

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Licensee: Northeast Utilities

Re: Nuclear Safety Concerns Program

Conference taken by and before Loretta B. Devery, Registered Professional Reporter and Notary Public, at the Nuclear Regulatory Commission, Region I, 475 Allendale Road, King of Prussia, Pennsylvania, on Thursday, March 22, 1990, commencing at 1:30 P.M.

NRC Attendees: WILLIAM RUSSELL
WILLIAM KANE
EDWARD WENZINGER
KARLA SMITH
TIMOTHY MARTIN
RICHARD BRADY
CHESTER WHITE
DONALD HAVERCAMP

Licensee Attendees: EDWARD J. MROCZKA
PETER F. SANTORO
JOHN S. KEENAN
RICHARD M. KACICH
NICK REYNOLDS
RICHARD LAINDENAT
ROBERT ZYSK

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ORIGINAL

1
2 MR. KANE: The purpose of today's meeting
3 is to provide an opportunity for Northeast Nuclear to
4 present to the staff its Nuclear Safety Concerns
5 Program enhancements. And you can see we have senior
6 managers from the Region, and at this point I would
7 turn it over to you to provide your program.

8 MR. MROCZKA: Okay, just start off with,
9 as you recall, it was awhile back, a meeting similar
10 to this was scheduled, and I apologize for any
11 inconvenience that the last minute canceling may have
12 imposed on you people. But we were extremely
13 interested to insure that the information that we
14 would have brought to that meeting was transmitted to
15 the NRC, so we took the liberty of sending you a
16 letter of March first, which I understand most of you
17 have, and I think that kind of gives us a running
18 start for today's session.

19 And our presentation is very similar to
20 the attachment to the March first letter, with the
21 exception that, of course, we've updated some items in
22 the interim time period. We appreciate your
23 participation in today's meeting and really look
24 forward to some comments and feedback as to what we're

1 doing.

2 With that, I'd just like to briefly
3 overview the agenda. First of all, I'll go through an
4 introduction. Peter Santoro, our Safety Concerns
5 Program Director, is going to go into the specifics of
6 our program and the enhancements that we have. Jack
7 Keenan, Nuclear Unit Director, Millstone 2, is going
8 to talk about some of the special efforts to address
9 issues that have arisen at Millstone. And then I'll
10 come back and have some items for conclusion and go
11 through questions and discussions. But at any time as
12 we're going through our presentations, if that's an
13 appropriate time that something comes to mind and it's
14 time to ask, feel free to ask questions.

15 In general, the general purpose of this
16 meeting, from our point of view anyway, is two-fold.
17 One is to review in detail our new Nuclear Safety
18 Concerns Program, and the other is to review
19 additional measures that either we have or are taking
20 in an effort to increase issues raised in your October
21 11, 1989 inspection report and other NRC
22 communications regarding our programs for handling
23 nuclear safety concerns raised by our employees. And
24 I'd like to provide a bit of an historical background

1 showing how our Nuclear Concerns Program evolved with
2 time. And each of these programs kind of reflect the
3 environment at that point in time, and like anything
4 else, you know, the environment changes and programs
5 change, but each of those programs was successful and
6 worked very well. And this entire process that I'll
7 go through is very consistent with our corporate
8 policy of really maintaining a very high regard for
9 our employees and this high regard is reflected
10 throughout company policy when it comes to any kind of
11 interrelationships between the company and our
12 employees. And like anything else, we try to show at
13 a corporate level and down through our entire
14 organization some special sensitivity in any of those
15 things that do interact with our employees and also to
16 their needs and wants. But more so, as times change
17 and environments change, you can see changes in those
18 kinds of policies. That's no different than what
19 we're talking about here in this specific area.

20 If you want to go back in history, go
21 back to the early '80s, not too long after TMI, and at
22 that time we began a direct mailing of a letter to
23 each and every one of our nuclear employees' homes
24 signed by the Chairman of the Board, and it was done

1 on an annual basis. And purpose of this letter was to
2 advise each employee that they had a responsibility to
3 report nuclear concerns to their supervisor, and if
4 they felt uncomfortable in doing this, they should
5 report the concerns to U.S. Nuclear review team, and
6 provided them with a little synopsis of that team
7 leader's past experience and a confidential telephone
8 number to contact those individuals.

9 In early 1985, with Unit 3 construction
10 winding down, being sensitive to that kind of a
11 transition period in construction where you're laying
12 off construction people and so forth, other utilities
13 seemed to have a blossoming of concerns surface. So
14 we took the initiative and put together an allegation
15 program to give employees the option of raising
16 concerns with an outside consultant that we retained
17 as well as with their own supervisor or with the NRC.

18 And our experiences in drawing from
19 lessons learned from that effort, which we felt was
20 very successful, we revised that program and then
21 implemented it at each of Millstone, Connecticut
22 Yankee, our two plants, and also our corporate office.
23 And that was done in the middle of say July of '87.

24 Then we implemented a training program

2

1 for all Millstone management personnel. And what we
2 talked about in that training program was employee
3 rights, management responsibilities and items that
4 refer to Section 210 and 10CFR50.7, and that was done
5 in September of '88. Further enhancements occurred
6 right toward the end of 1988, and we adopted a nuclear
7 concerns management concept and some other
8 enhancements. And then we extended the program at
9 that point to specifically -- even though we never
10 excluded contractor employees -- we specifically were
11 proactive to purposely point out and include
12 contractor employees.

13 The earlier training program that I
14 mentioned regarding 210 and 10CFR50.7 was expanded in
15 the fall of '89, and it included not just the
16 Millstone management people, but it also included all
17 of the supervisory personnel within my organization,
18 within our total nuclear organization. And then at
19 the end of '89, in November, we added some
20 enhancements to the program to insure prompt attention
21 to safety issues and put in some guidance on timely
22 feedback to concerns.

23 And in the recent past, there's been an
24 increase in safety issues reported directly to the NRC

1 without first having been raised with our own
2 management or our Nuclear Safety Concerns Program, and
3 this is a significant cause for our concern. At the
4 same time, both NU and NRC had conducted some surveys
5 with our employees, and those surveys indicated that
6 the overwhelming majority of people were comfortable
7 with the processes that we had at the time with our
8 safety ethic, the way we handled concerns, and they
9 suggested that they did not have reservations about
10 the existing program.

11 However, there were a small number of
12 individuals that did express some skepticism, and
13 specific reasons for that kind of skepticism have been
14 very difficult to try to identify with any kind of a
15 confidence level. The fact that the reporting
16 relationship suggested that the site nuclear concerns
17 manager lacked independence from plant management
18 seemed to be a factor. A few instances were
19 identified where the timeliness of the response was in
20 issue. Then there were questions that were raised
21 about whether concerns as they were reported to the
22 first line supervisor and on up through the management
23 chain -- or that's the normal process of raising
24 issues and passing on information. There are a few

1 people that believed that was there some kind of a
2 filtering system or where the essence -- or what the
3 individual felt was the concern wasn't getting up into
4 our senior management levels. And then there were a
5 few vocal critics who provided from them just little
6 focused criticism of our program. And some of the
7 expressions and opinions that we got from them was a
8 lack of confidence in the confidentiality of the
9 program, a failure of the program personnel to agree
10 with the concernce's assessment of the safety issue,
11 in other words, there was a difference of opinion
12 between the two individuals, and a generalized
13 perception of erosion of our corporate safety ethic.

14 Whatever the reasons, it's apparent that
15 our past programs were not sufficiently effective in
16 sustaining the credibility with a relatively small
17 number of employees who indicated some real strongly
18 felt skepticism. So what we needed to do was to try a
19 new approach to address the perceptions that have kept
20 our program from being as effective as we would like
21 it to be. So our new program is a logical evolution,
22 I believe, in our efforts to be more responsive to the
23 nuclear safety concerns of our employees.

24 And what we did is, I created a position

1 of Director of Nuclear Safety Concerns Program, which
2 is Pete Santoro, and he reports directly to me. And
3 essentially, I put Pete in that position with a
4 mandate to start off with looking at other nuclear
5 safety concerns programs that are utilized by other
6 utilities, and then to take those features that seem
7 to be some real important positive ingredients of
8 those programs, put them together, not just in a
9 hodgepodge, but to make sure that each of those
10 features was complementary so that we would do the
11 types of things that we've tried to do in the past,
12 and that was to take the best of the best so that we
13 end up with an extremely strong, effective program.

14 And with that, I'll pass the session over
15 to Pete and let him go into some of the details of
16 that program.

17 MR. SANTORO: Thanks, Ed. Today I want
18 to cover the specifics of Northeast Utilities' new
19 Nuclear Safety Concerns Program. New in the sense
20 that we're going to cover the enhancements that were
21 added to the program beyond that which already
22 existed. Before I get into the real details of the
23 program, I want to set the stage for what basically is
24 our nuclear safety program. Cornerstones for the

1 ethic fall into two major corporate documents, the
2 first of which is signed by Bill Ellis, Chairman and
3 CEO of our corporation, the date on that is April,
4 1986. And for the stenographer's benefit, there is a
5 package, and I'd like to have that be bound as part of
6 this transcript.

7 The second statement for setting our
8 nuclear safety ethic in place comes out of our Policy
9 Statements and our Quality Assurance Program as part
10 of our NEO Procedures Book. Not by casual incident,
11 the first statement in that book happens to be number
12 one, because it is number one, it's called Nuclear
13 Plant Safety. Ed Mroczka has issued the second
14 revision of this particular document, September of
15 1989. This addition, among other things that were
16 done, there's one that I'd like to point out in
17 particular. As Ed had already mentioned, one of the
18 things we were sensitive to now was the timeliness of
19 some of the events that are going on relative to
20 allegations and concerns. So the revision has shown
21 up to address this issue as well as several others.
22 In addition -- that is another item that goes into the
23 binding of the transcript for today.

24 The third element in the nuclear safety

1 ethic is the individuals' responsibilities. You all
2 have a copy of what is stated here, but let me just
3 focus on what I think is perhaps the most important
4 statement within this short paragraph. "Those
5 individuals with knowledge of nuclear safety concerns
6 have an obligation to communicate these concerns
7 promptly to their supervisor thereby assuring the
8 safety of the public and personnel working at these
9 facilities." Not coincidentally, the alignment with
10 your own form NRC 3, if you'll let me state what comes
11 out of that form, it says, "If you believe that
12 violations of NRC rules or in the terms of the license
13 have occurred, you should report them immediately to
14 your supervisor." We have stressed repeatedly within
15 our organization the importance of a free flow path of
16 communication emanating from the individuals directly
17 up to the supervisor and back.

18 The fourth element for safety, I think,
19 is the identification to all employees that they are
20 with protection relative to their ability to move up
21 and down the chain and outside the chain of command
22 relative to exercising their right to voice a safety
23 concern, and that is captured in Policy Statement
24 number 22. Again for the binding, there's a copy of

1 that available also. In terms of our objectives,
2 foremost in our mind is to provide for prompt
3 identification, practical tracking, feedback and
4 resolution of all nuclear safety concerns falling
5 outside the normal chain of command relative to our
6 even flow communication path. We stress that because
7 we believe that in the daily workings of our business,
8 that is the path that works and has been working. For
9 those cases where there is, for whatever reason, a
10 need to go outside of that chain, whether it be to my
11 program as Nuclear Safety Concerns Program, to our
12 independent consultant that's hired for these issues
13 that Ed had mentioned earlier, that we get an annual
14 letter that says that there is a consulting firm
15 available to any employee at any time 24 hours a day,
16 and I believe that the phone number is included with
17 that as well.

18 So tying those pieces together, there are
19 communication paths that the individual can follow
20 internally as well as externally, including the NRC.

21 MR. RUSSELL: Could I ask a question at
22 this point regarding the frequency of use of the
23 consultant by employees to raise concerns? Is that
24 fairly frequent, is it occasional, do you get numbers

1 of reports coming up through that chain?

2 MR. MROCZKA: I can answer that. Yeah,
3 there are a relatively small number, and by that I'm
4 talking numbers less than 10-ish, probably on an
5 annual basis that flow through that path. And again
6 with confidentiality, we get back information that
7 would give us some knowledge of the kinds of issues
8 that are being raised and kind of the sense of the
9 response going back to whoever raised the concern and
10 some feeling for how that response was accepted by the
11 individual. And that program has been fairly
12 effective.

13 MR. RUSSELL: So it would be the role of
14 the consultant to understand the concern, gather the
15 necessary information to respond to the concern and
16 then respond back. It would not be passing the
17 concern to the line organization to address and then
18 going back to the individual. In other words, is he a
19 middleman or is he --

20 MR. MROCZKA: No, they work independently
21 and travel back and forth, have meetings outside of
22 normal work hours, whatever, make arrangements,
23 telephone calls. They have some expertise in the
24 nuclear area, they do that assessment. It's true

1 though that in certain cases they do need to make
2 contact with some of our own staff to gather some
3 information, but it's done in a way where you don't
4 know quite what they're tracking down or whatever, and
5 they've been doing a very professional job of that
6 kind of assessment.

7 They also take into consideration
8 anything that might reflect anything in the area of
9 reportability, for instance, and insure that gets
10 identified to the appropriate people in our
11 organization. So I think from looking at it, I think
12 we've covered all the bases on that.

13 MR. RUSSELL: Okay.

14 MR. MROCZKA: But, you know, certain
15 individuals will use that system and --

16 MR. RUSSELL: But you've taken steps to
17 make that system known to the individuals such that
18 it's available to them to use if they so chose.

19 MR. MROCZKA: That one goes back to right
20 after TMI --

21 MR. SANTORO: That's an annual letter,
22 and also later on you'll hear me reference current NEO
23 Procedure 2.15, Rev. 6, the sequence for an
24 individuals' options fall out in that document, and

1 that is one of their options that is available to
2 them. So it has been communicated up and down the
3 line. The previous revisions also included it. It
4 wasn't just something that was added to Rev. 6, I want
5 to clarify that.

6 MR. RUSSELL: So your first preference is
7 for him to bring it to the immediate supervisor, and
8 that is an expectation of the company for the employee
9 as an employee. The second option that you provide,
10 historically now, is to go to a consultant which would
11 provide for confidential information to be presented
12 and resolved with feedback back to the employee. And
13 that may or may not involve contact on the technical
14 substance of the allegation with the line
15 organization. Is that a fair summary of what you've
16 described?

17 MR. SANTORO: I think that's a pretty
18 fair summary.

19 MR. MROCZKA: They would do whatever they
20 felt they needed to do. Either they could go out and
21 talk to some other consultants, whoever, and do what
22 they needed to do to bring it to conclusion.

23 MR. RUSSELL: Okay.

24 MR. SANTORO: Any other questions on the

1 first part? If not, the second program objective is
2 to establish a Nuclear Safety Concerns Program that
3 implements the normal practice of communicating
4 concerns through the functional chains of command.
5 Again, as you had indicated, Bill, that the preference
6 is to start with the line management. We have
7 encouraged that and we believe it's the right place to
8 start, because there has to be an open dialogue in our
9 minds to have people identify these, and we hope that
10 that's the preferred route.

11 Thirdly, our program objective is to
12 provide an unbiased focal point for individuals to
13 bring their concerns, whenever they're uncomfortable
14 using the functional or normal chains of command. As
15 we all know, that during sensitive periods of
16 performance reviews, things such as that, there may be
17 some friction that may have developed between two
18 people in terms of sensitivity. So as a result of
19 that, there are some cases where people will have a
20 feeling of uncomfort. This program is structured such
21 that they can come to us, present their concerns, they
22 will be duly evaluated, and above all, their
23 confidentiality will be maintained at all
24 times.

1 The fourth element for our program
2 objectives is to enhance the credibility, the
3 visibility and employee confidence in the proactive
4 Nuclear Concerns Program. We intend to do this by
5 doing several things. One of our intents is to
6 conduct periodic surveys at the functional unit
7 levels, basically one-on-one to see if there is
8 anybody who would want to come to a general
9 meeting and put something on the table. This
10 would also include and capture every individual in
11 the organization regardless of rank and/or
12 position.

13 In addition to the surveys, we expect to
14 conduct, and are already doing, exit interviews. And
15 these exit interviews will capture basically two broad
16 categories of people, the first that will transfer
17 from the company as NE&C to an external company, or
18 basically leaving the employ of Northeast Utilities.
19 The second group of people would be those people that
20 are in the nuclear operations functional units that
21 transfer within our company but go to a non-nuclear
22 position. And reason for that is to assure that if
23 there was not an opportunity or for some reason there
24 is a delay in getting information identified, we want

1 to capture that so that we can get it into the process
2 and be proactive and get something going, if in fact
3 there is a need to do an investigation.

4 I should tell you that the program since
5 its inception in January where we were officially
6 announced and in place in our new offices, we have
7 received four exit interviews and conducted those.
8 Three of those have involved no nuclear safety
9 allegations whatsoever. A fourth, very recently,
10 within say a matter of about three days ago, we did
11 have an identification of a nuclear safety concern and
12 that is already under investigation. And to make the
13 corporate statement for NE&O, Ed issued a memo on the
14 22nd of February which basically advised his three
15 direct reports to senior VPs reporting directly to Ed
16 that this is now a new requirement in addition to that
17 which already exists by our corporate policy for
18 people leaving the company to exit interview through
19 the Human Resources Group. So our program is in
20 addition to them. And the adherence to that has
21 already shown great alignment and I think it's going
22 to be a new source of information for us.

23 Lastly, it's our intent to conduct a
24 select sampling of NUSCO plant and contractor

1 personnel involved in our refueling outage locations.
2 When I say select sampling, that is specifically meant
3 that we're looking for the discreet groups of people
4 that will be involved with the quality program.

5 The next part I'd like to cover some of
6 the operations of the Nuclear Safety Concerns Program.

7 MR. RUSSELL: Can we go back to a
8 question on your first bullet, which was prompt
9 identification, tracking, feedback and resolution of
10 concerns. I recall a discussion, Ed, that you and I
11 had regarding the use of three-part memos and concerns
12 which were in your formal program and others which
13 appeared to be being handled outside that program, and
14 the discussion focused on the fact that the
15 individuals had not formally brought the concern to
16 the company's attention. The company was aware of it
17 through some other means, whether it was the newspaper
18 or referral by NRC or some other third party that
19 there is a concern. Is part of your program
20 objective to identify those concerns, whatever the
21 source, get them into a program and evaluate them, or
22 is it just responsive to those that are brought up by
23 employees or formally referred to?

24 MR. MROCKA: No, if you're talking about

1 a proactive approach, what this program -- and I'm not
2 sure specifically if that's something that Pete's
3 going to address -- is the fact that if we become
4 aware through any mechanism that there appears to be a
5 concern, we are going to actively seek out that
6 concern from the individual. And if we get to a point
7 where we can't make the proper contact and it's not
8 working well in our initiative, we'll inform the
9 individual again that he has a responsibility to us to
10 inform us.

11 We also feel that there's a point where
12 we can tell an individual that if they have a concern,
13 they need to express it, otherwise we can impose some
14 disciplinary action. Also, what we would do is if
15 that wasn't successful, we would attempt to arrange a
16 meeting between us, the individual and somebody from
17 the NRC, mostly like the resident. And if the
18 employee wished, we would leave the room and leave the
19 employee with the resident, but we would try to bring
20 forth that concern, okay, rather than just say he
21 hasn't approached us, we're not interested. We are
22 interested. If need be, and if that wasn't working,
23 we would notify the NRC and ask the NRC if they could
24 independently approach this individual and see whether

1 or not there is something of substance there.

2 MR. RUSSELL: Is what you've just
3 described covered in your -- either your program
4 description or internal procedures?

5 MR. MROCZKA: It's in my discussion with
6 Pete. I'm not sure if those words go in somewhere.
7 We have reference to proactive approaches, and I'm not
8 sure if we go into all those kinds of details that I
9 just expressed in writing anywhere in our program.
10 But between Pete and I, that's the understanding.
11 That's essentially what I asked Pete, and his antennas
12 are out for any source of information.

13 MR. RUSSELL: I'm as much interested not
14 only in what Pete's response is, but also the line
15 from the standpoint of a supervisor who hears an
16 employee may have a concern, the employee does not
17 formally kick it off to get into the program, but does
18 that supervisor then turned around, attempt to
19 interact with the employee, find out what the issue
20 is, get the process started so it's proactive in
21 attempting to identify the issues both within the line
22 and through your independent review that reports
23 directly to your level?

24 MR. SANTORO: Bill, I believe that that's

1 almost a given with the safety ethic that has been
2 published throughout the NEO group on numerous
3 occasions advised people that they have to be
4 responsible to the need to promulgate safety at all
5 times, and I believe that the majority of the staff,
6 and that includes the supervision, is responsive to
7 even what I'll call the hearsay. If there is a
8 potential for a problem there, I believe that people
9 will respond to it.

10 To get back to your specific concern
11 relative to the three-part memo, if an individual, for
12 example, found in the course of working off that
13 three-part memo and found perhaps maybe the timeliness
14 was not to his satisfaction, and if he chose to come
15 to our program, one of things we would be looking for
16 are the sources of his concern, what documentation do
17 you have, what references do you bring to try to get a
18 detailed evaluation from a firsthand knowledge, and
19 even if he brings it to us as secondhand knowledge, to
20 try to pursue in depth where these pieces are coming
21 from so that they can be addressed. So if you're
22 looking for the procedure to specifically say, what Ed
23 said is in agreement between us and what I also
24 believe our staff inherently knows by way of our ethic

1 and our procedures, I believe it's captured.

2 MR. MROCZKA: If it isn't, Bill, what
3 we're going to do is go back and take a specific look
4 at that and put it in there. And Pete's going to
5 mention about some additional training that we're
6 going to give. We're going to insure that it's not
7 only reflected in our procedures so that people are
8 reminded of this responsibility, but also make it part
9 of the training, so it will be there.

10 MR. RUSSELL: I think it was after the
11 SALP meeting that we discussed this issue and I felt
12 that the system had broken from the standpoint that I
13 felt there was a number of issues that were being
14 discussed at what I would characterize at a very
15 senior level within the corporation for which those
16 same issues were not being entered into your formal
17 tracking system and were being handled in an ad hoc
18 basis. So I'm interested in whether there is still --

19 MR. MROCZKA: That's a slightly different
20 wrinkle, and I think Jack can add some information
21 about that whole three-part memo system.

22 MR. RUSSELL: But we need to understand
23 how that relates to the formal process in tracking.
24 Once you decide you have a valid concern, you have a

1 process, at least as you described it in your March
2 first letter, globally how that was to be handled, and
3 it didn't seem to address specifically, or maybe I
4 missed it, the three-part memo approach.

5 MR. MROCZKA: As we go on in this
6 meeting, you're going to see there's two separate
7 paths. Essentially, one is through the normal
8 day-to-day line management system where we handle all
9 the -- you know, we're in the nuclear business,
10 there's nuclear issues all the time, and that's how
11 they flow and are tracked and responded. And when
12 that system isn't working, then we have the Nuclear
13 Safety Concerns Program and the three-part memo.
14 Specifically, Jack, I think that's something that
15 you're very familiar with.

16 MR. KEENAN: Right. I'll be talking
17 about that in a little bit. If you want to jump
18 ahead, I can.

19 MR. RUSSELL: No, I'll wait.

20 MR. KEENAN: Some of the training we've
21 already had has covered some of those issues in terms
22 of supervisors listening better for nuclear issues and
23 nuclear concerns. It's very hard to distinguish
24 between the two, but supervisors have been given a

1 higher sensitivity to have their ears open in a normal
2 day-to-day business, even though he may not take you
3 aside from his office and say I've got a nuclear
4 concern, but if you hear something, pursue it. And
5 that's some of the training we've already done and
6 will be doing more of.

7 MR. RUSSELL: It's also important not to
8 have a high hurdle that the concerned individual has
9 to get over first by way of putting it on a piece of
10 paper, passing it into the system, etc. Some of that
11 burden has to be accepted by management. Your
12 objective is to find out what the concern is, not
13 necessarily how it gets started.

14 MR. MROCZKA: I think as we go through,
15 you'll see that what we try to do is not only lower
16 the barrier down, but I think the barrier evaporates.

17 MR. RUSSELL: All right.

18 MR. SANTORO: Let's get back to page 5,
19 some of the operations of the program. It implements
20 the intent of NU and NE&O's Nuclear Safety Policy
21 Statements and recent correspondence that was put out.
22 Ed issued a fairly extensive memo describing the
23 enhanced program on December the 4th, which also
24 included a biography of myself and that had general

1 distribution to every employee under and reporting in
2 the NENOR group. That was followed up shortly
3 thereafter by a similar letter from Bill Ellis, again
4 encouraging employees to seek a communication path
5 through the first line of management, but again
6 stressing that if that didn't work, we could follow
7 other avenues. And again, as part of the record,
8 those two letters have been provided.

9 One of our features is that we operate
10 independent of the influence of functional line
11 management. As indicated earlier, I am the direct
12 report to Ed on the nuclear safety issues. I do not
13 have any other functional management alignments. The
14 intent here is to keep the senior executive advised of
15 the nuclear safety concerns. But I can assure you
16 that the agreements that we have with Ed and myself,
17 the critical piece to remember at all times is the
18 identification of the issue and not the identification
19 of the employee. So confidentiality is maintained at
20 all times. Ed is aware of everything that's going on
21 in my program from the identification phase of what
22 the issue is, does not know the source nor does he
23 need or ever have that source.

24 The program also provides a direct

1 communication link between the individual and the
2 senior vice president as I've just described. That
3 link comes through me directly to Ed. And again, I
4 will stress that it's the confidentiality. And I
5 think that's important here because it's the integrity
6 of the program. If people are going to feel the
7 credibility and experience and know it, then that has
8 to be maintained at all times and experience it and
9 know it.

10 We've also taken pains to provide an
11 off-site location, and we've done this for several
12 reasons, and we've looked at several programs out
13 there. One of the key features that we saw when Ed
14 said your charter is the best of the best, and we
15 looked at some of these programs, and the ones that
16 seemed to be with high credibility were those that
17 were located at either an off-site location or in a
18 remote part of the facility. And we have offices that
19 are like five miles away from Millstone and I would
20 venture to say somewhere around 20 to 25 from
21 CY.

22 The environment is what I would call less
23 than a typical utility office type-environment. It's
24 done with a very casual atmosphere. Several of your

1 residents have already visited the facility and I
2 think have had warm and comfortable feelings sitting
3 in the conference room. The conference room is not a
4 table such as this. The coffee is always warm, the
5 soda is always cold.

6 And lastly, I think the point about
7 confidentiality is again to be stressed, because as I
8 said, that's the integrity to the program. You not
9 only provide the individuals the opportunity to waive
10 the confidentiality if they wish to, okay, and we have
11 agreements for them to sign and they are not
12 enforceable. If the individual chooses not to sign,
13 and I can assure you that's the case already in one of
14 our cases, we had an individual who felt that he did
15 not wish to sign this confidentiality statement,
16 that's perfectly okay.

17 The other case is where we will have
18 people that will approach us anonymously, and that can
19 occur in a couple of ways: By way of a recorded
20 telephone message and also by way of correspondence to
21 our office. We have established a P.O. box. We have
22 also gotten ways in which they would be able to
23 communicate back on a form. We've provided postage
24 paid envelopes for their use. Any questions on

1 operations?

2 MR. KANE: If I recall from my visit to
3 that facility, you also have -- maybe you're going to
4 get into it -- the hours that it's open.

5 MR. SANTORO: Yes, that will come up
6 later, Bill. Anything else on that one? Let me get
7 you some status as of March of 1990. As Ed had
8 indicated earlier, we looked at several utility
9 programs. Basically, we looked at 11 plus one
10 contractor's program who we thought was pretty good,
11 and that included some extensive reviews not only of
12 the published data but we also brought down one of the
13 individuals that was my counterpart to the New
14 Hampshire Yankee program, and that's the employee
15 allegations resolution program, and we spent a day and
16 a half with this individual and we gained a lot of
17 insight into the development of our own program.

18 We've recently embarked on a pretty
19 proactive publicity campaign. Ed Mroczka, as I said
20 earlier, along with Bill Ellis, had issued memoranda,
21 December the 4th and December the 12th respectively,
22 to all NEO employees, that's already been bound as
23 part of the record. Program details have been posted,
24 and I'd like to point to the poster to the rear. Each

1 and every location in our operating environment where
2 there is a form NRC 3, you will also find this
3 particular safety program identification with our logo
4 that says "Nuclear Safety is Number One." It captures
5 Connecticut Yankee, Northeast Nuclear Energy and home
6 offices NUSCO, which includes the Berlin plus the
7 Rocky Hill complexes.

8 What you will see here is again a clear
9 statement encouraging the employee to work through his
10 supervisor, and if for any reason that is unacceptable
11 or he finds it uncomfortable, there are a number of
12 ways in which they can contact our office. First and
13 foremost is by way of a direct tie telephone. You can
14 call directly from CY and use the CY extension. You
15 can call from Millstone using the Millstone
16 extensions. You can call from outside or anywhere in
17 the U.S.A., continental. The number is
18 1-800-282-SAFE. And in addition, the employees can
19 write to a P.O. box. And coming shortly will be our
20 high security drop boxes which will include the
21 postage paid form that the individual can feel free to
22 fill out and send back to us for us to work on. There
23 is a folded copy of that in the binding for this
24 discussion.

1 The telephone lines that I described
2 earlier we took great pains, since you well know that
3 the Concerns Program has been somewhat evolutionary,
4 NE&O 2.15, which covers this program is now in its 6th
5 revision, so the numbers that were existing before,
6 not to confuse our employees, we've retained those
7 same telephone numbers so that there was no confusion
8 factor. The only thing that entered into it was the
9 1-800-282-SAFE number. And incidentally, with our
10 thought process to try to develop a good and
11 well-balanced and integrated program, when we came up
12 with the Nuclear Safety 1, I've got to tell you the
13 only disappointment I've had so far is I didn't get
14 what I wanted on the 800 number, and if you think
15 that's an easy process, try it sometime, because what
16 I wanted was 1-800-SAFETY1. Couldn't get it.

17 MR. RUSSELL: Are you going to discuss
18 what your experience is to date with respect to issues
19 coming through this process?

20 MR. SANTORO: Yes. As a matter of fact,
21 the last bullet on this page will cover that. In
22 addition to the publicity that went here, we also had
23 a feature article in our corporate newspaper or our
24 corporate magazine, which is right here, quoting from

1 several of our executives, and including myself, Ed,
2 Bernie Fox and John Opeka, and the relevant importance
3 to our enhancement program. So there's been ample
4 publication. That goes to some 9,000 employees,
5 n clear as well as non-nuclear.

6 In addition, on February 27th, Ed issued
7 a status memo to all of our NE&O employees to tell us
8 where we are in the program and what's to come next.
9 In addition, we've completed our Revision 6 of NE&O
10 2.15, that was signed off this month. It becomes
11 effective the 20th of April. We're in the process of
12 currently getting the design completed for our drop
13 boxes, and lastly, we will be completing the
14 development of our orientation program. All of the
15 employees of NE&O that work directly under Ed's
16 umbrella will be required to attend the session.

17 Okay, you asked the question, Bill,
18 relative to what's our performance to date. Since we
19 got into business January one, I have had six files
20 opened, two came in the month of January, one came in
21 the month of February, three have come in in the month
22 of March. Let me give you some categorization of how
23 those came in. Three were by phone contacts; two of
24 these came from a management level category; one came

1 from an employee category. Two of those files are
2 closed, one is open. We had one what I call casual
3 contact.

4 Being with the company some 16 years,
5 walking around our facilities, it's not uncommon for
6 somebody to approach me, and this has occurred. And
7 when I was encountered, it was done very warmly. I
8 secured a conference room and met with the people, and
9 we have that file in operation at the moment. It has
10 to be close to closure and I suspect that the activity
11 on this particular item will / me to closure, perhaps
12 middle to the end of next mo ..

13 The program also is, if you look at the
14 details here, you are welcome in this office with or
15 without a scheduled appointment. And typically we
16 would expect and encourage and would like to have that
17 warm and comfort welcome sign open at all times for
18 those that need it. And there will be walk-in
19 candidates, and we have received one walk-in candidate
20 and that particular file has just been opened and
21 we're in the preliminary phase of investigation right
22 now.

23 As I mentioned earlier, we had four exit
24 interviews. One of those, as I said, only had an

1 identifier for a nuclear safety concern, that also is
2 under investigation.

3 MR. KANE: May I ask a question before
4 you leave here? How is this factored into general
5 employee training?

6 MR. SANTORO: Once we do our
7 orientation --

8 MR. KANE: Was that the last bullet here?

9 MR. SANTORO: That will be the kickoff
10 for everyone to make sure that the awareness factors
11 are up, they know the details, they can ask questions
12 and then it will be a formalized process, thereafter
13 will be part of the GET program, which is the General
14 Employee Training. As a matter of fact, if I recall
15 correctly, in this year's test flow, based on Revision
16 5, there is a test question that relates to the
17 Nuclear Safety Concerns Program. So it will be
18 captured. And then there will be a formalized process
19 for all brand new employees coming into the program by
20 way of our training department. So that will be
21 captured. There was a question I think that needed to
22 be answered, and Bill, I'm trying to remember what it
23 was now.

24 MR. RUSSELL: It relates to the

1 three-part memos and their use vis-vis the system
2 and --

3 MR. SANTORO: No, there was another one
4 beyond that. It will come to us later. Again, if the
5 individual comes to us with the three-part memo and
6 believes that, for whatever reason, either he's not
7 satisfied with the response, doesn't like the
8 timeliness and would rather come to us, then we would
9 actually take on that three-part correspondence as
10 part of our documentation file and start to do our
11 work. Ed?

12 MR. MROCZKA: Even if it's not any of
13 those categories, no one gets turned away at all, even
14 if it's not nuclear, and we will get into that.

15 MR. SANTORO: For example, like in the
16 phone contacts, individuals don't necessarily have to
17 identify who they are. And they could put on our
18 table at that point in time a concern, and that is
19 sequenced just like it would be any other piece,
20 whether they have firsthand knowledge or they are
21 bringing something by way of hearsay. Our objective
22 is to get to the source, to get some details to
23 determine the factuality of what's there.

24 Lastly, I'd like to go through a

1 simplified flow chart of the program itself. To your
2 left there are three major blocks that identify how
3 the proactive base for our program is going to
4 function and operate. The concerns are identified as
5 you see by the top block by the employee, vendor, or
6 our own management. We are also going to proactively
7 solicit inputs by doing work group surveys, we've
8 talked about the exit interviews and the selective
9 sampling for refueling exit outages -- exit interviews
10 for people involved in the quality parts of our
11 refueling outage work.

12 Lastly, there's an input that comes
13 directly from the NRC and that I can tell you has
14 recently begun. I am pretty pleased with the
15 straightforwardness that we have gotten from your
16 organization. Your site representatives from both CY
17 and Millstone have been to our place. We have had
18 numerous discussions with Bill Raymond, all very
19 fruitful. I think the exchanges have been open and I
20 think that they are going to help strengthen the
21 program on both sides.

22 Once the information flows to our office,
23 we do a gathering of source information. One of the
24 important things we look for for every concernee is do

1 you have a recommended solution. Obviously, if people
2 have got a concern, they have to have some time to
3 think about it, why it is a concern to them and
4 perhaps maybe they have a recommended solution. So we
5 want to evaluate what it is they bring to the table in
6 total complement. We will do an interim
7 classification in terms of the severity and priority
8 of what we see, then we will enter this into our
9 program follow-up system to make sure that it's
10 identified and is tracked because we look to get
11 closure. We will identify current status to our NU
12 senior management. We will also be identifying
13 feedback to the NRC on those issues which you refer to
14 us. However, I wish to point out that we welcome the
15 NRC's review of our efforts at any time.

16 MR. RUSSELL: Can I go back to the issue
17 of a concern referred by NRC, because the way you
18 described it, I'm not sure whether we're talking about
19 a formal referral of an allegation that the NRC has
20 received, which would normally be done in writing from
21 us to you, or whether this is something that an
22 inspector on the site has picked up in the course of
23 discussion, which is not considered to be an
24 allegation but is brought to your attention in the

1 course of discussion.

2 MR. SANTORO: The routine normal plant
3 observations and events, Bill, would be to the
4 resident and the resident would be at this point using
5 our office as the focal point for us to get that into
6 the appropriate functional line management to get
7 action taken.

8 MR. RUSSELL: I'm not sure that I -- if
9 an issue comes in from a concerned employee to the
10 NRC, we make a judgment as to whether that is
11 something that we want the utility to follow-up on or
12 whether, because of the sensitivity of the concern,
13 it's appropriate for the NRC to follow-up on it or
14 take some other action.

15 MR. SANTORO: The key word there, Bill,
16 is you make the assessment for the referral, if you
17 think that it's something that the utility and this
18 program ought to be working on, then it will come to
19 my office by way of that route.

20 MR. RUSSELL: So if we in fact refer it
21 back and we write a letter to Mr. Mroczk: requesting
22 something be looked into, or to the state manager,
23 then that goes into your system and is handled through
24 the Employee Concerns Program?

1 MR. SANTORO: Correct.

2 MR. RUSSELL: You, I thought, also
3 mentioned something that the residents could bring an
4 issue to your attention verbally other than something
5 that's in writing.

6 MR. SANTORO: I believe that that is
7 something that we would like to cultivate in terms of
8 the evolution of our program.

9 MR. MROCZKA: I think what Pete's saying
10 is we would not turn that away, just like we wouldn't
11 with our own.

12 MR. RUSSELL: I understand what your
13 experiences to date are, the ones we talk about and
14 the ones we referred to --

15 MR. HAVERCAMP: There are some, in
16 addition to that, there are cases where there are
17 concerns that Bill Raymond may have discussed with Ed
18 and myself that we perceive are not allegations
19 because there was not a breakdown, there was no
20 opportunity to test a breakdown of the system, but
21 those concerns we may have been informed of in
22 parallel with a three-way memo or some other method
23 and we have determined them or assessed those as we
24 normally consider allegations. But we have a

1 supervisory and a management review of those concerns
2 before Bill Raymond would discuss the issue with the
3 Nuclear Safety Concerns Director and we track those on
4 site.

5 MR. KANE: Let me ask about another
6 category which is not identified on here. It concerns
7 concerns received by a third party, like the public,
8 like a member of the public. How would those fit into
9 your system?

10 MR. SANTORO: Again, that would be, I
11 think it's fair to say that once we've done this kind
12 of publicity with the 1-800 number, it's not unusual
13 for these kinds of numbers to go nationwide. Anybody
14 could call, okay, and if they gave an identification
15 for a concern and we would respond to that. We would
16 hope that the way the recorded message comes up, we've
17 asked the people to identify themselves so we can get
18 back. Because one of the key features of our program
19 is to provide feedback along the way so that the
20 concernee, whoever they be, whether they're external
21 or company employees, at least got some semblance that
22 somebody is working on the issue, and there is going
23 to be some routine feedback. So that if these
24 individuals call, it will register on the 1-800

1 number, or if they can get access to a Millstone
2 direct line somehow, those will be recorded and we
3 will respond to those.

4 MR. KANE: Just for example a member of
5 the public writes a letter to Mr. Mroczka, does that
6 go into this system or is that handled independent of
7 this system?

8 MR. MROCZKA: Depends on the nature of
9 the letter. If it's just something that appears to be
10 a routine, an individual has some concern and it
11 doesn't look like there's anything more than that, I
12 would try to use the chain of command as much as
13 possible. If I sensed or there was anything there
14 saying -- writing it to me personally for some reason
15 that I felt handling it through the chain of command
16 wouldn't be giving the right message back to the
17 individual and they might not continue to do that,
18 then I would go to Pete and tell him to put that into
19 his program.

20 MR. SANTORO: I responded to your
21 question, Bill, as though it were coming directly to
22 my office.

23 MR. KANE: Yeah, I understand that. If
24 it comes directly to your office, you would handle it?

1 MR. SANTORO: We would handle it, we
2 would not turn it away.

3 MR. MROCZKA: If I think it wouldn't
4 detract -- if it wouldn't detract from the
5 individuals, I would use the chain of command.

6 MR. WENZINGER: One follow-up question to
7 Bill's, you mentioned that your intention was to be
8 proactive. I wondered, do you, for example, read the
9 local newspapers, and if there's an article that might
10 appear in a local newspaper that said somebody at
11 Northeast Utilities thinks thus and such is all
12 screwed up or whatever, that you would then -- well,
13 what would you do with that?

14 MR. SANTORO: Well, it's a very good
15 question, Ed. As a matter of fact, one of the
16 concerns that did come in was exactly that, relative
17 to the increased sensitivity in the public domain,
18 relative to the radiation exposure standards, an
19 individual, an employee called and suggested that
20 perhaps it was time for our organization to do
21 something with that, and I'm happy to say that I
22 thought it was a good statement. I had seen the
23 program, it's been fully evaluated and there will be a
24 corporate statement coming out that will answer that

1 very shortly. So in a sense, if you hear and read, in
2 this case it was a newspaper article that tripped the
3 individual to raising the issue relative to radiation
4 exposure to our employees, would I be -- is this the
5 right place to bring this kind of a problem, and I
6 said most assuredly it is, and we followed through and
7 there's action being taken on that right now.

8 MR. MROCZKA: Even more specifically, in
9 our organization -- not in my organization, but in
10 Northeast Utilities is a public information
11 organization, a sub-part of that organization is a
12 nuclear information organization that works with us
13 hand in glove, because we're the ones that feed them
14 the information. Part of their formal process is to
15 keep track of any articles in any of the local
16 newspapers and the national newspapers that may have
17 something to do with some concern against one of our
18 plants.

19 MR. SANTORO: Another piece that goes
20 with that, to expand a little bit on what Ed does
21 relative to this whole topic, we get, on a daily
22 basis, a package of copies of all of the current
23 newsprint relative to the concerns, the issues at our
24 stations. So if there's something there that's being

1 stated for say the first time publicly, I might raise
2 a concern about radiation such as this individual saw
3 which tripped this person's circuit, bring that to the
4 program, it will be addressed, okay? We are being
5 responsive to what we read. So if we see it in the
6 print for the first time and we haven't seen it
7 someplace else in our total communications path
8 internally, that automatically is lighting a light
9 bulb in people's head to say if we haven't looked at
10 this, then why not, let's get on it.

11 MR. KEENAN: Can I add something, Pete,
12 there? Last Sunday morning there was an article here
13 and there was some quotes from unidentified Millstone
14 employces. Earlier this week we put out a Millstone
15 Messenger it's called which addresses what we're
16 doing. Actually I brought it back. I don't think you
17 would have seen it yet. I better give you one.

18 Something that we're trying to do in
19 terms of being very proactive in addressing concerns
20 when they show up in a newspaper or wherever, and we
21 don't know who the employees are, but we certainly
22 want to get the information out that everybody
23 understood the present situation with the steam
24 generators and what we've seen and what we monitor.

1 MR. SANTORO: There was one other point
2 that I failed to mention relative to the concerns
3 identified to the program. All of the telephones have
4 recorders so messages can be taken 24 hours a day, 7
5 days a week. Now I do remember what the other
6 question was that Bill -- the office will be putting
7 some flexible hours into the program such that we will
8 have office hours one day a week, which is now planned
9 to be on a Wednesday, and we will be open until 8 P.M.
10 So we're adding another dimension of flexibility to
11 accommodate people's schedules. So that if they are
12 uncomfortable during the work hours to arrive, they
13 certainly can come and see the program during this
14 period.

15 Once the program does its data gathering
16 and it basically comes to a decision point, which is
17 the diamond safety concern, yes or no, if it is, then
18 the program office identifies, tries to prioritize and
19 sets up a path for investigation, looking at a plan
20 and then making an assignment to that part of the
21 organization that is best equipped. Now, in some
22 cases, in fact I will say in all cases, we will be
23 sensitive to the origin of the concern such that we
24 have many places we can assign the detailed

1 investigation to get the technical facts such that
2 they may not and may never reside where the employee's
3 concern originates. We will track the concern,
4 provide feedback along the way to the employee with a
5 formal closure. By formal closure, bringing the
6 individual back, discussing the results and looking
7 for concurrence.

8 We also have looked at in all cases we
9 won't get concurrence. Part of that may come from a
10 differing professional opinion, but nevertheless, it
11 will be discussed. If we believe that the
12 investigation has looked at all of the details and is
13 correct, then we will say that it's correct. If the
14 individual concurs with the findings, he or she will
15 be asked to sign a piece of paper that says that.
16 Again, it does not have to be signed if the individual
17 doesn't wish to sign it. It's just an approach that
18 we put into the program to try to get things to
19 closure and to make sure that the concurrence is
20 identified, it's recorded.

21 We also recognize in our program that
22 we're going to hear things that are not nuclear safety
23 related and it's our objective to look at these,
24 identify them. For example, we may get somebody

1 complaining about a foul smell in a given area where
2 they're using some solvents that obviously looks like
3 it's got to be an industrial safety concern, we will
4 see that that gets identified, put into the right part
5 of our organization to get an investigation. It's our
6 job to make sure that the investigating agency comes
7 back to us with a closure statement so that we know
8 that the employee has in fact received information to
9 resolve that issue. But it's not our function to
10 physically do the investigation.

11 MR. BRADY: Excuse me, in that regard, is
12 there an onus on that individual to determine before
13 he comes in there if that -- if his concern is a
14 nuclear safety concern, because he may have a concern
15 about his confidentiality or an industrial safety
16 concern, if you are then going to give that to that
17 line organization and they're going to be responsible
18 for getting back to that employee, isn't that going to
19 compromise his confidentiality?

20 MR. SANTORO: Again, the first statement
21 we also go through is to look for a waiver of
22 confidentiality. If the individual waives it, then
23 there's no breach. If the individual says I wish
24 confidentiality, then there's no identification. In

1 that case, we will identify the issue, get back to us,
2 we'll get to closure.

3 MR. BRADY: So you would handle the
4 closure?

5 MR. SANTORO: In that case, we would have
6 to do it. We hope that those instances will be at a
7 small, small level. But the program is still young
8 enough, we're evolutionary, we really don't know how
9 it's going to play. It may very well work out like
10 you say, if they come with the confidentiality, then
11 that forces the hand to be retained in all cases for
12 confidentiality.

13 MR. MROCZKA: That's back to the concept
14 that I mentioned before, no barriers. We're just
15 going to try to encourage people to bring things
16 forward and get to resolution.

17 MR. SANTORO: In formulating this whole
18 program, we took a lot of pains to look at the best of
19 the best, and one of the things that we challenged
20 ourselves with is the question who do you represent.
21 And I've got to tell you, the program represents the
22 safety ethic and the issue of safety. We do not care
23 about the identity of people anywhere in this process,
24 but what we do care about is that the concern is

12

1 identified, it's looked after, tracked and there is
2 closure. And that's the end of my program.

3 MR. KANE: Let me ask a question on
4 feedback. If the allegation is anonymous, how do you
5 deal with the feedback?

6 MR. SANTORO: That comes I think by way
7 of two routes, Bill. We're encouraging those people
8 that want to remain anonymous, to give that feedback,
9 we will request is there a P.O. box, is there
10 someplace we can get you the information, can you give
11 us a telephone number. If they choose not to do that,
12 then the only way we can respond is if the individual
13 calls us back and says have you really looked at this
14 issue, and if you have, what's the resolution, what
15 did you find. So in that sense, they take partial
16 ownership. But if they give us the points of contact
17 by way of a P.O. box, mailing, we've even adopted the
18 concept that people can give us a code name. Okay, if
19 you want to be Batman, Bill, on your concern, that's
20 fine with me. We can find a way to get that
21 documented under your code name. So we have thought
22 about that concept.

23 The anonymous case is kind of a ticklish
24 one because you've got to be sensitive on how you

1 present that back, because one of the strengths is to
2 provide that feedback. So we encourage people to use
3 a drop box, whatever, leave it at Joe's Bar and Grill
4 in a pink envelope, we're prepared to do that.

5 MR. KANE: That's part of your procedure,
6 not written per se, but in terms of how the office
7 operates?

8 MR. SANTORO: Those scenarios have been
9 talked out. We have roleplayed a number of events.

10 MR. WENZINGER: Have you considered
11 public feedback such as a bulletin board, a
12 newsletter, newspaper article, things that are
13 available to the general public as feedback for
14 non-allegers?

15 MR. SANTORO: Per se, I got to say, Ed,
16 we looked at that. We had some reservations. There
17 is a positive side, there's a negative side. Do you
18 want to put a score sheet out for people to look at or
19 do you really want to run the program to get to the
20 root causes and solve the issue. So my current
21 assessment, I'm flexible, I'm going to let the program
22 dictate whether or not that's something we ought to be
23 doing to the future, right now we've evaluated it,
24 looked at it, we kind of think that the negative side

1 is too high for us now.

2 MR. RUSSELL: I'd like to address the
3 confidentiality issue from maybe a different
4 perspective. I think there are potentially or maybe
5 more reasons why a person would want to have
6 confidentiality. One would be a concern with respect
7 to how management might react for which there are
8 statutes that protect the individual.

9 MR. SANTORO: Also by way of Policy
10 statement 22.

11 MR. RUSSELL: The second area is a
12 perception from peer pressure that you're engaged in
13 an activity that's got some potential negative
14 connotations. Both those I think are good reasons for
15 the individuals to come forward and simply openly
16 state what their concern is to management and then
17 establish a track record of management professionally
18 responding to these concerns such that it is not
19 unusual, it is a matter of business as a day-to-day
20 activity of seeking out and responsibly replying back
21 to concerns. And in fact there may be some instances
22 where people will wait to see how the system works
23 before they will try it.

24 So I would encourage you to try and

1 convince through your actions that people can have
2 confidence in the program. And I think that, as you
3 discussed earlier, you commented that failure to bring
4 forth safety concerns to management could be the
5 subject of discipline. I think the opposite side of
6 that is those who bring things forward that are indeed
7 valid concerns that assist management in doing their
8 job ought to be considered for some type of
9 recognition, so that there's two sides to both issues.

10 MR. SANTORO: We share your heightened
11 interest in the importance of the confidentiality.
12 Let me just describe a little bit of one of the pieces
13 that are going on right now. An individual came and
14 basically waived confidentiality. I've had numerous
15 contacts with this individual over the last couple
16 weeks, and in all cases we have gone beyond the limits
17 if you will in terms of what he would have wanted. We
18 gave him the program. He has remained confidential
19 and everything has been going on in terms of discourse
20 between himself and my program to the point where
21 everything he has received to date, great pains were
22 used to make sure that whatever information was
23 conveyed back to him was not done in a public
24 environment, also to the point where he was given

13

1 strict instructions from me that as far as I'm
2 concerned, he's waived confidentiality. He made a
3 statement in the discourse, "I really don't care who
4 the hell you tell," and my response was "My program is
5 going to remain confidential in terms of your
6 identification. You give me a waiver, but anything
7 that goes outside of this office will protect your
8 confidentiality."

9 MR. RUSSELL: That's a part of the point,
10 but the point I was really focusing on is that in some
11 instances if a person does indeed waive confiden-
12 tiality and brings a valid concern forward, that
13 concern is resolved and it's something that management
14 would not have been otherwise aware of, then that's an
15 employee doing his job that you would expect and you
16 really need to be able to address that in a positive
17 reinforcing way rather than keeping it confidential
18 and away from the rest of the organization.

19 MR. MROCZKA: There was a recent incident
20 I think that illustrates that point. One of our
21 engineering personnel was working on the installation
22 of a project, and in the course of doing business, he
23 came across something that didn't look right to him
24 and it was part of a modification that was done years

1 ago. He determined something wasn't right and he
2 brought it up, had it evaluated and sure enough, it
3 was a mistake that we made somewhere X number of years
4 ago. And what came out of it was, you know with the
5 NRC interactions and so forth, it was mentioned in a
6 negative way in a SALP report.

7 His concern was that because of his
8 actions that he thought was positive, something
9 negative came back to the company. And he brought his
10 concern to our quality assurance people, okay, and we
11 have a process that's a form and a procedure that if
12 you've got a concern and nothing much fits, you can
13 always go to this one standard form, it's separate
14 from the Nuclear Concerns Program, but it's a formal
15 system that we previously had and we still have it.
16 And the quality assurance people took that, looked at
17 it and came up to me and said here's a concern that
18 this individual brought up and he also felt that this
19 type of thing may be impacting the way some of our
20 other people think. They see something wrong, but
21 maybe the company is going to get into problems with
22 the NRC.

23 Good, he's identified something, I said,
24 fine, if he's comfortable, I want to talk to the

1 employee. So I did and told him that what I would
2 like, with his concurrence, is to thank him in a
3 public way for bringing that kind of an issue forward
4 in spite of the fact that we got our hand slapped, and
5 to use that as an illustration of what I feel our
6 safety ethic is all about.

7 And I wrote up that kind of a memo with
8 Licensing's help, because they put some other factors
9 into it and some other concerns that people had
10 expressed, sent it down to the individual, let him
11 review it, he put in a couple other sensitivities that
12 even I didn't understand, but from his level some of
13 the things he sensed, he added some of those comments
14 in there that reinforced the message I was trying to
15 get across.

16 In essence, it thanked the individual for
17 coming forward, and it was a message for the rest of
18 our organization that at all times they do what's
19 right with our safety ethic and leave it up to me to
20 go and do battle with anyone that may come back to us
21 with something negative. And I started getting a lot
22 of feedback from our organization that that type of
23 thing was very well received. And this individual was
24 fully cooperative.

1 And I told him I wouldn't mention his
2 name in there if it bothered him the least, but he
3 said no, he would like to use that as an example and
4 he thought some of the people that knew him, it would
5 mean something to them. And we did that and that's
6 the type of thing that I think our sensitivities over
7 time have heightened to try to use those things in a
8 positive way whenever possible, providing the
9 individual also would like to and it wouldn't come
10 back as a negative to him.

11 MR. RUSSELL: That's what I say, in cases
12 where they do indeed waive confidentiality, the issue
13 has merit and it's an issue which, whether it gets the
14 company in trouble or not, if it's a safety issue that
15 needs to be addressed and by virtue of addressing it,
16 it prevents a problem, that type of behavior needs to
17 be reinforced positively, just as you have
18 expectations of employees bringing things to you, if
19 they fail to do that or refuse to cooperate, you have
20 other tools that you can use to reinforce the expected
21 behavior.

22 MR. SANTORO: Ed has even taken that
23 concept even further with our program and has had some
24 preliminary discussions with myself and Bob Cibik that

1 this might be a concept for us to follow using, for
2 those cases where we have the waiver and the
3 individual doesn't want to have his identity obscured,
4 put the memo out and also put it out with the logo
5 Nuclear Safety 1 up in the corner so people will be
6 reminded again that the program is important and their
7 part of the program is a key element of our success.
8 So we have talked about it and I suspect that they'll
9 be more of those with time.

10 MR. RUSSELL: Okay.

11 MR. KEENAN: Last year, late last year,
12 I'm sure you remember the service water incident in
13 Millstone 2, and that was an incident due to a very
14 proactive investigation by an engineer working with a
15 QC inspector identified that weakness in our service
16 water system. They identified that and we took, as
17 you know, the corrective action at the time. Those
18 individuals received a memo from me as an excellent
19 example of the NU safety ethic. So that's something
20 we're very sensitive to now.

21 MR. RUSSELL: Okay.

22 MR. SANTORO: Okay, if there are no
23 further questions, I'll turn it over to Jack Keenan.

24 MR. KEENAN: Okay, I'm going to address

1 some of the special efforts that have been addressed
2 at Millstone as issues have arisen. Ed Mroczka and
3 Pete Santoro have discussed the Nuclear Program Safety
4 Program and its history. During the time period in
5 dealing with the allegation in Millstone, we've
6 identified obligations for improvement on a site
7 basis. Our experience has highlighted the critical
8 importance of two items, one of which is effective
9 communications both up and down the chain; the second
10 is corrective supervisory-employee working
11 relationships. These two attributes provide an
12 atmosphere of trust for an effective Nuclear Concerns
13 Program. Right now it's our concern that if we have
14 had a couple of employees who have lost trust in using
15 our system, not only do we want to enhance their trust
16 in us and have them use our systems, but we're afraid
17 there could be other employees that could also have
18 the same feelings for whatever reason.

19 We have taken or plan to take a number of
20 steps to continue to strengthen other programs and to
21 improve those Ed Mroczka has mentioned in NE&O.

22 I will identify some items specific to
23 Millstone. Our focus is on a clear reporting process
24 promoting employee identification of issues and

1 corrective and timely resolution of issues with
2 appropriate feedback to employees. Some special
3 efforts to address issues that have arisen at
4 Millstone: Millstone Station Concerns Program
5 Enhancements: We recently have a new control
6 procedure, ACP-QA-1.20, which provides a road map to
7 employees for reporting problems. This procedure is a
8 user friendly road map to problem reporting. It
9 identifies the responsibility of the individual to
10 report problems and the responsibility of the
11 individual to assist and facilitate in this process.
12 This ACP covers three-part memos and getting back to
13 employees in a timely basis, which is consistent with
14 2.15. We feel that this road map will reduce the
15 number of three-part memos. We don't want to
16 eliminate them though because we do feel the
17 three-part memo does document some issues which don't
18 nicely fit into a present reporting process, and also
19 they capture things that maybe verbal between an
20 employee and a supervisor which in a day-to-day busy
21 atmosphere could get lost. So we think that the
22 three-way memo is a very important part of
23 communications.

24 A revised station posting is in place

1 which you've seen to my right which have employees'
2 rights and responsibilities regarding nuclear safety.
3 It identifies employees' rights and protection as well
4 as their responsibilities. It identifies the
5 preference for working through line management as well
6 as various other avenues open to employees to raise
7 concerns.

8 We originally, before Pete had this new
9 poster out, we originally had some posters out, about
10 a year ago, which I have some examples of, which again
11 were an evolutionary process as we worked on our
12 concerns program. In addition, a pocket size handout
13 is provided to all employees on site, in addition to
14 contractors, which focuses on nuclear safety at the
15 Millstone site. I have some examples of those which I
16 can pass around.

17 This little pamphlet talks quite a bit
18 about our safety ethic, concerns program, process for
19 problem identification and resolution, use of
20 procedures, effective communications and again,
21 responsibilities and accountability of workers at
22 Millstone.

23 You'll see towards the back part on
24 reporting of problems, it discusses the ACP 1.20,

1 which is reporting problems. And you can see from the
2 list of other ACPs that are covered under that ACP
3 that there are significant methods and why it may be
4 sometimes useful to an employee on which method to use
5 when he's reporting a problem. And we realize that
6 that may have been driving the number of three-part
7 memos up. So by giving him there a road map, it
8 should help him by identifying this procedure. You
9 have the proper corrective action that you should
10 take.

11 Certainly the supervisors are now very
12 sensitive to working with the employees if they want
13 to go through this ACP and come up with the proper way
14 to do it. In addition, the supervisor will actually
15 write the particular work order, or whatever an
16 employee wants, if he's uncomfortable doing it. I
17 think, as Ed said, we're trying to evaporate any
18 hurdles that may be there, right up to putting it down
19 on paper form.

20 MR. RUSSELL: So a satisfactory response
21 is send the three-part memo back to the employee and
22 say I entered it into the Employee Concerns Program
23 your concerned described in -- in other words, if the
24 employee doesn't know what is the right reporting

1 scheme to use, you would expect the supervisor to
2 understand that and answer back on the three-part
3 memo, maybe your item is going to be tracked in
4 accordance with particular procedure and cite that
5 procedure.

6 MR. KEENAN: Right. That's very common
7 that we would end up saying your concern has been made
8 into a nonconformance report or a maintenance request
9 to get an item repaired or that type of thing, drawing
10 change, whichever the proper one might be, so there's
11 a pretty good process right now for doing that.

12 In addition, some of the supervisory
13 skills and communication improvements which we've
14 accomplished or plan to do at this point, Section 210
15 and 10CFR50.7 training has been provided to the
16 management personnel at Millstone. As Ed mentioned,
17 this was an area where supervision has essentially no
18 experience basically due to our excellent
19 relationships with employees in the past. This
20 training was very well received by first line
21 supervisors. They were very interested, asked
22 questions. They've actually had some follow-up, they
23 would like additional training and we're presently
24 planning on providing that.

1 And all supervisory skills enhancement
2 training has been completed, which again covered
3 Section 210 and its specifics. Some of the
4 enhancements we were trying to accomplish which were
5 included in this program were managing employees and
6 documenting their performance and handling employees'
7 concerns and complaints. Again, I think this was the
8 area we were discussing before, where we were trying
9 to be much more sensitive to where an employee says
10 something and hear what he's saying and be thinking is
11 this a nuclear issue, is this a nuclear concern, what
12 response can I give back to the employee so I
13 understand his depth, his real level of concern in
14 this area. Because I think that's how in the past
15 we've not captured some of these items, where we just
16 thought it was something on passing. And at a later
17 point in time the employee says well, I told my
18 supervisor and he was real concerned about it and the
19 supervisor didn't remember it or didn't have the same
20 context of the meeting.

21 Additional specialized training in
22 conflict management is presently being planned, more
23 focus training on supervisory skills which will
24 include role playing and videotape critique. We

1 anticipate this type of training to start later this
2 year where the supervisors will actually get into some
3 one-on-one role playing to try to see if they're
4 listening and to develop their listening skills and
5 communication skills.

6 In-depth training for first line
7 supervisors and communication techniques is planned.
8 Right now we are developing a pilot program for
9 probably -- in one of the departments at Millstone,
10 and see what kind of reception and success we have
11 with it, basically the supervisor's role again in
12 facilitating communications between people.

13 Meetings between the Station Director,
14 the Senior Vice President and employees are held as
15 part of a proactive effort to improve communications
16 and working relationships. Basically, those meetings
17 would cover current topics that are under discussion,
18 what's working for the employee and what's not
19 working. And issues arising out of those meetings
20 would be basically use first line management in most
21 cases to resolve the issues.

22 The use of conflict resolution
23 specialists is being pursued in some instances. We
24 think a valuable part of the healing process between

1 the supervisor and the employee will be not blaming
2 anybody for the present conflict. We have a couple
3 issues where conflict is obviously a part of the poor
4 communications between supervisor and employee, this
5 certainly makes it very difficult to resolve nuclear
6 concerns between the two. So we feel that if we can
7 get into conflict management between these two people,
8 which is again not trying to point blame at either
9 issue but to resolve the conflicts and get on with
10 business, we'll be along the way to success. Again,
11 this is a kind of a team building atmosphere we're
12 looking for.

13 Like I said, some potential candidates
14 have been identified at this point for this type of
15 process. We actually have tried to use it with some
16 of the present Millstone employees, but it was turned
17 down basically because we had selected the individual
18 to do the conflict management, the specialist. We now
19 are negotiating who that person would be. We realize
20 that you really need input from both sides and we do
21 think that we'll be successful in attempting conflict
22 management in the near future.

23 In conclusion, numerous enhancements have
24 been made at Millstone to encourage and assist

16
1 employees to report concerns to supervision or to the
2 Nuclear Concerns Program, while assuring their access
3 to the NRC is not discouraged, with effective
4 communications and constructive relationships, we will
5 be successful. We now plan to monitor the program and
6 to make further adjustments and enhancements as
7 needed. That's all I have and I'll turn it back to Ed
8 Mroczka for conclusion.

9 MR. RUSSELL: I want to follow-up on a
10 question related to training and understanding, and
11 I'm going to put it in the context of a regulatory
12 question. 10CFR50.7 is a two-part test, one is did
13 the employee bring a safety concern forward either to
14 the NRC or to his company, and the second part is was
15 there discriminatory behavior that was engaged in
16 related to that employee. There's a causal
17 relationship that has to be established. But what I
18 want to focus on is what constitutes discriminatory
19 behavior and is there sensitivity training,
20 understanding being provided to the managers such that
21 they know and don't, through ignorance or some other
22 conflict that's going on, engage in a prohibited
23 activity?

24 MR. KEENAN: That has been a very large

1 part and that's what I think has sparked the first
2 line supervisors' interest is that they now realize
3 unintentionally they can be involved in that type of
4 activity because they just didn't understand 50.7, and
5 so that is being described to them to make sure they
6 understand what their rights are, what the employees'
7 rights are and be very sensitive to the concerns of
8 the employee and how he was treated. And it's a very
9 difficult thing, there's a fine line in a first line
10 supervisor's job. It is not easy and that's why we're
11 looking at enhancing the programs. We had already
12 looked at enhancing the first line supervisors'
13 program for sometime now, this is really an addition
14 to some of the things we were planning on doing.
15 Because the first line supervisor has a full bag of
16 tricks and this was just an additional one that they
17 were not very knowledgeable about in the past.
18 They're very interested because they realize if
19 they're not knowledgeable, they can get themselves and
20 the company in trouble. So I think that's the key to
21 our training right now.

22 MR. MROCZKA: And that training isn't
23 only a prescriptive type of training, but I think we
24 tried to sprinkle in there examples of situations to

1 give people a feel for what some of the words really
2 translate into on a day-to-day interaction process.

3 MR. RUSSELL: It's not a unique issue in
4 the context that we went through similar issues in EEO
5 training.

6 MR. MROCZKA: Exactly.

7 MR. RUSSELL: Issues associated with what
8 constitutes sexual harassment, and you certainly ought
9 to be doing case studies as a part of that training
10 and learn from errors that have been made in the past.
11 But at the same time, the NRC has a direct interest
12 and we are also quite concerned to make sure that
13 there is an open environment. We've sent you a number
14 of requests for information from you, we call them
15 "chilling effect letters," for you to describe why the
16 particular circumstances of a particular case have not
17 had a chilling effect on other employees and their
18 willingness to bring issues forward, either to the
19 company or to the NRC, because what we really need is
20 we need to make sure that the information flows. Our
21 objective is to identify safety issues and make sure
22 that there are no impediments to those issues being
23 identified.

24 MR. MROCZKA: And that's in line with our

1 objectives, so I think our mutual objectives are one
2 and the same. Whether it comes to -- there was a
3 statement made by Bernie Fox, our President, and he
4 reminded us to go back X number of years ago when the
5 company, not the nuclear area, but the company in
6 general was starting to get a lot of complaints about
7 discriminatory practices and so forth, the EEO types
8 of things that you talked about, and we went through a
9 process of adjustment. Again, the environment was
10 changing and we had to change and we had to become
11 sensitive to items that at one time was a no, never
12 mind type of situation. And with that, we went
13 through similar types of processes. And one of the
14 fundamental elements that made us successful in that
15 area was the training, the training portion, getting
16 people to understand and understand interactions and
17 the sensitivities and so forth.

18 Once we went through that process, at
19 this point Northeast Utilities is recognized as an
20 industry leader, not just in our industry, but across
21 the United States, and we have been receiving awards
22 for our sensitivities in the area of equal opportunity
23 and all those other discriminatory processes, and what
24 I firmly believe and where we're going with our

1 Nuclear Concerns Program is with some time, I expect
2 to have a quality program that would have the NRC and
3 others asking or sending or referring people that may
4 be getting into similar issues to us to see what we
5 have done because our program is extremely effective.

6 And those are the kind of things I was
7 going to say in conclusion. I think what we have is
8 sound with respect to today's environment. We know
9 it's good today, what we're doing. It may not be good
10 tomorrow because things change and we just have to
11 keep changing and trying to stay one step ahead of
12 those environmental changes so that we're in a
13 proactive mode rather than a catch-up mode. And
14 there's two real key elements, I believe, to the
15 success that we could have and that we must have. And
16 the first is right in my lap and it's my
17 responsibility and our organization's responsibility
18 and it's probably the element that's most critical and
19 that's our determination that our Nuclear Safety
20 Concerns Program will be executed vigorously and
21 effectively and that it will be a program that's
22 second to none. It just has to be that way and we're
23 committed to doing that.

24 On the other hand, there's another

1 element that we're hopeful that there can be effective
2 communication of the basic agreement that generally
3 those types of concerns that are raised with the NRC
4 in the first instance, where the people go to the NRC
5 first, will somehow flow easily into our program so
6 that we can follow up on them. And the kind of
7 approach that we seek is a protocol between the NRC
8 and ourselves such that those objectives -- there's a
9 full realization of a policy that all safety issues
10 can be presented to our management first, and that
11 with time, I hope we get the NRC, you people, to
12 become real comfortable with our program, what we're
13 doing, how we handle things so that your role can be a
14 monitoring role where we can have the initiative and
15 you will refer items to us and then be in a monitoring
16 role to see how we're progressing, our timeliness and
17 all those other things and the quality of our
18 responses back to people. And I feel that's very
19 important. I can control our part and I'm looking to
20 work with the NRC to try to insure both of us in our
21 basic goals are working very comfortably together.

22 MR. RUSSELL: I think with the second
23 point you raised that is indeed the NRC's policy. We
24 formally go through every allegation that we receive

1 and we make a judgment as to whether that is an issue
2 that should be turned over to the licensee to pursue
3 or not. And if we turn it over to the licensee, we do
4 so in a formal manner. We keep track of those. I
5 forget what the numbers are, something in excess of a
6 thousand allegations have been processed in the region
7 to date in our allegation tracking system, and you can
8 see up there, it's one of the management information
9 items that I track. And for example, now in reactors
10 through the end of February, we had 65 open
11 allegations. Many of those have multiple parts, some
12 have hundreds of individual issues within them. But
13 we do turn them over. And I think we have to make a
14 judgment based upon what we know about the program and
15 how well the program is working, and that's what I
16 really wanted to lead up to. I think the measure of
17 the program is whether the employees that you have use
18 it and how responsibly you reply to their concerns and
19 address them and how professional that process works.
20 And it's going to take a while. You get 6 or 7
21 employees that use it and they will talk to 10 other
22 employees and then it will start to move by virtue of
23 the fact of how it's being handled. It's not going to
24 be a quick process.

1 What you've described today is
2 encouraging from the standpoint of the program that
3 you've laid out. I think it is responsive at least to
4 the concerns I described to you after the SALP meeting
5 when we met in Berlin. I think it's responsive at
6 least to some of the issues that I've discussed with
7 Ed. I had him looking into some of these, but I think
8 it's going to take sometime with the process working
9 with some results and with positive feedback from your
10 own employees to other employees and that that will be
11 the real measure of how well it's working. And we're
12 frankly going to be watching it quite closely to see
13 how well that works.

14 MR. MROCZKA: The message in form 3 comes
15 out very clear to individuals that they should go to
16 their management first and when that process isn't
17 working, the corrective actions aren't proper or the
18 timeliness isn't right, then they come to the NRC.
19 Somehow in practice what I get very concerned with at
20 times is that message gets muddled. And I want to
21 insure that we're always giving that right message to
22 people so that inadvertently we don't send them a
23 wrong message and then swing the current in a
24 direction that neither of us thinks it's the proper

1 way to handle a safety issue.

2 MR. RUSSELL: At least in some of the
3 more visible cases, those which we have conducted
4 inspections on and we have made that observation in
5 the inspection report that indeed it's our
6 expectation, that's in our regulations, it's published
7 in the form 3s, and from a very practical standpoint,
8 the licensee is the individual organization that is
9 charged with the safety of the facility. They're the
10 ones that need to have the information so they can act
11 on it, and that's the basis for the requirement.

12 From a pragmatic standpoint, the NRC
13 doesn't have the resources to follow up on them, so we
14 don't have the responsibility and we don't have the
15 resources. So we want the program to work and we
16 definitely want to be in a monitoring role.

17 MR. MROCZKA: I would encourage that
18 continuing of that kind of message at all the right
19 opportunities. And on our side, we have a special
20 sensitivity to insure that while we encourage and set
21 up a program that tries to draw everyone into our
22 program, we have to be sensitive that in no way, shape
23 or form can we do anything to put any kind of a
24 barrier, suggest a barrier of going to the NRC. So

1 it's a balancing mode that we're in. And the chilling
2 effects can crop right in the other side very easily.
3 So that's why this consistent message that goes out to
4 licensee's personnel has to be always consistent,
5 otherwise we can very easily get some confusion.

6 MR. RUSSELL: Our role is one of
7 monitoring. The amount of resources we put into that
8 monitoring is directly a proportion to how well we
9 feel the program is performing. And if it feels like
10 it's being watched more closely, it's because we've
11 had concerns with how well it's been working, which is
12 why we are gathered here today discussing this.

13 MR. MROCZKA: We really appreciate the
14 opportunity to be able to come down and present our
15 program. I'm proud of it.

16 MR. RUSSELL: Good. Bill or Tim, any
17 other comment?

18 MR. MARTIN: None for now.

19 MR. KANE: No.

20 MR. RUSSELL: I would like to make sure
21 that the recorder has copies of the various documents
22 we've discussed so that we have a complete record
23 so --

24 MR. REYNOLDS: She has them.

1 MR. RUSSELL: Thank you very much. That
2 completes the meeting.

3 (Proceedings closed.)

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CORPORATE NUCLEAR POLICY

It is the policy of Northeast Utilities system companies to operate our nuclear plants in a safe and efficient manner, to meet all regulatory requirements, and to achieve INPO Benchmarks of Excellence while providing dependable, economic electrical power to our customers. We will do this by establishing clearly stated engineering and operational requirements, by providing adequate qualified staff and material resources to implement these requirements, and then ensuring that everyone does the right job right the first time in accordance with these requirements.

The Senior Vice President Nuclear Engineering and Operations is responsible for carrying out the implementation of this policy. All corporate functions shall appropriately support implementation of this policy as defined by the Senior Vice President Nuclear Engineering and Operations.

W. B. Ellis 4/11/54
W. B. Ellis Date
President and Chief
Operating Officer

2/1.54

NEO Policy Statement

NUCLEAR PLANT SAFETY

Northeast Utilities is dedicated to safe nuclear plant operation. Safe operation requires recognition of the potential radiological hazard inherent in nuclear power technology. To ensure that our plants continue to perform safely, it is essential that a safety ethic be set throughout our entire organization. A true safety ethic recognizes:

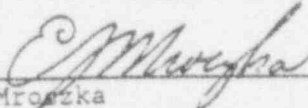
- A prevailing state of mind focusing on safety;
- An insistence on sound technical bases for actions;
- A disciplined approach to all work activities;
- Adherence to all procedures;
- A continuous, rigorous self-criticism of performance;
- Timely response to employee safety concerns.

Each NU Nuclear plant shall be operated, modified and maintained in accordance with Federal, State, Local and industry assessments and standards. NRC SALP ratings and INPO assessments and ratings are key independent measures validating that our plants are operated, modified, tested, and maintained safely. Activities affecting nuclear plant safety shall be subject to independent review by one or more of the following independent internal bodies:

- NU Quality Services Department
- Unit and Site Nuclear Review Boards
- Nuclear Safety Engineering Branch

These oversight activities do not replace line functions' responsibility to do the right job right the first time.

The overall accountability and responsibility for the safety of NU nuclear plants lies with the Senior Vice President of NEO. Specific responsibility for day-to-day operation, testing and maintenance lies with the Vice President, Nuclear Operations. The Vice President, Generation Engineering and Construction, and Vice President, Nuclear and Environmental Engineering are responsible for engineering, construction and technical support activities. These three NEO Divisions, functioning together, are responsible and accountable for nuclear plant safety.

 9-22-89

E. J. Mrozka Date
Senior Vice President
Nuclear Engineering & Operations

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Rev.: O.A
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NEO POLICY STATEMENT

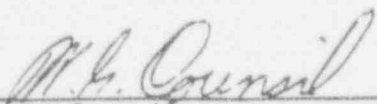
EMPLOYEE PROTECTION
(10CFR50.7)

Discrimination by Northeast Utilities System Companies or any of their contractors, or subcontractors against an employee for engaging in activities protected by the Nuclear Regulatory Commission (NRC) will not be tolerated. It is the policy of the Northeast Utilities System Companies to fully conform to the intent of Section 50.7 of Title 10 of the Code of Federal Regulations (10CFR50.7) which outlines NRC requirements and sanctions in the area of employee protection. Appropriate policies, programs, and procedures are to be established which protect all employees' rights when involved in protected activities as specified in 10CFR50.7. These protected activities are:

- o Providing the Nuclear Regulatory Commission with information about possible violations of requirements imposed under the Atomic Energy Act, the Energy Reorganization Act, or NRC regulations.
- o Requesting the Nuclear Regulatory Commission to institute action against an individual's employer for the administration or enforcement of these requirements.
- o Testifying or otherwise providing information in any Nuclear Regulatory Commission or similar governmental or administrative proceeding or investigation.
- o Providing Northeast Utilities System Companies, contractors, or subcontractors with information or participating in any proceeding or investigation regarding possible violations of the Atomic Energy Act, the Energy Reorganization Act, or NRC regulations.

Overall responsibility for assuring that employees' rights are protected lies with the Senior Vice President - Nuclear Engineering and Operations. Specific responsibility for assuring that appropriate procedures, programs, and policies are available to advise employees, contractor, and subcontractor personnel of the requirements of 10CFR50.7 rests with the Vice President - Nuclear and Environmental Engineering.

Revisions of, additions to, and audits verifying compliance with this policy are the responsibility of the Vice President - Nuclear and Environmental Engineering. Final approval of all revisions or additions to policy statements rests with the Senior Vice President - Nuclear Engineering and Operations.



W. G. Council
Senior Vice President
Nuclear Engineering and Operations

NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.15

NUCLEAR SAFETY CONCERNS PROGRAM

CONCURRENCE

Peter J. Santoro
Director, Nuclear Safety Concerns Program

CONCURRENCE

N/A
Director, Quality Services Department

APPROVED

J. M. M... 3-21-90
Senior Vice President, Date
Nuclear Engineering and Operations

REVISION

6

EFFECTIVE DATE

April 20, 1990

NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.75

NUCLEAR SAFETY CONCERNS PROGRAM

CONCURRENCE

Peter J. Santoro
Director, Nuclear Safety Concerns Program

CONCURRENCE

N/A
Director, Quality Services Department

APPROVED

J. M. Murphy 3-21-90
Senior Vice President, Date
Nuclear Engineering and Operations

REVISION

6

EFFECTIVE DATE

April 20, 1990

NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.15

NUCLEAR SAFETY CONCERNS PROGRAM

CONCURRENCE

Peter J. Santoro
Director, Nuclear Safety Concerns Program

CONCURRENCE

N/A
Director, Quality Services Department

APPROVED

J. M. Moryka 3-21-90
Senior Vice President, Date
Nuclear Engineering and Operations

REVISION

6

EFFECTIVE DATE

April 20, 1990

NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.15

NUCLEAR SAFETY CONCERNS PROGRAM

CONCURRENCE

Peter J. Santoro
Director, Nuclear Safety Concerns Program

CONCURRENCE

N/A
Director, Quality Services Department

APPROVED

C. J. M. [Signature] 3-21-90
Senior Vice President, Date
Nuclear Engineering and Operations

REVISION

6

EFFECTIVE DATE

April 20, 1990

NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.15

NUCLEAR SAFETY CONCERNS PROGRAM

1.0 PURPOSE

This procedure describes the options available to all personnel working at Northeast Utilities nuclear facilities for communicating their Nuclear Safety Concerns (NSC). In return for their proactive support of Nuclear Engineering and Operations (NEO) safety ethic, they can expect feedback and positive resolution without fear of discrimination or discharge by Northeast Utilities.

Protection from discrimination or discharge is given in NEO Policy Statement No. 22.

Lower tier procedures are not allowed (except that CYAPCO and NNECO may implement this procedure verbatim as an administrative procedure).

The evaluation and response mechanism must be supportive of an individual's right to raise a NSC and address the reply accordingly as this procedure is implemented.

2.0 APPLICABILITY

The Nuclear Engineering and Operations Group (NEO), including the Northeast Nuclear Energy Company and the Connecticut Yankee Atomic Power Company, supporting organizations within NU, and all other personnel (including contractor personnel) working at Northeast Utilities Service Company, Connecticut Yankee, or Millstone Station.

Those nuclear issues which are routinely handled through interactions between employees, professional staff, and supervision are most beneficially and expeditiously pursued in that manner. All personnel are encouraged to continue and expand these lines of communication.

3.0 REFERENCES

3.1 Source Documents

3.1.1 NEO Policy Statement No. 1, "Nuclear Plant Safety."

3.1.2 NEO Policy Statement No. 22, "Employee Protection."

3.2 Supporting Documents

3.2.1 NUP 23, "Employee Grievances and Complaints."

3.2.2 NEO 2.01, "Reporting of Defects and Noncompliances."

4.0 DEFINITIONS

4.1 Acronyms Used In This Procedure

NEO	-	Nuclear Engineering and Operations
NRC	-	Nuclear Regulatory Commission
NRT	-	Nuclear Review Team
NSC	-	Nuclear Safety Concern(s)
NSCP	-	NSC Program
NU	-	Northeast Utilities
NUP	-	Northeast Utilities Personnel Policies and Procedures
NUPOC	-	Nuclear Plant Operating Companies



4.2 Northeast Utilities Nuclear Review Team - A team of nuclear consultants retained by Northeast Utilities to address employee concerns on nuclear matters. The NU Nuclear Review Team is led by nuclear specialist Mr. Charles Rice, whose biography is provided in Attachment 8.A.

4.3 NSC - Events or observations dealing with nuclear or radiological safety which an individual believes violates regulatory requirements or NU policy or procedure, and:



- Falls outside the scope of our formal reporting mechanisms (e.g., Nonconformance Reports, Plant Incident/Information Reports, Drawing Change Requests, etc.),

or

- Is or has not been adequately addressed by the formal reporting mechanisms,

or

- Is not being addressed in a timely fashion through the formal reporting mechanisms.




5.0 RESPONSIBILITIES

5.1 Northeast Utilities Management

5.1.1 Address and resolve NSC in a manner that will protect the health and safety of the public and personnel working at NU nuclear facilities without intimidation or harassment to individuals raising NSC.


5.1.2 Ensure NRC Form 3 is posted.



- 5.1.3 Maintain appropriate documentation in confidential files.
- 5.1.4 Respond to requests for evaluations forwarded by the NSCP.
- 5.2 Director, NSC Program 
 - 5.2.1 Maintains this procedure current.
 - 5.2.2 Provides the first point contact for employee's NSC which they choose not to communicate to their direct chain of command.
 - 5.2.3 Assures prompt identification, tracking, evaluation, feedback and resolution of all NSC which are brought to the NSC Program.
- 5.3 Nuclear Review Board - Address and resolve NSC, as requested.
- 5.4 Northeast Utilities Nuclear Review Team - Address and resolve NSC, as requested.
- 5.5 Supervisors - Address and resolve all NSC as requested. 
- 5.6 Individual - Each individual (including contractor personnel) working at a nuclear facility, on a project that will be used on a nuclear facility, or involved in any way with the delivery of products or services to a nuclear facility has an obligation and a responsibility to report NSC.
- 5.7 Purchasing Department - Specify requirements for compliance with appropriate government regulations and NU Policies in purchase orders.
- 5.8 NU Contractor Managers - Ensure that the requirements of contracts for nuclear work extend the requirements and protection of this procedure to all personnel directly employed by NU vendors/contractors and subvendors/subcontractors to perform nuclear work. 

6.0 INSTRUCTIONS

The sequence of primary actions, and the personnel responsible for them is normally provided in a flowchart in Section 7.0. However, the scope and activity of this procedure is limited and, therefore, a flowchart is not considered necessary.

As a matter of NU policy in the safe operation of its nuclear facilities and in keeping with the NRC's preference as stated on Form 3 (Attachment 8.B), "If you believe that violations of NRC rules or of the terms of the license have occurred, you should report them immediately to your supervisor." Supervision will 

assess the sensitivity and the need for confidentiality regarding the individual's identity.



An individual can confidentially report their NSC to NU using the NSCP. This assures that NU can take timely action to address the issue raised and that the health and safety of the general public will be protected. Whenever individuals desire to maintain their identity confidential, they may request this when communicating their NSC. As appropriate, arrangements can and will be made to further protect the identity of an individual by the use of a code name, an NSCP identification number, response to a post office box, or other means. The objective is to ensure that NU is aware of the NSC which might affect its facilities and to protect the individual who has the concern.

If a concern is not, or cannot be, addressed by internal communication, an individual can also report the concern to the NRC. If an individual chooses to report a NSC directly to the NRC, they are requested to also inform NU of this action on a concurrent basis by reporting it to NU via their direct supervisor.

Sections 6.1 to 6.4, which follow, describe the various options available to individuals for communicating their NSC.

6.1 Communication With NEO and NU Management

- 6.1.1 The preferred first point of contact for an individual to identify a NSC should be with their immediate supervisor. Once the individual identifies an NSC, they should meet with their supervisor immediately and review the concern by providing written details and supporting documentation, whenever possible.
- 6.1.2 The supervisor shall transmit a written version of the NSC and all supporting and known relevant documents to the next levels of line management, through Director, and to the appropriate NUPOC Director.
- 6.1.3 The appropriate NUPOC and NEO functional management will assure all relevant tracking mechanisms required by procedures are in place and that evaluation of reportability requirements has begun.
- 6.1.4 The appropriate NUPOC and NEO functional management will assess the impact of the concern, assign resources, and set a plan in motion to evaluate and resolve the NSC, consistent with the severity of the concern.
- 6.1.5 Results of the evaluation and any corrective actions required shall be provided to the

appropriate NUPOC Director, NEO's Senior Vice President, and Division Vice Presidents.



- 6.1.6 During the course of evaluating the NSC, the supervisor shall maintain open communications with the individual until the NSC is resolved.
- 6.1.7 The supervisor shall provide the results of the preliminary evaluation in writing to the individual within 14 calendar days of receiving the NSC. For those cases where the preliminary evaluation resolves the individual's NSC, no further actions will be required. If the preliminary evaluation cannot be completed within 14 days or if the preliminary evaluation does not completely resolve the concern, the supervisor shall inform the individual of an action plan.
- 6.1.8 In the event the individual is not satisfied with the progress or the results of the NSC evaluation, the individual may, at any time, pursue any of the following:
 - 6.1.8.1 Communicate their concern up through successively higher levels of NEO management and, if needed, on to NU's most senior levels (Section 6.1.9).
 - 6.1.8.2 Communicate their concern to NEO's Director, NSC Program (Section 6.2).
 - 6.1.8.3 Communicate their concern to the NU Nuclear Review Team (Section 6.3).
 - 6.1.8.4 Communicate their concern to the Nuclear Regulatory Commission (Section 6.4).
- 6.1.9 If the individual desires, for whatever reason, they can communicate their NSC to successively higher levels of NEO and Station Management. See Attachment 8.C.
- 6.1.10 For those cases where the individual chooses to appeal their NSC to the NEO Vice President level, these referrals shall be accomplished in writing, immediately. The NEO Vice Presidents shall acknowledge in writing the receipt of the appeal within five (5) working days.

6.2 Communication with NEO's NSC Program

For those unique cases when an employee chooses not to communicate their NSC with their management chain-of-command, they can contact the Director, NSC Program, confidentially and

that office will pursue the identification, evaluation, tracking, feedback, and resolution of the concern.

6.2.1 The NSCP Director will immediately notify the NEO Senior Vice President of the NSC without disclosing the individual's identity.

6.2.2 The NSCP will work with the appropriate NUPOC and NEO management to evaluate all NSC. When requested, the origin of a NSC will be maintained strictly confidential.

6.2.3 Documentation pertaining to the individual's identification will be maintained as confidential. Files will not be disclosed to anyone except to the extent that further disclosure to a federal or state agency may be required, or to the extent that further disclosure may be required during the course of a legal proceeding.

6.2.4 Corrective action documents shall be prepared to resolve valid NSC. Where appropriate, the NEO Senior Vice President shall review corrective action plans, if any, before implementation.

6.2.5 Notification of the final resolution of a NSC will be provided to the individual identifying the concern, if possible.

6.2.6 Contact with the NSCP can be made as follows:

6.2.6.1 Direct NU System Dialing

Millstone Extension 4349
Connecticut Yankee Extension 276
Berlin Extension 3754

6.2.6.2 USA Toll Free Dialing

1-800-282-SAFE (7233)

6.2.6.3 In the event that NSCP Director or Representative are unavailable to personally answer telephone calls, a recorded message can be left. Messages left should include at least the following:

A brief description of the NSC, how and when the NSCP can reach you, and, if you so desire, your name. These messages can only be accessed by the NSCP.

- 6.2.6.4 Written correspondence identifying a NSC can be mailed to:

Northeast Utilities
NSC Program
P.O. Box 525
East Lyme, CT 06333

OR

inserting the correspondence in NSCP drop-boxes placed at multiple locations at Millstone, Connecticut Yankee, and Berlin.

- 6.2.6.5 Individuals can feel free to visit the NSCP with or without an appointment and trust that their confidentiality and anonymity will be honored when requested. The NSCP can be reached by taking Exit 71 (Four Mile River Road) off Rte. 95. The offices are located in Four Mile River Road Industrial Park, Building No. 10, second floor.

- 6.2.6.6 The NSCP hours are 7:30 a.m. to 4:30 p.m. Monday to Friday. Extended office hours are available on Wednesday evening until 8:00 p.m. Special meeting times can be arranged by appointment.

6.3 Communication with NU's Nuclear Review Team

The NU Nuclear Review Team can be contacted to review NSC while maintaining the individual's identity strictly confidential.

- 6.3.1 The NU Nuclear Review Team can be contacted via:

Mr. Charles Rice
355 West 14th Street
Idaho Falls, ID 83042
Phone, collect: (208) 522-4955

- 6.3.2 The results of the NU Nuclear Review Team assessment will be discussed with the originating individual.
- 6.3.3 NU executive management will consider the recommendations of the NU Nuclear Review Team and will implement any measures determined to be necessary and appropriate to prevent recurrence.

6.4 Communicating with the NRC

As stated in NRC Form 3 (Attachment 8.B), "If you believe that violations of NRC rules or of the terms of the license have occurred, you should report them immediately to your supervisor."

6.4.1 The individual may communicate directly with the NRC, per 10CFR19, by contacting or meeting with any of the following:


6.4.1.1 NRC Resident Inspectors at: Millstone Station-Plant extension 5394 and Connecticut Yankee Station-Plant extension 326

6.4.1.2 NRC Region I Office
475 Allendale Road
King of Prussia, PA 19406
Phone, collect: (215) 337-5000, night or day

6.4.1.3 Director of Enforcement
Phone, collect: (301) 492-7000

6.4.2 When contacting the NRC, an individual may request strict confidentiality (except to the extent that further disclosure may be required by law).

6.5 Employee Protection

As a matter of Corporate Policy, NU supervision and management shall not discriminate against an individual for the reason that he/she was involved in the activities identified in Sections 6.0 - 6.6. Discrimination includes discharge and other actions that relate to pay, promotion, performance reviews, and terms, conditions, and privileges of employment. 

NU management shall ensure that the current version of NRC Form 3 (Attachment 8.B) is posted in such a manner as to be clearly visible to individuals on their way to and from work areas.

6.6 Contract Personnel

To ensure that the protection and requirements described in this procedure are also extended to contract personnel:

6.6.1 Purchasing shall ensure that purchase orders for nuclear services specify that appropriate governmental regulations and NU Policies relating to reporting NS₂ and employee protection apply and are to be conformed to by the contractor(s). They will

instruct each contractor that all work must be done in strict adherence to NU's Safety Ethic (Reference 3.1.1) and that the contractor is obliged to promptly advise NU of any individual's concern brought to them or filed with a government agency or court in connection with work performed for one of NU's licensed facilities.

6.6.2 NU management responsible for overseeing the work of the contractor(s) shall ensure that contractor management is aware of the requirements as stated in the purchase order.

6.6.3 The contractor will designate a person responsible for on-site compliance with this provision. This person will interface with the NU person responsible for the purchase order on a regular basis, to insure compliance with the provisions of this procedure.

6.7 Confidentiality

Documentation pertaining to the identity of individuals raising NSC shall be maintained in locked confidential files with limited access.

7.0 FIGURES

None

8.0 ATTACHMENTS

<u>Attachment No.</u>	<u>Attachment Title</u>
8.A	Biography of the NU Nuclear Review Team Leader.
8.B	NRC Form 3, "Notice to Employees."
8.C	Management Directory for Nuclear Safety Concerns
8.D	Major Changes from Previous Revision. (<u>Rev. 5</u> updated to <u>Rev. 6.</u>)



ATTACHMENT 8.A

BIOGRAPHY OF THE NU NUCLEAR REVIEW TEAM LEADER

Charles M. Rice

Founder, former president and chairman of Energy Incorporated, Mr. Rice is a nuclear engineer who has acted as a consultant to nuclear utilities, state agencies, industrial firms, and federal contractors in the areas of reactor safety, radioactive waste management, energy alternatives, and both general and program management. He has been head of the Atomic Power Engineering Group and manager for the Army Gas Cooled Reactor system program and the AEC/NASA NERVA nuclear rocket development program. Mr. Rice has also served as president and general manager of the Idaho Nuclear Corporation and the Aerojet Nuclear Company with responsibility for management of the National Reactor Testing Station.

UNITED STATES NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION (PART 20); NOTICES, INSTRUCTIONS AND REPORTS TO WORKERS; INSPECTIONS (PART 19); EMPLOYEE PROTECTION



WHAT IS THE NUCLEAR REGULATORY COMMISSION?

The Nuclear Regulatory Commission is an independent Federal regulatory agency responsible for licensing and inspecting nuclear power plants and other commercial users of radioactive materials.

WHAT DOES THE NRC DO?

The NRC's primary responsibility is to ensure that workers and the public are protected from unnecessary or excessive exposure to radiation and that nuclear facilities including power plants are constructed to high quality standards and operated in a safe manner. The NRC does this by establishing requirements in Title 10 of the Code of Federal Regulations (10 CFR) and in licenses issued to nuclear users.

WHAT RESPONSIBILITY DOES MY EMPLOYER HAVE?

Any company that conducts activities licensed by the NRC must comply with the NRC's requirements. If a company violates NRC requirements, it can be fined or have its license modified, suspended or revoked.

Your employer must tell you which NRC radiation requirements apply to your work and must post NRC Notices of Violation involving radiological working conditions.

WHAT IS MY RESPONSIBILITY?

For your own protection and the protection of your co-workers, you should know how NRC requirements relate to your work and should obey them. If you observe violations of the requirements, you should report them.

HOW DO I REPORT VIOLATIONS?

If you believe that violations of NRC rules or of the terms of the license have occurred, you should report them immediately to your supervisor. If you believe that adequate corrective action is not being taken, you may report this to an NRC Inspector at the nearest NRC Regional Office.

WHAT IF I WORK IN A RADIATION AREA?

If you work with radioactive materials or in a radiation (conspicuous) area, the amount of radiation exposure that you may legally receive is limited by the NRC. The limits on your exposure are contained in sections 20.101, 20.103 and 20.104 of Title 10 of the Code of Federal Regulations (10 CFR 20). While these are the maximum allowable limits, your employer should also keep your radiation exposure as far below these limits as is "reasonably achievable."

MAY I GET A RECORD OF MY RADIATION EXPOSURE?

Yes. Your employer is required to tell you, in writing, if you receive any radiation exposure above the limits set in the NRC regulations or your employer's license. In addition, if your job involves radiation, you may request from your employer a record of your annual radiation exposures and a written report of your total exposure when you leave your job.

HOW ARE VIOLATIONS OF NRC REQUIREMENTS IDENTIFIED?

NRC conducts regular inspections at licensed facilities to assure compliance with NRC requirements. In addition, your employer and site contractors conduct their own inspections to assure compliance. All inspections are protected by Federal law. Interference with them may result in criminal prosecution for a Federal offense.

MAY I TALK WITH AN NRC INSPECTOR?

Yes. Your employer may not prevent you from talking with an NRC Inspector and you may talk privately with an Inspector and request that your identity remain confidential.

MAY I REQUEST AN INSPECTION?

If you believe that your employer has not corrected violations involving radiological

WHAT FORMS OF DISCRIMINATION ARE PROHIBITED?

No employer may fire you or discriminate against you with respect to pay, benefits, or working conditions because you help the NRC.

HOW DO I CONTACT THE NRC?

Notify an NRC Inspector on-site or call the nearest NRC Regional office collect. NRC Inspectors want to talk to you if you are worried about radiation safety or other aspects of licensed activities, such as the quality of construction or operations at your plant.

CAN I BE FIRED FOR TALKING TO THE NRC?

No. Federal law prohibits an employer from firing or otherwise discriminating against a worker for bringing safety concerns to the attention of the NRC. You may not be fired or discriminated against because you:

- ask the NRC to enforce its rules against your employer;
- testify in an NRC proceeding;
- provide information or are about to provide information to the NRC about violations of requirements;
- are about to sue for or testify, help, or take part in an NRC proceeding.

WHAT CAN THE LABOR DEPARTMENT DO?

The Department of Labor will verify the employer that a complaint has been filed and will investigate the case.

HOW AM I PROTECTED FROM DISCRIMINATION?

If you believe that you have been discriminated against for bringing safety concerns to the NRC, you may file a complaint with the U.S. Department of Labor. Your complaint must describe the firing or discrimination and must be filed within 30 days of the occurrence.

WHAT WILL THE NRC DO?

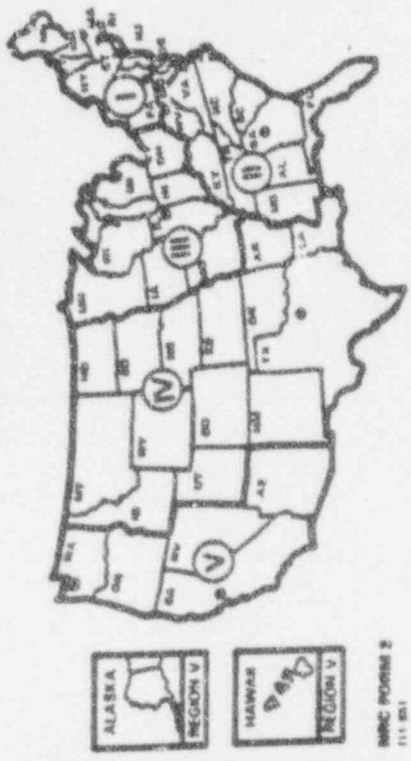
The NRC may seek the Department of Labor in its investigation. NRC may conduct its own investigation where necessary to determine whether unlawful discrimination has presented the true face of action to the Commission. Also, if the NRC or Department of Labor finds that unlawful discrimination has occurred, the NRC may issue a Notice of Violation to your employer, impose a fine, or suspend, modify, or revoke your employer's NRC license.

UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONAL OFFICE LOCATIONS

A representative of the Nuclear Regulatory Commission can be contacted at the following addresses and telephone numbers. The Regional Offices will accept collect telephone calls from employees who wish to register complaints or concerns about radiological working conditions or other matters regarding compliance with Commission rules and regulations.

Regional Offices

REGION	ADDRESS	TELEPHONE
I	U.S. Nuclear Regulatory Commission Region I Nuclear 1 831 Park Avenue King of Prussia, PA 19609	215 337-5000
II	U.S. Nuclear Regulatory Commission Region II Nuclear 11 101 Mulberry St., N.W. Atlanta, GA 30333	404 331-4603
III	U.S. Nuclear Regulatory Commission Region III 799 Riverchase Road Glen Echo, IL 60137	312 750-5500
IV	U.S. Nuclear Regulatory Commission Region IV 811 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011	817 860-8100
V	U.S. Nuclear Regulatory Commission Region V 1450 Mark Lane, Suite 210 Westport, CA 94098	415 943-3700



Attachment 8.C

Management Directory for Nuclear Safety Concerns

CY Station Management

Nuclear Station Director - (203) 267-3690, plant extension 690
Nuclear Unit Director - (203) 267-3392, plant extension 392
Nuclear Services Director - (203) 267-3393, plant extension 393

Millstone Station Management

Nuclear Station Director - (203) 444-4300, plant extension 4300
Nuclear Unit Director - Unit 1 - (203) 444-4301, plant extension 4301
Nuclear Unit Director - Unit 2 - (203) 444-4302, plant extension 4302
Nuclear Unit Director - Unit 3 - (203) 444-4303, plant extension 4303
Station Services Director - (203) 444-4304, plant extension 4304
Site Services Director - (203) 444-4305, plant extension 4305

NEO Vice Presidents

Vice President Nuclear Operations - (203) 665-3528
Vice President Nuclear & Environmental Engineering - (203) 665-3758
Vice President Generation Engineering & Construction - (203) 665-3521
Senior Vice President Nuclear Engineering & Operations - (203) 665-5217

NEO Directors

Director Generation Engineering & Design - (203) 665-5441, Berlin extension 5441
Director Environmental Programs - (203) 665-4620, Berlin extension 4620
Director Nuclear Engineering and Operations Services - (203) 665-3885, Berlin extension 3885
Director Nuclear Engineering - (203) 665-5519, Berlin extension 5519
Director Nuclear Training - (203) 437-2600, Training Center 2600
Director Quality Services - (203) 665-5447, Berlin extension 5447

Attachment 8.D

MAJOR CHANGES FROM PREVIOUS REVISION
(Revision 5 Updated to Revision 6)

Change Number	Correspondence No.	Correspondence Subject	Section No. Affected	Description of Change
	Sender/Receiver Date			
11		Enhancements to overall procedure to incorporate elements of Nuclear Safety Concerns Program	<u>Changed title</u> <u>Changed RI</u> <u>Sections</u> 1.0, 2.0, 3.2, 4.1, 4.3, 5.1, 5.2, 5.5, 5.8, 6.0, 6.1, 6.2, 6.5, Attach. 8.C (New)	Revision 6 incorporates enhancements announced in E.J. Mroczka's Dec. 4, 1989 memo NEO 89-G-828

NORTHEAST UTILITIES



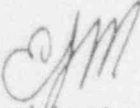
THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

M
E
M
O

December 4, 1989

NEO-89-G-828

TO: Nuclear Engineering and
Operations Personnel

FROM: E. J. Mroczka 
Senior Vice President

SUBJECT: Nuclear Safety Concerns Program

A critical element of NU's nuclear safety program is NE&O's nuclear team. As a member of that team, each of you has an obligation and responsibility to report nuclear concerns that you may have. Our corporate goal is to ensure that there are no nuclear concerns that escape our attention and that all such concerns are addressed promptly and positively.

We have established a Nuclear Safety Concerns ("NSC") Program so that if any NE&O employee wishes to raise concerns outside the normal chain-of-command, then he or she may do so.

We are always interested in making changes to NE&O programs or procedures if greater efficiency or other improvements can be accomplished. In that spirit, we are in the process of intensifying our NSC Program in the following manner:

1. We will assign a single point of contact within NE&O, who will handle all nuclear safety concerns raised outside the normal chain-of-command. We have appointed Mr. Peter Santoro to the new position of Director, Nuclear Safety Concerns Program. The effective date of this appointment is January 1, 1990. Attached for your information is a copy of Peter's People Profile.
2. In his new position, Mr. Santoro will report directly to me. This direct access to NU's senior nuclear officer will assure that nuclear concerns handled by Mr. Santoro will receive the prompt attention of senior management.

NORTHEAST UTILITIES



THE CONNECTICUT
WESTERN MASSACHUSETTS
HOLYOKE WATER
NORTHEAST UTILITIES
NORTHEAST NUCLEAR

PETER F. SANTORO
U78 GENERATION ENGINEERING
MP GENERATION PROJ-MILLSTONE
01 NORTHEAST UTILITIES SERVICE CC

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M
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December 12, 1989

RECEIVED

DEC 22 1989

ION PROJECT

TO: Nuclear Engineering and Operations Personnel

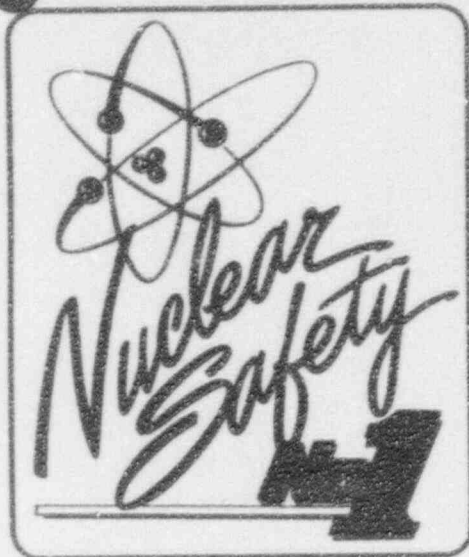
FROM: W. B. Ellis *W. B. Ellis*

SUBJECT: Nuclear Safety Concerns Program

Each of you should have received a copy of Ed Mroczka's December 4, 1989 memorandum announcing a substantial expansion and enhancement of our Nuclear Safety Concerns (NSC) Program. I want to emphasize that these important changes to the NSC Program have my full support and the full support of NU's senior management. Your company places great importance on maintaining an environment in the workplace in which all employees are encouraged to contribute information bearing on any aspect of nuclear safety. The appointment of Peter Santoro as Director of the NSC Program reflects our strong commitment to this objective.

I encourage you to work through your line management first in resolving problems. However, if that approach does not work for you, please take advantage of the NSC Program.

With your help, our excellent record of safe nuclear operations will continue to stand at the forefront of the nuclear industry.



Northeast Utilities

NUCLEAR SAFETY CONCERNS PROGRAM

CYAPCO • NNECO • NUSCO

Our corporate goal is to ensure that there are no nuclear safety concerns that escape our attention and that all such concerns are addressed promptly and positively.

You are encouraged to work through your line management first in resolving problems. However, if that approach does not work for you, please take advantage of the Nuclear Safety Concerns Program Office by one of the following methods:

- **Direct NU System Dialing**
Millstone Extension 4349
Connecticut Yankee Extension 276
Berlin Extension 3754
- **USA Toll Free Dialing**
1-800-282-SAFE (7233)
- Mailing your written nuclear safety concern to:

Nuclear Safety Concerns Program Office
P.O. Box 525
East Lyme, CT 06333


- Placing your written nuclear safety concern in the Nuclear Safety Concerns Program Office drop boxes.
- Visiting the Nuclear Safety Concerns Program Office with or without an appointment. The Nuclear Safety Concerns Program Office can be reached by taking Exit 71 (Four Mile River Road) off Rte. 95. The offices are located in the Four Mile River Road Industrial Park, Building No. 10, second floor.

Your confidentiality and anonymity, when requested, will be honored by the Nuclear Safety Concerns Program Office.

In raising nuclear safety concerns, employees are fully protected by law against harassment and discharge from their jobs.

With your help, our excellent record of safe nuclear operations will continue to stand at the forefront of the nuclear industry.

Thank you,



E.J. Mroczka

Senior Vice President,

Nuclear Engineering & Operations

Enhanced NUCLEAR SAFETY CONCERNS PROGRAM Debuts

On January 1, 1990, one of Nuclear Engineering and Operations' (NE&O) most important programs, the Nuclear Safety Concerns Program, took an important step forward with the establishment of the new position of director of Nuclear Safety Concerns. Peter F. Santoro, formerly director of the Generation Projects Department, was named to fill the position. In this position, Santoro reports directly to Edward J. Mroczka, senior vice president, NE&O.

NU has always encouraged employees to bring forth nuclear safety concerns. The Nuclear Safety Concerns program has undergone many evolutions over the years, but the primary means of addressing concerns has been, and remains, for employees to bring their concerns to their direct supervisor. If an issue is not resolved at that level, it can be brought to successively higher levels of management, up to the company's most senior levels. In addition, the concern can be brought to LRS, an independent consulting group, or to the Nuclear Regulatory Commission.

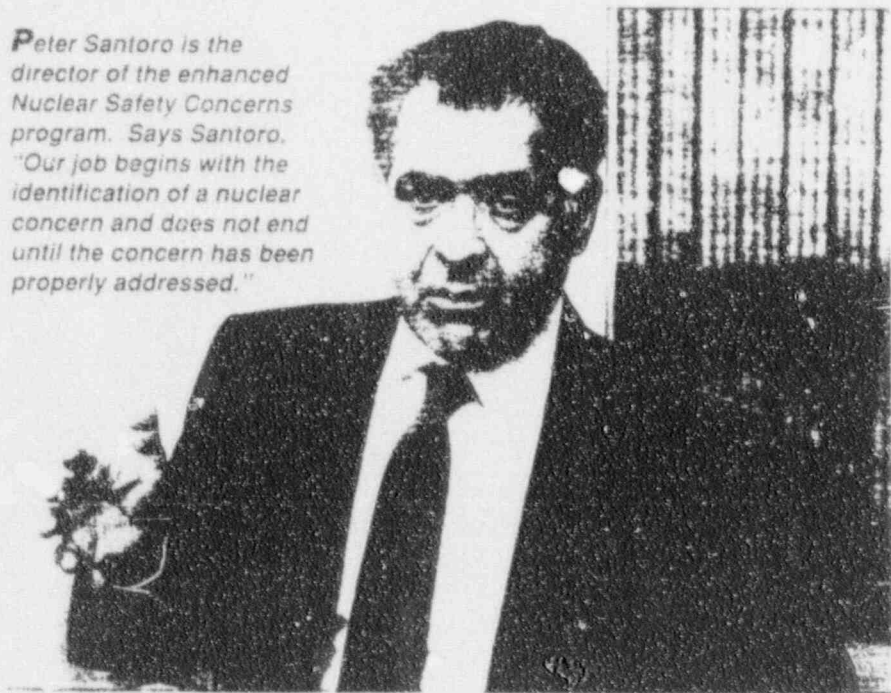
The enhanced Nuclear Safety Concerns program provides another direct link between NU employees and contractors and their senior management for those cases where the employee, for whatever reason, feels uncomfortable using the management chain of command. The program provides a means of anonymously bringing concerns about

nuclear safety to an NU management representative who is dedicated solely to handling such issues, and is independent of NE&O's functional line management.

"We have earned an international reputation for nuclear safety and operational excellence," said John F. Opeka, executive vice president for Engineering and Operations. "Our employees quite properly expect the company to be responsive toward employee concerns about nuclear safety."

In 1985, as the construction of Millstone 3 wound down, NU supplemented the traditional "chain-of-command" program by appointing a Nuclear Concerns manager to act as a point of contact, independent of the normal reporting chain, for employees with nuclear safety concerns. In addition, a toll-free phone number was established for employees to report concerns anonymously, if they so desired.

Peter Santoro is the director of the enhanced Nuclear Safety Concerns program. Says Santoro, "Our job begins with the identification of a nuclear concern and does not end until the concern has been properly addressed."



Connecticut Yankee

Millstone complex

Making A Good Program Even Better

"Each of these programs reflected the operating environment of its time, and each worked well," said NU president Bernard M. Fox. "There has been a growing feeling, however, that in today's world, we can and should do even more. We are now trying to make a good program even better. This new program is a logical evolution in our efforts to be more responsive to the nuclear safety concerns of our employees."

The new Nuclear Safety Concerns program, like its predecessors, is designed to

Information

The Nuclear Safety Concerns office will be located at the Four Mile River Road Industrial Park in Old Lyme, off Exit 71 from Interstate 95. The office is open from 7:30 a.m. to 4:30 p.m., Monday through Friday. Extended office hours will be available on Wednesday evenings until 8:00 p.m. Employees can reach the Nuclear Safety Concerns Program office by calling one of several telephone numbers:

Direct NU System Dialing

From Millstone	Extension 4349
From Connecticut Yankee	Extension 276
From Berlin/Rocky Hill	Extension 3754

Toll Free Dialing (7 days/week—24 hours/day)
1-800-282-SAFE (7233)

Employees can submit their concerns in writing by using Nuclear Safety Concerns program "drop boxes," which will be placed in strategic locations at Millstone, Connecticut Yankee, and Berlin, or by using the following address: Nuclear Safety Concerns Program Office, P.O. Box 525, East Lyme, CT 06333. Employees also can feel free to walk in without an appointment. "We've designed the program office setting to be a comfortable place where people are away from their job sites. Our goal is to get results, so we are making things as easy as possible for employees. We are determined to make our program highly effective so that it will have a real impact in improving communications and seeing that every safety concern is promptly addressed," said Santoro.

ensure that every concern is fully evaluated and resolved. The new effort includes a private, off-site location and an NU representative who is independent from the normal plant or corporate management chains.

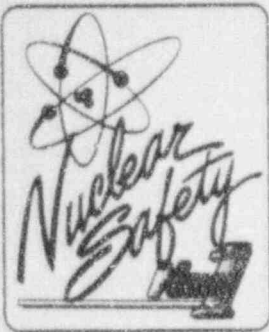
"Our safety ethic is the heart of our nuclear operations," said Mroczka. "We take great pride in our ability to operate our nuclear power plants safely. Part of this ethic is recognizing that there may be times when employees feel that not enough is being done in certain areas. This program will give employees the assurances they need to bring any nuclear safety matter to management's attention."

Santoro says the program is designed to complement the normal management chain of command. "Our enhanced program recognizes that in certain instances, such as those involving personality conflicts or other sensitivities, the normal means of communicating nuclear safety concerns may not be enough. We are providing a private, informal, off-site location for employees to bring forward their nuclear safety concerns. We will then make sure the issue is fully heard by the appropriate parties. When requested, the identity of the individual raising the concern will be kept confidential. Concerns may be expressed anonymously if so desired. Our job begins with the identification of a nuclear concern and does not end until the concern has been properly addressed."

The Nuclear Safety Concerns Program will operate with two primary objectives:

- ▶ To assure timely resolution of nuclear safety concerns that are not resolved by the normal chain of command.
- ▶ To bring visibility and a proactive stance to the existing program by providing a single point focus for the timely resolution of nuclear safety concerns.

—Louis J. Keezing



February 27, 1990
NEO-90-G-071

TO: NE&O Personnel

FROM: E. J. Mroczka *E. J. Mroczka*
Senior Vice President
Nuclear Engineering and Operations
Berlin Ext. 5217

SUBJECT: Nuclear Safety Concerns Program - Status

As part of NE&O's continuing interest in improving communications, I'm taking this opportunity to update you on the status of our Nuclear Safety Concerns Program since the initial announcements made in December 1989 by Bill Ellis and myself.

Some key events coming your way are:

- o On February 26, 1990 the direct dial telephone concerns lines

Berlin/Rocky Hill ext. 3754
CY ext. 276
Millstone ext. 4349

were transferred to our new Nuclear Safety Concerns Program Director, Peter F. Santoro. For your convenience we've retained the same direct dial numbers where possible. Also, a USA toll free number 1-800-282-SAFE (7233) is available for your use. In the event our Nuclear Safety Concerns Program staff are unavailable to answer your call, you can leave a recorded message.

- o Around March 1, 1990, Nuclear Safety Concerns Program posters will be placed throughout NE&O's facilities adjacent to the NRC Form-3 notices that cover 10CFR Parts 19 and 21. These posters will contain the details on the location of the Nuclear Safety Concerns Program office and on how to contact your Nuclear Safety Concerns Program representatives.

These posters will be readily recognizable by the yellow logo that states Nuclear Safety is Number 1 as seen on this correspondence.

- o Our new Nuclear Safety Concerns Program office is located on the second floor of Building No. 10 of the Four Mile River Road Industrial Park in Old Lyme, CT, take Exit 71 off Route 95. The current office hours are from 7:30 a.m. to 4:30 p.m. Monday to Friday. Your visits are welcomed with and without scheduled appointments.
- o Exit interviews of all NE&O employees who transfer within the NU system to non-nuclear positions or leave the company are now required as part of the enhanced Nuclear Safety Concerns Program. These interviews are in addition to those required by NU's HRG. It's the employee's Supervisor's responsibility to schedule these exit interviews by calling Ms. Sandra Turbyfill at Millstone extension 4370.

Here's an advance look at future enhancements to our Nuclear Safety Concerns Program:

- o Special locked drop-boxes will be located throughout our NE&O facilities and contain forms to convey your nuclear safety concerns confidentially or anonymously. Only Nuclear Safety Concerns Program representatives will have access to these locked drop-boxes.
- o Evening office hours on Wednesdays will begin once our private entrance to the second floor of Building No. 10 is completed. At the time we announce our private entrance is completed, we will begin the Wednesday schedule 7:30 a.m. until 8:00 p.m. Please note that until our private entrance is completed, access to the Nuclear Safety Concerns Program office is via the A&H Office Supply show-room, the lower level of Building No. 10.
- o An orientation program for all NE&O employees on both the intent and the operation of the Nuclear Safety Concerns Program is scheduled for the spring of 1990. Multiple presentations will be scheduled to accommodate your attendance.

Your continuing interest and support of our nuclear safety ethic is appreciated. Keep up the good work!

NORTHEAST UTILITIES
NUCLEAR SAFETY CONCERNS PROGRAM

CYAPCO - NNECO - NUSCO

NRC MEETING
March 22, 1990

MEETING AGENDA

- I. INTRODUCTION
- II. SPECIFICS OF NU'S NEW NUCLEAR SAFETY CONCERNS PROGRAM
- III. SPECIAL EFFORTS TO ADDRESS ISSUES THAT HAVE ARISEN AT MILLSTONE
- IV. CONCLUSION
- V. QUESTIONS AND DISCUSSION

INTRODUCTION

INTRODUCTION

- o GENERAL PURPOSES OF MEETING
- o HISTORICAL BACKGROUND FOR NEW NSC PROGRAM
- o NU SENIOR MANAGEMENT DIRECTION FOR NEW NSC PROGRAM
 - oo NRC INSPECTION REPORT OF OCTOBER 11, 1989
 - oo SURVEYS OF EMPLOYEES
 - oo EMPLOYEE SKEPTICISM EXPRESSED BY SOME
 - oo NEW APPROACH ADOPTED TO ENHANCE EFFECTIVENESS OF NSC PROGRAM

SPECIFICS OF NU'S NEW NUCLEAR SAFETY CONCERNS PROGRAM

NUCLEAR SAFETY ETHIC

o CORPORATE NUCLEAR POLICY

BILL ELLIS, CHAIRMAN AND CEO-NU

o NE&O POLICY STATEMENT NO. 1, "NUCLEAR PLANT SAFETY"

ED MROCZKA, SENIOR VICE PRESIDENT, NE&O

o INDIVIDUAL RESPONSIBILITIES

As a matter of NU's policy to assure the safe operation of its nuclear facilities, NU encourages and supports reporting of known or potential safety defects by any individual employed by NU regardless of position or title. Those individuals with knowledge of nuclear safety concerns have an obligation to communicate these concerns promptly to their supervisor, thereby assuring the safety of the public and personnel working at these facilities.

o EMPLOYEE RIGHTS

Employees who report nuclear safety concerns are afforded protection from discrimination and reprisal by NU per the provisions of NEO Policy Statement No. 22.

PROGRAM OBJECTIVES

- o Provide for prompt identification, tracking, feedback and resolution of all nuclear safety concerns falling outside the normal chain-of-command communication paths.
- o Establish a Nuclear Safety Concerns Program that complements our normal practice of communicating these concerns through our functional chain-of-command.
- o Provide an unbiased focal point for individuals to bring their nuclear safety concerns whenever they are uncomfortable using their normal chain-of-command communication paths.
- o Enhance credibility, visibility and employee confidence in the proactive NSC Program by conducting:
 - oo Periodic surveys at the functional unit levels, one-on-one.
 - oo Exit interviews of all NE&O employees either transferring within NU or leaving the Company.
 - oo Refuel outage field exit interviews (NNECO, CY, NUSCO, and site contractor personnel).

NSCP - OPERATIONS

- o Implements the intent of NU's and NE&O's Nuclear Safety Policy Statements and the recent correspondence from Ed Mroczka and Bill Ellis.

- o Operates independent of the influence of functional line management.

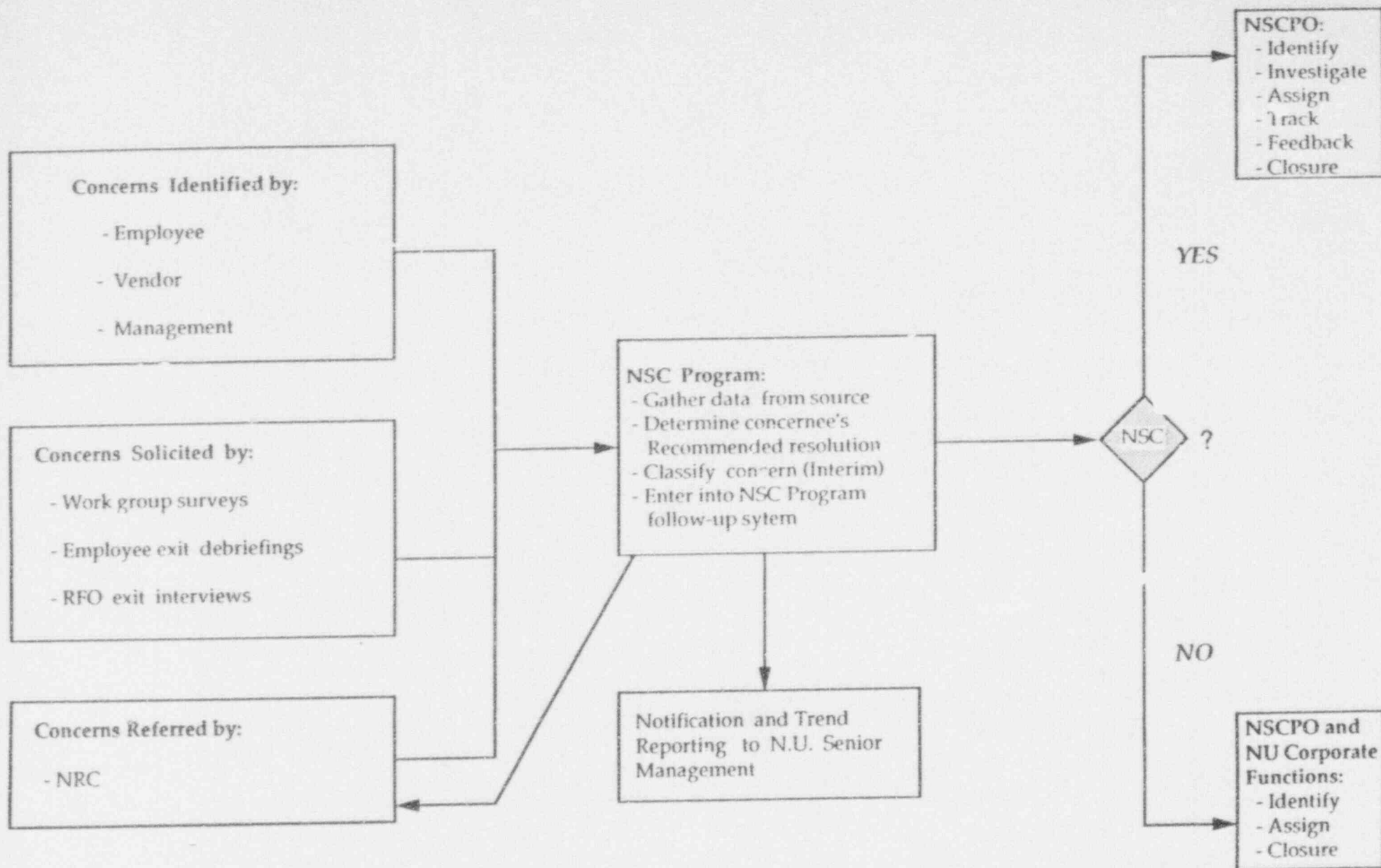
- o Provides a direct communication link between the individual and the Senior Vice President of Nuclear Engineering and Operations, Ed Mroczka.

- o Provides an off-site office location which permits open communication away from the work environment.

- o Provides confidentiality and anonymity when requested by the individual.

STATUS AS OF MARCH 1990

- o Reviewed 11 utility NSC Programs already in place to develop "Best of Best".
- o NSC Program publicity:
 - oo Ed Mroczka's memo issued to all NE&O employees in December 1989.
 - oo Bill Ellis' memo issued to all NE&O employees in December 1989.
 - oo Program details posted in February 1990.
 - oo Direct telephone links and 1-800-282-SAFE number turned over to NSCP in February 1990.
 - oo SCOPE feature article issued in February 1990.
 - oo Revision No. 6 of NE&O Procedure 2.15 issued in March.
 - oo Drop boxes being designed.
 - oo Orientation program for all NEO employees is in preparation.
- o NSC Program Performance



SPECIAL EFFORTS TO ADDRESS ISSUES THAT HAVE ARISEN AT MILLSTONE

S. SOCIAL EFFORTS TO ADDRESS ISSUES THAT HAVE ARISEN AT MILLSTONE

MILLSTONE STATION CONCERNS PROGRAM ENHANCEMENTS

- o Administrative Control Procedure (ACP-QA-1.20) provided a "roadmap" for employees to use in the reporting of problems.
- o Internal correspondence (e.g., three-part memos) relating to nuclear safety issues are being tracked and appropriately responded to.
- o A revised station posting is in place which outlines to employees their rights and responsibilities regarding nuclear safety concerns.
- o A pocket-size handout has been provided to all employees on site which focuses on nuclear safety at the Millstone Station.

SUPERVISORY SKILLS AND COMMUNICATIONS IMPROVEMENTS

- o Section 210 and 10CFR50.7 training has been provided to all management personnel at Millstone Station.
- o NEO supervisory skills enhancement training has been completed.
- o Additional specialized training in conflict management is planned.
- o In-depth training for first line supervisors in communication techniques is planned.
- o Meetings between the Station Director, the Senior Vice President and employees are held as part of proactive efforts to improve communications and working relations.
- o The use of a conflict resolution specialist is being pursued in some instances.

CONCLUSION

CONCLUSION

- o NEW PROGRAM SHOULD IMPROVE EFFECTIVENESS
- o KEYS TO SUCCESS
 - oo EFFECTIVE COMMUNICATION OF POLICY OF NRC-NSC REFERRALS
 - oo VIGOROUS AND EFFECTIVE PROGRAM EXECUTION

QUESTIONS AND DISCUSSION

NRC FEEDBACK



February 22, 1990
NEO-90-G-044

TO: W. D. Romberg
C. F. Sears
R. P. Werner

FROM: E. J. Mroczka *EM*
(Ext. 5217)

SUBJECT: Nuclear Safety Concerns Program - Exit Interview

Please advise your management that as part of NE&O's enhancements to our Nuclear Safety Concerns Program, all NE&O employees either transferring to other NU non nuclear positions or terminating their employment with the company will be required to take part in a Nuclear Safety Concerns Program exit interview.

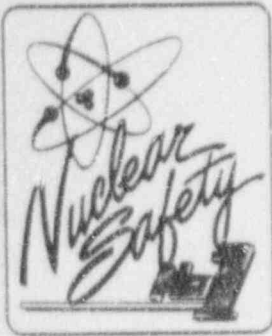
These Nuclear Safety Concerns Program exit interviews are in addition to the normal exit interviews required by the Human Resources Group.

Scheduling these exit interviews is the direct responsibility of the exiting employees involved supervisor. Exit interviews may be scheduled by contacting Sandy Turbyfill of the Nuclear Safety Concerns Program at Millstone, extension 4370.

Your cooperation in assuring this requirement is implemented is appreciated.

EJM/ld

cc: B. Ilberman
J. F. Opeka
P. F. Santoro
S. K. Turbyfill
R. P. Zysk



February 23, 1990

NEO-90-G-045

TO: Distribution*

FROM: E. J. Mroczka
Senior Vice President
Nuclear Engineering and Operations

SUBJECT: Nuclear Safety Concerns Program - Framed Posters

Please ensure that the attached framed posters explaining the details of our enhanced Nuclear Safety Concerns Program (NSCP) are posted immediately upon receipt. I recommend that our NSCP Posters be placed at all locations where 10CFR Part 19 and 21 information is posted for our employees' information.

Additional unframed copies of these posters are available by contacting Sandy Turbyfill of the Nuclear Safety Concerns Program Office at Millstone extension 4370.

Your cooperation in this matter is appreciated.

EJM/st

Attachment

*J. M. Black/S. W. Zatarain - MP Simulator
E. V. Fries - Connecticut Yankee
M. L. Michelson - Berlin W104
W. C. Renfro - Rocky Hill B4F3
R. C. Rodgers/B. Kreiling - Berlin W122
F. C. Rothen/W. R. Carr - Millstone
J. M. Venable - Millstone

cc: D. B. Miller, Jr.
W. D. Romberg
P. F. Santoro
S. E. Scace
C. F. Sears
S. K. Turbyfill
R. P. Werner
R. P. Zysk

ADMINISTRATIVE CONTROL PROCEDURE COVER SHEET

A. IDENTIFICATION

NUMBER: ACP-QA-1.20

REV. 0

TITLE: PROBLEM REPORTING

B. QA REVIEW:

W. Waring
MANAGER PLANT QUALITY SERVICES

(QA RELATED ONLY)

C. SPECIFIC UNREVIEWED SAFETY QUESTION EVALUATION REQUIRED:

Modifies intent of procedure and changes operation of systems as described in design documents

YES [] NO [X]

(If yes, perform written USQ determination and Safety Evaluation, and contact Manager, Safety Analysis Branch to determine need for Integrated Safety Evaluation.)

ENVIRONMENTAL REVIEW REQUIRED
(Adverse environmental impact)

YES [] NO [X]

D. SPECIFIC SAFETY EVALUATION REQUIRED:

Affects response of safety systems, performance of systems which may have been credited in the safety analysis or non-credited systems which may indirectly affect safety system response.

YES [] NO [X]

(If yes, perform written Safety Evaluation and contact Manager, Safety Analysis Branch to determine need for Integrated Safety Evaluation.)

E. INTEGRATED SAFETY EVALUATION REQUIRED:

YES [] NO [X]

F. SORC APPROVAL:

SORC MEETING NO. 89-41

(Items above having a YES response must be documented in SORC meeting minutes.)

G. APPROVAL AND IMPLEMENTATION:

THIS PROCEDURE IS HEREBY APPROVED AND EFFECTIVE ON THE DATE BELOW.

Stephen J. Scace
STATION/UNIT/STATION SERVICES SUPERINTENDENT

12/1/89
EFFECTIVE DATE

H. REQUIRED ROUTING

The following personnel are required to initial that they are aware of the provisions of the above listed document:

	Admin.	Unit 1	Unit 2	Unit 3	Station Services	Other Groups
Superintendents	✓	✓	✓	✓	✓	
All Plant Personnel	✓	✓	✓	✓	✓	
Exempt Personnel	✓	✓	✓	✓	✓	
Department Heads	✓	✓	✓	✓	✓	
Supt. Staff Engineers	✓	✓	✓	✓	✓	

I. DOCUMENT SUMMARY

SUMMARY:

- _____ Minor Housekeeping - title changes, typographical errors, reference changes, etc.
- _____ Change resulting from NRC regulations, bulletins, etc. (indicated in body of procedure per MAP 1.02). See action/description below.
- _____ Change resulting from a Station CR (audit finding, program improvement, program expansion, etc.). See action/description below.
- X _____ Other _____
See action/description below.

Action:

- _____ ✓ Personnel indicated on SF 330 read procedure as revised.
- _____ Personnel indicated on SF 330 read description below at a minimum. (Procedure may be reviewed as time permits.)

Description: New ACP which identifies problem reporting systems in use at Millstone Station and which defines station policy on handling "informal" correspondence

PROBLEM REPORTING

PAGE - NO.

1 - 10

EFF. REV.

0

RESPONSIBLE INDIVIDUAL: STATION SUPERINTENDENT STAFF ENGINEER
TITLE

1. PURPOSE

This procedure provides guidance on the use of the various problem reporting systems available to individuals working under the Millstone Nuclear Power Station Administrative Control Procedures.

2. APPLICABILITY

This procedure applies to the problem reporting systems in use at Millstone Nuclear Power Station and provides guidance on the recommended use of procedures to report problems and request corrective action. This procedure does not deal with personnel related matters.

3. REFERENCES

- ACP-1.14A Nuclear Concerns
- ACP-QA-2.17 Setpoint Change Control
- ACP-QA-2.02C Work Orders (Trouble Reports)
- ACP-QA-3.02 Station Procedures and Forms
- ACP-QA-3.24 Drawing Change/Submittal Request
- ACP-QA-5.01 Nonconforming Materials and Parts
- ACP-QA-10.01 Plant Incident Reports
- ACP-QA-10.07 Substantial Safety Hazard Report
- ACP-QA-10.10 Corrective Action Request

4. DEFINITIONS

4.1 Acronyms

- ACP Administrative Control Procedures
- NRC Nuclear Regulatory Commission
- NU Northeast Utilities Service Company
- PORC Plant Operations Review Committee
- SORC Site Operations Review Committee
- SSH - Substantial Safety Hazard

5. RESPONSIBILITIES

5.1 Individual Employees

Each employee is responsible to report problems with plant equipment, procedures, drawings and repair activities in accordance with the guideline provided in this procedure.

5.2 Station Supervision/Management Personnel

Each person with supervisory or management status at Millstone Station is responsible to assist employees who feel they have a problem to report. This assistance can be in determining if a problem exists or in addressing which reporting mechanism is the most appropriate.

6. INSTRUCTIONS

6.1 The first step in reporting of a problem is to determine the nature of the problem. The following examples are intended to help identify which system to use.

6.1.1 Is the problem related to the physical condition of operating plant equipment? If this is the case, then report the condition via a Trouble Report against the components PMML identification using the Trouble Report. See Section 6.3, Work Orders, for general instructions and reference to the applicable ACP. Examples include:

- ° Valve packing leak.
- ° Noisy or overheating bearing.
- ° Loose or broken pipe support.
- ° A component which fails to function.
- ° A component fails a surveillance or channel check.

- 6.1.2 Is the problem related to a requirement not being satisfied during a work activity? The requirement may be spelled out in a repair procedure, drawing or the specification. If so, then report the problem via a Nonconformance Report. See Section 6.6, Nonconforming Materials and Parts for general instructions and reference to the applicable ACP. Examples include:
- ° Spare part not having proper certification.
 - ° The repair procedure is not successful or applicable to the work needed.
 - ° An unanticipated condition of the equipment is found.
- 6.1.3 Is the problem related to a procedure inadequacy that prevents the work from being completed? If so, stop the work and correct the procedure. See Section 6.4, Station Procedures and Forms for general instructions and reference to the specific ACP. Examples include:
- ° A procedure step is missing.
 - ° An initial condition necessary to begin the work is not met.
 - ° The procedure issued for the work does not apply to the work being performed.
 - ° A deficiency exists in the procedure.
- 6.1.4 Is the problem that an existing drawing does not show the actual field condition of a component, plant lay out or wiring circuit? If so, process a Drawing Change Request to have the actual condition corrected on the drawing. If a drawing is not in the drawing control system and it should be, process a Drawing Submittal Request. This request will enter the drawing into the system and provide a means of controlling changes to the drawing in the future. Examples of this include important drawings included in vendor manuals as well as drawings for new equipment installed in the station. See Section 6.5, Drawing Change/Submittal Request for general instruction and reference to the specific ACP.

6.1.5 Is the problem associated with the reporting of an item which requires that the NRC be notified; that involves a non-reportable equipment failure and malfunction; or involves a non-reportable Plant Incident? If this is the case, a Plant Incident Report is submitted. These reports are reviewed by the Shift Supervisor and the Unit Superintendent. See Section 6.7, Plant Incident Reports for general instructions and reference to the specific ACP. Examples include:

- ° A Technical Specification surveillance is not performed in the required time.
- ° A Technical Specification safety limit is violated.
- ° A plant incident occurs which requires initiation of the Emergency Plan.

6.1.6 Is the problem such that you want to receive guidance from your supervisor on how to proceed? If this is the case, then submit a Three-Part Memo or other correspondence requesting assistance. This process is for those problems which you are not sure of how to solve. Your supervisor will get back to you with a recommendation on which system to use or an answer. See Section 6.8, Informal Correspondence, for a description of the method to be used in processing this type of correspondence.

6.1.7 Is the problem such that a setpoint change is required for plant equipment? If so, then initiate a Setpoint Change Request. See Section 6.9, Setpoint Change Control for general instructions and reference to the applicable ACP. Examples include:

- ° A permanent setpoint change is required.
- ° A setpoint tolerance is to be changed.
- ° A temporary setpoint change is necessary.

- 6.18 Does the problem represent a loss of safety function to the extent that there is a major reduction in the degree of protection provided to public health and safety? If so, process a Substantial Safety Hazard Report. See Section 6.10, Substantial Safety Hazard Reports, for general instructions and reference to the specific ACP. Examples include:
- ° Moderate exposure to, or release of, licensed material.
 - ° Major degradation of essential safety related equipment.
 - ° Major deficiencies involving design, construction, inspection, test or use of licensed facilities, or material and components delivered for use in such facilities.
- 6.1.9 Does the problem represent a programmatic problem where either no procedures exist to correct the problem, or where existing procedures prove to be inadequate to prevent recurrence? If so, then initiate a Corrective Action Request. See Section 6.11, Corrective Action Requests, for general instructions and reference to the applicable ACP.
- 6.1.10 Is the problem sensitive in nature and one that you would like to discuss with someone other than your supervisor? If this is the case, the Nuclear Concerns Program is available to provide an answer to you. The contact can be made on a confidential basis if you wish. See Section 6.2, Nuclear Concerns, for general instruction and reference to the specific ACP.

6.2 ACP-1.14A Nuclear Concerns

Purpose

This procedure establishes a method for all personnel working at Northeast Utilities Nuclear Facilities to express nuclear concerns. This procedure describes the protection provided to those employees who express their concerns internally, or who provide information to the Nuclear Regulatory Commission, as required by Title 10, Code of Federal Regulations, Part 50, Section 7 and Nuclear Engineering and Operations Policy statement No. 22.

6.3 ACP-QA-2.02C Work Orders

Purpose

NOTE:

The Production Maintenance Management System (PMMS) is a complex computer based system which has many functions and capabilities that are used at various levels within the organization. These functions and capabilities are continuously being changed and updated and therefore cannot be fully described in this procedure. For information concerning the use of computer hardware and detailed descriptions of the PMMS capabilities, consult the PMMS User's Guide/Edit Indexes.

6.3.1 Define the process for controlling those aspects of work which are important to Safety, Quality, Reliability and Documentation.

6.4 ACP-QA-3.02 Station Procedures and Forms

Purpose

This Administrative Control Procedure establishes the requirements for controlling the use, preparation, review, approval, changes and revision of Station Procedures, Special Procedures, and associated forms.

6.5 ACP-QA-3.24 Drawing Change/Submittal Request

Purpose

This procedure defines the processing of Drawing Change/Submittal Requests (DCRs/DSRs). It provides the requirements/provisions applicable to Quality and Non-Quality DCR/DSR packages for drawings associated with Northeast Utilities' (NU) Nuclear, Fossil, and Hydroelectric Generating Facilities.

6.6 ACP-QA-5.01 Nonconforming Materials and Parts

Purpose

To implement the requirements for identifying, documenting, dispositioning, and approving their disposition for quality non-conforming materials, parts components and on occasion services.

6.7 ACP-QA-10.01 Plant Incident Reports

Purpose

To provide guidance for the assessment and reporting of plant symptoms, conditions and events, in order to accurately and efficiently assign incident classification and determine reportability of such occurrences to the Nuclear regulatory Commission (NRC), State of Connecticut and NUSCo/NECo Management. In addition it is intended to provide information to Plant Management on Non-reportable equipment failures and malfunctions, plant incidents which require action and review by plant staff and provide guidance for Scram Evaluation Reviews.

6.8 Informal Correspondence

Three-Part Memo forms and other informal correspondence used to communicate with individuals, supervision and management at the station when a response is requested and when one of the established systems mentioned previously is not appropriate. When a Three-Part Memo or other informal correspondence is used to communicate with a member of supervision or management on a problem which falls outside of the scope of one of the existing corrective action systems, the following process will be used to log each memo.

- 6.8.1 Each department will maintain a log of Informal Correspondence which identifies a problem and is addressed to Supervision/Management and for which a response is requested by the originator. The log will contain a unique numbering system.
- 6.8.2 In cases where a response is requested, the employee will obtain a unique number from the log, enter the necessary information in the log and record the number on the correspondence.
- 6.8.3 The correspondence will then be provided to the addressee, with a copy retained by the originator.
- 6.8.4 In cases where the correspondence is not uniquely numbered and does not contain a potentially safety significant issue, it is station policy that a response will be provided by Supervision/Management if the nature of the concern requires it.
- 6.8.5 The employee will be given initial feedback on the correspondence and will be advised as to when the evaluation action or concern requested on the memos will be completed. Initial feedback for logged memos will be provided within 10 working days of receipt.

6.9 ACP-QA-2.17 Setpoint Change Control

The purpose of this procedure is to establish a method for initiating, controlling and documenting setpoint changes made to plant equipment.

6.10 ACP-QA-10.07 Substantial Safety Hazard Reports

This Administrative Control Procedure establishes requirements and a system for reporting and management review of substantial safety hazards as required by 10CFR Part 21. (Security related substantial safety hazards shall be reported in accordance with ACP 7.13, Security Reports).

6.11 ACP-QA-10.10 Corrective Action Reports

This procedure provides a mechanism, the Corrective Action Report (CAR), to be used to identify and correct programmatic problems when either no procedures exist to correct the problem, or when the existing procedures prove to be inadequate to prevent recurrence. CARs may be initiated by any person/organization within NEO.

7. FIGURES

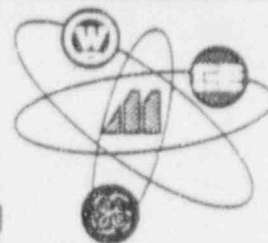
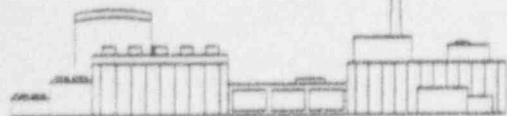
N/A

8. ATTACHMENTS

N/A

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THE MILLSTONE MESSENGER



Millstone Unit 2 Steam Generator Leakage

Recently a news article was published about possible steam generator tube/plug leaks at Unit 2 and possible safety problems they represent. Let me take this opportunity to provide additional information on the issue and the actions we are taking that ensure the safe operation of the unit.

As you undoubtedly already know, we are planning to replace the Unit 2 Steam Generators in 1992. That decision was made because the condition of generators has steadily declined over the years. The generators are not in any danger of falling apart, however. The degradation that has been detected and repaired is gradual. We have always tracked the condition of the tubes with defects and plugged or sleeved them when the defect exceeded rigidly established limits. These defects can be very small pits (approximately 5 hundredths of an inch diameter) or sometimes small cracks. Tubes are plugged if the defect penetrates 40% or more through the wall thickness of the tube. It is also important to note the sensitivity of the instruments used to monitor the condition of the tubes has vastly improved also. Defects that we now monitor could not have been detected at all a few years ago.

Currently a small leak seems to be present in one of the generators. It is so small that of the systems that detect and measure leakage from the primary system, only one is indicating any leakage at all. What we are detecting are periodic spikes on the radiation detector at the Steam Jet Air Ejector (SJAE) of the condenser. These spikes are occurring about twice a day on average and return to normal after a few minutes. These

detectors normally read some low level of activity at PWR's.

A primary to secondary steam generator leak can follow one of three major paths. Direct leakage through a hole in a tube, indirect leakage through a tube that was previously plugged due to a crack in the plug or a leak around the plug or, leakage past a tube sleeve in a tube with a thru wall defect. A sleeve is a short piece of tubing that has been inserted into the tube to cover over a defect. In effect, it patches the defect and allows continued use of the tube. From 1983 to 1986, sleeving was used to repair a number of tubes. In 1989, we were notified that a number of plugs previously installed could be defective and develop cracks themselves. In last year's refueling outage plug-in-plug devices (PIP's) were installed to repair those plugs. Neither PIP's or sleeves are designed to be 100% leak tight. Rather they are designed to limit the possible flow from a failure to a very small amount. Some indirect leakage is not unexpected.

The primary leak detection methods at Millstone 2 include:

- 1) Liquid grab samples
- 2) Computer monitored primary to secondary unidentified leak rate
- 3) SJAE radiation monitor
- 4) N16 radiation monitors
- 5) Steam Generator blowdown radiation monitor
- 6) Main Steam Line radiation monitors

The Steam Jet Air Ejector (SJAE) radiation monitor along with liquid grab samples has been used effectively in the past to detect and track primary to

secondary leakage. The SJAE radiation monitor monitors gases that pass from the primary coolant into the secondary side and subsequently travel along with the steam through the turbine and into the condenser. The SJAE extracts non-condensable gases from the condenser and passes them to the Unit 1 stack. This monitor is very sensitive to primary system gas activity, which would be generated via a leak. As activity in the primary coolant (reactor side) increases (a normal occurrence during a fuel cycle) the SJAE counts increase without any increase to the calculated steam generator leak rate. The SJAE is closely following the calculated primary coolant activity. In addition to this expected steady increase (currently running 500 - 800 counts per minute), spikes to 2000 - 4000 counts per minute (the highest one was 9200 cpm) are occurring about twice a day.

The N16 monitors are installed adjacent to the main steam lines. They were installed specifically to provide early detection of very small steam generator leakage from a cracked tube. They detect short lived (half life of 7.8 seconds), high energy activity from the core. This state of the art early warning equipment has only been installed at a few plants. The capability of this system has been proven at other plants that have encountered tube leaks. The installed monitors at MP2, though very sensitive, have not picked up increased activity associated with spiking.

The behavior of the current leak suggests that it is an indirect leak through a tube that was plugged in the past. A small leak from the primary side fills the tube until it reaches a high enough pressure to open a small hole or crack in the tube. Some of the radioactive primary water flows into the secondary side relieving the pressure in the tube and closing the crack. This would account for two things, the intermittent nature of the rad monitor spikes, and the fact the the steam line N16 radiation monitors have not also shown increases in activity. The short

lived isotopes picked up by the N16 detectors would have decayed while the water leaking into the secondary spends hours pumping up the tube to a high enough pressure to be ejected into the secondary.

We have calculated that the leak rate that would account for the radiation levels that are being detected is 0.002 - 0.003 gallons per minute (gpm). Unit 2's Technical Specifications allow 0.1 gpm leakage per steam generator before the requiring that the plant be shut down. It is significant that we asked that the limit be lowered from a previous value of 0.5 gpm about a year ago. The current leak is only a small percentage of the new limit and could be due to just one or two indirect leaks (either a sleeve or PIP).

We do not believe that the current situation requires that we shutdown the plant to make repairs. Remember that a shut down causes increased radioactive waste, increased exposure to our work force, and adds costs to our customers for replacement power. The small size of the leak also indicates it could be very difficult and time consuming to find.

We are watching conditions closely, however. If the leak increases, or we get indications that it is not safe to operate the plant until the scheduled refueling outage, we will not hesitate to shut down. For example, if we start to get indications on the N16 monitors, it would be a sign of changing conditions that would have to be reevaluated.

Safety is always our first consideration.

*John S. Klenan
for S.E. Scace*

Reporting of Problems

Administrative Control Procedures are in place which provide specific instructions on how various types of problems can be reported for corrective action. ACP-QA-1.20 provides guidance on the use of each of the procedures. The procedures available to employees at Millstone Nuclear Power Station include the following:

- * ACP-1.14A Nuclear Concerns
- * ACP-QA-2.02C Work Orders (Trouble Reports)
- * ACP-QA-2.17 Setpoint Change Control
- * ACP-QA-3.02 Station Procedures and Forms
- * ACP-QA-3.24 Drawing Change/Submital Requests
- * ACP-QA-5.01 Non-Conforming Materials and Parts
- * ACP-QA-10.01 Plant Incident Reports
- * ACP-QA-10.07 Substantial Safety Hazard Reports
- * ACP-QA-10.10 Corrective Action Requests

Employees are encouraged to become familiar with these procedures and to use them as the need for them is identified in the daily work activities.

Northeast Nuclear Energy Company

Northeast Nuclear
Energy Company



NUCLEAR SAFETY
at
MILLSTONE NUCLEAR
POWER STATION

Do You Have A Question Regarding Nuclear Safety At Millstone Nuclear Power Station?

Northeast Utilities Procedure NEO 2.15 describes our Nuclear Concerns Program.

In raising nuclear concerns, employees are fully protected by law against harrassment and discharge from their jobs.

We encourage all on-site personnel to utilize this procedure to resolve any nuclear safety concerns that you might have. If at all possible, please discuss your concern with your supervisor first. Your supervisor will probably have the answer that you are looking for.

If you wish to contact the Nuclear Concerns Manager, please call site extension 4349. From within Connecticut, please call 1-800-612-1066. From outside Connecticut, please call 1-800-541-9987. All three numbers are available day or night.

At NU, we take nuclear safety very seriously and want to hear from anyone who has a concern.

