FINAL REPORT

EMPLOYEE CONCERNS PROGRAM
1995 RE-BASELINE
EVALUATION

September 1995

South Texas Project
HL&P

by

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EMPLOYEE CONCERNS PROGRAM EVALUATION
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EXECUTIVE SUMMARY

In the fall of 1993, Houston Lighting & Power Company (HL&P) asked SYNERGY to perform an assessment of the SPEAKOUT Program and the nuclear safety culture at its South Texas Project (STP). SYNERGY had performed similar assessments covering over a dozen nuclear plants and several corporate locations over the previous year. The 1993 assessment evaluated the elements, attributes and procedures of SPEAKOUT and, through interviews, assessed employee and contractor perceptions of the STP site environment for raising and addressing safety and quality concerns. Following that assessment and taking into consideration the recommendations and other inputs, STP management continued to take steps to improve the nuclear safety culture at the site and made significant changes to its employee concerns program. The primary change was that, in January 1994, SPEAKOUT was replaced with a new Employee Concerns Program (ECP), composed of four subunits - the Nuclear Safety and Quality Concerns Program, Human Resources, Industrial Safety and Health, and Access Authorization, which is the organization responsible for wrongdoing investigations.

To determine the effectiveness of these changes, HL&P asked SYNERGY in the summer of 1994 to perform a follow-up review to assess the effectiveness of the new Employee Concerns Program and of the steps that had been taken to improve the overall nuclear safety culture at STP. SYNERGY concluded that STP had made significant progress since the fall of 1993 in establishing a strong nuclear safety culture at the plant and strengthening the employee concerns process. To achieve a sustained high level of employee satisfaction, SYNERGY noted a need for increased management attention to address employee perceptions of a lack of responsiveness or effectiveness by the Human Resources (HR) group in dealing with personnel matters. SYNERGY also offered several recommendations for administrative changes and clarifications as refinements or adjustments in assuring continuous improvement.

SYNERGY performed this employee survey in late summer, 1995 to re-baseline attitudes and perceptions about the STP nuclear safety culture, the general site environment and the ECP. This survey included approximately fifty interviews representing a cross-section of the STP workforce and selected review of current ECP procedures and records. The methodology was similar to the two prior surveys,

enabling trending of results and an assessment of progress. SYNERGY also focused on employee receptiveness to management and staffing changes within HR and, in particular, employee satisfaction with a new operating philosophy within the Legal & Personnel Services (L&PS) sub-group of the ECP which is managed by HR.

The 1995 survey results indicated a continuing trend of improvement across all categories of inquiry, indicating that HL&P had maintained a focus on continuous improvement of the nuclear safety culture, the general site environment and the ECP. SYNERGY concluded that employees and contractors are comfortable raising issues directly with their management or through alternate means such as the ECP. Of the employees and contractors interviewed at STP, 100% rate the nuclear safety culture as adequate to excellent, giving STP the highest rating of the nuclear plants and corporate locations surveyed by SYNERGY. These facilities are judged to represent a cross-section of the industry with three on the NRC's top performers list, two on the NRC's problem plant list, with the others performing somewhere in between. Employees also expressed continued satisfaction with the site environment as reflected in their high ratings of management's influence and their individual willingness to raise concerns; again placing STP first amongst the other facilities surveyed. SYNERGY concluded that at STP, employees believe that plant management is committed to maintaining an open and self-critical environment for raising concerns and to making STP one of the top performing plants in the country. Many employees expressed opinions that over the last year, STP's goal of attaining World Class performance status had become a reality.

The ECP continues to be well received by employees with visibility, acceptance and confidence being maintained at high levels. SYNERGY concluded that HL&P has continued to do a good job of informing employees about the purpose and scope of the ECP and conveying to them management's commitment to the program. Additionally, SYNERGY concluded that earlier problems with confidence in the L&PS sub-program of the ECP had been substantially corrected through management and personnel changes and a focus on employee advocacy and responsiveness as an operating philosophy. Additional management attention will be required in this area to assure continued progress.

SYNERGY offered recommendations for additional changes to the ECP as refinements or adjustments in assuring continuous improvement. While a significant

majority of employees continue to share perceptions of high integrity and expertise on the part of the ECP, some employees who have used the ECP cited administrative problems that if not corrected could challenge future credibility. SYNERGY's suggestions are aimed at options for shifting operating practices to improve the speed and effectiveness of "closure" in the eyes of STP employees. Other suggestions addressed methods of obtaining employee feedback, monitoring of ECP performance and communications.

In summary, SYNERGY concluded that STP has met its goal of creating and sustaining a strong nuclear safety culture and positive work environment, and providing employees with an effective means of expressing their concerns about nuclear safety, quality and other issues. This achievement is reflected in STP employees' industry highest ratings in the areas of nuclear safety culture, management influence on the environment and individual willingness to report potential nuclear safety or quality issues or concerns. Recommendations as a result of this assessment may further improve an already effective ECP.

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▸ **Nuclear Safety Culture**

HL&P has continued the process of strengthening the STP nuclear safety (NS) culture; 100% rate the NS culture as adequate to excellent, giving STP the highest rating of 10 sites and 3 corporate locations surveyed by SYNERGY.

- Strong overall sentiment that NS is the Company's highest priority; clear expectations have been set by management and employees feel encouragement in being proactive.

- Interview results pertaining to performance in issue identification and resolution and, knowledge, confidence and acceptance of the Company's Condition Reporting (CR) and event response processes and, the Employee Concerns Program (ECP) showed continued improvement.

- The STP environment promotes strong willingness and likelihood of raising NS concerns (97% rate the environment as adequate or better and 87% rate it as very good or excellent, also a highest rating of those surveyed).

  - Comfortable with Supervision: 97%
  - Comfortable with the ECP: 92-97% depending on sub-program

- Employees feel expectations are high, that they are being held accountable for high performance and they are empowered to make decisions.

- Sentiment that the earlier gaps in performance have substantially closed and the prospect of attaining World Class is becoming a reality; that current gains are focusing beyond regulatory compliance; that future gains will come in smaller increments and in different areas.

- Some developing concern about the risks of downsizing on issue thresholds and the ability of the Company to balance priorities given lower resources and the continuing high workload.

SYNERGY

▸ **General Site Environment and Performance**

Employees expressed continued satisfaction with the site environment as reflected in their high ratings of management's influence and their overall personal experience; i.e., 94 & 100% rate as adequate to excellent, respectively (again, the highest ratings of those surveyed).

- All categories of interview results showed significant improvement since the September, 1993 interviews; 26% improvement overall, with 18% and 8% in the last two years respectively.

- Job security (including the prospect of forced ranking) is a major source of concern that is adversely affecting morale.

- Some developing sentiment that STP may be experiencing the best of times and that downsizing may result in a less satisfactory work environment and, potentially lower overall performance.

  - Many indicated they felt the Company has been open about these plans.
  - Some can't reconcile the need to downsize given the Parent Company's high profit margins.
  - Some are having difficulty envisioning being able to "do more with less" and dealing with the resulting stress.
  - Some are concerned about losing essential capabilities/people.
  - Some are concerned that budget pressure is resulting in work deferral and that STP's high "standards" may be at risk.

- The emphasis on "WE" has created better teamwork; e.g. the Nuclear Generation - Engineering interface is perceived to have improved and a developing partnership with the bargaining unit.

- General satisfaction that STP business processes have improved and that the Company is now less dependent on key individuals.

- Majority feel the new CR process is more effective in resolution, followup and preventing recurrence; however, some felt this process wasn't viewed as being appropriate for "concerns".

- Problems are owned on a broader scale and solutions are less compartmentalized.
- Some feel the process is too complicated, but it works.
- Some feel the computerized system is not user friendly.
- Some feel supervisors have been given too much "control".

- There are widely varying opinions on the consistency and fairness of implementation of the Company's recognition and awards programs (20% rated these as less-than-adequate).

► **Employee Concerns Program**

General visibility, acceptance and confidence in the ECP was maintained at high levels over the last year; however, some employees who have used the Program have cited administrative problems that if not corrected could challenge future credibility.

- A significant majority like the concept of the ECP and feel that as structured, the ECP fits well with employee needs.

- Awareness of the ECP sub-programs increased significantly; however, awareness of the Concerns Coordinator is still less than 50%.

- Willingness to use the sub-programs remained high (mid to high 90%) with significant improvement in L&PS (76 to 92%).

- Employees seem universally aware of senior management support of the ECP.

    - Mid-level management/supervisory emphasis and support of the ECP is perceived to be lower in some locations.
    - In some bargaining unit (BU) groups, employees feel the ECP is an extension of management, rendering it as no further option after addressing a concern to their line management.
    - Some BU employees indicated it would be useful if the ECP reps visited their shops to discuss the Program (more effective than formal training).

- Earlier credibility problems associated with the HR sub-program, now Legal & Personnel Services (L&PS) are partially restored; however, the changes in management, personnel and philosophy are not widely visible yet. To assure

SYNERGY

high levels of employee satisfaction, additional management attention, sensitivity and responsiveness by L&PS will be required to show employees how this component of the ECP is a useful resource.

- The Company's efforts to inform employees about the revised ECP have been very successful; however, many employees still do not appreciate the full range of issues for which they can seek assistance and how the ECP operates on their behalf.

    - Many employees indicated perceptions (through postings) that the ECP may be dealing with trivial issues.
    - Many expressed a need to communicate the more substantive examples to enhance knowledge and confidence.
    - Anticipating future pressures in the workplace, e.g. cutbacks, some interviewees shared the opinion that improved knowledge of the L&PS/human resources area will become more important.

- Many employees surveyed, including users and non-users, share a perception that the ECP takes too long to address concerns; particularly, those in the people-related or human resources area.

    - Some indicated the ECP needs to focus more on "closure" versus "investigations".
    - Some would like to see the ECP in a mediator role.
    - Some expressed preference for an informal mode.

- The new ECP database (good practice) will help track backlog/aging of concerns and employee followup/feedback to highlight areas needing attention; it will facilitate coordination between sub-programs.

ADDITIONAL OBSERVATIONS & RECOMMENDATIONS

► **ECP Structure, Process, Management and Oversight**

Roles & Responsibilities: Continued lack of awareness and confusion about the Concerns Coordinator existence/advocate role (still very important given efforts by L&PS to improve employee confidence and acceptance of their role).

> Recommendation 1: Highlight the Concerns Coordinator role through her participation at tool box sessions, group meetings, etc.

Practices, Process and Procedures: ECP operating practices have generally been formal, requiring detailed investigations and documentation. Occasionally, the ECP has operated more informally, by listening and providing advice without opening a "case". The majority of employees are familiar with the formal mode and not the informal mode. Some employees indicated the ECP needs to focus more on "closure" and possibly mediation, rather than investigations; indicating a desire for quicker and more effective solutions. The shift of the ECP towards employee advocacy and responsiveness suggests greater use of the informal mode; however, appropriate controls are necessary. Some users indicated confusion of which mode the ECP was in and how to select one mode or another. In at least one case, this led to missed expectations on the part of the employee.

> Recommendation 2: Clarify actual practices as a two-tiered ECP to include both an informal problem resolution/mediation mode and a formal investigations mode. Consider establishing internal guidelines to aid in deciding the appropriate mode and to minimize the need for more costly and time consuming investigations. Communicate these practices with employees in general and, during interactions with concernees, make sure their expectations are consistent.

Performance: Many employees share perceptions that the ECP takes months and longer to address concerns. Actual backlogs within some sub-groups, notably, L&PS and Investigations, support these perceptions. On one occasion, a high priority concern was delayed because of backlog problems. Followup (not necessarily full resolution) with concernees is required by procedure within 90 days. Together, these factors do not support employee expectations of a responsive ECP. Industry practices typically set a goal of approximately 30 days to resolve concerns. The development of the new ECP database will enable visibility of backlog problems, employee

statusing, etc. To date, the ECP Coordinator/NSQP manager has provided general oversight in this area, but has not typically tracked specific concerns forwarded directly to the other sub-programs.

Recommendation 3: Evaluate a full range of options, e.g., Recommendation 2 and others, to improve timeliness of resolution without corresponding increases in manpower.

Recommendation 4: Sub-program procedures currently acknowledge concern investigation priorities based upon importance; however, these are not accompanied with guidelines for resolution. Modify the 90-day procedural requirement consistent with priority. Consider two timeframes, one for feedback and the second for closure.

Recommendation 5: The ECP Coordinator should be responsible for monitoring concerns resolution activity across all sub-programs on a concern-specific basis. He should identify the need for action and followup with requisite sub-programs.

Perceptions of "customers" and/or real problems in any of the sub-programs can potentially threaten the credibility of the ECP; therefore, it is important to detect perceptions and react to problems pro-actively. Ongoing feedback obtained by the ECP from users and others in the worforce may not have adequately detected a trend of employee perceptions of a lack of timeliness and responsiveness. User satisfaction feedback obtained by SYNERGY and the BCS survey offer conflicting results when compared with the more positive results gathered by the ECP. Many users and non-users perceive it takes "months" for action. In one case, a user noted that concernees are required to formally indicate/lodge a concern for action to be taken. This instance seems to be related to an informal operating mode and mis-communication in general. Efforts to address Recommendation 2 will minimize this problem in the future. The BCS survey of the STP workforce indicated that over 1/4 of the employees feel that they would "sometimes" receive proper consideration. Half of these indicated "never" or "rarely". The ongoing ECP random interviews/surveys have also not detected these perceptions.

Recommendation 6: Re-evaluate methods used to obtain feedback from ECP users and the workforce in general and continue to factor this feedback into program improvements.

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Training/Communications: The Company's efforts to communicate the purpose and philosophy of the ECP have been very successful. The "STP On-Line" articles, the videos, etc. are well done and along with continued senior management emphasis, has created and maintained visibility of the ECP. In particular, the publishing of the ECP rep pictures in "STP On-Line" was effective. Employees appear to support repetition of the message as these practices were cited as evidence of management support. Employees shared an interest in learning more about the value the ECP has provided through exposure to substantive problems resolved. Practices such as the postings are perceived to have trivialized the ECP and some employees feel that they can learn more from other examples. This was amplified further by those who felt a need to more fully understand the types of concerns that are addressed. Many indicated face-to-face presentations would be more effective; e.g. some noted their appreciation of the new HR manager's participation.

> Recommendation 7: Continue the communications campaign with a shift in content towards how the ECP works and provides real solutions. Consider opportunities for live presentations by the ECP reps (refer also to Recommendations 1 & 2). Consider posting pictures of the ECP reps on bulletin boards and/or near the ECP boxes.

There are a few items in the ECP brochure where clarification may be desirable. The ECP is described as a "mechanism to voice a concern" and "concerns" are defined as "problems in....". There is a potential to overburden the ECP with issues that should be addressed by the line; e.g. it may not be clear that the ECP is an alternative path when the employee either does not feel comfortable or there has been less-than-adequate resolution. Additionally, some employees did not view Condition Reports as mechanisms for documenting "concerns". The brochure may also overcommit the ECP ability to protect identity/maintain confidentiality. L&PS is not highlighted and their role as the point of contact for human resources concerns is confusing. There are also typos.

> Recommendation 8: At the next appropriate point, modify the ECP brochure to clarify differences between normal issues and concerns, the relationship with CRs, the L&PS point of contact, limitations on employee protection and any typos. To further highlight the Concerns Coordinator role, consider presenting her on the "Process" chart at a similar level of visibility as the sub-programs.

Oversight: The ECOG involvement continues as an effective mechanism for assuring the ECP is meeting it's goals. Some ECOG members indicated a preference for standardizing the content and format of sub-program outputs to facilitate their review.

> Recommendation 9: In concert with response to the 8/95 self-assessment recommendation on use of evaluation plans and consideration of Recommendation 2 documentation requirements, re-evaluate documentation needs with a focus on the minimum required to support ECP objectives.

CONCLUSION:

STP's has Met Its Goal of Creating and Sustaining a Strong Nuclear Safety Culture and Positive Work Environment, and Providing Employees with an Effective Means of Expressing their Concerns About Nuclear Safety, Quality and Other Issues. This Achievement is Reflected in STP Employees' Industry Highest Ratings in the Areas of Nuclear Safety Culture, Management Influence on the Environment and Individual Willingness to Report Potential Nuclear Safety or Quality Issues or Concerns. Recommendations for Additional Changes are Offered as Refinements or Adjustments in Assuring Continuous Improvement.

Appendix A

Employee Concerns Program Evaluation

South Texas Project
Employee Interview Data

September, 1995

INTERVIEW SAMPLE CHARACTERISTICS

- Total Personnel Interviewed   43

- Distribution by Organization

	Sample Pop.	Actual Org.
Nuclear Generation	38%	58%
Nuclear Engineering	26%	15%
Nuclear Assurance & Licensing	13%	5%
Plant Services	20%	20%
Other	3%	2%

- Distribution by Personnel Category

Exempt Personnel:

-	Sr. Engineers/Sr. Specialists	28%
-	Engineers/Specialists	26%
-	Supervision	18%
-	Management	4%

Non-Exempt/Bargaining Unit Personnel: 15%

Contractors: 9%   14%

SUMMARY
COMPOSITE INTERVIEW RESULTS
1993, 1994 & 1995 Employee Interviews

Familiarity with the Employee Concerns Program, Rights and Responsibilities:

Company Policy on Nuclear Safety & Employee Concerns:	High
Individual Rights & Responsibilities:	High
General Awareness of ECP Process & Procedural Requirements:	Opportunity
- Awareness of Sub-Programs (85%) & CC Role (46%)	
Relationship with Condition Reporting Process:	High

Characterization of the Environment for Identifying & Resolving Concerns:

	Mean Response Stats		
	9/93	7/94	9/95
Performance in Ident./Resol. NS Concerns	3.43	3.73	4.05
Management's Influence	3.27	3.90	3.95
Confidence in ECP	2.84	3.51	3.56
Individual's Willingness & Likelihood	3.27	3.83	4.13
Overall Personal Experience	3.24	3.73	4.03

Strengths & Weaknesses of the ECP Process:

Clarity of Scope & Responsibility	2.57	3.20	3.67
Administrative Process	2.73	3.24	3.31
Training & Communications	2.51	3.20	3.56
Technical Reviews & Investigations	2.81	3.46	3.95
Management Involvement/Support	2.86	3.34	3.18
Recognition of Individual Performance	2.54	2.90	3.03

Overall Rating of STP's Nuclear Safety Culture:	3.51	3.85	4.26

Note: Interviewees responded using a scale of Excellent (5), Very Good/Better-than-Adequate (4), Adequate (3), Less-than-Adequate/ Needs Improvement (2), In-Adequate/Needs Improvement (1)

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COMPARATIVE INTERVIEW RESULTS
BY PERSONNEL CATEGORY
1993, 1994 & 1995 Interviews

| Subject	STP Composite			Supv.		Non-exempt/BU			Contr.		
	'93	'94	'95	'94	'95	'93	'94	'95	'93	'94	'95
Site Environment for Ident./Resol. Concerns:											
Performance-NS Concerns	3.43	3.73	4.05	↓			↓	+		+	·↓
Management's Influence	3.27	3.90	3.95	++	++	↓↓	↓↓	↓		++	+
Confidence in ECP	2.84	3.51	3.56					+		↓	+
Individual's Willingness	3.27	3.83	4.13		+	↓↓					
Overall Personal Exper.	3.24	3.73	4.03		++	↓	↓		++		↓
Strengths/Weaknesses of ECP Process:											
Clarity of Scope & Resp.	2.57	3.20	3.67				+				
Administrative Process	2.73	3.24	3.31		↓	↓↓		+		↓	
Training/Communications	2.51	3.20	3.56			↓↓	+	↓↓	↓↓	↓↓	+
Tech. Reviews & Invest.	2.81	3.46	3.95				↓↓	↓			+
Management Involvement	2.86	3.34	3.18		++			↓		↓	++
Recognition of Ind. Perf.	2.54	2.90	3.03				↓	↓	↓↓	↓↓	↓
Overall Rating of STP's Nuclear Safety Culture	3.51	3.85	4.26		+	↓	↓				+

Notes:

1. The symbols + and ↓ indicate positive and negative responses <u>relative to the composite values</u> shown under the column "STP Composite". If there is no symbol, this indicates a response that is within 5% of the composite value. Single symbols indicate differences of over 5% but less than 10%. Double symbols indicate differences of over 10%.

2. Interviewees responded using a scale of Excellent (5), Very Good/Better-than-Adequate (4), Adequate (3), Less-than-Adequate/ Needs Improvement (2), In-Adequate/Needs Improvement (1); thus, the composite values represent the mean for the full sample.

3. The 1993, 1994 and 1995 values for Exempt personnel were all within 5% of the STP Composite.

4. *The 1995 mean values for all personnel categories were 3 (Adequate) or greater.*

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COMPARATIVE INTERVIEW RESULTS
BY ORGANIZATION
1993, 1994 & 1995 Interviews

Subject	NA/L		PS		NE			NG		
	'94	'95	'94	'95	'93	'94	'95	'93	'94	'95
Site Environment for Ident./Resol. Concerns: Performance-NS Concerns			↓							
Management's Influence					+	+				
Confidence in ECP		+		↓						
Individual's Willingness				↓	+					
Overall Personal Exper.					+		↓			
Strengths/Weaknesses of ECP Process: Clarity of Scope & Resp.				+					+	
Administrative Process				↓			+ +			
Training/Communications		+ +		+	+					↓ ↓
Tech. Reviews & Invest.					↓	+			↓	↓
Management Involvement		+ +			+					↓
Recognition of Ind. Perf.		↓ ↓		↓			+ +			
Overall Rating of STP's Nuclear Safety Culture	+		↓		+	+				

Notes:

1. The symbols + and ↓ indicate positive and negative responses <u>relative to the composite values</u> shown under the column "STP Composite" on the previous chart. If there is no symbol, this indicates a response that is within 5% of the composite value. Single symbols indicate differences of over 5% but less than 10%. Double symbols indicate differences of over 10%.

2. *The 1995 mean values for all organization categories were 3 (Adequate) or greater except for the "recognition" category in the PS & NA/L organizations.*

Environment for Addressing Concerns

STP EMPLOYEE CONCERNS PROGRAM
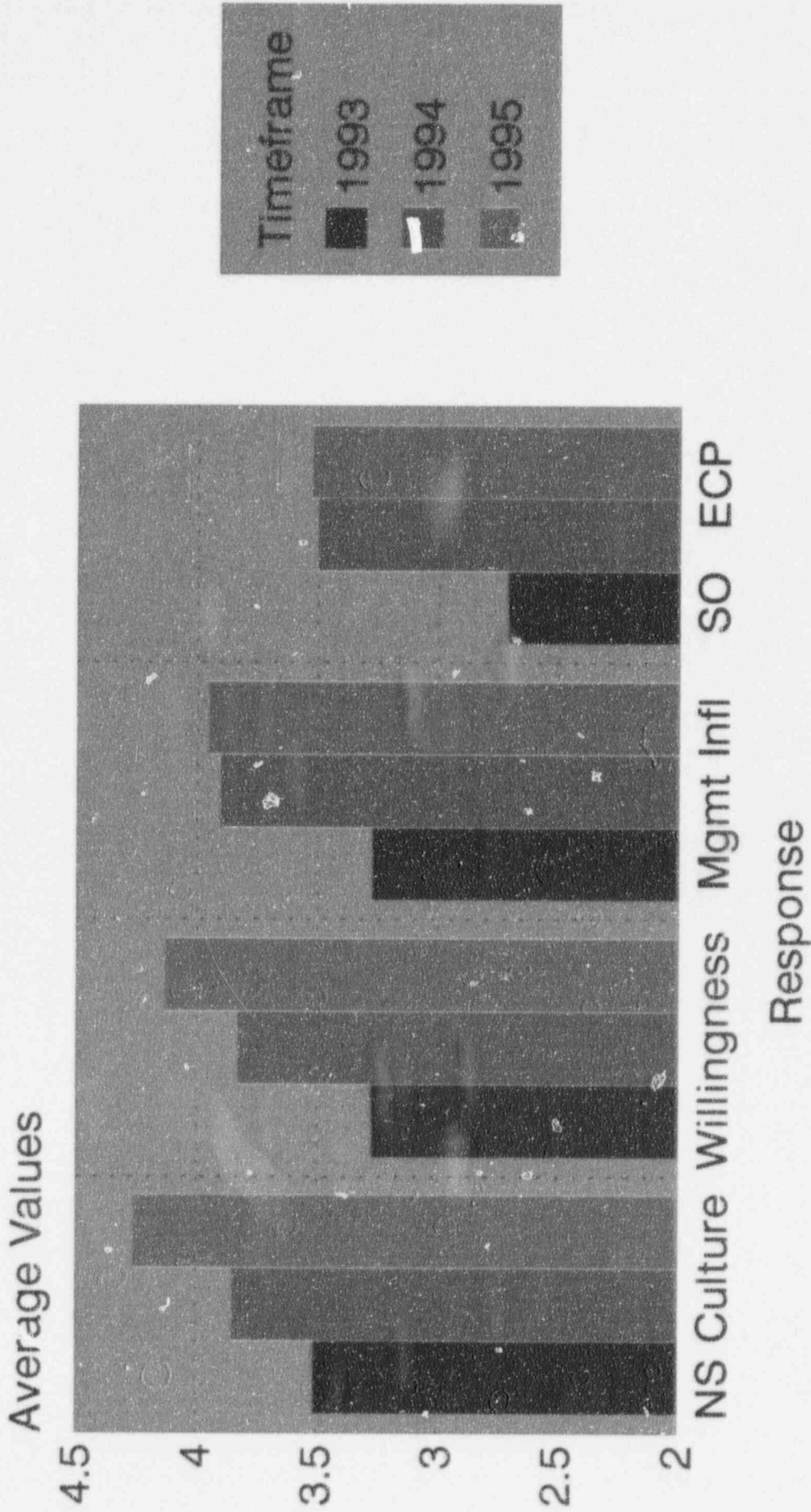
Trend of Perceptions - STP Composite

Key: 5=Excellent 4=Very Good 3=Adequate 2=Less-than-Adeq. 1=Inadequate

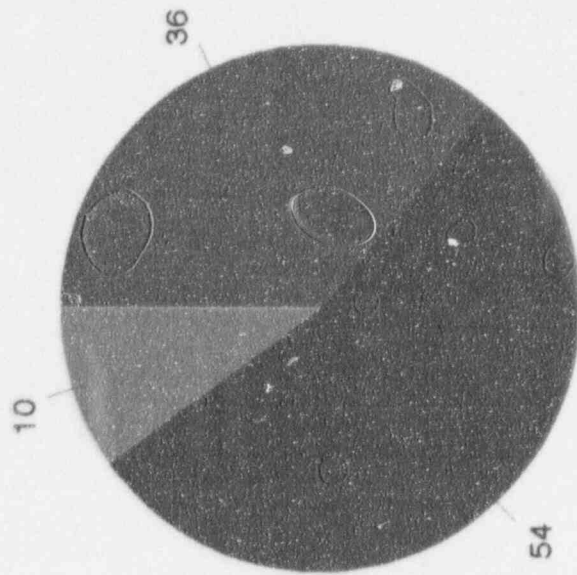# NUCLEAR SAFETY CULTURE

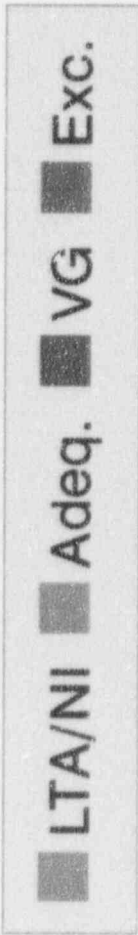## Ratings of STP Culture for Emphasis on Nuclear Safety:
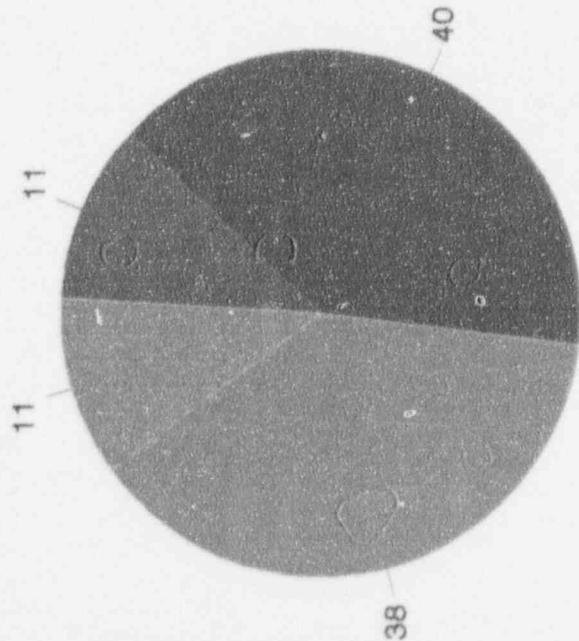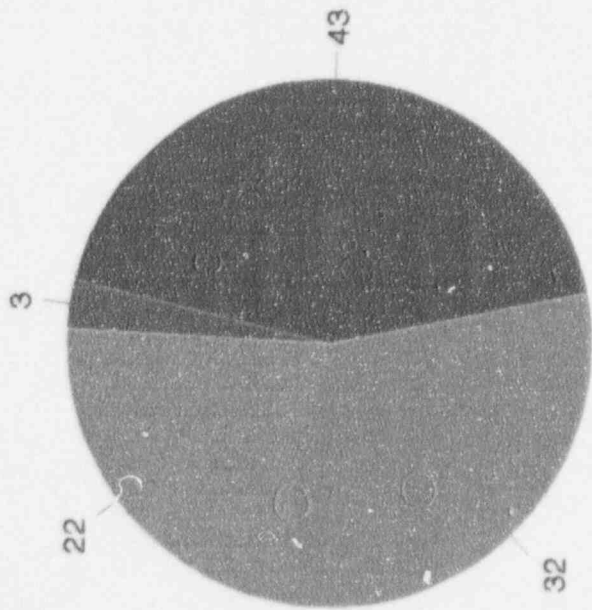

1993
Avg=3.51

1994
Avg=3.85

1995
Avg=4.26

LTA/NI   Adeq.   VG   Exc.

Composite Results

MANAGEMENT'S INFLUENCE ON ENVIRONMENT

Perceptions of Effectiveness of STP Leadership:

1993
Avg=3.27
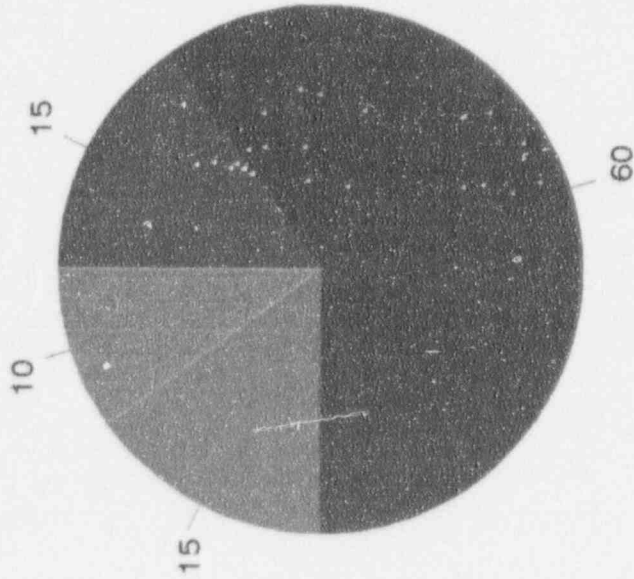
1994
Avg=3.90
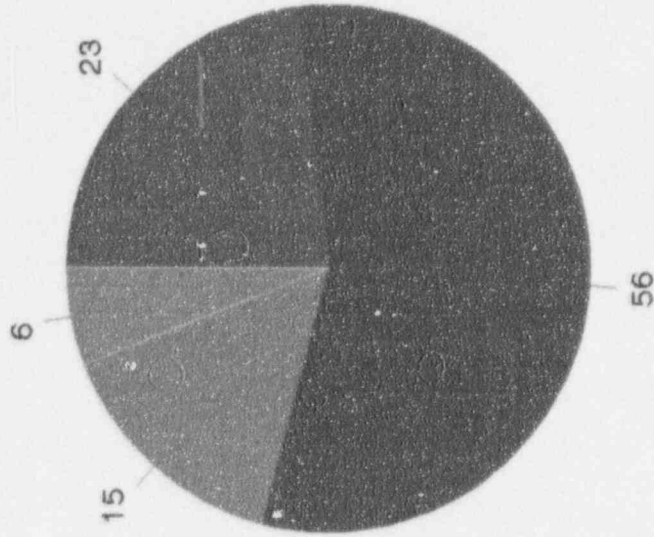
1995
Avg=3.95

LTA/NI   Adeq.   VG   Exc.

Composite Results

ADEQUACY OF STP CONCERNS PROCESS

Perceptions of Effectiveness & Confidence:
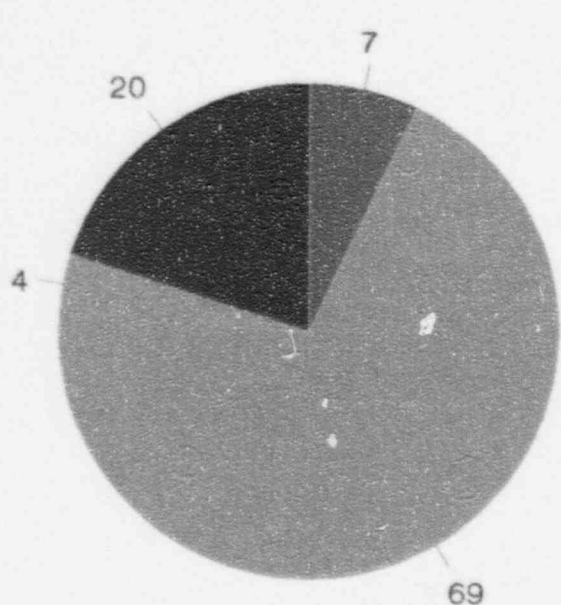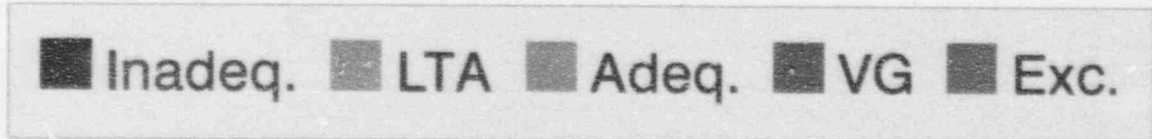

Speakout
Avg=2.71
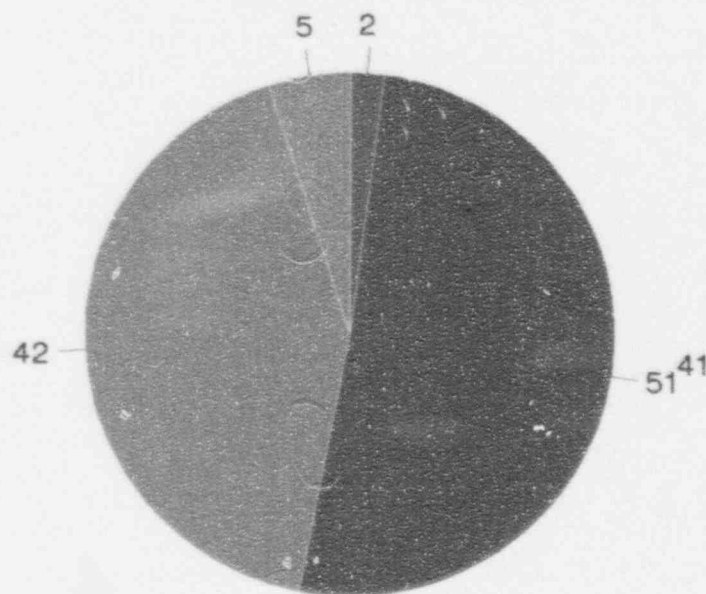
ECP `94
Avg=3.50

ECP `95
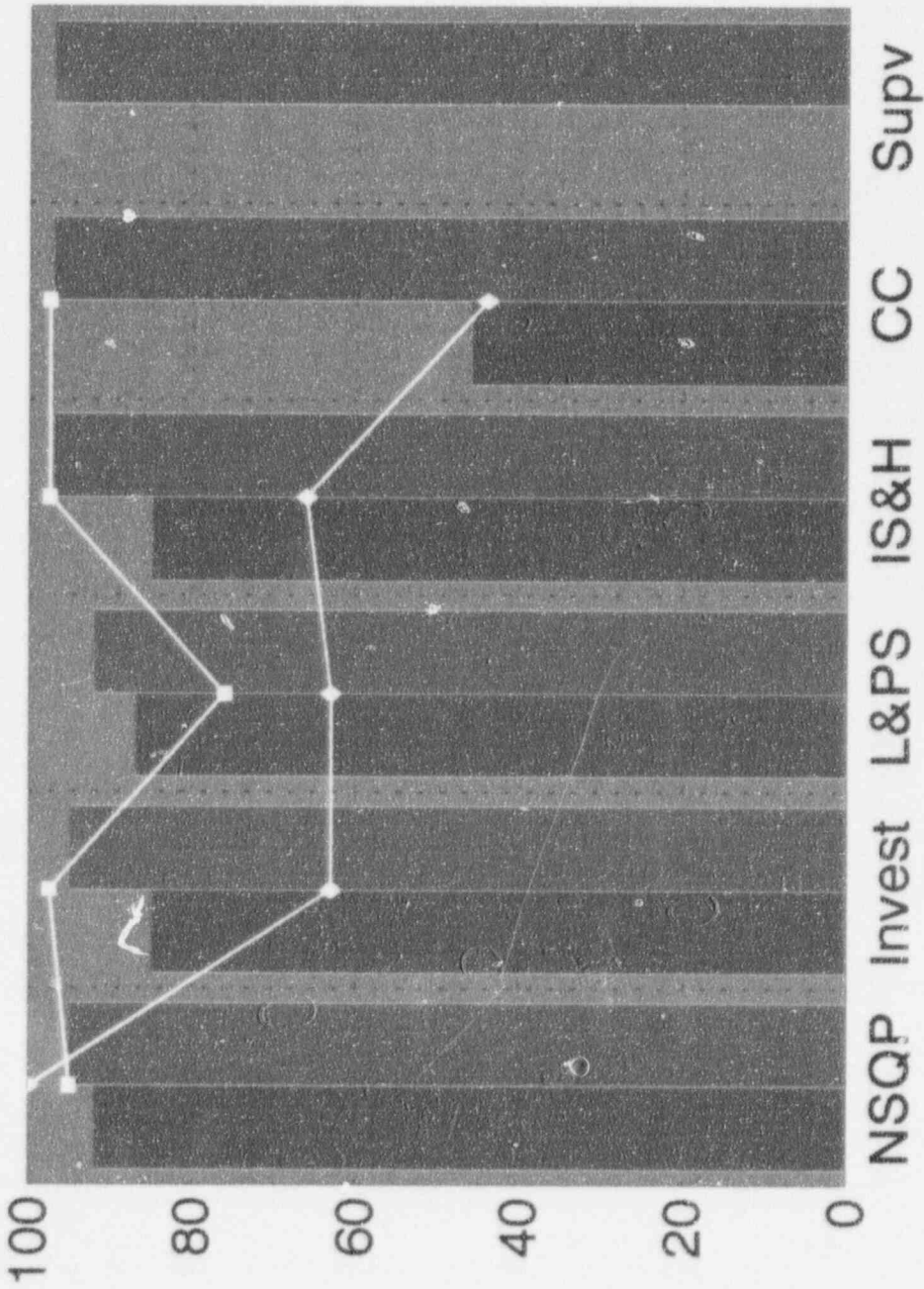Avg=3.53

Inadeq. LTA Adeq. VG Exc.
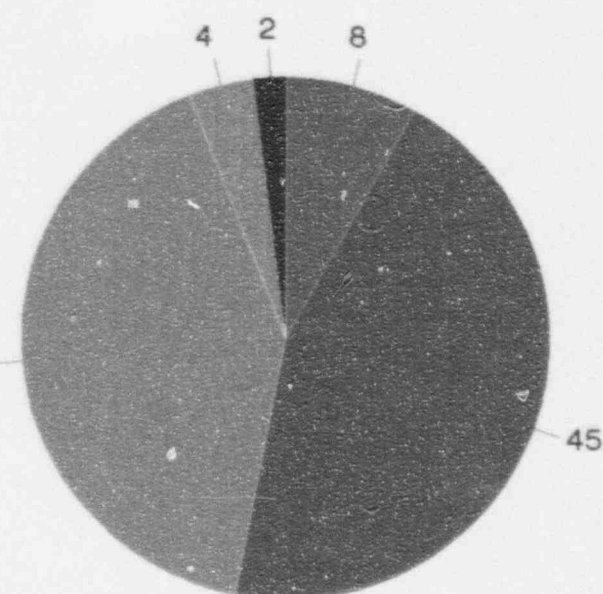
Composite Results

Sub-Program Awareness & Willingness to Use
STP EMPLOYEE CONCERNS PROGRAM

Percent of Employees with Positive Response

Response
- '95 Aware
- '95 Willing
- '94 Aware
- '94 Willing

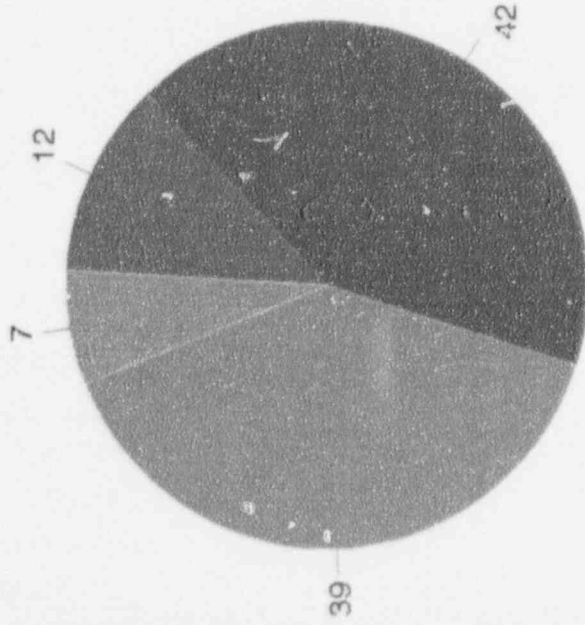NSQP   Invest   L&PS   IS&H   CC   Supv
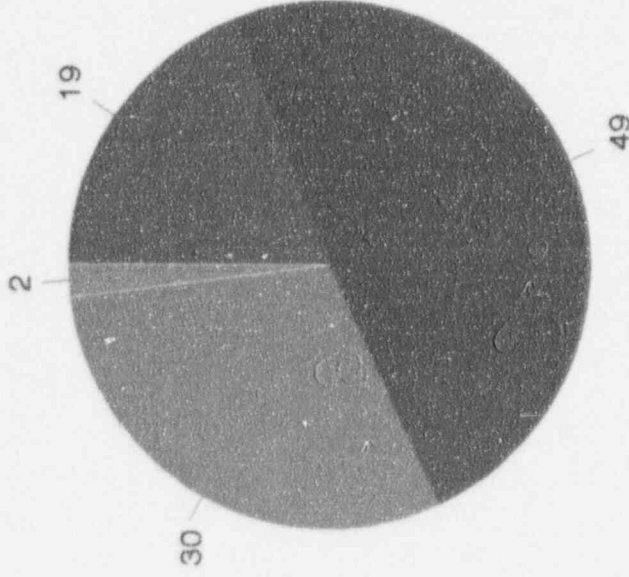
ECP Sub-Program

September, 1995 Interviews

INDIVIDUAL WILLINGNESS & LIKELIHOOD

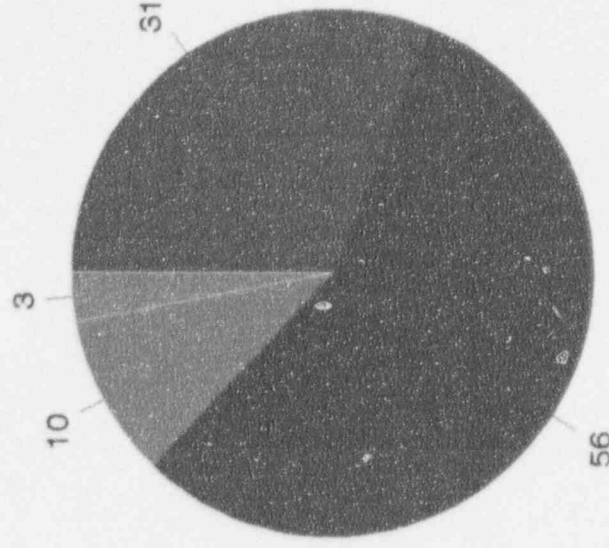Rating of Environment for Effect on Individuals Pursuing Concerns:
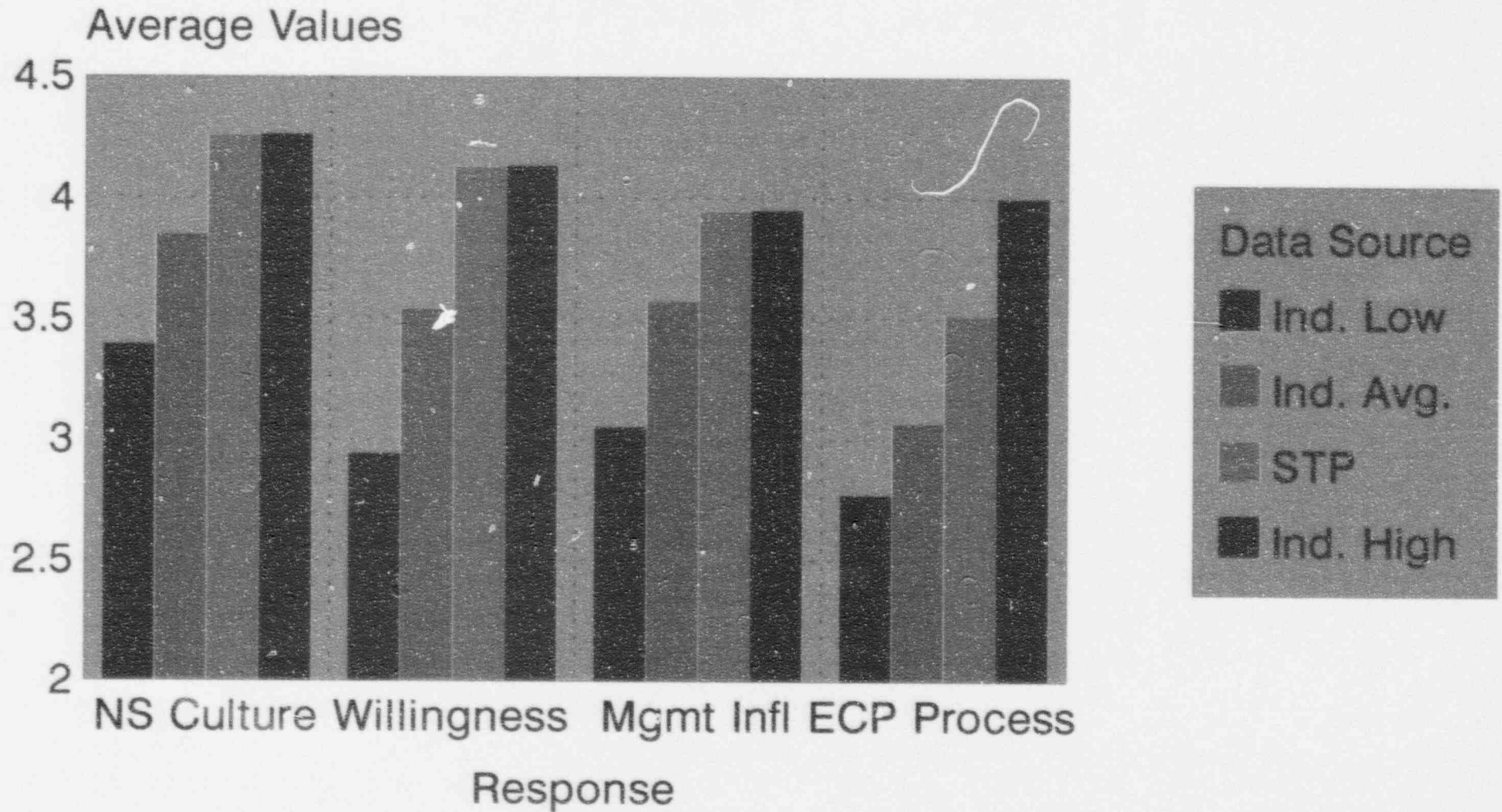

1993
Avg=3.27

1994
Avg=3.83

1995
Avg=4.13

LTA/NI   Adeq.   VG   Exc.

Composite Results

Environment for Addressing Concerns
COMPARISON OF STP & INDUSTRY EMPLOYEE CONCERNS PROGRAMS

Composite of 10 Sites & 3 Corporate Locations vs Sept. 1995
Key: 5=Excellent 4=Very Good 3=Adequate 2=Less-than-Adeq. 1=Inadequate

Explanatory Notes for Interpretation of Interview Results and Graphic Presentation:

▸ Interview Data Collection Techniques

- Interactive discussion and questioning: Common attitudes, perceptions, opinions and recommendations characterized into themes.

- Structured questioning: Interviewees responded by offering quantitative ratings that have been statistically analyzed and presented in graphic form.

- Timeframes: In response to the structured interview questions, interviewees were asked to provide their ratings applicable to two time periods, the present and approximately a year earlier.

  Note: Because interviewees have the benefit of new information, retrospective ratings may yield different results than if the data had been collected contemporaneously. Accordingly, ratings applicable to past periods are not necessarily reliable measures of actual employee perceptions at the earlier time. However, these ratings can be used to gage the trend or change in the individuals' perceptions on these topics over time.

▸ Commentary on Selected Structured Interview Questions

Interviewees were given the following guidance to consider in providing their ratings:

- Nuclear Safety Culture - Provide higher ratings if you feel nuclear safety; is a foremost consideration in all activities; is properly balanced with other considerations in the decision process; is highly valued, rewarded and a key to being successful at STP; and if in your opinion, STP ranks high amongst others in the industry.

- Willingness- Provide higher ratings if you feel your environment; encourages proactive initiative in identifying potential nuclear safety issues; if you are comfortable in raising any issue, particularly where the safety significance may not be readily apparent and where difficult decisions may be involved; i.e. taking the plant off-line or devoting significant resources/dollars; and if you believe you would not pay a personal "price" for raising the concern.

- Management Influence- Provide higher ratings if you feel that collectively, those in your management chain are providing a positive influence in promoting the principles of nuclear safety, i.e. consider the influence on the workforce stronger where the message is "right" and where follow-up actions are consistent; if your management is engaged, leading by example and communicating; if you feel

management supports your efforts in identifying and addressing potential nuclear safety issues; and if you generally feel a strong commitment on their part to nuclear safety and attaining higher levels of performance.

- Employee Concerns Process- Provide higher ratings if you feel that the process is properly structured/scoped; if roles and responsibilities are clear; if you perceive high integrity (confidentiality); if in your judgement, the process is competently implemented; and generally, if you feel there are no barriers to using the process.

▸ Description of Attached Figures

- Environment for Addressing Concerns: STP Employee Concerns Program-Comparison of site composite (average) ratings for key responses over three timeframes

- Nuclear Safety Culture: Ratings of the STP Culture for Emphasis on Nuclear Safety- Comparison of site composite distribution of ratings over three timeframes

- Management's Influence on the Environment: Perceptions of Effectiveness of STP Leadership- Comparison of site composite distribution of ratings over three timeframes

- Adequacy of STP Concerns Process: Perceptions of Effectiveness and Confidence- Comparison of site composite distributions, rating both SPEAKOUT and the new ECP

- Sub-Program Awareness & Willingness to Use: STP Employee Concerns Program- Site composite percentages for each of the ECP sub-groups and the Concerns Coordinator

- Individual Willingness and Likelihood: Rating of the Environment for Effect on Individuals Pursuing Concerns- Comparison of site composite distribution of ratings over three timeframes

- Environment for Addressing Concerns: Comparison of STP and Industry Employee Concerns Programs- Current STP site composite (average) ratings for key responses versus the industry average and high/low range (sample of 10 sites and 3 corporate locations)

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APPENDIX B
Qualifications and Experience

Howard A. Levin

Mr. Levin is Vice President of SYNERGY Consulting Services Corporation, a professional services firm that provides services to management including organizational and programmatic consultation, program development and enhancement, and other advisory and analytical services. Mr. Levin holds an advanced degree from M.I.T. and has twenty years of regulatory, engineering, and management experience across a broad spectrum of areas including commercial power, defense and research facilities. He has held senior-level positions with an architect-engineering firm and the Nuclear Regulatory Commission. Prior to founding SYNERGY he served as Chief Operating Officer of a large nuclear consulting services firm. His current consulting activities are focused on assisting clients in achieving higher levels of operational performance in regulatory, production and financial areas. Mr. Levin has been involved in many facets of the industry's response to the challenges of nuclear safety issues and in particular, enhancing employee concerns programs. He also has been responsible for resolution of over two thousand employee concerns impacting the licensing of several nuclear construction projects. His activities have ranged from working directly with concerned individuals in reaching resolutions for their concerns to broader programmatic reviews and initiatives directed at enhancing the nuclear safety culture, developing proactive partnerships between internal organizations and improving business processes. At the NRC, he was responsible for formulating nuclear safety policies and standards, addressing differing professional opinions and participated in many critical nuclear safety reviews, adjudications and inspection activities.

Robert B. McGehee

Mr. McGehee is Chairman of the Board of a 42-lawyer law firm in Jackson, Mississippi. He has twenty years of experience in providing utility clients with legal services. He specializes in nuclear utility issues including NRC regulatory matters, enforcement issues, whistleblower related issues, and employment matters. In addition to his assistance with the evaluation of the South Texas Project SPEAKOUT Program, he has recently participated in reviews of nuclear concerns programs of four large nuclear utilities. He has an engineering education from the United States Naval Academy and Navy nuclear power training and experience. He is Vice Chairman of the Atomic Energy Committee of the Public Utility, Communications and Transportation Law Section of the American Bar Association.

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