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

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

May 14, 1986

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT

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

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

Dear Mr. Johnson:

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

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

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

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

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

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

Very truly yours,

*W. G. Council*  
W. G. Council

JWA/arh  
Attachments

c - Region IV (Original + 1 copy)

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

Mr. V. S. Noonan

Mr. D. L. Kelley

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

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

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

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

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

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

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

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

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

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

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

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

## INTERVIEWERS QUALIFICATIONS [4.c.(1)]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5. SAFETEAM Review by Office of Investigations

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

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

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