



GPU Nuclear Corporate
Policy and Procedure Manual

Number
1000-POL-1020.01

Title
Use of the Ombudsman Function for Resolving
Nuclear or Radiation Safety Concerns

Revision No.
2

Applicability/Scope
All GPU Nuclear Corporation Employees and all Met-Ed
and JCP&L Employees Working Under GPUNC Supervision

Responsible Office
NSAD - 6300

This document is important to safety Yes No

List of Effective Pages

Effective Date
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1.0 Purpose

1.1 The purpose of this policy statement is to:

1.1.1 Define the responsibilities of the Ombudsman, and

1.1.2 Describe the steps to be followed when an employee identifies a nuclear or radiation safety concern.

2.0 Applicability/Scope

This policy applies to all GPU Nuclear employees and all Met-Ed and JCP&L employees working under the direction of GPU Nuclear. Nothing in this policy shall limit or otherwise preclude an individual's rights or obligations under state or federal laws or regulations.

3.0 Definitions

None

4.0 Policy

4.1 GPU Nuclear Corporation recognizes that there may be activities in our company, in addition to those defined as "safety related," which could impact the safety of our nuclear power plants.

4.1.1 Accordingly, the Nuclear Safety Assessment Department (NSAD) has been directed to assess both the importance of these activities and their impact on nuclear or radiation safety, and to recommend improvements where deficiencies are believed to exist.

4.2 All line functions of GPUNC are responsible for assuring that the activities they control are done properly to protect the health and safety of Company employees and the public.

4.2.1 In addition, various organizational elements and committees within GPUNC (e.g., the Quality Assurance Department and the General Office Review Board) are charged with reviewing designated nuclear and radiation safety related aspects of our nuclear power plants.

- 4.2.2 To promote an even higher degree of access for any individual concerned about nuclear or radiation safety, the position of Ombudsman has been established within the NSAD. The Ombudsman will receive, review and make appropriate recommendations on employee concerns about nuclear or radiation safety. In this way, an employee with a concern about nuclear or radiation safety may make a positive contribution.
- 4.2.2.1 Employees are strongly encouraged to raise their concerns through normal supervisory channels and to have them resolved in that manner.
- 4.2.2.2 However, employees are invited to bring their concerns regarding nuclear or radiation safety to the Ombudsman if they are not satisfied with the results obtained through normal channels or have good reason to not want to use normal channels.
- 4.2.3 By definition, an Ombudsman is one who investigates reported complaints, reports findings and helps to resolve the concern.
- 4.2.3.1 As applied to NSAD, this role is essentially the same except that the Ombudsman will address the resolution of nuclear or radiation safety concerns.
- 4.3 Such concerns should be communicated to the Ombudsman (in care of the Nuclear Safety Assessment Director) at GPUNC Headquarters. The basic information required to investigate the concern should be presented as clearly and as completely as possible.
- 4.3.1 The confidentiality of the communicator will be maintained except to the extent the identification of the communicator is lawfully required by a governmental body or agency. When such governmental body, or agency requires the identification of the communicator, the Ombudsman will use his/her best efforts to maintain the public anonymity of the communicator.
- 4.3.2 The Ombudsman will review all initial correspondence (or record of telephone conversation) and provide the originator, if identified, with an acknowledgement of receipt. This will include a target date for initiation of the review.

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- 4.3.2.1 The Ombudsman may appoint a NSAD staff member to conduct the review and prepare a presentation of the facts.
- 4.3.2.2 A suggested resolution of the concern will be defined by discussion with the appropriate functional organizational element(s). If the concern is determined to have no impact on nuclear or radiation safety, the individual will be so informed and no further action will be taken by NSAD. The appropriate functional organization will be responsible for resolution of the concern.
- 4.3.2.3 The results of the review plus the suggested resolution will then be forwarded to the division or specific organizational element having responsibility for the concern. This group will then be responsible for implementing corrective action.
- 4.3.2.4 Results of the review and corrective action taken, if required, will be communicated to the employee who submitted the original concern to the Ombudsman.

4.4 Summary reports of significant Ombudsman activities will be developed periodically and submitted to the Chief Executive Officer, GPUNC and the Director, Nuclear Assurance.

5.0 Responsibilities

As defined above.

6.0 References

6.1 GPU Nuclear Organization Plan

6.2 GPU Nuclear Policy Regarding Cheating, Fraud and Misrepresentation, Procedure #1000-POL-2604.01.

7.0 Attachments

None