

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/86-11
50-446/86-09

Construction Permits: CPPR-126
CPPR-127

Dockets: 50-445
50-446

Licensee: Texas Utilities Generating Company
Skyway Tower
400 N. Olive Street
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station

Inspection At: Comanche Peak Site, Glen Rose, Texas

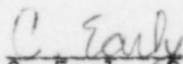
Inspection Conducted: May 5-8, 1986

Inspectors:



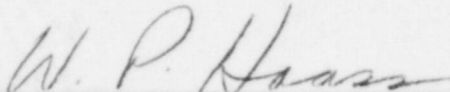
A. Vietti-Cook, Project Manager
Comanche Peak Project
Division of Licensing
Nuclear Reactor Regulation

6/24/86
Date



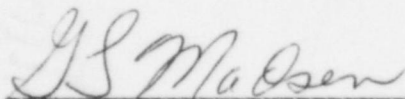
C. Early, Project Manager
Comanche Peak Project
Division of Licensing
Nuclear Reactor Regulation

6/24/86
Date



W. P. Haass, Vendor Program Branch
Office of Inspection and Enforcement

6/24/86
Date



G. L. Madsen, Reactor Inspector
Comanche Peak RIV Group

6/30/86
Date

Approved:

J. I. Westerman for
I. Barnes, Chief
Comanche Peak RIV Group

7/1/86
Date

Inspection Summary

Inspection Conducted May 5-8, 1986 (Report 50-445/86-11 and 50-446/86-09)

Areas Inspected: Reactive, announced inspection of the applicant's policies, procedures, and implementation relating to the CPSES site Ombudsman and SAFETEAM programs in identifying and resolving site personnel concerns resulting from exit, scheduled, and walk-in interviews with applicant and contractor employees.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Principal Licensee Personnel

- *W. G. Council, Executive Vice President
- *J. Barker, Executive Assistant, Nuclear Engineering and Operations
- *R. A. Werner, Manager, SAFETEM
- P. Ortstadt, Evaluation Research Corporation (ERC)

NRC Personnel

- *T. F. Westerman, Chief, Reactor Safety Branch

*Attended exit interview.

2. TUEC's Employee Concern Program Prior to January 14, 1986

The TUEC files resulting from this program are composed of 53 individual files. Since the last inspection of this subject on August 26-29, 1985, TUEC staff and SAFETEM personnel reviewed the 53 site files and identified 15 files needing additional attention. With the receipt of additional information contained in the master files at the TUEC corporate office, 7 of the 15 files were considered sufficiently complete for closure. SAFETEM performed additional investigations on the remaining 8 files. With the additional investigative followup, TUEC closed all 53 files prior to this inspection.

The NRC inspection team reviewed the 15 files which TUEC initially identified as needing additional attention and concluded that with the additional reviews and information provided by the SAFETEM, there was a reasonable basis for file closure. Some difficulties in obtaining specific information on an allegation were noted; these were linked to the period of time that had elapsed since the receipt of the concerns.

During the August 26-29, 1985 NRC inspection, four observations were identified. TUEC evaluated these observations and provided a formal response to the NRC by letter dated May 14, 1986, from W. G. Council to Eric H. Johnson.

In response to NRC Technical Review Team finding AQ-133 identified in Supplemental Safety Evaluation Report No. 11, TUEC Comanche Peak Response Plan Item VII a.6 commits to additional evaluations of the employee concern programs. Evaluation Research Corporation (ERC) has been contracted to perform evaluations of the effectiveness of the Ombudsman and SAFETEM programs. Discussions revealed that the evaluation sample includes all 53 Ombudsman files and some 80 SAFETEM files (representing

about 100 concerns). ERC's evaluations are nearing completion and a report is in preparation. The report is scheduled for submittal to the NRC in accordance with commitments included in Response Plan Item VII.a.6.

The staff will consider applicant's letter of May 14, 1986, and the results report for item VII.a.6 in response to observations identified in the previous report.

3. TUEC's Employee Concerns Program After January 14, 1985 - SAFETEAM Program

a. Background

As a result of the August 26-29, 1985 inspection, the interviewers' qualifications and the formality in reporting of potential 10 CFR 50.55(e) items were identified as areas of potential weakness. In addition, five areas were identified for potential improvement. TUEC evaluated each item and provided a formal NRC response by letter dated May 14, 1986, from W. G. Council to Eric H. Johnson. The staff will consider applicant's letter and results report for item VII.a.6 in response to observations identified in the previous report.

b. Number and Qualifications of Personnel

The SAFETEAM organization is composed of the same individuals whose qualifications were reviewed during the last inspection, with the exception that the investigative staff has been reduced from five to three due to the reduction in workload.

Since August 1985, a formal document for qualifications of investigators has been issued.

NRC Inspection Report 50-445/85-11; 50-446/85-09 incorrectly indicated that the interview coordinator and interviewers are employees of National Inspections and Consultants, Inc. Their employer instead is McIntyre and Associates.

c. Implementation of the SAFETEAM Program

As of May 1, 1986, SAFETEAM had received 1230 concerns. Since the NRC inspection of August 1985, 575 concerns had been received and 557 concerns had been investigated. An analysis of the concerns revealed many are related to industrial safety, personnel practices, etc., as opposed to nuclear safety. Additionally, 47 concerns involving potential wrongdoing issues were selected for future review considerations.

The NRC inspection team selected 9 of 87 concerns that had not been investigated at the time of the August 1985 inspection for a file review. Additionally, the inspection team selected, for file review, 41 of 83 of the technical and managerial concerns most potentially significant to plant safety, as indicated from a brief description of the concern.

These concerns were received and investigated during the period August 1985 to the time of this inspection.

The file review revealed the following:

- ° The SAFETeam program is generally implemented in accordance with the SAFETeam manual.
- ° The classification of the concerns into five categories was performed in a conservative manner.
- ° The confidentiality of the concerned individuals was appropriately protected and did not appear to distract from the ability of the investigators to evaluate the concerns.
- ° The files were organized, auditable, and contained more backup information than observed during the August 1985 inspection. The general control of the files was found to be acceptable.
- ° Interviews improved, contained more specificity, and more recontacting of the concerned individual was accomplished.
- ° As noted in our previous inspection, trending of SAFETeam issues is used to a limited degree at Comanche Peak. The staff believes that Texas Utilities could increase the benefit of this tool by providing management with trending reports.

As of May 1, 1986, 113 concerns had not been investigated.

4. Exit Interview

An exit interview was conducted on May 8, 1986, with personnel as indicated in paragraph 1 of this report.