

COMANCHE PEAK RESPONSE TEAM

ACTION PLAN

Item Number: VII.a.6

Title: Exit Interviews

Revision No.	0			
Description	Original Issue			
Prepared and Recommended by: Review Team Leader	<i>J. L. Harned</i>			
Date	<i>6/21/85</i>			
Approved by: Senior Review Team	<i>John W. Bush</i>			
Date	<i>6/21/85</i>			
		FOIA-88-62		

. ITEM NUMBER VII.a.6

Exit Interviews

1.0 DESCRIPTION OF ISSUE IDENTIFIED BY NRC

The TUEC exit interview system for departing employees appeared to be neither well structured nor effective, as evidenced by the lack of employee confidence, limited implementation, failure to document explanations and rationale, and failure to complete corrective actions and to determine root causes.

2.0 ACTION IDENTIFIED BY NRC

Evaluate the TRT findings and consider the implications of these findings on construction quality. "...examination of the potential safety implications should include, but not be limited to the areas or activities selected by the TRT."

"Address the root cause of each finding and its generic implications..."

"Address the collective significance of these deficiencies..."

"Propose an action plan...that will ensure that such problems do not occur in the future."

3.0 BACKGROUND

3.1 Information Supplementing NRC Description of Issues

Prior to January 14, 1985, TUGCO had procedurally defined programs which required all personnel departing from QA/QC to complete a questionnaire and all Brown & Root construction employees terminating employment to be interviewed. One of the purposes of the questionnaires and interviews was to identify "quality concerns." In response to NRC EA No. 83-64, an Ombudsman from an outside organization (Gilbert/Commonwealth) was assigned to the site in November 1983, and personnel released from QA/QC since October 3, 1983 who had not filled out a questionnaire were located, if possible, and given the opportunity to fill out the questionnaire.

On January 14, 1985, TUEC established an independent group called SAFETEAM utilizing personnel from Utility Technical Services, Inc. This group has assumed the responsibility for interviewing personnel and investigating concerns.

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(Cont'd)

3.0 BACKGROUND (Cont'd)

3.2 Preliminary Determination of Root Cause and Generic Implications

The problems with the exit interview program as described in the NRC TRT January 8, 1985 letter were identified by the TRT as examples which indicate TUGCO "lacked the commitment to aggressively implement an effective QA/QC program in several areas."

Extensive investigations addressing past history are being carried out by the Comanche Peak Response Team to determine the adequacy and safety of the existing station. When specific areas of past concerns involving the exit interview program are identified during this evaluation process, additional concerns in the same generic area will be evaluated to determine whether a generic problem exists. The purpose of this action plan is to determine if TUGCO management has now established an effective program which encourages employees to voice concerns regarding safety and to seriously evaluate these concerns. This determination will then be used as input to the overall evaluation of the QA program including TUGCO's current commitment to an effective QA/QC program.

4.0 CPRT ACTION PLAN

4.1 Scope and Methodology

4.1.1 The scope of this action plan is to evaluate the adequacy of the policies, procedures, and activities of the CPSES Site Ombudsman and the CPSES SAFETEAM in identifying and resolving CPSES site personnel concerns which have potential safety implications. As noted in paragraph 3.2 above, other CPRT investigations will determine the overall adequacy of the installed hardware. This action plan will ensure an adequate program is now in place.

4.1.2 The specific methodology is as follows:

4.1.2.1 Review the procedures being utilized by the Ombudsman and SAFETEAM to determine their ability to satisfactorily accomplish the following:

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(Cont'd)

4.0 CPRT ACTION PLAN (Cont'd)

- Identify employee concerns having potential safety implications.
- Investigate and evaluate employee concerns to determine potential safety implications.
- Resolve employee concerns including:
 - Resolution of safety implications
 - Resolution of the concern with the employee and management.
- Alert TUGCO management of root causes and generic implications of identified concerns.
- Protect the anonymity of the interviewees and prevent employees that have expressed concerns from being subjected to intimidation or harassment.
- Insure proper coordination between Ombudsman and SAFETEAM.

The review of the program shall include comparison with other similar programs being effectively implemented by other utilities.

- 4.1.2.2 Evaluate the implementation of the procedures being utilized by the Ombudsman and SAFETEAM to determine compliance with the procedures and the effectiveness of their implementation. The evaluation of the effectiveness of implementation will be based on the same criteria listed in paragraph 4.1.2.1 above.

Implementation will, in the case of SAFETEAM, be limited to examination of records which, in the judgement of SAFETEAM, will not compromise the independence and effectiveness of their operation.

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(Cont'd)

4.0 CPRT ACTION PLAN (Cont'd)

4.1.2.3 A review shall be conducted of past items of concern of QA/QC and other employees which were identified during exit interviews to verify all concerns have been properly evaluated for potential safety implications.

4.1.2.4 An Action Plan Report documenting the results of 4.1.2.1 and 4.1.2.2 shall be prepared. The report shall include recommendations for improvement in the program if warranted. The results of the Action Plan Report shall be included in the final overall evaluation of the adequacy of the QA program being conducted by the QA/QC Review Team.

4.2 Responsibilities

4.2.1 Evaluation Research Corporation

This action plan will be developed and implemented by Evaluation Research Corporation.

4.2.1.1 Scope

The scope of this evaluation is anticipated to include only the current and on-going activities of the Ombudsman and TUEC SAFETEAM.

4.2.1.2 Personnel

Mr. Dave Boydston Issue Coordinator

4.3 Personnel Qualification Requirements

Personnel participating in the implementation of this action plan shall be qualified in accordance with paragraph III.H, of the TUGCOs Program Plan and Issue-Specific Action Plans, Revision 1.

4.4 Procedures

Development and implementation of this action plan shall be in accordance with TUGCOs Program Plan and Issue-Specific Action Plans, Revision 1. Checklists will be developed by the Issue Team Leader for use in conducting reviews of policies and procedures and review of actual employee concerns.

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(Cont'd)

4.0 CPRT ACTION PLAN (Cont'd)

4.5 Standards/Acceptance Criteria

The acceptance criteria for this action plan are defined in paragraph 4.1.2.1.

4.6 Decision Criteria

Not applicable.

5.0 SCHEDULE

The Action Plan Report shall be issued by August 30, 1985.

Boye Board

0

Employee Concern Program

1. 4/85 - interview of [unclear] for [unclear] - [unclear] personnel 10/85

conducted by [unclear]

2. 4/85 - interview of [unclear]

12/85

3. 4/85 - interview of [unclear]

4/85

4. 4/85 - interview of [unclear] related to [unclear]

conducted by [unclear]

Investigations

- Allegations - 5/85 11 AQ-133
- Findings - [unclear] management concerns
- CPET I XI AQ-133 - [unclear] programs and [unclear]
- [unclear] / [unclear]

1.85

Transcripts

NRK/RTI/IE/VI
(85-12/08) (A4-85-020)

URE/CI/IE
(86-11/09)

August 20-29, 1985

July 11, 1986

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B/1

Impact of Structure/Implementation

- 4/85 September
- [unclear] not knowledgeable
- [unclear] how investigators did work
- interviews lacked necessary [unclear]

investigation were not applied. re about re-structuring

The program stops at system in place for evaluation
does not call for follow-up work. impact on

Resolutions for correction action in present future only
not past

100 CFR 50.55(e)

improvement between 1st & 2nd inspection

Training very limited use → Most crews selected
to ~~provide~~ procedures

- 2
20-11/09

- poor training of crew
- lack of crew
- lack of understanding of
crew
- conflict in resources

Guidance

Guidance: Limited crew. Limited independence did not allow ^{some} independent
Safety on tomorrow and if limited work.

- 4
20-11/09

DOC-SEARCH ASSOCIATES
P.O. Box 7
Cabin John, MD 20818
January 21, 1988

Donnie H. Grimsley, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST
FOIA-88-62
Rec'd 1-27-88

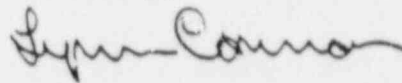
Dear Mr. Grimsley:

Pursuant to the Freedom of Information Act, I request that you make available, by placement in the Public Document Room at 1717 H Street, N.W., all documents associated with the NRC review, and evaluation thereof, of the Comanche Peak Safe Team by Headquarters and the Region 4 Staff, from 1985 until the present. Please include the review of the Office of Investigations.

For the purposes of this request, "document" is defined to include but not be limited to drafts and final versions of memoranda, meeting and trip reports, reports of telephone conversations, transcripts, notes, letters, records, graphs and charts.

Thank you.

Sincerely,



Lynn Connor

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8602180139 DOC. DATE: 86/02/06 NOTARIZED: NO DOCKET #
 FACIL: 50-445 Comanche Peak Steam Electric Station, Unit 1, Texas U 05000445
 50-446 Comanche Peak Steam Electric Station, Unit 2, Texas U 05000446
 AUTH. NAME: JOHNSON, E. H. AUTHOR AFFILIATION: Region 4, Office of Director
 RECIP. NAME: SPENCE, M. D. RECIPIENT AFFILIATION: Texas Utilities Electric Co. (formerly Texas Utilities Gene

SUBJECT: Forwards Insp Repts 50-445/85-12 & 50-446/85-08 on 850826-29. No violation or deviation noted. Several areas identified for improvement of SAFETEAM program.

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EXTERNAL:	24X	1 1	LPDR	1 1
	NRC PDR	1 1	NSIC	1 1
NOTES:		14 14		

10 concerns.
 All but 1 related to procedures
 Concern

- poor training of procedure
 - lack of
 - concern re: cause of lack of understanding
 - procedure allows a particular activity
 - insufficient procedure

Some concerns did not have enough specificity to fully investigate not sure if just did not receive enough info or did not submit the specific info

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8602180139 1p

File

Handwritten initials/signature

Log # TXX-4766
File # 10130
IR 85-12
IR 85-08

TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER · 400 NORTH OLIVE STREET, L. S. 81 · DALLAS, TEXAS 75201

May 14, 1986

WILLIAM G. COUNSIL
EXECUTIVE VICE PRESIDENT

Mr. Eric H. Johnson, Director
Division of Reactor Safety and Projects
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NO. 50-445 AND 50-446
RESPONSE TO NRC INSPECTION REPORTS
INSPECTION REPORT NOS.: 50-445/85-12 and 50-446/85-08

Dear Mr. Johnson:

We have reviewed your letter of February 6, 1986, regarding the inspection conducted by W. P. Haass, A. Vietti-Cook, C. Early, and G. L. Madsen during the period August 26-29, 1985. The inspection concerned the TUEC programs established to identify and investigate safety concerns of workers at CPSES.

We noted that no violations or deviations were identified in your inspection report. We have elected to address the observations noted and have done so in the attachments to this letter. Attachment I is in response to the observations noted in Section 3 of your report. Attachment II is in response to the concerns noted in Section 4.

We would like to emphasize the fact that the SAFETEAM is a program with a specific purpose and scope. It is not a licensing activity but rather a management tool with the purpose of responding to concerns expressed by project employees. This is the intended nature of the Comanche Peak Safeteam.

In addition to our responses as attached, we would like to note the following observations regarding your inspection report:

1. The Interview Coordinator, part-time Interviewers and a Secretary/Receptionist are provided under subcontract from McIntyre & Associates, Inc., not National Inspection and Consultants, Inc.

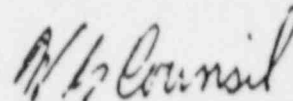
FOIA-88-62

B/3

~~88-03-1000-15~~ 7 pp

2. SAFETEAM now has a formal document of qualifications for Investigators (Paragraph 4.d.).

Very truly yours,



W. G. Council

JWA/arh
Attachments

c - Region IV (Original + 1 copy)

Director, Inspection and Enforcement (15 copies)
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. V. S. Noonan

Mr. D. L. Kelley

TUEC's Employee Concern Program Prior to
January 14, 1985 (Section 3)

At the time of the inspection the NRC found 51 of 53 QAI (Quality Assurance Investigation) files to be closed. As of this date all 53 QAI files are considered closed. With the advent of the Safeteam no new QAI's have been initiated. The NRC inspectors selected 22 files from the QAI index for their review which resulted in four observations. The following provides our response to the observations:

NRC ITEM 3a - Employee responses to the questionnaires were somewhat sketchy. The applicant did recontact some of the concerned individuals.

The QA Supervisory staff conducted the questionnaire for persons leaving QA/QC and attempted to obtain as much specific information as the person would volunteer. As the questionnaires show, the success of this effort was highly dependent on the frame of mind of the person leaving QA/QC. Brown and Root craft exit questionnaires were forwarded to QA leaving any followup effort to QA. Where the concern lacked sufficient specificity to conduct a reasonable investigation, an attempt by either Corporate Security or the site Ombudsman was made to recontact the individual. The solicitation of additional information was not always successful and some QAI's were closed as being too vague or general to reasonably investigate.

NRC Item 3b - The program was administered by TUEC QA. This is a poor practice especially for concerns relating to QA management, supervisory confidence, and supervisor involvement, since the individuals responsible for investigating and correcting the concerns could be the same individuals who could be the subject of, or be responsible for, the concern expressed by the employee.

While it is true that the program was administered by QA, the extent of involvement of TUEC personnel and management went beyond the boundaries of QA. Depending on the QAI, investigations were conducted by the Ombudsman, an independent contractor, and/or by Corporate Security which is a function that is provided by Texas Utilities Services Inc. and as such is responsible to a management chain separate and distinct from TUGCO or TUEC. Furthermore, all QAI's prior to closure were reviewed by three levels of management, the highest level of this review being the Vice President, Nuclear Operations.

NRC Item 3c - Some concerns were not fully addressed during the course of this investigation.

This observation appears to indicate that while all concerns were addressed, the inspectors were either not satisfied with the depth of the investigation or the documentation of the investigation. The depth and extent of any investigation

is a subjective judgement and in many cases is dependent on the general level of understanding or knowledge of the particular circumstances in question of the individual making the judgment. It should be noted that three levels of TUEC management all concurred in closure of QAI files. With regard to documentation, it was not intended that QAI files should be stand alone files. That is, the QAI file would only reference other administrative systems such as the NCR system and would not contain all details concerned with the disposition and closure of the NCR. QAI's were closed based on the initiation of the appropriate corrective action.

NRC Item 3d - There was only limited contact of concerned individuals to inform them of the resolution of their concerns.

The QAI system was not designed to provide written feedback to the concerned individual. Normally, if the individual expressed a desire to know the resolution, a followup contact would be made. Again the implementation of the Safeteam was, at least in part, motivated by a desire on management's part to better control the investigation, resolve employee concerns, and provide feedback to the employee.

TUEC's Employee Concern Program After January 14, 1985
SAFETEAM Program (Section 4)

INTERVIEWERS QUALIFICATIONS [4.c.(1)]

The subject of interviewer qualification was discussed at length with the NRC during the inspection. The statement in the SAFETEAM manual that "interviewers should have a knowledge of nuclear principles" is from the early days of the Fermi 2 program. The experience from all five of the SAFETEAM programs suggests that this statement should be changed. All of the SAFETEAM programs have an ongoing program to monitor the quality of interviews. This monitoring program has shown that some of the best interviews have been by non-technical people trained to be effective communicators in the one-on-one interview. Some of the least effective interviews have been done by technical persons.

The interviewers must build a rapport with the interviewee so the interviewee will be candid and express concerns. We have found non-technical people to be better at this. The non-technical interviewers are trained in specific questions to ask to get the type of details necessary to do a complete investigation. There is a backup to get additional information not reported on the interview form. This can be done by listening to the tape or by recontacting the concernee either during the investigation or in the response letter. We believe that the interviewers do have the necessary communication skills to get an individual to express a concern, thus making it possible to obtain backup information.

We are confident that the selection and training of the Comanche Peak SAFETEAM interviewers has resulted in good interviews. The CPSES SAFETEAM has made a recommendation to SYNDICO that the SAFETEAM manual be revised.

FORMALITY IN REPORTING POTENTIAL 50.55(e) [4.c.(2)]

The matter of SAFETEAM's reporting items potentially reportable under 10 CFR 50.55(e) was also discussed at length during the on-site inspection. To maintain independence from the project and to operate efficiently, Comanche Peak SAFETEAM conducts its program such that it would not be necessary for it to make formal notification of potential reportable items under 50.55(e). SAFETEAM does not do inspections, engineering evaluations or any functions that are a normal part of the project. If the investigation of a concern requires an inspection, SAFETEAM requests that QC inspect and report results to SAFETEAM. Likewise, if an engineering evaluation is required, SAFETEAM requests that engineering do an evaluation and inform SAFETEAM of the results. By investigating in that manner, problems are discovered (at SAFETEAM's prompting) by the normal site processes and are evaluated and reported under existing procedures. Conducting the program in this manner is consistent with the nature of SAFETEAM, as noted in the cover letter.

AREAS OF IMPROVEMENT [4.f.(4)]

- (a) Interviews lacked specifics. With experience, recontacting the concerned individuals for additional details has increased.

As mentioned before, the quality of interviews is continually monitored. While we believe that even the earliest SAFETEAM interviews were adequate, with more experience and continued evaluation, considerable improvement has been shown.

- (b) Some files revealed that the investigator did not attempt to obtain adequate information sufficient to establish the specificity of the concern.

We believe that in all plant safety concerns each investigator attempted to obtain the specifics of a concern. In a few cases where specifics were not given and could not be obtained, the concern was addressed generally. In some management type concerns, specifics were not pursued in order to protect the confidentiality of the concernee. In these cases, the concern was pursued in general terms.

- (c) The program does not call for follow-up resolutions to work completion. In one case, a concern regarding the disposition of the NCR raised by an individual was not addressed by SAFETEAM.

The SAFETEAM program investigates a concern to determine if it is an actual problem rather than a misunderstanding or miscommunication. If it is determined that the identified problem is real, the investigation is not complete until corrective action is identified. This corrective action must be verifiable in the project program (an NCR, CAR, etc.). Identifying corrective action in this manner allows SAFETEAM to respond to the concernee without delay if the completion is a lengthy process.

In the example cited, the concernee received the details of how the NCR's were dispositioned. However, the NCR's were still open because the corrective action was in process.

- (d) Resolutions provided corrective actions for present and future; however, the impact on the past was not always clearly addressed.

Unless specifically part of the concern, evaluation of past implication of problems is not within the scope of the SAFETEAM program. If such a past evaluation needs to be performed, other project departments have and will continue to perform this function.

- (e) The SAFETEAM does not comply with the manual with regard to formally reporting conditions discovered by the SAFETEAM investigators that may be reportable to the NRC in accordance with the requirements of 10 CFR 50.55(e).

See response to [4.c.(2)].

- g. Documentation - In some cases,...it was difficult to infer what the investigator did from the contents of the file.

Because of discussions with the NRC during the inspection, it is believed that the problem was that while certain concerns were dispositioned in accordance with SAFETEAM policies, these policies and procedures were not restated in each file. These procedures were properly documented and understood by program personnel and this was explained to the inspectors.

5. SAFETEAM Review by Office of Investigations

OI commented that, "...the investigative findings of some instances were inconclusive."

This observation by OI is correct. It was explained to the NRC Inspectors that the investigations they questioned had been referred by procedure to TUGCo Corporate Security. Those in question were not formally investigated because they did not meet the criteria of Corporate Security. Corporate Security requires that the allegation received from a single source meet one of the following criteria:

- (1) be of such specificity and detail as to clearly establish its reliability;
- (2) be corroborated by information received from another independent source;
- (3) be of a nature permitting corroboration by independent investigative methodologies.

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DOCKET

'87 JAN 27 P1:35

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

I. Barnes
C. Hale
A. Viethi-Cook
G. Mizuno
J. Malonson
C. Trammell

In the Matter of)
)
TEXAS UTILITIES ELECTRIC)
COMPANY et al.)
)
(Comanche Peak Steam Electric)
Station, Units 1 and 2))

Docket Nos. 50-445-OL
50-446-OL
(Application for an
Operating License)

ANSWERS TO BOARD'S 14 QUESTIONS
(Memo; Proposed Memo of April 14, 1986)
Regarding Action Plan Results Report VII.a.6

In accordance with the Board's Memorandum;
Proposed Memorandum and Order of April 14, 1986, the
Applicants submit the answers of the Comanche Peak
Response Team ("CPRT") to the 14 questions posed by the
Board, with respect to the Results Report published by
the CPRT in respect of CPRT Action Plan VII.a.6, Exit
Interviews.

FOIA-88-62

B/5