

U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF SPECIAL PROJECTS

NRC Inspection Report: 50-445/88-23 Permits CPPR-126
50-446/88-20 CPPR-127

Docket: 50-445 Category: A2
50-446

Construction Permit
Expiration Dates:
Unit 1: August 1, 1988
Unit 2: Extension request
submitted

Applicant: TU Electric
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES),
Units 1 and 2

Inspection At: Comanche Peak Site, Glen Rose, Texas

Inspection Conducted: February 22-25, 1988 and April 21-22, 1988

Inspectors:

P. F. McKee 5/2/88
P. F. McKee, Deputy Director, CPPD:OSP Date

G. C. Gower 5/3/88
G. C. Gower, Office of Special Projects Date

R. Brady 5-3-88
R. Brady, Office of Nuclear Reactor Regulation Date

Consultant: Victor Wenczel, EG&G

Reviewed By:

C. I. Grimes 5/9/88
C. I. Grimes, Director Date
Comanche Peak Project Division
Office of Special Projects

Inspection Summary

Inspection Conducted: February 22-25, 1988 and April 21-22, 1988 (Report 50-445/88-23;50-446/88-20)

Areas Inspected: Reactive, announced inspection of TU Electric's policies, procedures, and implementation relating to programs for identifying and resolving employee concerns.

Results: The inspection team was generally impressed with TU Electric's programs to address employee concerns. The team found a broad range of programs (see Section 3) which provided employees with many viable options to express concerns. The SAFETEAM program (see Section 4) appeared to be one effective means for site personnel to express concerns that they might not express through their normal management chain. The team did not detect any indications that there was reluctance by site personnel to raise concerns to SAFETEAM (see Section 3.h) or through other avenues for expressing concerns. Further, the placement on site of a Corporate Security-Nuclear group which conducts investigations of harassment and intimidation and other matters has provided TU Electric with a good capability to address wrongdoing concerns. Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

D. L. Andrews, Director, Corporate Security, TU Services*
D. J. Brown, Brown & Root Consultant*
D. E. Deviney, Manager, Operations QA, TU Electric
J. Dodd, V. P. Project Manager, Brown & Root
J. B. George, V. P. Support, TU Electric*
T. Gibbs, Investigator Coordinator, SAFETEAM Contractor Personnel
F. Green, Interview Coordinator, SAFETEAM Contractor Personnel
P. E. Halstead, Manager, Quality Control, TU Electric*
J. Rumsey, Manager, Corporate Security-Nuclear, TU Services*
J. F. Streeter, Director of QA, TU Electric
R. Werner, SAFETEAM Manager, TU Electric*
L. Teague, Contractor Personnel
W. Ballman, Contractor Personnel
D. Heintz, Training Department, TU Electric

The NRC Inspectors also contacted other applicant employees during this inspection period.

*Denotes personnel present at the April 22, 1988, exit interview.

2. Background

In December 1984, as a result of numerous allegations of intimidation, harassment, and discrimination and the relevance of these issues to the contentions in the operating license hearing, the EDO formed a panel of senior NRC staff to evaluate the intimidation issue at Comanche Peak Steam Electric Station (CPSES) and prepare a comprehensive staff position. The panel was assisted by a study team composed of a group of consultants.

The results of the panel's evaluation were presented in a report dated October 18, 1985, "Report of the Review and Evaluation of Allegations of Intimidation and Harassment of Employees at Comanche Peak Steam Electric Station Units 1 and 2." The panel concluded that, while some instances of intimidation did occur, there was no pervasive climate of intimidation and harassment at CPSES. TU Electric was provided the panel's report and was requested to perform an assessment of the incidents described in the report and of current conditions at the site. In addition, TU Electric was requested to address their commitments to assure the establishment of a "quality first" attitude by TU Electric management and employees and to describe programs or other efforts underway, or planned, to address intimidation and harassment issues. TU Electric responded to the panel's report and additional staff requests for information on February 7, 1986 (TX-4696).

On May 2, 1986, the NRC issued a Notice of Violation and Imposition of Civil Penalties related to three incidents of intimidation and harassment (EA-86-63). These incidents were identified during the NRC staff review of the panel's report and OI investigation reports. In the NRC letter forwarding the civil penalty, the staff recognized that TU Electric had made some management and organizational changes to address issues

associated with intimidation and harassment. However, the NRC concluded that a civil penalty was appropriate for the identified violations to emphasize the need for lasting and effective corrective actions. TU Electric responded to the Notice of Violation and Proposed Imposition of Civil Penalty on June 2, 1986 (TXX-4838). TU Electric's response, while taking exception to some of the specifics of the violations, detailed a number of corrective actions taken "to assure that incidents and configurations that could be perceived as harassment do not recur in the future." The corrective actions presented by TU Electric included restructuring top corporate nuclear management, restructuring site and corporate quality assurance/quality control management, instituting training programs to emphasize to all employees the need for a "quality first" attitude, providing numerous avenues for employees to raise safety concerns, and interviewing employees involved in quality activities prior to their termination of employment. Final actions with respect to EA-86-63 (and earlier violations EA-83-64 and EA-83-132) were described in an NRC letter to TU Electric dated August 25, 1987.

3. Programs To Deal With Employee Concerns

a. Nuclear Engineering and Operations (NEO) Procedure NEO 2.15, Nuclear Complaints and Concerns

NEO 2.15 establishes methods for employees to register nuclear complaints or concerns. The procedure encourages employees to resolve their complaints and concerns through existing project programs to address corrective actions (e.g., nonconformance reports or deficiency reports). If the employee feels that these corrective action programs do not adequately address his or her concerns, the procedure then encourages them to present their concerns in writing to their immediate supervisor. If not satisfied with normal processes at any time, NEO 2.15 provides for the following contacts to raise concerns:

- Levels of management up to the President, TU Electric Generating Division
- The NRC
- SAFETEAM
- HOTLINE

NEO 2.15 describes SAFETEAM as an administrative program, headed by the SAFETEAM Manager, established to help identify and investigate safety concerns of workers at CPSES. The HOTLINE is described as another administrative program, headed by the Director, Corporate Security, established to encourage the reporting of quality concerns and the timely investigation and resolution of those concerns.

b. Employee Orientation Programs

It is TU Electric's policy to give each of its newly hired employees an introduction/orientation session at which they are provided a copy of the company's Employee Information Packet. According to Ms. Teague

and Mr. Ballman, TU Electric Personnel Department, these introduction sessions serve to inform new employees about the many items contained in the Employee Information Packet. Part of the session is devoted to an explanation about the SAFETEAM and its function, purpose, and availability to all employees. A short video about SAFETEAM is shown during the introduction/orientation session.

The inspector reviewed a copy of the current version of the Employee Information Packet and noted policy statements regarding the commitment to nuclear safety and the quality of workmanship. There are other specific statements that address the open door policy, reporting of non-conforming conditions, compliance with design and/or procedural requirements, and the accuracy of documentation. Included as an attachment to the packet is a 2-10-86 Policy Statement (#13) that makes it a requirement for each employee to be given the opportunity to visit SAFETEAM whenever his term of employment at Comanche Peak is ended and they are preparing to leave the site.

During the review of the Employee Information Packet, it was observed that some of the documents appeared to be Brown & Root (B&R) documents and perhaps could be construed to apply to only B&R personnel. This was acknowledged by Mr. Ballman and Ms. Teague. Ms. Teague advised the inspector that the Employee Information Packet was undergoing a revision that would correct this possible misinterpretation. A copy of the draft revision of the packet was reviewed and the inspector noted that this matter had been addressed in the draft revision.

Through discussions with Mr. Dewey Heintz, TU Electric Training Department, it was learned that the present policy at the site is for all newly hired TU Electric employees to be given a 1-day General Employee Training (GET) course in which they are given a personal copy of the GET Manual. This course duplicates many of the subjects discussed during the introduction/orientation session discussed above.

The inspector examined the GET Manual and observed that the training provided includes, among other things, topics such as the Quality Assurance Program, Problem Identification and Reporting, NRC Reportable Noncompliances, and the purpose and use of the Hotline and SAFETEAM. The manual provides an 800 number to the Hotline that can be used for reporting concerns. Mr. Heintz said that a 60-question examination is given at the completion of the course. He also stated that each year all TU Electric employees are required to attend a 2-hour retraining session and pass an examination on the information covered. Mr. Heintz informed the inspector that all contractor personnel who are permitted to work in the plant protected area must also take the GET course, pass the exam, and undergo retraining once a year. He briefly discussed the system of records that is maintained at the site to ensure compliance with the training policy.

From the discussions and review of documents, the inspector found that the licensee is implementing an adequate training program for all their employees in those areas dealing with the reporting of employee concerns.

c. Contractor Programs

Through discussions with Mr. Donald Brown, Brown & Root consultant, the inspector reviewed B & R's program for management/supervision training to deal with employee concerns. According to Mr. Brown, the program was initiated by B&R in response to a history of concerns that had developed at Comanche Peak and at another B&R nuclear job site. The program is formalized in a training manual titled "The Quality Supervisor." The training, which takes 20 hours, is mandatory for all B&R supervisors. While various sections of the training program apply directly to the handling of employee concerns, the program treats employee concerns in the overall context of a management policy that fosters the "Open Door" resolution of concerns. That is: supervisors are required to attempt resolution of employee concerns, using established criteria, at the lowest level of management, and if not satisfied at this level the supervisor is required to walk the employee to the next level of management, and so forth, until resolved. Some of the training topics covered in the manual are as follows: National Labor Relations Act, Managing of Quality Communications, Personnel Motivation, Equal Employment Opportunity, Sexual Harassment, Threats, Intimidation, Types of Discrimination and Counseling.

One technique used by B&R to monitor the program's effectiveness is through the issuance of a questionnaire quarterly to craft personnel. This questionnaire asks pointed questions about the performance of the supervisory staff in areas such as: use of the open door policy, freedom to approach supervision with concerns (all levels), freedom from harassment and intimidation, adequacy of training/counseling, attitudes, and motivating actions. The results of the surveys are evaluated by a Quality Management (QM) consultant and then sent to B&R top management for appropriate action. Supervisors who are identified as having problems may be required to retake the training program, while those doing well are given recognition. Craft personnel are not required to sign their names to these survey forms; however, the consultant informed the inspector that between 15% and 20% of them are doing so at present.

When asked to give some measure of effectiveness for the B&R training program, Mr. Brown stated that before the program was placed into effect the rate of personnel complaints of bad treatment by management was running about 70 a month. Presently, the rate is about 3 or 4 a month.

Mr. Brown said that the Quality Supervisor training program is available to anyone at the site who wishes to avail himself of it. He said that all the SAFETEAM staff has been through the program. Also, it is B&R's policy to conduct 2- to 4-hour seminars every 3 months to remind supervision about the program requirements and to discuss noted problems of interest to others in the program. While the program is structured to resolve employee concerns within the B&R organization, nonsupervisory personnel are advised that they are free to go to SAFETEAM or to the NRC if they so desire.

From the interviews conducted and a review of documents provided, the B&R program appears to foster a climate conducive to the reporting of employee concerns free from intimidation and harassment and there are provisions within the program for routine re-training and evaluation of its effectiveness.

With respect to the other contractors on site, discussions were held with W. Ballman and L. Teague, TU Electric Personnel Department, about the training and orientation of new contractor personnel. The inspector was informed that it is TU Electric's policy to provide an Employee Information Packet to all newly-hired contractor personnel, regardless of position. This is done as each person is sent to the site personnel office to obtain his badge. According to Teague, all site contractors are instructed to provide an orientation session to all new hires and that they are to be informed, among other things, about the reporting of concerns and the availability of SAFETEAM.

d. Corporate Security-Nuclear

Nuclear Engineering and Operations (NEO) procedure NEO 1.17, Security, Rev. 0, dated September 11, 1987, describes the responsibilities and instructions for the TU Electric Manager of Corporate Security-Nuclear, who is presently Mr. John Rumsey. Mr. Rumsey stated that the onsite office was initially formed in the spring of 1986. Presently, the staff consists of four full-time investigators with considerable investigation experience and who are licensed by the State of Texas.

All concerns determined by SAFETEAM to have aspects of wrongdoing are forwarded to Corporate Security-Nuclear for investigation. Corporate Security also investigates concerns received by individuals, the Hotline, and other TU Electric organizational units. Mr. Rumsey stated that his group has been responsible for the investigation of harassment and intimidation (H&I) concerns since November 1986.

4. SAFETEAM Program Implementation

The Manager of SAFETEAM reports directly to the Executive Vice President, NEO. The SAFETEAM staff is made up of four interviewers and three investigators. The SAFETEAM process consists of receipt of the concern (via interview, mail, phone, or special request), investigation of the concern, and feedback to the person expressing the concern regarding the results of the investigation. These processes are described in the SAFETEAM Operational Manual and SAFETEAM Handbook which are the governing documents for the operations of SAFETEAM. The results of the inspector's review of these processes is provided below.

For the period of May 1, 1986 to February 15, 1988, SAFETEAM received a total of 1090 concerns, 315 of which were classified as Plant Safety concerns, 115 were categorized as involving harassment and intimidation, and 78 were forwarded to Corporate Security-Nuclear for investigation.

a. Orientation and Employment Presentations

The SAFETEAM offers frequent orientation sessions to all site personnel. These sessions are given in the SAFETEAM offices and take about 10 to 15 minutes. During the session, site personnel are told about the purpose of SAFETEAM and how SAFETEAM might be used. This Orientation by SAFETEAM staff is not mandatory for all new personnel reporting to the site. Although other new-employee orientation programs expose individuals to the existence of SAFETEAM, the inspection team believed all new employees would benefit from the SAFETEAM orientation.

On termination of employment, employees are invited by TU Electric to visit the SAFETEAM for a short presentation. Although some employees may leave employment at the site more than once, they are offered the chance to visit the SAFETEAM each time they leave. At the exit presentation, employees are asked if they would like to present any concerns they may have about the project in a private interview. In addition, each employee is given a postage-paid, "mail-in" form should a concern be remembered later. Employees who do not choose to attend the presentation are sent a letter by SAFETEAM giving them an opportunity to write down any concerns they may have and return them to SAFETEAM in a stamped, pre-addressed envelope.

Because of recent large reductions in the on-site work force, SAFETEAM has given the exit presentation to 2,074 employees during the period of January 1, 1988 to April 15, 1988. During this period, SAFETEAM has conducted 49 interviews and received 16 write-in concerns. The inspection team found that SAFETEAM was well prepared to provide exit presentations to the large number of employees leaving the site.

The NRC has inspected SAFETEAM's exit interview process as part of reviewing implementation of Comanche Peak Program Plan, ISAP VII.a.6, "Exit Interview." The results of this inspection are documented in Inspection Reports 50-445/87-06;50-446/87-05 and 50-445/87-09;50-446/87-07.

TU Electric written policies and site bulletin board postings were found to inform employees of their rights to file a complaint with the Department of Labor (DOL) within 30 days for acts of discrimination in Violation of Section 210 of the Energy Reorganization Act of 1974. The inspectors found that employees were not advised of Section 210 as part of the SAFETEAM program. Since it is SAFETEAM's practice to accept all types of concerns (including potential acts of discrimination), the inspection team believed that it would be appropriate for SAFETEAM to also inform employees of their rights with respect to Section 210 of the Act.

b. Interviews

Interviews are available to all groups who receive SAFETEAM orientation, whether at entrance or when exiting the site. The interview coordinator stated that the majority of concerns are taken from "walk-in interviews."

Interviews are conducted in private offices, with only the persons being interviewed and the interviewer present. All interviews are taped, unless the person being interviewed objects. If the interview is not taped, the interviewer makes handwritten notes of the concerns and the person being interviewed may be asked to review a final write-up of the concern before it is sent to the investigation staff.

The interview staff is comprised of individuals who do not have engineering backgrounds. This does not appear to have caused a problem. The Interview Coordinator indicated that on fewer than five (5) occasions has a employee with a concern expressed a desire to speak to an individual with a technical background. This can be accommodated by having an investigator sit in on the interview, if the person being interviewed is willing to waive confidentiality. As another alternative, the investigator can listen to the tape of the interview and can prepare specific questions for the persons raising the concerns that can be relayed by the interviewer. The inspector found no problems with this practice.

SAFETEAM's approach for conducting interviews was found to be adequate and no programmatic deficiencies were observed.

c. Confidentiality Protection

The inspector's review of this area consisted of discussions with SAFETEAM investigators, the interview coordinator, review of procedures, and review of six (6) SAFETEAM case files which indicated possible problems within this area. Based on this review, no general or program weaknesses were found.

To maintain anonymity of the individuals raising the concerns, concerns received by personal interview, "mail-in," or telephone calls are recorded on a two-part form; both parts of which are imprinted with a sequence number. The top portion, which is completed if the individual chooses to give his name, is used to record the individual's name, address, and other pertinent information. The bottom part of the form is used to record the concern(s) without reference to the individual's name. After the form is completed, the parts are separated. The bottom part is sent through the SAFETEAM Program Manager to the investigation staff. Each time an individual raises a concern(s) a distinct number is assigned which allows the interview staff to track the concern(s) and respond to the individual.

The inspector found that persons raising concerns were not required to provide their identity to SAFETEAM, but when they did, they were automatically granted confidentiality. Persons raising concerns were required to sign a waiver before their identity could be made known to those outside the SAFETEAM interview staff.

The inspector reviewed the SAFETEAM files for cases where it was alleged that the confidentiality of the individual raising the concerns had been violated. The review indicated that there was only one file where this allegation was substantiated. In the one case where the investigator had released/revealed the identity of the allegor, the investigator had been reprimanded even though there were

mitigating circumstances which caused the identity of the person raising the concern(s) to become known. There were several files wherein individuals raising concerns indicated an uneasiness about coming to SAFETEAM because their supervisor had to know where they were if they were away from their workstation for more than 30 minutes. In discussing this problem with the SAFETEAM Program Manager, he indicated that this was a problem, but pointed out that there were a number of ways for a site employee to communicate with SAFETEAM without coming to the SAFETEAM offices during their normal working hours.

At the conclusion of an investigation, the SAFETEAM investigator prepares a report, which is reviewed and approved by a SAFETEAM Steering Committee. This review committee, which consists of the SAFETEAM Program Manager, a legal representative and the QC Manager, reviews the report to assure the concern is properly addressed, the investigation results completely address the concern, and appropriate actions are indicated. From the report approved by the Steering Committee, an editor on the interview staff prepares a close-out letter to the individual who raised the concern(s). After the close-out letter is approved by the Steering Committee, the letter is dispatched by the interview staff after attaching a mailing label that is generated by the computer which contains the name and mailing address of the individual who raised the concern.

The inspector found that the SAFETEAM organization has appropriate practices in place to protect the identity of persons raising concerns and that the individuals involved with SAFETEAM are aware of the sensitivity of this issue.

d. Classification of SAFETEAM Concerns and Trending

The SAFETEAM Program Manager classifies all concerns. Concerns are classified into five (5) categories:

- Category 1: Nuclear Safety
- Category 2: Security
- Category 3: Management
- Category 4: Worker safety/industrial safety
- Category 5: Miscellaneous

It was found by the inspector that the initial categorization of concerns is performed by the SAFETEAM Program Manager. The practice of keeping this task at a high level in the organization is designed to achieve a level of consistency that would not accrue if several individuals were involved in the categorization process.

In addition to assignment of the concern to one of the five categories, subcategories (almost 100 of these are available) are assigned to all concerns and this information is inputted into a computer data bank. With these entries in the SAFETEAM tracking program, SAFETEAM is able to sort or extract information on a wide variety of issues and has the capability to do trending analysis on this data. Bimonthly reports are prepared and provided to senior TU Electric management. These reports contain some trending data.

Other than the bimonthly reports, trending capability is apparently used only infrequently and, then, normally at the specific request of a representative of a particular site group.

The inspector noted that there were no specific definitions for each of the concern subcategories, which could result in some inconsistencies in categorization. This should not cause a problem so long as the manner in which these terms are used is understood by those reviewing the information, and these categorizations are consistently applied.

e. Investigation of Concerns

The purpose of reviewing SAFETEAM's process of investigating concerns was to verify that concerns were investigated properly and in accordance with the the SAFETEAM Manual and SAFETEAM Handbook. The investigation process includes, among other things techniques for: characterizing concerns and documenting investigation activities; referencing codes, standards, procedures, regulations, specifications, etc., that were used and were applicable to the investigation; documenting discussions related to the investigation; and documenting the results of the investigation.

The SAFETEAM investigator coordinator assigns each concern to one of the SAFETEAM investigators. SAFETEAM investigators coordinate the investigation of each concern, but the investigation responsibility is often transferred to another TU Electric organizational unit having management or technical responsibility and knowledge. Concerns that suggest aspects of wrongdoing, including harassment and intimidation concerns, are forwarded to Corporate Security-Nuclear for investigation (see Section 8).

The inspectors found that concerns about SAFETEAM practice received by SAFETEAM are normally processed through the SAFETEAM organization. Although the inspector found that the investigations of such concerns were usually done by an organization other than SAFETEAM, the response to the individual who raised the concern was normally issued by SAFETEAM. The SAFETEAM Manager stated that he considered it appropriate that the response came from SAFETEAM since the concern was brought to SAFETEAM. The inspection team was concerned that this practice gives the appearance, at least, that SAFETEAM is conducting the investigation; a practice the inspection team believes may give an inappropriate impression of the independence of an investigation.

To verify implementation of the process for investigation of technical concerns, the NRC inspector reviewed 20 closed case files which contained 32 technical concerns and covered the period of July 1986 to December 1987. The inspector's review found that the documentation of the investigations included: persons contacted (including details of contact); references to applicable documents; the results of hardware inspections, if done; the results and findings of the investigation; and corrective action, if applicable.

It should be noted that the NRC had previously inspected SAFETEAM's investigation of technical concerns. The results of this inspection are documented in Inspection Report 50-445/86-11;50-446/86-09. SAFETEAM investigations previously reviewed by the NRC covered the period of January 14, 1985 to May 8, 1986. Other NRC Inspection Reports which document the results of NRC inspections of SAFETEAM activities (including SAFETEAM technical concern investigations) were 50-445/87-06;50-446/87-05, 50-445/87-09; 50-446/87-07, and 50-445/88-01;50-446/88-01.

Based on the sample of concerns reviewed and review of previous inspection results, the inspector determined that concerns brought to SAFETEAM were investigated properly and in accordance with the SAFETEAM Manual and SAFETEAM Handbook.

f. Feedback

The inspector reviewed approximately 20 SAFETEAM case files. In all instances, there was evidence that the resolution to the allegation was provided to the concerned individual. Even in those cases where the allegor was anonymous and offered no way for recontact to be made, the appropriate closure information was found in the SAFETEAM file. Based on these observations, there does not appear to be a problem with regard to providing the allegor with feedback upon completion of the SAFETEAM investigation.

g. Corrective Action

Neither the SAFETEAM Manual or SAFETEAM Handbook specifically addressed SAFETEAM's responsibility with respect to corrective action. The SAFETEAM Handbook did state that investigation reports should "... tell exactly what was found, and what is being done about it" (i.e., what corrective action is being taken). The inspector interviewed the SAFETEAM manager to determine how he perceived SAFETEAM's role regarding corrective action. The manager indicated that SAFETEAM is a management tool to identify problems to management and management is responsible for initiating and taking appropriate corrective action for identified problems. He indicated SAFETEAM's role is to verify that corrective action is responsive to the problem and that corrective action is appropriate. Based on review of the SAFETEAM's case files, the inspector determined that letters sent to persons raising concerns did identify corrective action being taken (i.e., what was being done about the problem/concern). For example, in those cases involving hardware, corrective action included project initiation of Nonconformance Reports or Corrective Action Reports. These documents initiate and track to completion specific actions taken to address technical problems/concerns. Although SAFETEAM does not have the responsibility for corrective action, the inspector's review found evidence to indicate that SAFETEAM is taking an active role in ensuring that corrective action is being initiated when required.

h. Survey of Workers

Arrangements were made for two NRC inspectors to walk through the plant and, at random, ask questions of workers about the reporting of concerns, their understanding of the SAFETEAM program, and any training they may have had about the reporting of concerns. A total of 32 workers were engaged in short discussions for this purpose. Below are lists of the workers' general work assignments and the company they said they worked for.

Company Name

Brown & Root
Impel
Fluor/Daniel
Ebasco
TU Electric
Hydro Nuclear
South Western Labs

Work Areas

Electrical Helper
Welder/Cable trays
QC Inspector/mechanical
Engineer
Laborer/cleaning
Pipehanger/installer
QC Inspector/electrical
Hydroblaster/cleaning
Sheet Metal/foreman
QA/QC (ASME)
Engineer/mechanical
Equipment Qualification
Secretary/office asst.
Components Engineer
Paper Flow Group/electrical
Paper Flow Group/supervisor
Fire Watch
Security Guard
Concrete Helper
Operations/office asst.
Operations/maintenance mech

Of the employees surveyed, according to their statements, some had worked at the site for a minimum of 2 months while others had worked up to a maximum of 12 years. From this survey, it was found that, for the most part, the employees were quick to respond to those questions which focused on their knowledge and understanding of SAFETEAM and their willingness to use SAFETEAM if the occasion were to arise. There were other workers who appeared to hesitate in their response at first but, after further explanation of what the survey was about and additional questions concerning methods available to them to resolve concerns, they acknowledged awareness that such provisions existed for them at the site, including SAFETEAM.

Many of those surveyed responded that they would attempt to resolve their concerns directly with their supervision, at higher and higher levels if necessary, before they would go to SAFETEAM. A few of the workers had gone to SAFETEAM themselves and had been satisfied with the result. In large part, the concerns that they had worked out with SAFETEAM personally, or other concerns that they were aware of, dealt with general working practices rather than concerns having safety implications of interest to the NRC. Of the 32 persons surveyed, all knew of a system available to them for the reporting of concerns; none expressed a fear of retaliation if they were to do so.

5. Training and Orientation Programs

- a. The inspector interviewed the SAFETEAM Investigator Coordinator to review training programs and experience levels for the investigative staff. Mr. T. Gibbs briefly described the early setup of the SAFETEAM investigative staff when first organized at the Comanche Peak site. He reviewed the capabilities and experience of those persons brought in to start the program and the eventual development of the current training course now in effect. Mr. Gibbs explained that the current training course was developed and implemented in response to questions raised over time at several of the SAFETEAM sites. The course was introduced at Comanche Peak in February 1987. The inspector reviewed the Training Manual (Rev. 0) and noted several sections of general interest such as: SAFETEAM Origin, Structure and Purpose; Investigator's Responsibilities; Interpersonal Communications; Problem Analysis; Effective Listening; Verbal and Written Communication Skills; Investigative Techniques, and Confidentiality. The course was stated to take a total of 20 hours to complete and included two quizzes and a final exam. The

It was observed that the Manual did not contain specific sections devoted to the various technical disciplines that the investigators would be expected to be familiar with during the course of their work. Mr. Gibbs explained that the training program was not intended to provide technical training as such. It was intended that the persons employed to be investigators would have one or more areas of technical expertise and that the combined staff would be able to cover most of the technical areas to some extent. It was noted from the discussion that, for the most part, the investigators are expected to evaluate the technical concerns to the point where they could correctly determine that part of TU Electric or a contractor organization that would most likely do the best job of investigating and resolving the concern. It is expected that the SAFETEAM investigator be sufficiently knowledgeable in the particular technical area to be able to evaluate the resolution once it is provided to SAFETEAM. Several examples were given by Mr. Gibbs where the proposed resolution of a concern provided by the technical staff was not fully acceptable to SAFETEAM and was referred back for additional work before being offered as the best solution to the person who brought the concern to SAFETEAM.

Mr. Gibbs said that any new investigators assigned to work at SAFETEAM are required to go through the SAFETEAM investigator training course.

- b. The inspector interviewed the SAFETEAM Interview Coordinator to review the type and frequency of training the interviewers are given. Ms. Filianne Green, who had worked at SAFETEAM for about 3 years, currently had four interviewers working for her. All were part-time employees. In 1985, when the program started at Comanche Peak, a couple of days training were provided which included a plant tour, a presentation about SAFETEAM, and mock interviews. Later instructions were provided on the preparation of interview records and the use of acronyms which had been somewhat of a problem in communicating with those bringing concerns to SAFETEAM. There has been some specialized training in the use of the computer and editing of interview reports.

Ms. Green showed the inspector a training document titled "Interview Update Workshop" that had been used at the Comanche Peak SAFETEAM last April 7-8, 1987. This document described a 2-day course covering such topics as: Hidden Meanings, Building Trust, Technique On Tape, Cave Rescue-Who Is Biased, Experience As Teacher, Effects On the Job, Problems Solved, and Listen Here, Now. A plant tour was given at the end of the class.

Ms. Green said that many of the interviews they conduct are recorded. Some are not because the person may be too nervous or inhibited with a recording device in use. In any event, the purpose of the training is to equip the interviewer with the necessary skills to adequately obtain the information and write a concise report that can be turned over to the investigators.

It is not intended that the interviewer necessarily understand the technical nature of the concern. The inspector found that the training provided appears directed toward creating an environment in which sensitive information can be easily obtained and accurately documented.

- c. The inspector met with the SAFETEAM manager, R. Werner, to discuss the record system in use at SAFETEAM to keep track of the training received by those working at SAFETEAM. Mr. Werner gave the inspector copies of computer printouts for 1986 and 1987 showing training received by each of the staff members, including himself.

In 1986, 11 training courses that appeared to be important to SAFETEAM were listed as being attended. Of the 11 staff members, all had attended at least 2 of the courses; 2 members had attended a total of 6 courses. In 1987, there were nine members and seven different courses listed as being attended. Each employee had attended at least one course; one had attended four courses.

6. Followup of Past Inspection Findings

During a previous inspection of SAFETEAM (ref. IR 50-445/85-12;50-446/85-08), five areas for improvement were identified. TU Electric's May 14, 1986 letter to the NRC addressed each of these areas. The inspector reviewed the applicant's response and actions taken regarding the five areas. The following writeup identifies each of the five areas and the results of the inspector's review.

Areas identified in IR 50-445/85-12;50-446/85-08 as needing improvement are identified in quotes followed by the results of the inspector's review.

- a. "Interviews lacked specifics. With experience, recontacting the concerned individuals for additional details had increased."

The inspector found that interviewers were provided with initial and periodic training. Based on review of SAFETEAM case files, the inspector found that the quality of the documentation of interviews had improved since the previous inspections and appeared to be adequate.

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

Based on review of SAFETEAM case files, the inspector observed that the investigations for the timeframe of July 1986 through December 1987 contained adequate information to properly characterize the concern. Several instances were noted where the initiative was taken to broaden the investigation to more fully characterize the concern. The topic of investigation of technical concerns is also discussed in Section 4e of this report.

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

In their May 14, 1986 response to this item, TU Electric stated SAFETEAM investigates to determine if it is an actual problem rather than a misunderstanding or miscommunication. If a real problem is determined, the May 14, 1986 response states that the investigation is complete once the corrective action is identified. SAFETEAM staff further stated that prior to closure of an investigation, they review the corrective action to assure it is reasonable and tracked (e.g., identified in an NCR, Corrective Action Report (CAR), or other project tracking system). The inspector's review of SAFETEAM case files found that the above described approach was being implemented and that the approach was adequate.

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

In their May 14, 1986 response to this item, TU Electric stated that unless specifically part of a concern, evaluation of past implication of problems is not within the scope of the SAFETEAM program. As discussed in paragraph c above, SAFETEAM assures that concerns requiring corrective actions are documented in a project issue tracking system. These tracking systems include evaluation of generic implications of the concern, including impact on the past. The inspector found TU Electric's response to this issue acceptable.

- 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 55.5(e)."

In their May 14, 1986 response to this item, TU Electric stated SAFETEAM does not do inspections, engineering evaluations, or functions that are normally part of the project. If the investigation of a concern requires an inspection or engineering evaluation, TU Electric stated that projects are requested to complete the action and report formal notification if required. The inspector found TU Electric's response to this issue acceptable.

7. QA Changes

One conclusion presented in a September 1985 report, CPSES Alleged Climate of Intimidation Supplementary Report (an enclosure to the NRC I&H Panel Report), was that: "Some management practices at CPSES, while not constituting intimidation, were of concern to the Study Team because they are generally not conducive to good job performance. Poor communications, inadequacy of training and infrequent feedback on performance were found." These findings were based on an NRC Study Team's observations of managerial practices related to the performance of QA/QC personnel. TU Electric's February 7, 1986 response to the Study Team's report acknowledged the "description of 'prior management' style at Comanche Peak presented in the Study Team's reports is a fair appraisal, under the circumstances." The TU Electric response described several actions to improve management and employee relations for the QA/QC organization.

The inspector reviewed four aspects of the QA/QC organization to assess changes made to improve management and employee relations. These aspects were: (a) management and organizational changes, (b) QA/QC inspector training, (c) manager skills training, and (d) programs for employee feedback.

a. Management and Organizational Changes

TU Electric's February 7, 1986 response to the Study Team's observations and June 2, 1986 response to Enforcement Action (EA) No. 86-63 described major changes to the QA/QC management structure. Management changes included the appointment of John F. Streeter as Director, Quality Assurance in April 1986; the appointment of David McAfee as Manager, Quality Assurance in March 1985; and the appointment of Phil Halstead as Manager, Quality Control in March 1985. Since their appointments, these managers have made several lower tier

supervisory changes to their organizational units. Further, the QA and QC staffs have been increased substantially since early 1986, thus enabling better distribution and broader coverage of the QA/QC workload.

Major changes have also been made in the QA/QC organization over the past two years. These changes include completion of the transfer of the Manager of QA and his staff from Dallas, Texas, to the site and having the site surveillance group report to the Manager of QA instead of the Manager of QC.

Specific aspects of TU Electric's management and organizational changes were previously inspected by the NRC and the findings of the inspectors are presented in IR 50-445/86-03; 50-446/86-02, paragraphs 3.a and 4a-h and in IR 50-445/86-15; 50-446/86-12, paragraph 3a. Based on interviews with QA/QC managers, review of SAFETEAM cases, discussion with NRC resident inspectors assigned to the Comanche Peak site, and review of NRC inspection reports, the inspector found that the management and organizational structure changes have resulted in an organization with good capabilities to handle issues raised by employees.

b. QA/QC Inspector Training

The inspector interviewed TU Electric managers and staff responsible for the technical training of the QA/QC staff. The Quality Assurance organization has established a staff specifically dedicated to overseeing the technical training needs of the QA organization. Extensive efforts have been made to upgrade the training of QC inspectors. These efforts were, in part, implemented as a result of ISAP I.d.1, QC Inspector Qualifications, and ISAP I.d.2, Guidelines for Administration of QC Inspector Tests. The specific implementation elements of these ISAPs have been reviewed by the NRC and the findings documented in several issued inspection reports.

Based on interviews with the staff responsible for implementing the QA/QC staff technical training programs, review of previous NRC inspection reports, and discussion with Comanche Peak NRC resident inspectors, the inspector concludes that there have been significant improvements in the organization and thoroughness of the technical training programs for QA/QC staff.

c. Management Development Training

The inspector inquired about management development training required or available for QA/QC managers. The TU Electric Course Catalog and Calendar provides a listing of numerous management development courses available to TU Electric staff. Also, as described in Section 3.c of this report, Brown & Root offers a comprehensive training program for managers. Although many QA managers have attended TU Electric courses, Brown & Root's course, and some special training sessions, the inspector found no systematic program for management development training for new

or current TU Electric QA/QC managers. The inspector considered that TU Electric might benefit from a more systematic approach to management development training.

d. Programs For Employee Feedback

TU Electric NEO Quality Assurance Department Procedure NQA 3.30, Quality Assurance Investigations, establishes a method for initiating, documenting, and closing Quality Assurance Investigations (QAI) in response to concerns identified by TU Electric Quality Assurance personnel. The primary purpose of the QAI is to assure that personnel departing the quality assurance organization complete a questionnaire. The questionnaire, which is part of the procedure, allows for the individual to check "yes" or "no" to two questions related to that person's awareness of programmatic or hardware problems. If the individual checked "yes," then he or she is asked to explain. The inspector found that over the past two years departing quality assurance employees seldom identified any problems.

The inspector inquired about any programs that provided feedback to managers about job satisfaction, manager/employee relations, training, and other motivational factors. The inspector found that the Manager, Operations Quality Assurance, had an informal system where his employees were requested to complete a questionnaire on such issues. The manager tracked and trended the information and stated that it provided valuable feedback on the functioning of his organization. The inspector thought that the questionnaire provided a good method of feedback on employee relations matters.

8. Investigation of Wrongdoing Concerns

During the week of February 22, 1988, the Office of Investigations (OI), Region IV Field Office, assisted the inspection team in evaluating the effectiveness of TU Electric's employee concern programs as they relate to potential wrongdoing issues. The result of the OI assessment is documented in OI Report A4-88-005 and summarized in the following paragraphs.

The SAFETEAM Manager, R. Werner, stated that summaries of concerns that involve aspects of wrongdoing received by SAFETEAM are sent to Corporate Security-Nuclear for investigation. R. Werner further stated that the identity of the individual expressing the concerns was not provided to the Corporate Security investigator, but the individual was often asked to waive confidentiality to allow the security investigator to conduct an interview. In instances when the alleege would not waive confidentiality, a conference call was sometimes arranged by the SAFETEAM interviewer to allow the Corporate Security investigator to further debrief the employee. The Manager of Corporate Security-Nuclear stated that security investigators also perform investigations at the request of TU Electric organizations other than SAFETEAM.

A total of 17 TU Corporate Security investigation case files were reviewed. Most of these files contained the backup documentation to support the investigative conclusions; however, some of the earlier investigations contained notations indicating that backup documentation was stored in the TU Corporate Security office in Dallas. In most cases, the wrongdoing concerns had originated through SAFETEAM interviews and the SAFETEAM interviewers' summaries detailed the concern without naming the alleged. In a number of instances, it was noted that TU Corporate Security had requested and received a waiver from SAFETEAM confidentiality and had also interviewed the employee having the concern.

TU Corporate Security's investigations were found to have been scoped well beyond the original concern and capable of addressing the generic implications of issues investigated. As in the past, TU Corporate Security's investigations were found to be of high quality and adequate to resolve the concerns. A potential weakness of the investigations done by the security investigators was the continued reliance, in some instances, on the SAFETEAM interview process. Corporate Security investigative case files indicated that great care was taken in documenting interviews done by Corporate Security so that the end user can independently assess the evidence that formed the basis for Security's conclusion.

A total of 24 SAFETEAM case files were reviewed related to wrongdoing issues, principally involving allegations of harassment and intimidation. These files represented closed concerns investigated between June 1986 and February 1988. Some of the earlier wrongdoing concerns had been investigated and reported by SAFETEAM investigators, while the more recent concerns were investigated by Corporate Security.

The SAFETEAM investigative files reviewed during this inspection were found to be adequate to resolve the employees' concerns. The interviewers' summaries were found to be detailed to the degree necessary to provide the investigators sufficient detail to perform their investigations. The wrongdoing investigations performed by SAFETEAM investigators were fully documented, appeared to be properly scoped with the investigative conclusions supported by evidence. SAFETEAM files closed by investigations done by Corporate Security contained the SAFETEAM interviewers' summaries, the Corporate Security response/report, and the response sent by SAFETEAM to the person who raised the concern.

9. Exit Interview (30703)

An exit interview was conducted on February 25, 1988 and April 22, 1988, with personnel as indicated in paragraph 1 of this report. No written material was provided to the applicant by the inspectors during this inspection. The applicant did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection. During this interview, the NRC inspectors summarized the scope and findings of the inspection. The applicant acknowledged the findings.

Distribution:

Docket File

- NRC PDR
- LPDR
- CPPD Reading (HQ)
- OSP Reading
- RPB, RIV
- RIV Docket File
- J. Taylor
- S. Ebnetter/J. Axelrad
- C. I. Grimes
- P. F. McKee
- J. H. Wilson
- J. Lyons
- M. Malloy
- CPPD-LA
- J. Moore, OGC
- J. Gilliland, RIV
- F. Miraglia
- E. Jordan
- J. Partlow
- B. Hayes
- R. Brady

OFC	: DD: <i>PM</i> :OSP	: D: CPPD:OSP	:	:	:	:	:
NAME	: PFMckee;cb	: CIGrimes <i>CGI</i>	:	:	:	:	:
DATE	: 5/4/88	: 5/9/88	:	:	:	:	: