

March 4, 1986

Mr. Richard L. Gridley  
Manager of Licensing  
Tennessee Valley Authority  
LP 5N 157B-C  
1101 Market Street  
Chattanooga, Tennessee 37402-2801

Dear Mr. Gridley:

Subject: Response by Texas Utilities to Allegations of Intimidation  
and Harassment at Comanche Peak

Enclosed is a copy of the Texas Utilities' letter to the NRC responding to the Comanche Peak Intimidation Panel Report regarding allegations of intimidation and harassment at Comanche Peak. This is being forwarded for your information as we discussed during the March 3, 1986 conference call between the NRC and TVA.

Sincerely,  
*Original signed by*  
Hugh L. Thompson, Jr.

Hugh L. Thompson, Jr., Director  
TVA Oversight Group

Enclosure:  
As stated

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HGilpin:pab  
3/4/86

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3/4/86

*HJA*  
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**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER - 400 NORTH OLIVE STREET, L. B. #1 - DALLAS, TEXAS 75201

February 10, 1986

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Mr. Harold R. Denton  
Director, Office of Nuclear  
Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Vincent S. Noonan  
Director, Comanche Peak Project

SUBJECT: ATTACHED RESPONSE TO THE REPORT OF THE  
COMANCHE PEAK INTIMIDATION PANEL  
DOCKET NOS. 50-445 & 50-446

Dear Mr. Denton:

The enclosed letter dated February 7, 1986, was completed on the 7th, but due to word processing difficulties could not be readied for transmittal until today. We trust the slight delay has not inconvenienced you or your staff.

Yours very truly,

*W. G. Council*

W. G. Council  
Executive Vice President  
Texas Utilities Generating Company

By: *John W. Beck*

John W. Beck  
Vice President

WGC:tj

Enclosure

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*lp.*

*Boo!*  
*3/40*



**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER • 403 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

February 7, 1986

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Mr. Harold R. Denton  
Director, Office of Nuclear  
Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTN: Mr. Vincent S. Noonan  
Director, Comanche Peak Project

SUBJECT: RESPONSE TO THE REPORT OF THE  
COMANCHE PEAK INTIMIDATION PANEL  
DOCKET NOS. 50-445 & 50-446

Dear Mr. Denton:

On October 18, 1985, the Comanche Peak Intimidation Panel provided to the Comanche Peak Task Force its Report of the Review and Evaluation of Allegations of Intimidation and Harassment of Employees at Comanche Peak Steam Electric Station, Units 1 and 2 ("Report"). By letter to me dated November 4, 1985, Mr. Noonan requested that Texas Utilities Generating Company ("TUGCO") respond to the Report. By letter to me dated January 13, 1986, it was requested that our response be filed by February 7, 1986. This submittal responds to these requests.

I. Introduction

The Report confirms that a climate of harassment or intimidation did not exist at Comanche Peak, a conclusion with which we agree. While the Report identifies particular incidents that may have constituted harassment or intimidation, the Report concludes that these incidents were not part of a broader climate of harassment or intimidation. The Report also notes that these incidents apparently have not resulted in poor quality work. Report at 7-8. We agree with the ultimate conclusions of the Report, but believe that reasonable arguments can be made as to whether particular incidents did or did not constitute harassment or intimidation.

The construction and operation of a nuclear power plant is a complex endeavor involving thousands of people and millions of human contacts and decision points. The leadership and management of personnel in this process in many respects is as challenging as actual plant construction. The Report identifies certain past management practices at Comanche Peak that, according to the Intimidation Panel and Study Team, may not have been conducive to producing a quality product. Accordingly, we have scrutinized this Report to assess current management's dedication to

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assuring that a "quality first" attitude is instilled in the work force involved in the construction and operation of Comanche Peak. We believe that the management and programmatic actions taken during that past few years demonstrate such dedication and provide assurance that such an attitude exists. We discuss these actions in Section III of our comments.

A lengthy factual record has been developed on all of the specific incidents identified in the Report. We have reviewed the record and the Panel's Report and do not necessarily agree with the conclusions reached in the Report as to all of these incidents. However, there is ample record on these incidents and we see no merit for purposes of this response to rehearse that record here. We would point out that even if the Intimidation Panel's conclusions regarding the individual incidents are correct, we are satisfied that, while certainly of concern to us, those incidents do not have independent safety significance. We agree with the findings of the Study Team, adopted by the Panel, that the "number of alleged incidents of intimidation, allegations, and named intimidators was small" and "well within the number of events that would be expected to occur even under the best of circumstances." We also agree with the ultimate conclusion that the incidents do not establish a pervasive climate of intimidation. Supplementary Report at 44.<sup>1</sup> This is the finding that we believe is significant in terms of resolving the question of whether the pending license application should be granted.

## II. Observations on the Report

For purposes of this response, the most significant conclusions of the Report are directed at past "management style". Generally, "the Study Team noted that a number of management practices existed which may not have been conducive to good job performance and which may have generated mistrust, suspicion and lack of management credibility." Report at 8. We have taken this observation seriously, and over the past months have aggressively assessed the "management" issue. We address below our observations on the Report. In Section III we address the management and programmatic actions which we believe respond to the conditions that gave rise to the Report's findings.

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<sup>1</sup>The Study Team, a group of consultants to the NRC, issued two reports adopted by the Panel. (See "Comanche Peak Steam Electric Station: Alleged Climate of Intimidation", EG&G Idaho, Inc. (September 1984) ("EG&G Report"); "Comanche Peak Steam Electric Station: Alleged Climate of Intimidation Supplementary Report", EG&G Idaho, Inc. (September 1985) ("Supplementary Report"). The EG&G Report and the Supplementary Report are attached to the Report of the Intimidation Panel transmitted on November 4, 1985.

Comanche Peak is the first nuclear project undertaken by TUGCO. It is not overly simplistic to state, nor are we too proud to admit, that we have indeed learned from experience. We believe that our management has always been committed to constructing and operating a safe nuclear power plant. We concur with the Panel and Study Team that, while there have been isolated situations that could have been handled better from the standpoint of employee relations and communications, there is no evidence that prior management directed or condoned any systematic discouragement of inspectors to do their jobs. Moreover, we reiterate the observation of the Panel that, even assuming some undesirable management practices, "the environment created by these management practices would not necessarily lead to intimidation or result in improper construction or quality control." Report at 8.

We believe that the description of prior "management style" at Comanche Peak presented in the Study Team reports is a fair appraisal, under the circumstances. Some of the Study Team observations most likely would apply at many large construction sites, not only at Comanche Peak. For example, EG&G found a basically conservative style with an emphasis on error prevention and adherence to preset procedures. The atmosphere was found to be "task-centered", with accomplishment of the objective (getting the job done) being "the most important priority (which) consumes much of the attention of supervisory personnel." EG&G Report at 38. These broad observations could be applied to many utilities' construction projects and perhaps reflect conditions that are almost inevitable at a construction site the size of Comanche Peak.

On the other hand, EG&G more significantly found the atmosphere to be "tense and stressful due to the complexity of schedules and interfaces which tend to be potentially conflictful." EG&G Report at 38. We acknowledge that this is clearly not desirable. EG&G found that management had "little tolerance for ambiguity or for the questioning of supervisory demands." EG&G also found that communications were primarily downward and afforded "very little opportunity for interaction" and "little tolerance for deviating from information communicated downward." *Id.* at 38-39. Similar observations are made in EG&G's Supplementary Report. Supplementary Report at 37-43. For example, EG&G found poor communications between QA inspectors and their supervisors, a lack of job training and clear job performance standards for QC inspectors and that "the interface between craft and QC is viewed as an adversarial one." Supplementary Report at 40. In sum, EG&G described a management style lacking "attention to the human dimension." *Id.* at 43. We take these findings very seriously and believe that the findings reflect a management style that has been less than ideal for handling employee relations in today's complex world of nuclear power.

We have considered these findings and evaluated in that light the important measures previously taken to improve management, enhance employee relations, and reaffirm a "quality first" attitude on the part of all employees. These efforts are itemized in Section III below. We believe that our efforts will enhance trust and communications between employees and management. We further recognize that "management style", a "quality first" attitude, and "trust and communications" between employees and management are not issues which can be addressed once and forgotten. These subjective matters are dynamic issues which must be addressed and reaffirmed, through word and conduct, throughout the lifetime of a nuclear plant. Our current management team, staffed with individuals experienced in nuclear power, is committed to continuing self-assessment and self-improvement in these areas. We are convinced that the management improvements and initiatives discussed in the next Section have assured and enhanced a work environment dedicated to safety, reliability, and excellence at Comanche Peak in which employees do not fear reprisals for identifying safety concerns or questioning safety procedures.

### III. Actions to Assure Quality First

We believe that the following actions are evidence of our commitment to quality. These actions include restructuring top corporate nuclear management, restructuring site and corporate quality assurance/quality control management, instituting training programs to inculcate employees with a "quality first" attitude, providing numerous avenues for employees to raise safety concerns, and interviewing employees involved in quality activities prior to the termination of his or her employment in connection with Comanche Peak. In addition to these programs, we have issued periodic reminders to employees of our corporate commitment to quality. Further, when appropriate, ad hoc actions such as employee surveys and internal inquiries have been conducted. Each of these actions is discussed below.

We believe that these actions complement each other. They involve hiring managers with a proven commitment to quality and a track record of excellence, providing a structure in which those managers can effectively carry out their jobs, assuring employee awareness of the corporate commitment to quality and safety, and providing employees with the necessary tools to bring their concerns to management. In short, we believe we have created a working environment which has established and is maintaining a "quality first" attitude on the part of those constructing and operating Comanche Peak.

Restructuring Top Corporate Nuclear Management

TUGCO some time ago decided that new management should be added to enhance top management direction of the nuclear program. Such management would provide a fresh perspective and a depth of proven experience to that program. Consequently, TUGCO undertook to obtain new management personnel with outstanding management skills and experience in the nuclear industry.

In April, 1984, Michael D. Spence, President of TUGCO, appointed Mr. John Beck as a special assistant to him on nuclear matters. Mr. Beck has extensive experience in the licensing and management of nuclear power reactors, having served 10 years in various roles with the Yankee Atomic Electric Company, including activities with respect to the Maine Yankee and Vermont Yankee plants. From 1976 through 1980 he served as Vice President, then as Executive Vice President, with Vermont Yankee Nuclear Power Corporation. He also spent four years as a senior officer with a major nuclear power engineering and consulting firm. Mr. Beck's initial role at TUGCO was to provide an overview of the Comanche Peak project and apply his expertise to assist management in establishing means to address outstanding licensing issues.

In April, 1985, Mr. Spence announced my appointment as Executive Vice President of Texas Utilities Generating Company with responsibility for all nuclear activities, reporting to the President of TUGCO. I was formerly the Senior Vice President for nuclear engineering and operations at Northeast Utilities. In my 18 years with that utility, I served in numerous positions related to the management of Northeast's four nuclear power reactors. This experience included responsibility for engineering, construction, and operation of these power reactors. I previously served seven years as a commissioned officer in the United States Navy, five of which were in nuclear power.

At the time of my appointment, Mr. Beck was appointed Vice President with direct responsibilities for licensing, quality assurance and nuclear fuel management, reporting to me. Mr. Beck and I spend a substantial portion of our time at the Comanche Peak site.

In October, 1985, Mr. Austin B. Scott, Jr. was appointed Vice President-Nuclear Operations, also reporting to me. Mr. Scott recently retired from the United States Navy as Rear Admiral and Commander of the Submarine forces of the U. S. Pacific Fleet. Mr. Scott has 30 years experience in engineering, operation and fiscal management related to nuclear power, including the supervision of nuclear submarine reactors. Mr. Scott's office is located at the Comanche Peak site.



These individuals' proven track records in the management of quality construction and safe operation of nuclear facilities assures the maintenance of the high standards expected by TUGCO in the construction and operation of Comanche Peak.

#### Restructuring QA/QC Management

TUGCO has also made several changes to the Quality Assurance management team for Comanche Peak. These changes were made to provide a fresh management perspective and to assure that the high standards by which such activities should be conducted are maintained. These changes are also intended to reemphasize the importance of a "quality first" attitude in the workforce.

TUGCO appointed new managers over quality assurance activities both in the Dallas corporate offices and at the site. In March 1985, TUGCO appointed James R. Wells to the new position of Director, Quality Assurance, reporting to the Vice President responsible for quality assurance. Mr. Wells was appointed on loan from Duke Power Company where, since 1966, he was directly involved in the implementation and management of construction and quality assurance activities at Duke's nuclear facilities, including nine years as Corporate QA Manager responsible for the design, construction and operations QA programs for seven nuclear plants during construction and operation. At the same time, TUGCO also appointed Mr. David McAfee as Manager, Quality Assurance (Dallas) and Mr. Phil Halstead as Manager, Quality Control (CPSES Construction), both reporting to Mr. Wells. These individuals are on loan from Daniel Construction Company. Mr. McAfee has served in various roles involving industrial (including nuclear) QA program supervision and management since 1968, including 12 years with Daniel. Mr. Halstead has 14 years nuclear quality assurance experience at a number of nuclear power reactors.

In addition, we recently announced the appointment of John R. Streeter as Director of Quality Assurance, succeeding Mr. Wells. Mr. Streeter came to Texas Utilities Generating Company from NRC Region III, where he served most recently as the Technical Assistant, Division of Reactor Safety. He had been with the NRC for the last 14 years and has 25 years nuclear experience with the NRC, private industry and the U. S. Navy.

#### Orientation Programs

In November 1983, and May 1985, two orientation programs were conducted in addition to general training programs, the goal of which was to inculcate employees at Comanche Peak with a "quality first" attitude. The November 1983 program was an audiovisual presentation that made these points:

- Quality is expected in all aspects of construction;
- Cooperation between craft and QA/QC is expected and harassment or "bullying" will not be tolerated;
- If a craft employee identifies what he believes is a nonconforming condition, he should bring it to the attention of his supervisor, to QA/QC personnel, to TUGCO's management or to the NRC;
- If an employee has a concern about quality, he has the right to voice the concern without fear of retribution; and
- Employees may contact management through a telephone "hotline" (discussed below).

Further, in May 1985, Brown & Root commenced a "Quality Supervisor" training program for supervisors of Brown & Root employees. This program is designed to teach, through an initial 16 to 20 hour course, the principles of good management and introduce proper communication skills to supervisors at Comanche Peak. Included in the course are topics such as quality, safety, motivation, leadership and problem solving techniques. A series of 4-hour follow-up courses is also offered on a variety of management techniques, including counselling employees, delegating duties and motivation of employees.

#### Programs for Reporting Safety Concerns

TUGCO has put into place a number of programs through which employees may report their safety concerns. The programs include means to assure employee anonymity, if requested. The programs have included a telephone hotline, a site ombudsman and the SAFETEAM program. In addition, formal procedures have been issued governing investigations into quality activities.

The telephone hotline program was initiated on October 4, 1983, at the direction of Mr. J. S. Farrington, President of Texas Utilities Company (Attachment 1), and remains in place. A description of the program is set forth in a letter from B. R. Clements, the Vice President Nuclear, dated October 25, 1983. (Attachment 2.) This program was announced through audiovisual presentations to CPSES personnel, posters placed throughout the site and paycheck inserts. This program provides a 24-hour method of receiving, in confidence, employees' concerns. The concerns are investigated under the direction of the Director, Corporate Security. Upon completion of an investigation the results are provided, again confidentially, to the employee.

Beginning in November 1983, a site ombudsman was available for employees wishing to raise safety concerns. Mr. Boyce Grier, a former Region I director with the U. S. Nuclear Regulatory Commission, served in the capacity of an independent contractor with direct access to top management. In May 1985, the ombudsman program was discontinued following implementation of the SAFETEAM Program.

Mr. Harold R. Denton  
February 7, 1986  
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Also, in January 1984, TUGCO put into effect a system to initiate, investigate, document and close quality assurance investigations. Concerns to be addressed through this system may come to the attention of QC supervisors through exit interviews, personal or telephone contacts or questionnaires.

The SAFETEAM program was instituted at Comanche Peak in January 1985. The SAFETEAM program is conducted under contract with Syndeco, a subsidiary of Detroit Edison, and has been successfully implemented at other power reactor sites. It establishes several means by which workers can raise concerns on any topic and receive a full investigation report in strict confidence. The program is under the direction of a fulltime TUGCO manager and is organizationally independent of site management. It originally reported to the TUGCO President. Upon my arrival it was changed to report directly to me. All employees at Comanche Peak were introduced to the SAFETEAM program through small group presentations and paycheck inserts. SAFETEAM posters are placed throughout the site and other notices and forms are routinely made available to workers. The program includes toll free telephone numbers and independent reviewers to interview each employee with a concern. SAFETEAM also conducts an exit program where any employee, upon termination of his or her employment at Comanche Peak, is given an opportunity for an interview and is provided a package which includes a form for transmitting to SAFETEAM any concerns the employee may think of later. Since the inception of the SAFETEAM Program several hundred concerns have been brought to SAFETEAM. These concerns range from questions regarding pay and benefits, to specific inquiries concerning plant safety. All concerns and investigations results are reviewed by a group of senior advisors who assure that the concerns have been fully addressed before responses are provided. Each employee with a concern receives a written response to his or her concern.

#### Periodic Reminders of Quality First Corporate Policy

There have been a number of reminders to employees of our "quality first" corporate policy. These reminders have taken the form of personal presentations to employees by corporate officers and policy announcements issued to employees. For instance, in April 1984 and again in April 1985, Mr. Spence, President of TUGCO, conducted meetings with site QC personnel to reemphasize management's commitment to quality and support for the performance of their jobs in a "quality first" manner. Even prior to Mr. Spence's meetings, Mr. Clements, then the TUGCO Vice President, Nuclear, held a series of meetings with the workforce at Comanche Peak. Mr. Clements first met with QC inspectors to emphasize their right and responsibility to report safety concerns to either TUGCO or Brown & Root management or to the NRC. Mr. Clements also met with Brown & Root employees who were foreman or higher to emphasize TUGCO and Brown & Root management's support for the principles addressed in the audiovisual presentation (discussed above).



Mr. Harold R. Denton

February 7, 1986

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In addition, numerous announcements from corporate management have been made to workers at Comanche Peak regarding the policies concerning reporting of safety defects and harassment or intimidation of workers. For example, in December 1983, Mr. Spence issued two policy statements to all personnel assigned to Comanche Peak. Mr. T. L. Austin, Jr., President of Brown & Root, separately transmitted these statements for Brown & Root employees at Comanche Peak. (Attachments 3-5.) The first reemphasized the obligation of every employee to identify, document, and report any safety deficiency they believe exists at the plant. It emphasized that acts of harassment or intimidation were prohibited and any employee who commits such an act would be subject to disciplinary action, up to and including discharge from employment. The second policy dealt expressly with harassment and threats, noting again that such acts by an employee would subject the employee to disciplinary action, including termination.

There have also been several letters and notices to employees from management reaffirming management's commitment to safety and quality and prohibiting acts of intimidation or harassment. Most recently, in July 1985, both Mr. Austin and I transmitted letters both to supervisors and employees at Comanche Peak. (Attachments 6-9.) The letters to supervisors reiterated the importance of assuring an atmosphere where everyone feels free to report safety concerns, and that any action or conduct on their part to the contrary will not be tolerated. The letters to the employees emphasized that it is everyone's responsibility to report safety or quality concerns and that management will not tolerate any interference with the reporting of safety concerns.

#### Other Actions

TUGCO has also performed various reviews and investigations to provide greater management awareness of the attitude of employees or facts surrounding specific incidents. For instance, in 1983 a survey of approximately 150 non-ASME QA/QC inspectors was conducted. The purpose of the survey was to give management a better understanding of employee attitudes and opinions about their jobs, supervisors, the work environment and management philosophy. Partly as a result of this survey some QC supervisory changes were initiated.

As a final point, I recognize that regardless of the existence of numerous programs and processes designed to establish and maintain a "quality first" attitude and "trust and communications" between employees and management, the most important factor in assuring safe construction and operation of Comanche Peak is the creation of a safety ethic on the part of every employee. It is my deep conviction that such an ethic be instilled in the entire Comanche Peak organization. To this end I have prepared a brochure to be distributed to every employee within my organization. (Attachment 10.) This brochure presents excerpts from a speech I delivered last summer at Stanford University as

Mr. Harold R. Denton  
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part of a course sponsored by the United States Department of State entitled "Management of National Nuclear Programs for Assured Safety." In that speech I presented my philosophy regarding the creation of a safety ethic. To me, a nuclear safety ethic is a state of mind that affects the entire organization. The foundation of that ethic is the insistence that nuclear plants be constructed, operated and maintained with the highest standard of excellence. All employees should be dedicated to doing the job right the first time and pay close attention to details and question what might go wrong. I intend to dedicate myself and the persons under my direction to assuring that such an ethic exists at Comanche Peak.

#### IV. Conclusion

Management at Comanche Peak has always been committed to quality and to safety. Nevertheless, we have thoroughly considered the observations of the Panel with respect to past management style. As discussed above, subsequent to virtually all the incidents discussed in the Report, we have taken aggressive measures with the objective of reinforcing a "quality first attitude" at the plant. We have implemented major changes in the management organization to increase nuclear experience, and have instituted several specific programs to improve the management-employee relationship, QA inspectors' job performance, and the attitude and morale throughout the organization. We believe these measures have addressed and will successfully address all of the Panel's observations on past management style and practices.

Yours very truly,

*W. G. Council*

W. G. Council  
Executive Vice President  
Texas Utilities Generating Company

By: *John W. Beck*

John W. Beck  
Vice President

WGC:tj

Attachments

cc: See Next Page

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## TEXAS UTILITIES COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

October 4, 1983

J. S. FARRINGTON  
PRESIDENT

Mr. D. L. Andrews  
Director, Corporate Security  
Texas Utilities Services Inc.  
2001 Bryan Tower  
Dallas, Texas 75201

## HOT LINE PROGRAM

As part of a program to reaffirm the corporate commitment to an effective, independent QA/QC program, Texas Utilities Generating Company has initiated a number of actions. One of those actions involves the establishment of a Hot Line Program to encourage the reporting of quality concerns and the timely investigation and resolution of those concerns.

To provide this program the desired independence from the nuclear organization, I am assigning the responsibility for the Hot Line Program to the Director, Corporate Security. Specifically, the Director, Corporate Security will:

1. Install a hot line telephone in his office and set up procedures to answer/record calls from concerned persons.
2. Document all allegations; based on a review of each allegation, conduct an investigation, if appropriate.
3. Maintain records of the disposition of each allegation received.
4. Inform the Vice President, Nuclear TUGCO of:

All allegations received, requirements for technical assistance to support an investigation, status of on-going investigations, and the final results of each investigation.

In the event the Vice President, Nuclear is the subject of an allegation, the Director, Corporate Security will report the results of the investigation to the Executive Vice President, Texas Utilities Generating Company.

Mr. D. L. Andrews

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October 4, 1983

By copy of this letter, the President, Texas Utilities Generating Company is requested to direct the Vice President, Nuclear to:

Insure that the hot line number is given wide dissemination to personnel working at CPSES and that persons are encouraged to report their concerns;

Upon his request, provide technical assistance to the Director, Corporate Security;

Review the results of each investigation and take the necessary action to close out the allegation; and

Forward a report of the action taken to the Director, Corporate Security.

The Hot Line Program has an important role in corporate efforts to reemphasize the importance of quality in construction, inspection, testing, and operations of CPSES and to enhance our implementation of the Corporate Quality Assurance Program. I expect the full support of all concerned in establishing and carrying out the program.

  
J. S. Farrington

JSF:cp

c: P. G. Brittain  
M. D. Spence  
R. J. Gary  
L. F. Fikar  
B. R. Clements  
J. B. George  
D. N. Chapman  
J. T. Merritt

## TEXAS UTILITIES GENERATING COMPANY

## OFFICE MEMORANDUM

D. L. Andrews  
To D. N. Chapman

Dallas, Texas October 25, 1983

Subject Quality Hot Line Program

This letter is being written to provide an outline of the Quality Hot Line Program which is being initiated to comply with Mr. Spence's letter to me of October 4, 1983.

A basic description of the program, the TUGCO Nuclear responsibilities, and the interfaces with Mr. David L. Andrews is as follows:

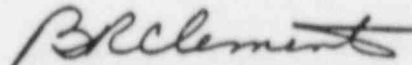
1. All personnel associated with CPSES will be shown an audiovisual presentation reaffirming TUGCO's commitment to an effective, independent QA/QC Program. The Quality Hot Line Program will be introduced during this presentation. QA and Engineering and Administrative Services are responsible for this activity.
2. Posters will be placed throughout the site and information will be distributed with the paychecks of all personnel involved in construction activities describing how to report concerns with quality. There will also be a brief description of the program, informing them of the hot line number, providing a form to fill out if they would rather write down their quality concerns instead of calling the 800 number, and stating that their names will be kept confidential and known only to Corporate Security. They can remain anonymous if they so desire. For those who wish to remain anonymous, the program information will indicate that we will not be able to provide feedback on the results of investigations of their quality concerns. QA and Engineering and Administrative Services are responsible for this activity.

The posters and pay envelope inserts will state that all concerns, whether in writing or via a phone call, are to be brought to the attention of the Director, Corporate Security in Dallas, who will be responsible for the investigation.

3. Personnel leaving QA/QC will have an interview by a Supervisory QA/QC individual to determine if they have any quality concerns. Their concerns will be documented and forwarded to the Director of Corporate Security in Dallas for investigation. If they prefer, they can provide information on their quality concerns by the method described in item 2 above.
4. It is my understanding that D. L. Andrews will be responsible for all investigations and will be the interface with all persons who have quality concerns. If the quality concerns are safety related and if technical assistance is required in conducting the investigation, D. L. Andrews will contact me. I will assign an individual or group of individuals to provide assistance, working under the direction of D. L. Andrews.

It is also my understanding that Corporate Security will maintain the anonymity of persons who indicate quality concerns, should the individual desire. They will maintain all files concerning the hot line program and will maintain a tracking system. They will also provide a monthly report to M. D. Spence and J. S. Farrington.

5. D. L. Andrews will provide me a copy of the results of each investigation of safety related concerns. I will review them for significance and take appropriate action. All results which concern QA/QC will be transmitted to D. N. Chapman who will make a determination of reportability per 10 CFR 50.55e.



B. R. Clements

BRC:kh

cc: P. G. Brittain  
J. S. Farrington  
M. D. Spence  
R. J. Gary  
L. F. Fikar  
J. B. George  
J. T. Merritt



TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

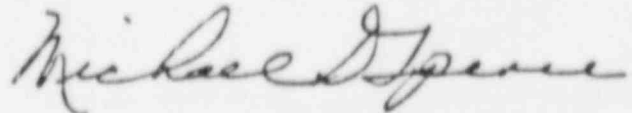
MICHAEL D. SPENCE  
PRESIDENT

December 20, 1983

TO: All Personnel Assigned to  
Comanche Peak Steam Electric Station

CPSES POLICY REGARDING INVESTIGATION  
AND REPORTING OF QUALITY MATTERS RELATED  
TO NUCLEAR SAFETY

It has been and remains the highest priority of CPSES management to ensure the quality and safety of the plant. To that end, all employees and supervisors are required to identify, document and report as soon as possible any conditions that they know, or have reason to believe, could compromise the safety and integrity of the plant. Any failure to report such conditions, knowingly withholding information regarding such conditions, failure to cooperate fully with other personnel investigating such conditions, or any attempt to harass or intimidate any employee attempting to report such conditions is regarded by management as a gross breach of employment responsibilities and may constitute a violation of law. Any employee or supervisor who commits any of the foregoing acts shall be subject to disciplinary action, up to and including discharge from employment.



MDS:ln



TEXAS UTILITIES GENERATING COMPANY  
2001 BRYAN TOWER DALLAS, TEXAS 75201

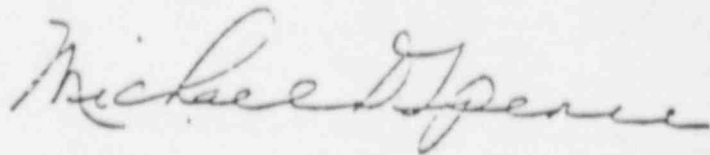
MICHAEL D. SPENCE  
PRESIDENT

December 20, 1983

TO: All Personnel Assigned to  
Comanche Peak Steam Electric Station

CPSES POLICY REGARDING INTIMIDATION,  
HARASSMENT OR THREATS

All personnel assigned to the Comanche Peak project, whether employed by the Texas Utilities System or contractors, are expected to conduct their activities in a professional manner. Accordingly, acts of intimidation, harassment or threats on the part of construction, Quality Assurance/Quality Control or any other functional organization personnel, will not be tolerated. Personnel engaging in acts of intimidation, harassment or threats shall be subject to disciplinary action including termination. The appropriate level of disciplinary action will be determined on an individual case basis.



MDS:ln

**Brown & Root, Inc.**

A Halliburton Company

Post Office Box Three, Houston, Texas 77001

T. Louis Austin, Jr.  
President

(713) 676-3431



December 27, 1983

Mr. Doug C. Frankum  
Project Manager  
Brown & Root, Inc.  
P. O. Box 1001  
Glen Rose, TX 76043

Dear Mr. Frankum:

The attached letters from Mr. Michael D. Spence, President of Texas Utilities Generating Company, are self-explanatory. Please post these two policy letters in areas of high visibility immediately.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'T. L. Austin, Jr.', written in a cursive style.

js

cc: J. T. Gossett  
W. M. Rice

attachments

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER DALLAS, TEXAS 75201

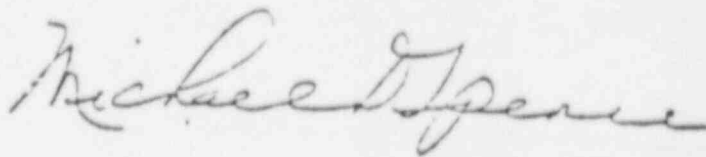
MICHAEL D. SPENCE  
PRESIDENT

December 20, 1983

TO: All Personnel Assigned to  
Comanche Peak Steam Electric Station

CPSES POLICY REGARDING INTIMIDATION,  
HARASSMENT OR THREATS

All personnel assigned to the Comanche Peak project, whether employed by the Texas Utilities System or contractors, are expected to conduct their activities in a professional manner. Accordingly, acts of intimidation, harassment or threats on the part of construction, Quality Assurance/Quality Control or any other functional organization personnel, will not be tolerated. Personnel engaging in acts of intimidation, harassment or threats shall be subject to disciplinary action including termination. The appropriate level of disciplinary action will be determined on an individual case basis.



MDS:ln

TEXAS UTILITIES GENERATING COMPANY

2001 BRYAN TOWER · DALLAS, TEXAS 75201

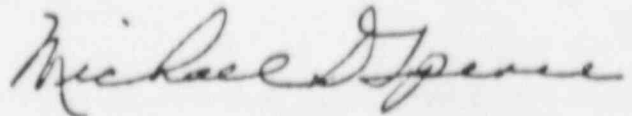
MICHAEL D. SPENCE  
PRESIDENT

December 20, 1983

TO: All Personnel Assigned to  
Comanche Peak Steam Electric Station

CPSES POLICY REGARDING INVESTIGATION  
AND REPORTING OF QUALITY MATTERS RELATED  
TO NUCLEAR SAFETY

It has been and remains the highest priority of CPSES management to ensure the quality and safety of the plant. To that end, all employees and supervisors are required to identify, document and report as soon as possible any conditions that they know, or have reason to believe, could compromise the safety and integrity of the plant. Any failure to report such conditions, knowingly withholding information regarding such conditions, failure to cooperate fully with other personnel investigating such conditions, or any attempt to harass or intimidate any employee attempting to report such conditions is regarded by management as a gross breach of employment responsibilities and may constitute a violation of law. Any employee or supervisor who commits any of the foregoing acts shall be subject to disciplinary action, up to and including discharge from employment.



MDS:ln

**Brown & Root, Inc.**

A Halliburton Company

Post Office Box Three, Houston, Texas 77001

T. Louis Austin, Jr.  
President

(713) 676-3431



July 9, 1985

Brown & Root, Inc.  
Comanche Peak Steam  
Electric Station  
P. O. Box 1001  
Glen Rose, TX 76043

Dear Brownbuilder Supervisor:

Please pardon this form letter because I wish I could sit down and talk with every one of you personally. You have done a great job on the construction of Comanche Peak in spite of the criticism that this project gets in the press. One of these days, people will understand that this is one of the greatest and best construction projects in the world. It is vitally important, however, that we continue to do our job well and that requires that we assure an atmosphere where everyone feels free to report safety concerns.

Attached to this letter is a letter that will go out to all employees later on emphasizing Brown & Root's commitment to safety and quality. This is a further effort to assure that all employees feel free to report their concerns about safety and quality. It has come to our attention that some of our employees believe that it is not a part of their job to report safety concerns. Several have expressed the belief that their job would be in jeopardy if their supervisor were to learn that they had reported a safety concern. This is absolutely contrary to Brown & Root policy.

As supervisors, you should assure the employees working under you that they are free to report their concerns about safety and quality at any time. It is important that we maintain and preserve a work environment in which there is no question that employees are free to come forward with their concerns. This is absolutely essential to insure that Comanche Peak is built safely.

You are reminded that any action or conduct on your part that in any manner discourages employees from reporting safety and quality concerns will not be tolerated. Moreover, any manager or supervisor who engages in such actions will be subject to severe disciplinary action up to and including discharge from employment. So there will be no doubt about your responsibility, please be guided by the following:

1. Communicate with your employees that they are free, without fear of reprisal, and at any time, to report any concern that they have regarding plant safety, either to you, to Safeteam, to Quality Control, or to the Nuclear Regulatory Commission. Make sure that they know it is not only their right but their obligation as a Brown & Root employee to make plant safety of highest priority when performing their duties.
2. Take each and every concern seriously and be sure to communicate back to your employee the resolution of each concern.
3. Encourage your employees to report safety concerns to you, even if they may have been responsible, in whole or in part, for the safety problem they are reporting on. Employees should not be encouraged to hide their mistakes. Rather, they should be encouraged that it is their duty to report concerns so that they can be corrected at the very earliest opportunity.
4. However, do not discourage any employee from reporting their concerns to Safeteam. More specifically, do not question an employee either before or after he or she goes to Safeteam about what was reported there. Do not insist that an employee report his or her safety concerns to you first rather than reporting to Safeteam, QC, or the NRC.
5. Do not, by word or deed, lead your employees to believe that the reporting of safety concerns is up to QC and not a responsibility of craft. This is not so.

I know that all of you are committed to building a quality plant. Safety and quality are keys to the success of the Comanche Peak project. While we are all proud of the work we have done, there is always room for improvement. It is essential that we make sure that all supervisors, as well as all employees, are aware of, and practice daily, their individual responsibility to assure that all safety concerns are addressed before this plant goes into operation. I very much appreciate your efforts in meeting this challenge.

Sincerely yours,



**Brown & Root, Inc.**

A Halliburton Company

Post Office Box Three, Houston, Texas 77001

T. Louis Austin, Jr.  
President

(713) 676-3431



July 11, 1985

Dear Comanche Peak Brownbuilder:

Over the history of our company, "Brownbilt" has come to mean quality in construction and "doing it right the first time." In building this reputation we have relied upon craft to be the first line of quality in the construction process. It has recently come to my attention that several of you have expressed the belief that it is not your duty to report safety concerns and that you might believe you would regret it if you did. This is certainly not the case. As you know, we have made many efforts over the past several years to provide the means by which all employees working at Comanche Peak could freely report any concerns they may have concerning quality matters and can do so without fear that their job would be adversely affected. I want to re-emphasize to each of you the following:

1. It is your responsibility to report any safety or quality concern which you discover. The responsibility for reporting safety concerns does not rest solely with quality control personnel. It is a duty that each of you share in insuring the safe operation of Comanche Peak.
2. If you report a safety concern and do not receive a reply to that concern within a reasonable time, do not hesitate to use one of the several other avenues that are available to you. If your supervisor does not take your concern seriously, then go to his or her supervisor or manager. If for some reason you have a problem with reporting a concern, take that concern higher up the chain of command if necessary.
3. Feel free to report any of these concerns either to your supervisor, or to QC, to Safeteam, or to the NRC.
4. Anyone interfering with your obligation to take the action described above will be violating Brown & Root policy and will be subject to severe disciplinary action. In this connection, each employee is reminded of the policy letter on harassment dated December 20, 1983, directed to all site personnel at Comanche Peak. Should anyone attempt to interfere with your reporting safety concerns, such conduct requires immediate attention and should likewise be reported.

You are doing a good job in building this plant. The success of this project is important to all of us. I encourage you to continue to have pride in the good work that you have done, and I ask that each of you support fully the policies re-emphasized by this letter.

Sincerely yours,

## TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 100 NORTH OLIVE STREET, L.B. #1 • DALLAS, TEXAS 75201

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

July 23, 1985

Dear Comanche Peak Supervisor:

You have done a good job on the construction of Comanche Peak in spite of the criticism that this project receives. However, it is vitally important that we continue to do our job well, and to do so requires that we assure an atmosphere wherein everyone feels free to report safety concerns.

Attached to this letter is a letter that will be sent to all employees later, emphasizing our commitment to safety and quality. This is a further effort to assure that all employees feel free to report their concerns about safety and quality. It has come to our attention that some employees believe that it is not part of their job to report safety concerns. Some have expressed the belief that their job would be in jeopardy if their supervisor were to learn that they had reported such concerns. This is absolutely contrary to company policy as well as my own personal beliefs.

As supervisors, you should assure the employees working under your supervision that they are free to report their concerns about safety and quality at any time. It is important that we maintain and preserve a work environment in which there is no question that employees are free to come forward with their concerns. This is absolutely essential to insure that Comanche Peak is built to operate safely.

You are reminded that any action or conduct on your part that in any manner discourages employees from reporting safety and quality concerns will not be tolerated. Moreover, any manager or supervisor who engages in such actions will be subject to severe disciplinary action up to and including discharge from employment. So there will be no doubt about your responsibility, please be guided by the following:

1. Communicate with your employees that they are free, without fear of reprisal, and at any time, to report any concern that they have regarding plant safety, either to you, to Safeteam, to Quality Control or to the Nuclear Regulatory Commission. Make sure that they know it is not only their right but their obligation as an employee to make plant safety and quality of highest priority when performing their duties.



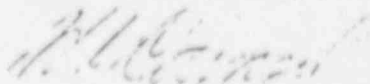
July 23, 1985

Page -2-

2. Take each and every concern seriously and be sure to communicate back to your employee the resolution of each concern as soon as possible.
3. Encourage your employees to report safety concerns to you, even if they may have been responsible, in whole or in part, for the problem they are reporting. Employees should not be encouraged to hide their mistakes. Rather, they should be encouraged that it is their duty to report concerns so that they can be corrected at the very earliest opportunity.
4. However, do not discourage any employee from reporting their concerns to Safeteam. More specifically, do not question an employee either before or after he or she goes to Safeteam about what was reported there. Do not insist that an employee report his or her safety concerns to you first rather than reporting to Safeteam, QC or the NRC.
5. Do not, by word or deed, lead your employees to believe that the reporting of safety concerns is up to QC and not a responsibility of craft. This is not so. I rely on our crafts to build quality into our plant in the first place.

I know that all of you are committed to building a quality plant. Safety and quality are keys to the success of the Comanche Peak project. While we are all proud of the work we have done, there is always room for improvement. It is essential that we make sure that all supervisors, as well as all employees, are aware of, and practice daily, their individual responsibility to assure that all safety concerns are addressed before this plant goes into operation. I very much appreciate your efforts in meeting this challenge.

Very truly yours,



W. G. Council

WGC: jkh  
Attachment

DRAFT

TEXAS UTILITIES GENERATING COMPANY

SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. #1 • DALLAS, TEXAS 75201

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

Dear Comanche Peak Employee:

It has recently come to my attention that some employees at the site have expressed the belief that it is not their duty to report safety concerns and that they believe they would regret it if they did. This is certainly not the case. As you know, we have made many efforts over the past several years to provide the means by which all employees working at Comanche Peak could freely report any concerns they may have concerning quality matters and can do so without fear that their job would be adversely affected. I want to re-emphasize to each of you the following:

1. It is your responsibility to report any safety or quality concern which you discover. The responsibility for reporting safety concerns does not rest solely with quality control personnel. It is a duty that each of you share in insuring the safe operation of Comanche Peak.
2. If you report a safety concern and do not receive a reply to that concern within a reasonable time, do not hesitate to use one of the several avenues that are available to you. If your supervisor does not take your concern seriously, then go to his or her supervisor or manager. If for some reason you have a problem with reporting a concern, take that concern higher in the chain of command if necessary.
3. Feel free to report any of these concerns either to your supervisor, to QC, to Safeteam or to the NRC.
4. Anyone interfering with your obligation to take the action described above will be violating Comanche Peak site policy and will be subject to severe disciplinary action. Should anyone attempt to interfere with your reporting of safety concerns, such conduct requires immediate attention and should likewise be reported.

You are doing a good job in building this plant. The success of this project is important to all of us. I encourage you to continue to take pride in the good work that you have done, and I ask that you fully support fully the policies re-emphasized by this letter.

Very truly yours,

W. G. Council

WGC: jkh

**TEXAS UTILITIES GENERATING COMPANY**  
 SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. #1 • DALLAS, TEXAS 75201

July 30, 1985

WILLIAM G. COUNCIL  
 EXECUTIVE VICE PRESIDENT

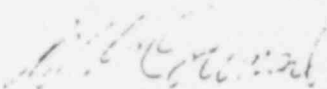
Dear Comanche Peak Employee:

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You are doing a good job in building this plant. The success of this project is important to all of us. I encourage you to continue to have pride in the good work that you have done, and I ask that you fully support fully the policies re-emphasized by this letter.

Very truly yours,

  
 W. G. Council

WGC: jsh

Dear Fellow Employee:

You are in a position to help ensure the safe operation of Comanche Peak.

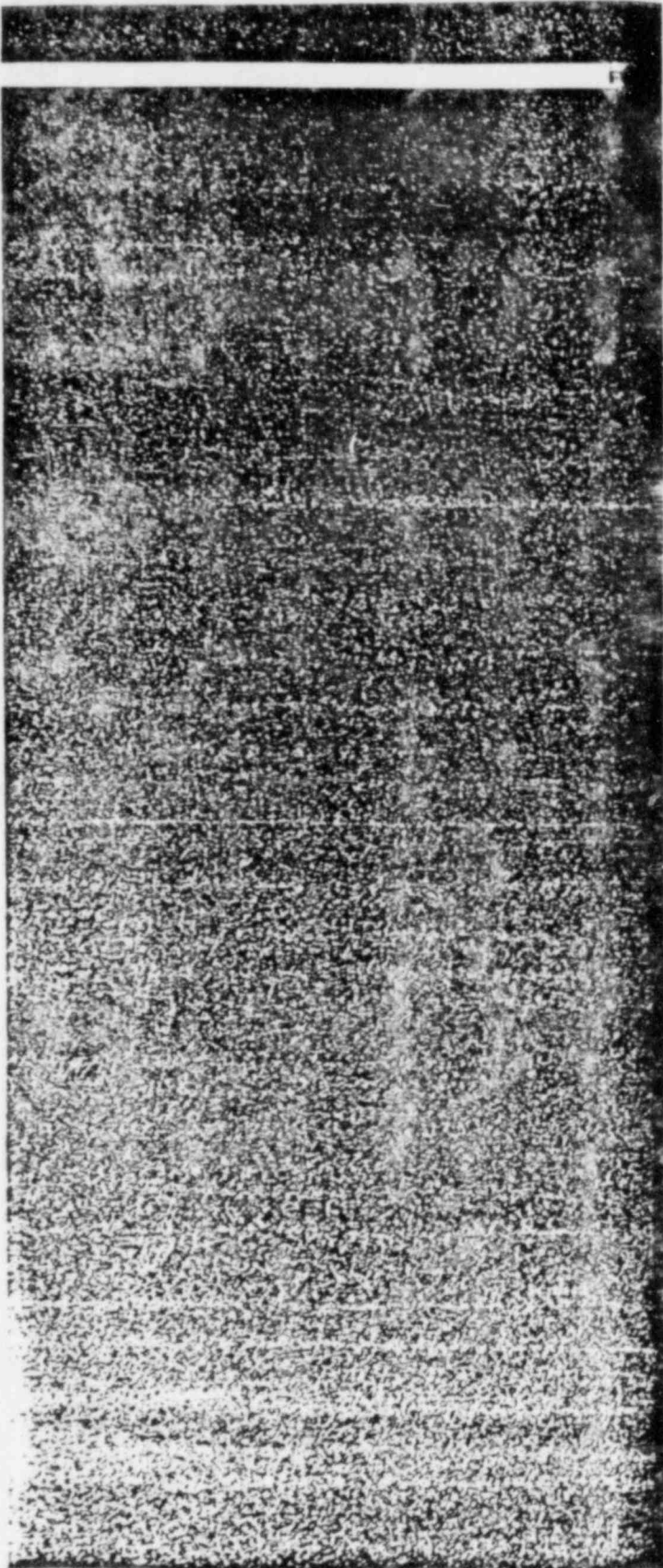
My thoughts on nuclear safety are contained within the attached pamphlet, and I invite you to read and consider them. By working together as a team, we can develop this 'Safety Ethic'.

*W. G. Council*

**“Nuclear safety is an ethic that must pervade an entire organization. It is not just a collection of codes and criteria.”**

**Nuclear Control  
Engineering Corporation  
10000 Wilshire Boulevard, Suite 1000  
Beverly Hills, California 90210  
Tel: (310) 277-1000**





*Nuclear safety. The reason for the entire federal licensing and regulatory process and the construction procedures and all the quality control inspections at a nuclear plant. The reason why reactor operators spend the equivalent of four years in a college classroom preparing for a federally administered examination. In twenty-five years of operating experience, the commercial nuclear power industry's attention to safety has resulted in a good safety record. There is no reason why that safety record cannot continue.*

*Since beginning the Comanche Peak project, Texas Utilities Electric Company has been dedicated to operating a safe plant. As the start-up and operation of the two nuclear units approach, we want to define "safety" more precisely.*

*Strict compliance with all commitments and regulations should provide reasonable assurance that the health and safety of the public is protected during operation of a nuclear power plant. For Bill Council, executive vice president of Texas Utilities Generating Company, this is not enough. "Strict compliance" is at best the minimum requirement. For Council, who will be directly responsible for the operation of Comanche Peak, safety means, in addition to compliance, an attitude, an ethic, that is shared by the entire operating organization.*

*From the perspective of eighteen years in commercial nuclear power, a career that includes responsibility for the operation of three nuclear units and one under construction, Council recently shared his thoughts on the safety ethic at Stanford University.*

*The occasion was a two-week course at Stanford sponsored by the United States Department of State entitled "Management of National Nuclear Programs for Assured Safety." Senior-level administrators from countries in the process of developing, expanding, or seriously considering nuclear power programs participated in the conference. Mr. Council, recognized as an authority in the safe management of nuclear power systems, was an invited speaker.*

"A safety ethic is a state of mind that affects the entire organization. Each person in the organization realizes that he or she is an important part of the big picture."

"Organizations with a strong safety ethic depend upon their people to do the job right the first time... pay close attention to details and question what might go wrong."

**S**afety is not written into the Code of Federal Regulations; it is only partially specified. Federal regulations specify at best only the minimum requirements that, if met, should provide reasonable assurance that the public health and safety will be protected. How, then, does one truly ensure that organizations operating and maintaining nuclear power plants are doing so safely?

The way is to infuse the organization with a safety ethic. A safety ethic is a state of mind that affects the entire organization. It is a sense of responsibility and a very strong professional attitude. Each person in the organization realizes that he or she is an important part of the big picture.

Within such organizations, each person feels responsible for ensuring that each step of every activity is performed in a first-class, professional, and quality manner. People should understand that any mistake can be very costly, both financially and personally. Organizations with a strong safety ethic train their personnel well, insist upon a knowledgeable, participating management, and depend upon their people to do the job right the first time.

These organizations expect their people to pay close attention to details and question what might go wrong. Operations personnel are alert and continually question what equipment might malfunction. Engineers, when making design modifications, ask "what if the component breaks?" and then look at the consequences of that failure.

Studies have shown that 80 to 90 percent of people interviewed after accidents of various types say they "didn't think" or "didn't realize" the consequences of their

**Insist on an uncompromising commitment to following directions and procedures.**

**Having a successful safety ethic requires the strongest kind of leadership from the top.**

**Supervisors are not only managers, but also leaders and trainers of their people. They must be out in the plant much of the day, leading and training their people.**

actions. Good organizations with a very strong safety ethic take the time to do things right the first time. The excuse "I didn't know" cannot be tolerated. The Institute of Nuclear Power Operations and the Nuclear Regulatory Commission have found that many accidents involving personnel error occur because of lack of attention to details or because of improper practices.

When you enter the nuclear power field, develop and implement comprehensive procedures for all aspects of the operation. Insist on an uncompromising commitment to following directions and procedures. One of the biggest quality assurance problems I have found is that of people not following procedures. A strong management insists that people follow procedures, or:

- *if the procedure is wrong, stop, have it changed and then restart the work.*
- *if improvement is possible, follow the procedure and then have it changed.*

Another ingredient that is essential to maintaining a position of leadership in safety is the total commitment of the entire organization to safe designs and intense design reviews; to putting safety first—no shortcuts, no deviations from the first-class way. Putting safety first requires a system of many checks and balances. It requires diligent investigation of all accidents and near misses. People do not easily adapt to such a stringent atmosphere. Having a successful safety ethic requires the strongest kind of leadership from the top. That leadership must stress teamwork, because only teamwork will ensure that even the smallest detail has been addressed.

Each employee should know that he is an integral factor in the pursuit of excellence. Checks and balances are definitely needed and so is learning from the mistakes of others.



We can expect our personnel to follow our lead if we, as management, accept our responsibility and implement a safety ethic that insists that our nuclear plants be operated and maintained at the highest standard of excellence.

When developing your safety ethic, follow these guidelines:

- Remember that regulations are minimum requirements.
- Insist on good procedures and train your people to follow them.
- Insist your personnel follow your procedures.
- Develop teamwork throughout the organization.

Obviously, supervisors must assign their employees work, allocate other resources to meet corporate commitments, and provide early warning when commitments cannot be met. Sometimes we forget that supervisors are not only managers, but also leaders and trainers of their people. Supervisors must ensure that the job is done correctly and accept responsibility for what goes wrong. Supervisors in a nuclear plant cannot do this while sitting in their offices. They must be out in the plant much of the day, leading and training their people.

We can expect our personnel to follow our lead if we, as management, accept our responsibility and implement a safety ethic that insists that our nuclear plants be operated and maintained at the highest standard of excellence. Nuclear safety is an ethic that must pervade an entire organization. It is not just a collection of codes and criteria.



**W**illiam G. Council is executive vice president—Nuclear Engineering and Operations for Texas Utilities Generating Company. He has a B.S. degree in engineering from the U.S. Naval Academy and served aboard nuclear submarines for five years. His experience includes positions as operations supervisor, plant superintendent, and project manager at Northeast Utilities' three Millstone nuclear units in Connecticut. He also was vice president and senior vice president for nuclear engineering and operations for Northeast Utilities' four nuclear facilities. Council joined Texas Utilities Generating Company in May of 1985.

