

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

September 8, 1993
ST-HL-AE-4565
File No.: G25
10CFR50.7

Mr. A. Bill Beach
Director, Division of Reactor Projects
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498; STN 50-499
Investigation of Allegations

In response to your letter of June 1, 1993, Houston Lighting & Power Company (HL&P) has investigated allegations relating to statements made by a manager regarding generation of a Station Problem Report (SPR). HL&P has completed its investigation of this matter and the results of this investigation are available onsite for NRC review.

The investigation indicates that this matter apparently involved statements and behavior that are inconsistent with HL&P's policy of encouraging individuals to raise safety concerns, and, where appropriate, to document those concerns on SPRs. Accordingly, HL&P is taking action to assure that all management and supervisory personnel, particularly those at senior levels, understand the need to manage and communicate in a manner which minimizes the risk of any potential chilling effect, either real or perceived. In addition to the actions described in my May 21, 1993 letter to you, which address similar issues, we have taken the following actions.

1. I have conducted a seminar for STP managers and supervisors on these issues to reinforce the need for sensitivity in responding to employee concerns that may be of potential safety significance. A copy of the videotape made at the seminar is attached. All management and supervisory personnel will view the videotape by October 15, 1993.

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PDR FOIA
LAWRENC93-642 PDR

Rev
all of the Participants in the South Texas Project
P. O. to HLW
55/10

2. All senior level site management have attended the sensitivity training described in my letter to Mr. Milhoan dated May 28, 1993 or have viewed the videotape of the training.
3. A short bulletin concerning this issue has been posted onsite to ensure that personnel understand management's approach to this issue and are aware that any behavior which may discourage employees from raising safety concerns or otherwise reporting problems will not be tolerated. Management expectations regarding responsiveness to employee concerns have also been reinforced in recent policy revisions and other site communications.
4. I have met with each of the individuals who might have been affected by this event to personally reinforce with them that preparation of the SPR in question was entirely appropriate and to encourage them to continue to bring any similar problems which they may become aware of to senior management.
5. An evaluation of the STP employee concerns program, SPEAKOUT, has been initiated. This evaluation will assess the program's policies, scope, procedures, and implementation, and will result in recommendations on how to assure that the program is effective in soliciting and responding to employee concerns. HL&P will keep the NRC apprised of the results of this evaluation and actions to address its recommendations.

Although the matters investigated did not involve any actual retaliation, HL&P believes that this occurrence underscores the need for sustained efforts to assure that the Company's policy of openness and responsiveness to concerns is fully appreciated and implemented.

Please call me at (512) 972-8434 should you wish to discuss this matter further.

William T. Cottle

William T. Cottle
Group Vice President,
Nuclear

JTC/pa

Attachment: "Responsiveness to Employee Safety Concerns" Videotape

Houston Lighting & Power Company
South Texas Project Electric Generating Station

ST-HL-AE-4565
File No.: G25
Page 3 of 3

c: Letter Only

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ALLEGATION MANAGEMENT SYSTEM

ALLEGATION NUMBER - RIV-93-A-0054

RUN DATE: 11/18/93

DOCKET/FACILITY/UNIT: 05000498 / SOUTH TEXAS 1	/ 1
DOCKET/FACILITY/UNIT: 05000499 / SOUTH TEXAS 2	/ 2
DOCKET/FACILITY/UNIT: /	/
DOCKET/FACILITY/UNIT: /	/

ACTIVITY TYPES - REACTOR

MATERIAL LICENSES -

FUNCTIONAL AREAS - SAFEGUARDS
OTHER

SCENARIO OF POTENTIAL THREAT

DESCRIPTION - 6/25/93 DRSS MEMO REC'D - NO NEW ISSUES TO REVIEW
 RIV REC'D A COPY OF A LETTER THAT EXPRESSED SEVERAL CONCERNS
 ABOUT THE SECURITY ORGANIZATION AND PROGRAM. THE LETTER
 CONCERNS - ALSO IDENTIFIED A SCENARIO OF EVENTS THAT DEPICTED A
 2 POTENTIAL THREAT, MANY OF THE ISSUES HAD BEEN PREVIOUSLY
 DOCUMENTED IN OTHER ALLEGATIONS

SOURCE - CONTRACTOR EMPLOYEE

CONFIDENT - NO

RECEIVED - 930427 BY - M. SATORIUS / RIV

ACTION OFFICE CONTACT - W. JOHNSON

RESPONSIBLE PGM OFFICE - R VIOLATION SECTION 210 ALLEGED - NO

STATUS - OPEN SCHED COMPLETION - 931027 DATE CLOSED -

ALLEGATION SUBSTANTIATED - ALLEGER NOTIFIED -

OI ACTION - YES OI REPORT NUMBER - 4-93-023 RK

REMARKS - 4/27/93 ARP - FACSIMILE COPY LTR TO NUCLEAR GROUP VP, RA
 CONTACTED OIG, AC CONTACTED ALLEGER
 4/29/93 INITIAL LTR TO ALLEGER W/DOL INFORMATION
 5/3/93 ALLEGER CONTACTED AC - PROVIDED ADDITIONAL CONCERN
 RELATED TO TRAINING OF SECURITY OFFICERS
 6/25/93 DRSS MEMO REC'D - NO NEW ISSUES TO REVIEW

4/27/93 SPECIAL ARP CONVENED - REFER TO STP
REFER

ACTION: REFER TO STP, REVIEW LICENSEE ACTIONS WHEN COMPLETE
ENTERED SYSTEM - 930427 CLOSED SYSTEM - RECORD CHANGED - 930707

55/11

R-2

Index to RIV