the Employee Discussion Guide to prepare for and document this interview. The memo is written after the formal disciplinary interview and a copy given to the employee.

b. Approvals

Supervisors should obtain the prior review of at least their own immediate supervisors before administering this level of discipline.

c. Documentation

A Written Reminder is documented by placing the formal memo and the Employee Discussion Guide in the employee's personnel file. The employee will be given a copy of both the memo and the Employee Discussion Guide. A copy of the memo and the Employee Discussion Guide must be forwarded to Vice President, Human Resources for use only in legal proceedings.

If the employee corrects the problem, the memo and Employee Discussion Guide will be removed from the employee's personnel file twelve months later and given to the employee with verbal recognition for improving. If the employee does not correct the problem, discipline should be escalated to the next level.

- 3. Level Three -- Decision Making Leave (DML)
  - a. Application

A Decision Making Leave is the third and final level of formal discipline in the Positive Discipline system. It is given to an employee when the employee does not meet a commitment to improve following a Written Reminder, or when a single infraction is

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serious enough to warrant this level of discipline.

The DML consists of a discussion between the employee and his immediate supervisor, during which the supervisor, using the Employee Discussion Guide, makes clear the extreme Jeriousness of the employee's problem and the requirement for a total performance commitment. The employee is told to make a conscious decision whether to meet Georgia Power's expectations in all areas or to resign from the Company.

The employee is given the following workday off with pay to think about the matter, and is told to report back to the supervisor the next workday with a decision. If possible, avoid giving a DEL the day before an off When the employee returns, the day. supervisor reinforces the seriousness of the situation and receives either the employee's commitment to improve or a notice of resignation. If the employee elects to keep the job, specific notice should be given that any performance problem requiring disciplinary action is likely to result in the employee's dismissal during the time the DML remains actively in the employee's file.

#### b. Approvals

Supervisors should obtain the prior review of at least their own and the next higher level of supervision before administering a DML.

## c. Documentation

After an employee returns from a DML, the supervisor will write a formal memo to the employee outlining the employee's decision and commitment to improve. This memo and the Employee Discussion Guide will be put in the employee's personnel file. The employee will be given a copy of both the memo and the Employee Discussion Guide. A copy of the memo and Employee Discussion Guide must be forwarded to the Vice President, Human Resources for use only in legal proceedings.

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If the employee corrects the problem, the memo and the Employee Discussion Guide will be removed from the employee's personnel file eighteen months later and given to the employee with verbal recognition for improving.

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#### Termination D.

An employee will be terminated when adequate improvement is not made after a DML or when the employee commits another infraction which might otherwise call for formal discipline while a DML is actively in the file.

Employees may also be terminated for very serious infractions or violations of Company policy. Examples include theft, certain violations of the alcohol and drug policy, and fighting.

#### Approvals

Supervisors should obtain the prior review of at least their own and the next higher level of supervision before terminating an employee.

#### ADMINISTRATIVE GUIDELINES III.

Performance problems that require discipline are A. divided into three general areas: Safety and Conduct, Work Performance, and Attendance. Employees may have a maximum of three Oral Reminders at any time and these must all be in separate categories. Should another performance problem occur in a category where there is already an active Oral Reminder, the discipline must escalate to a higher level, usually a Written Reminder.

Similarly, the maximum number of Written Reminders that may be active at one time is two; these also must be in separate categories. Should another performance problem occur in a category where there is already an active Written Reminder, the discipline step must escalate to a DML. Likewise, if two written reminders are in effect and a problem develops in a third category, the disciplinary level must also escalate to a DML.

Because the Decision Making Leave requires a total performance commitment by the employee, there may only be one active DML. If an employee is not

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terminated after committing a significant infraction while under an active DML, the decision not to terminate must be documented and approved by the supervisor who authorized the original DML, or another appropriate level of management.

#### B. Administrative Suspensions

An administrative suspension is used to remove the employee from the work site while the supervisor investigates certain infractions. Some examples include theft, fighting, violation of the alcohol and drug policy, or insubordination. Employees who are placed on administrative suspension will be paid their regular straight time wage unless a decision is made to terminate the employee. In those cases, the termination will be made effective on the date the employee was suspended. In no case will an employee be suspended without pay.

#### C. Deactivation

A very important feature of Positive Discipline is deactivation. When an employee satisfactorily corrects a problem that required discipline, the Employee Discussion Guide and disciplinary memo are removed from the employee's personnel file and returned to the employee after the active period of that discipline. The steps remain active as follows:

Oral Reminder: 6 months Written Reminder: 12 months Decision Making Leave: 18 months

When an employee corrects a problem and maintains satisfactory performance in that category for the required period, his personnel file is purged of any Employee Discussion Guides and/or disciplinary memos that pertain to that infraction. Other records such as accident investigations, positive drug test results, and attendance records remain a part of the employee's personnel file. The employee's improvement should be verbally acknowledged. In the case of Written Reminders and DML's, copies are maintained by the Vice President, Human Resources for legal purposes only.

D. Supervisors may contact the Labor Relations Department or the Equal Opportunity Section for assistance in administering this policy.

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- E. This policy does not alter existing appeals procedures for both covered and non-covered employees.
- F. This policy is not intended as a contract, either bargained nor implied, nor does it alter any contractual agreements already in effect.
- G. Summer students, co-ops, temporary employees, and employees in their trial period are excluded from this policy. If coaching is not sufficient for these employees, and formal discipline is required, they should be terminated.
- IV. <u>POSITIVE DISCIPLINE TRANSITION</u> (This portion of the policy will become void after all areas of the Company implement positive discipline.)

As this policy takes effect, employees must have any previous discipline converted to the Positive Discipline system. The following guidelines are for use in making this conversion.

A. During the implementation period, the levels of progressive discipline should be roughly equated to the levels of Positive Discipline as follows:

Progressive Discipline	Positive Discipline
Memorandum of Discussion	= Coaching
Written Reprimand	= Oral Reminder
First Disciplinary Suspension	<pre>= Written Reminder (Active 12 months)</pre>
Second Disciplinary Suspension	<pre>= Written Reminder (Active 18 months)</pre>

Note: An employee given a final warning prior to implementation is still subject to immediate termination for a similar infraction under Positive Discipline.

B. Employees who recently have been disciplined should have their personnel files reviewed prior to implementation or when they transfer into a participating location after the implementation has begun. At that time, management should convert their previous discipline to the corresponding level of Positive Discipline. Management should also apply

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the time limits that go with each level of Positive Discipline.

For example, if an employee received a Written Reprimand two months before implementation began, that reprimand should be converted to an active Oral Reminder with four months remaining before it is deactivated. The same would apply to an employee who transfers into this location from another organization not yet using the Positive Discipline System.

Employees who transfer out of a Positive Discipline area should not have any active Positive Discipline converted to the corresponding step of progressive discipline.

C. While Positive Discipline is being implemented throughout the Company, documentation of deactivated discipline will not be destroyed. It will be returned to the employee as stated in the policy, but a copy will be kept in the file with a note that it has been deactivated. When Positive Discipline is fully implemented, these notated records will be returned to the employee.

Similarly, records of discipline from earlier in the employee's career which would have been deactivated under Positive Discipline, will be batched and marked as inactive. It will not be used as a basis for future discipline. When Positive Discipline is fully implemented, it, too. will be returned to the employee.

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President and Chief Executive Officer

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# Interoffice Correspondence

DATE: February 28, 1989

RE: <u>Plant Vogtle - Units 1 & 2</u> Operability Policy Log: NOP-00547 Security Code: NC

FROM: W. F. Kitchens

TO: Licensed Operators (via ORRB)

Attached for your information and use is a policy statement on "OPERABILITY". This policy is established plant wide for consistency in making determinations of OPERABILITY.

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Georgia Power

Call me if you have any questions or comments.

WFK:pc

Attachment

xc: Operations Policy Book R. M. Bellamy G. Bockhold, Jr. T. V. Greene M. A. Griffis C. C. Eckert J. B. Beasley A. L. Mosbaugh K. R. Holmes J. E. Swartzwelder O. D. Hayes NORMS

# OPERABILITY POLICY

I. OPERABILITY is a condition of compliance with the Technical Specifications. It is initially achieved through an exhaustive construction and testing program, and maintained by successful and timely completion of surveillance requirements. The achieved state of operability is protected and ensured by our work and configuration control programs and deficient condition evaluations.

OPERABILITY applies only to the specific equipment covered by the Technical Specifications. (Equipment not included in the Technical Specifications should be called "functional" or "not functional" to avoid confusion).

The legal definition given in the Technical Specifications is:

#### OPERABLE - OPERABILITY

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1.19 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train component, or device to perform its function(s) are also capable of performing their related support function(s).

- II. The determination of OPERABILITY is the responsibility of the Operations Department. The other plant groups are responsible to observe conditions, report specific problems, and support operations in making a determination of equipment status. Interpretation of Technical Specification requirements is the responsibility of operations line management. These determinations and interpretations should be made using the collective knowledge of our plant staff.
- III. When surveillance requirements are not met, or specific evidence exists that Technical Specification required equipment does not meet the OPERABILITY definition, the equipment shall be declared INOPERATLE and the appropriate ACTION statement shall be followed. This will be documented using the "LCO" form, and entry in the Shift Supervisor log book. (Short term entries into ACTION statements do not require an LCC form, but must be logged). The time of entry into the LCO ACTION statement shall be the time of discovery - the point in time at which responsible parties become aware of the condition.

When the INOPERABLE equipment is not required to be OPERABLE during the existing OPERATIONAL MODE, an "information only" LCO shall be initiated for tracking and operational control.

# OPERABILITY POLICY

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We will plan our work to minimize the number of LCO's, and timely corrective action will be taken to minimize down time of Technical Specification required equipment. For <u>unplanned</u> outages of equipment with an action statement time of 7 days or less, or a <u>planned</u> outage with less than 72 hours action statement time remaining, corrective action should proceed around the clock, and appropriate personnel called out to restore the equipment to operable status.

IV. Sometimes conditions are revealed that could result in equipment not being at'e to perform its intended design function, but it is difficult (or impossible) to determine if OPERABILITY is affected, with existing information. In such cases, an operability evaluation shall be initiated immediately by Operations, with support from Plant Engineering, NSAC, H.P./Chemistry, Maintenance, or other technical experts as appropriate. Corrective or compensatory actions should be initiated, where possible and prudent, in parallel with this operability evaluation. If the OPERABILITY evaluation reveals that the equipment fails to meet the definition of OPERAB&LITY, the equipment shall be declared INOPERABLE, and the appropriate action statement entured with the action clock beginning at the time INOPERABILITY was determined.

Special attention must be paid to peripheral operability impacts such as equipment qualification, flood protection, missile shields, impingement plates, or high energy line breck protection. These items, often referred to as "hazard" protection, may require special design engineering expertise for a proper OPERABILITY evaluation. (Even though OPERABILITY may not be affected, we shall take timely corrective action to restore the plant to its intended design condition.)



#### Interoffice Correspondence

DATE: August 15, 1991

RE: Technical Specification Clarifications Log: NOTS-00898

FROM: William B. Shipman

TO: Operations Department Employees

Earlier this year, the NRC Resident Inspectors at VEGP reviewed three occasions where VEGP Operations Department personnel found it necessary to clarify specific Technical Specifications. In these three instances, the Resident Inspectors determined that VEGP's clarifications were safe and conservative. (See the NRC's Inspection Report No. 91-05, dated April 16, 1991, Section 2.f, at pages 4-5, copy attached). The Resident Inspectors noted that this conservative approach taken in the evaluation and clarification of Tech. Specs. constituted a strength. As many of you know, we have strengthened this important area of operations in recent times, in part as a result of NRC observations, including a revision to VEGP Procedure 10000-C (Section 3.11) to provide for interdepartmental review of Tech. Spec. clarifications. I commend your efforts and urge you to maintain vigilance in assuring VEGP's compliance with Tech. Specs. I also urge your continued adherence to established policy and practice for obtaining clarifications.

Of course, where the wording of the Tech. Specs. is clear, straightforward application of the wording, without clarification, is appropriate. Examples of instances where it would be appropriate to obtain Tech. Spec. clarification are any of the three examples discussed in NRC Inspection Report No. 91-05 and some other determinations of "operability." As you know, "operability" clarifications frequently require the expertise of VEGP Departments outside the Operations Department, including Technical Support and Engineering, as well as the expertise of vendors and consultants on occasion.

One specific area of Tech. Spec. clarification which has come under NRC scrutiny over the past year is the voluntary entry into Tech. Spec. LCOs. GPC has recently become aware of an NRC position that Tech. Spec. LCOs and their associated Action Statements which <u>do not</u> provide a specific LCO action time (often referred to by the NRC as an "Allowed Outage Time" or "AOT") should not be voluntarily entered except as expressly provided in associated Surveillance Requirements.

Further NRC guidance exists concerning voluntary entry into LCOs during power operations in order to perform preventive maintenance. That guidance explains that on-line preventive maintenance, primarily for the purpose of reducing plant outage time or other operational convenience, should not be undertaken without a full appreciation of Operations Department Employees Technical Specification Clarifications August 15, 1991 Page two

the effects of this practice on plant safety. This would not apply to on-line preventive maintenance to be performed in conjunction with corrective maintenance during a system/equipment outage.

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WBS/MS/dmh

xc: T. V. Greene, Jr. W. F. Kitchens J. B. Beasley S. H. Chesnut NORMS