

TEXAS UTILITIES GENERATING COMPANY
NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE
NEO 2.15
NUCLEAR COMPLAINTS AND CONCERNS

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NUCLEAR ENGINEERING AND OPERATIONS PROCEDURE

NEO 2.15

NUCLEAR COMPLAINTS AND CONCERNS

1.0 PURPOSE

This procedure establishes a method for employees to register nuclear complaints or concerns. It describes the protection afforded to employees who pursue these complaints/concerns or provide information to the Nuclear Regulatory Commission (NRC).

2.0 APPLICABILITY

- 2.1 This procedure applies to the Nuclear Engineering and Operations (NEO) Group and supporting organizations within Texas Utilities Generating Company (TUGCO).
- 2.2 Affected organizations will assure that affected documents (i.e., implementing procedures, plans, and policies), if required, are developed/revise and implemented on (but not before) the effective date of this procedure.

3.0 REFERENCES

- 3.1 Title 10, Code of Federal Regulations, Part 50, Section 7 (10 CFR 50.7), Employee Protection.
- 3.2 NEO Policy Statement No. 12 - Employee Protection.
- 3.3 Title 10, Code of Federal Regulations, Part 19 (10 CFR 19), Notices, Instructions, and Reports to Workers; Inspections.
- 3.4 NEO Policy Statement No. 14 - Investigations by NRC, Office of Investigations.
- 3.5 NEO CS-1 - Evaluation of and Reporting of Items/Events Under 10 CFR 21 and 10 CFR 50.55(e).
- 3.6 NEO Policy Statement No. 13 - Employee Concerns.
- 3.7 NEO 1.06 - Regulatory Posting Requirements.

4.0 DEFINITIONS

4.1 Safeteam

SAFETEAM is an administrative program established to help identify and investigate safety concerns of workers at CPSES. While primarily providing an opportunity for all site workers to report

concerns they might have as they leave the project, the program is available to all workers at any time. The program is administered through an on-site office by the Safeteam Manager.

4.2 Hotline

HOTLINE is another administrative program established to encourage the reporting of quality concerns and the timely investigation and resolution of those concerns. The program is administered by the Director, Corporate Security.

5.0 RESPONSIBILITIES

5.1 Management Personnel, NEO Group

5.1.1 Managers have an obligation and responsibility to address nuclear concerns of employees under their supervision and to resolve those concerns in a manner that will protect the health and safety of the public, without discrimination towards such employees. If a concern, complaint, or allegation is quality-related and a formal review (investigation) is appropriate, the SAFETEAM Manager will be contacted to determine whether or not an investigation of the particular matter has already been conducted, is in progress, or is scheduled. If the quality-related investigation is conducted outside of the SAFETEAM process, a copy of the results shall be forwarded to the SAFETEAM Manager.

5.1.2 Responsible for posting Form NRC-3 (reference Section 6.7 of this procedure).

5.2 Vice President, Nuclear Engineering

Responsible for maintaining this procedure current.

5.3 Individual Employee

Each employee has an obligation and responsibility to bring nuclear concerns to the attention of his immediate supervisor and to pursue those concerns until satisfactory resolution is achieved.

6.0 INSTRUCTIONS

6.1 Employees may pursue their complaints or concerns regarding nuclear matters until they feel it is satisfactorily resolved, without fear of discrimination or reprisal by TUGCO (References 3.1 and 3.2). This protection from discrimination or reprisal also applies to situations where an employee: (1) provides the NRC with information about possible violations, (2) requests NRC action, or (3) testifies in any NRC proceeding.

6.2 First, employees should resolve their complaints or concerns through existing corrective action programs (Nonconformance Reports or Deficiency Reports). If they feel that their concerns are not adequately addressed by these programs, employees should present their concerns in writing to their immediate supervisors with copies to the next level of management. The supervisor shall thoroughly consider the significance of the concern and present his evaluation to his management, in writing, so that further resources can be employed as necessary. If management determines that the concern is quality-related and that an investigation may be warranted, they will notify the SAFETEAM Manager.

6.3 If not satisfied with the progress or resolution by supervision, the employee at any time may contact any of the following directly:

6.3.1 TUGCO Management

6.3.1.1 Director/Manager/Superintendent

6.3.1.2 Division Vice President

6.3.1.3 Executive Vice President, NEO

6.3.1.4 President, TUGCO

6.3.2 The Nuclear Regulatory Commission

Any employee may communicate directly with the Nuclear Regulatory Commission (NRC), per Reference 3.3, by calling or requesting a meeting with any of the following:

6.3.2.1 NRC inspectors, including resident inspectors at Comanche Peak Steam Electric Station.

6.3.2.2 NRC Region IV Office, 611 Ryan Plaza Drive, Suite 1000, Arlington, Texas 76011
817-860-8100

6.3.2.3 NRC Director of Inspection and Enforcement.

Phone collect: (301) 492-7000

It is the NRC practice to keep the employee's identity confidential.

6.3.3 Safeteam

The Safeteam representative may be contacted by calling:

Extension 8149 or 8214 (Onsite)

1-800-633-6502 (In Texas)

1-800-645-0021 (Out-of-State)

Identity of the caller will be kept confidential.

6.3.4 Hotline

The Hotline representative may be contacted by calling:

1-800-442-3022

Identity of the caller will be kept confidential.

- 6.4 TUGCO supervision and management shall not discriminate against an employee for the reason that he/she was involved in the activities identified in Section 6.1. Discrimination includes discharge and other actions that relate to pay, terms, conditions, and privileges of employment.
- 6.5 If an employee believes that discrimination has occurred due to engaging in the protected activities described in References 3.1 and 3.3, the employee may, within 30 days of the discriminating act, file a complaint with the Department of Labor, Employment Standards Administration, and Wage and Hour Division.
- 6.6 While an employee may not be discriminated against for communicating to the NRC, an employee also has specific rights when involved in NRC investigations, as described in Reference 3.4.
- 6.7 NEO vice presidents shall ensure that Form NRC-3 is posted per Reference 3.7.

7.0 FIGURES

None

8.0 ATTACHMENTS

None

9.0 QA RECORDS

None