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JUL 07 1967

MEMORANDUM FOR: Thomas A. Rehm, Assistant for Operations, Office of the
Executive Director for Operations

FROM: A. Bert Davis, Regional Administrator, Region III

SUBJECT: DRAFT RESPONSE TO SENATOR LEVIN (EDO CONTROL NO. 002961)

The attached draft response to Senator C. Levin's letter of May 28,
1967, is forwarded for review and EDO signature. Should you need additional
background information, please call Ed Greenman (FTS 386-5516).

Original signed by

A. Bert Davis
Regional Administrator

Attachment: Draft Response
to Senator Levin

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 5
FOIA- 87-871

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PDR FOIA
BAUMANB7-871 PDR

YES
RIII
PRP
Pelke/abl
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RIII
Greenman
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Benson

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Paperiello
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yes
RIII
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July 30, 1987

M. J. Gavin, Director, Nuclear Services
146 NOC, Enrico Fermi Power Plant
Detroit Edison Company

Subject: Improvement In SAFETEAM

Dear Mike:

This is in response to your request that I describe the improvements to SAFETEAM since Wayne Jens statement to the NRC on July 10, 1985.

On July 8, 1985, Jens produced a two page document titled; "Introduction" stating the objectives and philosophy of SAFETEAM. Attached was a two page document titled; "Improvements to be made to the SAFETEAM program"; apparently provided by A. J. Benes, the Corporate Officer responsible at that time for SAFETEAM operation. These documents attached. I can only assume that these changes were made as I was not on site at that time, but did receive a copy of Jens transmittal and the documents.

In early 1986 it was decided that a third party SAFETEAM would be an improvement and SYNDECO was awarded a contract to operate SAFETEAM.

SYNDECO conducted a search for interviewers, provided training and made a final selection of interviewers between mid February and March 14, 1986. The search, training and evaluation of interviewers was done by F. M. McIntyre and Associates Inc., an industrial psychologist and his associates.

A group of general questions have been prepared as a guide for the interviewers to use in conducting interviews. A book with questions on specific subjects has been developed and is available to interviewers if needed during the interview.

All investigators at Fermi are provided to SYNDECO by National Inspection and Consultants Inc. (NIC). Each investigator is required to have prior background in the Nuclear Industry. Most are certified inspectors or auditors. In addition, N.I.C has developed an investigator training program patterned after a college level law enforcement course.

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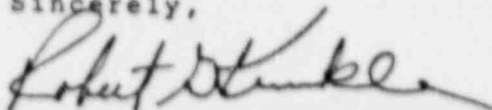
Fermi's specific training was given in addition to the general orientation required for all new employees. All SAFETEAM employees have made a guided tour of the plant, were provided a special one day program explaining the features of the plant including a session in the simulator describing operation of the plant. Video training tapes and specific training documents have been made available and have been used to help both investigators and interviewers better understand the plant and its language.

Fermi SAFETEAM management is now provided by SYNDECO and coordinates site activity through the Director, Nuclear Services. In all operating respects, SAFETEAM is at arms length from the Nuclear Operations Organization.

In terms of specific procedures outlined in the W. S. Jens commitment to Art Davis, the following changes were initiated and continue:

1. Interview audio tapes, when available, will be reviewed by an investigator to assure that concerns are fully identified.
2. Concerns of wrongdoing will be turned over to Nuclear Security who will conduct a detailed investigation of the concern using professional investigators. Wrongdoing involving Nuclear Security will be assigned to another appropriate agency to investigate.
3. When a concern has been identified as a technical specification violation the shift supervisor will be notified immediately. The Shift Supervisor will issue a Deviation Event Report as appropriate.
4. When a concern has been identified as a public safety issue Quality Assurance will be notified. Quality Assurance will originate a Deviation Event Report. When the concern involves the Quality Assurance Organization the director of Licensing will be notified.

Sincerely,



Robert G. Kunkle
Director, SAFETEAM

1 more valuable to the industry and to the Staff. But we think
2 the utility took a major step forward in getting the program
3 in place.

4 COMMISSIONER ASSELSTINE: Darrell, has the company,
5 in your view, been receptive and responsive to the kinds of
6 concerns that you've had in the areas where you found some
7 maybe soft spots or areas where further improvement could be
8 made in the SAFETEAM approach? And have they taken some steps
9 to upgrade the program for the longer term as they look
10 towards operation of the plant?

11 MR. EISENHUT: Yes. I think everything I've heard
12 from the Staff -- and Tom and Bert might want to comment on it
13 more -- is that the utility has been receptive, and I think
14 the other utilities who are using the SAFETEAM concept are
15 equally receptive. They all recognize that this is a program
16 that's just really getting underway, and I have quite a bit of
17 confidence that the industry, as we give them the comments,
18 sit down and interact with it, will be quite responsive to
19 those comments.

20 MR. DIRCKS: I might want to add, too, on this whole
21 area of SAFETEAM, I have asked the Staff to pull together some
22 thoughts on this subject so that we could come down and treat
23 it as a policy issue with the Commission, so we have a
24 Commission paper in very rough form on my desk now. I haven't
25 gone over it. But I think we do want to get into this issue.

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1 pose some questions to the Commission, get some policy
2 guidance back, and we may want to treat it as an issue that we
3 could give some guidance to the industry on.

4 COMMISSIONER ASSELSTINE: I think as you look down
5 the road and see other cases coming along, that's a good idea,
6 and I think we have all felt the same way, but if we want to
7 provide some guidance in this area, the sooner we do that, the
8 better. I agree with what Darrell said, I think these are
9 positive, good programs, and what we want to do is make sure
10 that they are as good as they can be, so that we can rely on
11 them and use that information, and not have to duplicate work
12 that's already been done.

13 MR. DIRCKS: I think we have to have guidance on how
14 much we do rely on them and how much we encourage utilities to
15 ask us to give them credit for it.

16 COMMISSIONER ASSELSTINE: That's right.

17 MR. DIRCKS: And once we get into that realm, then
18 we have to figure out what sort of criteria we want to
19 establish to provide them a basis for the program.

20 But as I said, I have asked the Staff to put
21 something down. I haven't even reviewed it yet, so I'll be
22 getting something down to the Commission on this subject.

23 COMMISSIONER ZECH: I'd like to just add, too, that
24 during my visit to Vermont a couple months ago, I had a chance
25 to discuss this SAFETEAM concept in some depth with management

1 and look at it firsthand. I think it is an excellent
2 concept. There's just no question about it. It's an
3 excellent concept. It does appear to me, though, that it's
4 important for the Staff to work closely with the utility on
5 the execution, because as we develop the program, as the
6 utility develops the program, I think it's important that we
7 do indeed provide them some kind of NRC guidance.

8 So I hope it can be something that you can work
9 closely with the utility and the utility will be responsive to
10 the execution, because although I think the concept is sound,
11 I do think there are some things that probably need to be
12 worked out, as far as responsibilities are concerned, NRC
13 responsibilities, utility responsibilities and so forth.

14 So I think that its management certainly impressed
15 me as being responsive to that kind of an approach, and the
16 initiative is one that I agree should be commended and
17 extended to other utilities.

18 CHAIRMAN PALLADINO: Let me add that I concur in
19 what Commissioner Zech has said.

20 I do have a question. I understand that there are
21 unresolved issues before the SAFETEAM, and do we have any idea
22 on their plan for resolving them, or when they expect to be
23 resolved?

24 MR. DAVIS: We -- as a result of some of the
25 weaknesses that were identified, there were 459 safety-related

1 concerns that were identified that were given to the SAFETEAM
2 over the years. We have sampled a large number of those, and
3 we asked the Licensee to look at them. The NRC has looked at
4 them, and we have looked also at some of the ones we asked the
5 Licensee to look at.

6 Out of the 459, I think there are only less than 10
7 that have not been completely closed out at this point, and we
8 have determined that none of them involve any hardware
9 problems.

10 CHAIRMAN PALLADINO: So you're satisfied with the
11 rate of progress on them, and the resolution?

12 MR. DAVIS: That's right. I expect them all to be
13 done in the next day or two.

14 CHAIRMAN PALLADINO: In the next what?

15 MR. DAVIS: In the next day or two.

16 CHAIRMAN PALLADINO: Oh, I see. Okay, good. That's
17 what I was interested in.

18 COMMISSIONER ASSELSTINE: Before we move on, it just
19 struck Commissioner Bernthal and myself that perhaps a lot of
20 people might not understand what the SAFETEAM concept is, or
21 what this was all about.

22 CHAIRMAN PALLADINO: Yes.

23 COMMISSIONER ASSELSTINE: You might want to just say
24 a few words about what the concept is and what you see as some
25 of the benefits, both to us and to the Licensee.

1 MR. EISENHUT: I appreciate that. In fact, that's
2 why I wrote the comments at the time I did.

3 Bert, do you want to try?

4 MR. DAVIS: Want me to do that?

5 COMMISSIONER BEERTHAL: One of the virtues of a
6 public meeting is the hope that the public understands what is
7 going on, so maybe we ought to try and explain what we're
8 talking about.

9 MR. DIRCKS: We can cover it, too, but it might a.
10 be good to get the company itself to give you the more
11 positive image of this.

12 COMMISSIONER BEERTHAL: Right. But a quick
13 definition may be helpful.

14 MR. DAVIS: Okay. Well, in 1983, the company
15 recognized that there were a lot of allegations that concerned
16 workers and others were -- particularly workers -- were
17 bringing to the NRC or bringing to outside groups. And they
18 thought it would be a good idea to create a climate with the
19 workers and individuals to bring their concerns to the
20 company, so that the company could act upon them and correct
21 any problems that existed, and then to avoid a last-minute
22 rush of a lot of allegations.

23 They set up a group to do that, which was somewhat
24 independent of the normal construction and operating people in
25 that company. They wanted to have people interviewed by an

1 interviewer who was not intimidating to them and who could
2 draw them out and get their concerns.

3 Then the company's plan was to take these concerns
4 and provide them to company staff, depending upon what kind of
5 a concern there was. If it was a concern of wrongdoing, it
6 would go to a nuclear security department; if it was a
7 technical kind of a concern, it would go to another group.

8 Then these concerns would be looked at, corrected,
9 and there would then be a response provided to the concernee
10 about what was done with respect to this concern.

11 CHAIRMAN PALLADINO: That's an important feature.

12 MR. DAVIS: That's right.

13 CHAIRMAN PALLADINO: That some other programs, I
14 don't think had at the beginning.

15 MR. DAVIS: Then there was also a follow-up, and I
16 believe it was four or six months later, where they would
17 reestablish contact with the person to find out if his
18 concerns were satisfied. And they would provide an 800 number
19 to call in, in case they didn't believe the concern was
20 satisfied.

21 And based on the number of allegations that we have
22 received from Fermi, compared to some of the other plants,
23 why, you can either say that the system apparently worked, or
24 else the work environment was such that the workers did not
25 have as many concerns as some other plants did.

1 won't disappoint you in our performance in doing that.

2 I was personally disappointed when we got our SALP
3 rating 3 on fire protection, and I think the Region III people
4 know how disappointed I was. We're going to do better than
5 that from now on.

6 We would like to encourage more NRC inspections, as
7 you pointed out, Commissioner Bernthal.

8 COMMISSIONER BERNTHAL: Would you care to say that
9 again?

10 [Laughter.]

11 MR. JENS: Let me tell you, that's unusual for
12 somebody to say that, but we benefited a great deal, once we
13 got the inspection we did get toward the end of the
14 construction program. I wish we'd had it sooner, because I
15 think we could have avoided some of our problems.

16 COMMISSIONER ASSELSTINE: We need to make him an
17 appointment.

18 [Laughter.]

19 MR. JENS: Well, I'm not saying that just -- I
20 believe in what I'm saying.

21 As far as SAFETEAM is concerned, I would like to
22 point out that we have finished up all of the investigations
23 on the SAFETEAM allegations except one item, and that is
24 associated with industrial safety, it's not part of the plant
25 safety, so we're caught up to date and we will continue that

1 program on into operation, and we will make the improvements
2 that we find necessary.

3 We are also going to pass on what we have learned
4 during this recent inspection by Region III to the other
5 plants that are using the SAFETEAM program.

6 We talked about an acronym LDDI, this drawing issue,
7 and we are also committed to eventually eliminate that index
8 that we have on drawings and come up with a consistent design
9 data base for the plant over its lifetime.

10 CHAIRMAN PALLADINO: Wayne, the five minutes are up,
11 but you can take another half minute or so.

12 MR. JENS: Well, I do have some questions that I've
13 got to answer. Would you --

14 CHAIRMAN PALLADINO: Our questions don't count.
15 We'll take care of that on our own time.

16 COMMISSIONER BERNTHAL: We can cancel the next
17 meeting.

18 [Laughter.]

19 MR. JENS: There was one question about the
20 maintenance training program. First of all, let me tell you
21 --

22 CHAIRMAN PALLADINO: Yes, I was about to ask about
23 that.

24 MR. JENS: -- that we are committed to have our
25 programs accredited by INPO. Three of the programs have been