

**From:** [Jack Giessner \(He/Him\)](#)  
**To:** [Billy Dickson](#)  
**Cc:** [Mohammed Shuaibi](#); [Diana Betancourt-Roldan](#); [Michelle Garza](#); [Thomas Briley](#); [Jason Kozal \(He/Him/His\)](#); [Julio Lara](#); [Raymond Ng](#); [Thomas Taylor](#)  
**Subject:** Re: Approval to Conduct NRC Appendix C Inspection Procedure 93100, (November 17, 2023)  
**Date:** Saturday, November 18, 2023 10:00:13 AM

---

That is correct,  
Thanks!

Get [Outlook for iOS](#)

---

**From:** Billy Dickson <Billy.Dickson@nrc.gov>  
**Sent:** Friday, November 17, 2023 9:41:07 PM  
**To:** Jack Giessner (He/Him) <John.Giessner@nrc.gov>  
**Cc:** Mohammed Shuaibi <Mohammed.Shuaibi@nrc.gov>; Diana Betancourt-Roldan <Diana.Betancourt-Roldan@nrc.gov>; Michelle Garza <Michelle.Garza@nrc.gov>; Thomas Briley <Thomas.Briley@nrc.gov>; Jason Kozal (He/Him/His) <Jason.Kozal@nrc.gov>; Julio Lara <Julio.Lara@nrc.gov>; Raymond Ng <Raymond.Ng@nrc.gov>; Thomas Taylor <Thomas.Taylor@nrc.gov>  
**Subject:** Approval to Conduct NRC Appendix C Inspection Procedure 93100, (November 17, 2023)

This email documents your approval for Region 3's Division of Operating Reactor Safety to conduct NRC Appendix C Inspection Procedure 93100, "Safety-Conscious Work Environment Issue of Concern Follow-up," at Fermi Power Station.

**Background:** While conducting interviews as part of performing IP 71152 "Problem Identification and Resolution [PI&R]" at Fermi, the inspection team noted that 100 percent of the Radiation Protection (RP) technicians interviewed, either during standalone one-on-one interviews or as part of focus group interviews, stated that they would not initiate corrective action program items for fear of retaliation, embarrassment, or it would be closed out to the initiator just having a "beef" with management and licensee management took action to resolve the issue. The inspection team also observed that although the RP staff had yet to initiate corrective action program items for what they viewed as nuclear, quality, and radiological safety concerns; licensee staff made allegations to the NRC concerning some of these issues. The inspection team concluded that this situation strongly hinted at a chilled work environment in the RP department that the PI&R inspection team could neither substantiate nor refute definitively due to time restraints and limited inspector availability. The PI&R inspection team strongly recommended that the agency perform IP 93100 to examine the perceived environment that discourages RP staff from initiating condition reports. The IP 93100 basis states that when directed by management, SCWE-related issues of concern identified during IP 71152 can be examined in more depth using this procedure to gain additional insights.

DORS Projects Branch 2 agreed with this recommendation and presented this recommendation at a follow-up Allegation Review Board meeting. The ARB agreed with this recommendation.

Following my and others' discussions with you on November 17, 2023, about the inspection team's recommendation, the results of the follow-up ARB, and additional guidance from HQ

Allegations/SCWE program owner, you approved using this NRC Appendix C inspection procedure.

The DORS Reactor Project Branch 2 will continue to work with members of the Region 3 EICS team and Headquarter Allegations/SCWE program owners and specialists to coordinate this inspection activity and will provide you with periodic updates related to the progress and completion of this inspection activity.

Billy C. Dickson, Jr., Chief Projects Branch 2  
Division of Operating Reactor Safety, Region III  
USNRC