

Northeast
Nuclear Energy

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The Northeast Utilities System

NOV - 7 1997

Docket Nos. 50-245

50-336

50-423

B16783

Little Harbor Consultants, Inc.
Millstone - ITPOP Project Office
P.O. Box 0630
Niantic, Connecticut 06357-0630

Millstone Nuclear Power Station, Units 1, 2, and 3
Response to LHC's Clarification of Information

References (a). J. W. Beck letter to B. D. Kenyon, "Clarification of Information," dated August 21, 1997.

The purpose of this letter is to provide the Northeast Nuclear Energy Company (NNECO) response to clarifications of the information that was communicated by Little Harbor Consultants, Inc. (LHC) during the July 22, 1997 meeting. The LHC clarifications to this information were forwarded in a letter from Mr. Beck to Mr. Kenyon, dated August 21, 1997 [Reference (a)]. Accordingly, the Attachment to this letter provides NNECO's response to LHC's comments.

NNECO appreciates LHC's perspective and clarification and welcomes any additional information from LHC on this issue. //

The following are NNECO's commitments contained within this letter. All other statements within this letter are for information only. 9001

B16783-1 NNECO commits to reassess the protocol between the Employee Concerns Program (ECP) and Human Resources (HR) regarding the handling of employee concerns referred to HR by July 1, 1998.

B16783-2 NNECO commits to reassess the practice of conducting periodic joint staff meetings between ECP and site HR by July 1, 1998.

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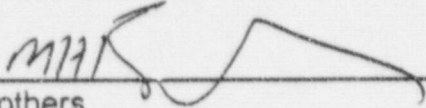


- B16783-3 NNECO commits to reassess the practice of ECP periodically sending a representative to the regular site HR staff meetings for the purpose of better understanding the issues related to human resources that may end up as employee concerns by July 1, 1998.
- B16783-4 NNECO commits to evaluate the performance of the Executive Review Board in ensuring that personnel, both NNECO and contractors, receive due process and that disciplinary decisions are consistent and not retaliatory by July 1, 1998.

Please contact Mr. W. J. Temple at (860) 437-5904 should you have any questions regarding this matter.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



M. H. Brothers
Vice President - Millstone Unit No. 3

Attachment:
As stated

cc: H. J. Miller, Region I Administrator
W.D. Travers, PhD., Director, Special Projects Office
W.D. Lanning, Deputy Director, Inspections, Special Projects Office
P. F. McKee, Deputy Director, Licensing and Oversight, Special Projects Office
H. N. Pastis, Sr. Project Manager, IT POP, Special Projects Office
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Docket Nos. 50-245
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B16783

Attachment 1

**Millstone Nuclear Power Station, Units 1, 2 and 3
Response to LHC's Clarification of Information**

November 1997

Millstone Nuclear Power Station, Units 1, 2 and 3
Clarification of Information

LHC Comments:

First, LHC observed that 37% of the 27 employees who filed a concern with ECP [Employee Concerns Program] expressed a lack of trust in the HR [Human Resources] department as the major reason for why they would not reuse the program. This reluctance was based on the reliance of ECP on HR to address issues of work-related harassment, intimidation, unfairness in personnel matters and poor management.

Second, LHC noted that ECP files need to include HR reviews and investigations in order to classify the files as resolved or closed.

NNECO has taken the following actions to address these observations:

1. Changes in staffing assignments and reporting relationships were made in September 1997 which 1) reduces the reliance of the ECP on HR for conducting most investigations formerly referred to HR, and 2) assures those investigations will be conducted in a quality manner consistent with the provisions of the ECP Manual. Those changes include the reassignment of two capable individuals having HR and investigative experience. One of these individuals came from HR and the other from our Internal Audit Department. These individuals functionally report to the Director of the Employee Concerns Program for their assignments and are responsible to him for the quality and timeliness of their work. Both of these individuals have been physically relocated to the ECP office area.

A protocol between the ECP and HR was also approved in September 1997 regarding the handling of employee concerns referred to HR. The protocol provides for the discussion between HR and the ECP of employee concerns involving alleged or apparent harassment, intimidation, retaliation, or discrimination (HARD). While the protocol allows for the referral of such cases to HR, such referrals are expected to be rare because a team of ECP individuals, including the two recently reassigned, has been assigned to focus on human resources types of concerns.

The protocol will be reassessed by July 1, 1998, and a decision will be made if it is to be continued.

2. HR now provides to ECP, investigation reports that are more detailed than those provided prior to June 1997. In addition, ECP no longer classifies files as "resolved" or "closed" unless external investigation reports such as those from HR have been received, evaluated, and considered in the resolution/closure action.

Additional initiatives are also being implemented to enhance the working relationship between HR and ECP. ECP and site HR has conducted a joint staff meeting for the purpose of identifying and removing obstacles to working together in addressing employee concerns. ECP and HR intend to conduct similar meetings periodically in the future. Also, at site HR's request, ECP has agreed to send a representative to its regular staff meetings for the purpose of better understanding issues related to human resources that may end up as employee concerns.

The Senior Vice President and Chief Administrative Officer has committed to spending one day per week at Millstone Station in order to heighten awareness of the importance of rebuilding trust in Human Resources. She has been meeting with the ECP staff during these visits to assure her organization is fully supporting the ECP.

To further emphasize that the importance of Human Resources to the recovery effort at the Millstone Units, on October 15, 1997, NNECO announced a Recovery Officer for Human Resources. Mr. Robert Long, Vice President, Human Resources-Nuclear, will report directly to the President & CEO-Nuclear, Mr. Bruce Kenyon. This is expected to be a three- to five-month assignment. Mr. Long assumes responsibility for all Human Resources activities for the Nuclear employees and contractors at Connecticut Yankee, Millstone Station, and Seabrook Station.

Mr. Long comes to Millstone after nearly 40 years experience in the nuclear field, including 14 1/2 years as a Vice President of GPU Nuclear. At his retirement from GPU in 1996, he had spent seven years as vice president and director of Nuclear Safety & Technical Services, which included responsibility for GPU Human Resources.

In addition, an Executive Review Board has been established to ensure that personnel, both NNECO and contractors, receive due process and that disciplinary decisions are consistent and not retaliatory. This review will take place prior to any final decision being made and will extend to non-discipline related personnel actions such as downsizing and position eliminations. The review will consider: 1) whether the individual has engaged in protected activities, 2) whether the proposed discipline is consistent with past practice, 3) the potential for chilling effect, and 4) whether retaliation was involved.

As noted above, the Human Resources Recovery Officer position is expected to be in place for three to five months. With regard to the other measures addressed in this section, they will be reassessed by July 1, 1998, and a decision will be made if they are to be continued.