

**Herb Williams notes/comments on the [REDACTED] interview (2-27-04)** 7C

The following are my observations/questions of the [REDACTED] interview held on 2-27-04.

ASSESSMENT QUESTION	YES/NO	AMPLIFICATION (WHY, WHY NOT, ETC.)
Will raise concerns and has done so before?	YES	See below
Raises concerns for others?	N/A	Not addressed
Believes others raise concerns without hesitation?	NO	See Below
Knows of someone who has experienced retaliation for raising concerns?	N/A	Not specifically addressed during interview

**Bins for Issues:**

**#1 - PERCEIVED LACK OF FREEDOM TO RAISE SAFETY CONCERNS TO PSEG MANAGEMENT**

**#2 - PRODUCTION OVER SAFETY ISSUES**

**#3 - SCHEDULE PRESSURE ISSUES**

**#4 - LABOR - MANAGEMENT ISSUES**

**#5 - INDUSTRIAL SAFETY ISSUES**

**OTHER UNSPECIFIED ISSUES/COMMENTS**

**#1 - PERCEIVED LACK OF FREEDOM TO RAISE SAFETY CONCERNS TO PSEG MANAGEMENT**

- (p. 9 & 10) "I would say [that the atmosphere for raising concerns at the site is] neutral, depending upon the concern. Some are addressed expeditiously and some are not." Equipment issues are handled better than personnel or procedural issues.

**#2 - PRODUCTION OVER SAFETY ISSUES**

- (p. 12 - 21) Production pressures, an inefficient work control process and less than adequate procedural guidance has resulted in a culture that accepts (even expects) procedures to require some sort of on the spot modification or may even be used merely as "guidance." Deviation from a procedure is not uncommon, but only on procedures with no nuclear safety impact. The belief exists that better planning may reduce the number of procedure deviations.
- (p. 28 - 38) Specific instances sending a "production over safety" message: (1) conducting diesel surveillances in Scott air packs and (2) elimination of planned work on control rod drives to save outage time (neglect of this maintenance subsequently resulted in the tremendous rise in the incidence of sticking control rods which provides additional challenge to the conduct of shift operations).
- (p. 41 - 45, 89 & 90) There was intense senior management pressure to start up following the stuck Bypass Valve shut down (because the problem preventing full closure was no longer evident) without addressing the original problem.
- (p. 45) The reactivity excursion event was communicated as Operations Management asking the shift operators to take manual control of too many systems.
- (p. 75) With respect to deregulation, "the overall pressure is [to] get the unit back on line versus doing the right thing ... it just continues to move closer and closer [to] a very blurry [line between] production and nuclear safety"
- (p. 100 - 110) Senior Hope Creek plant management forced a declaration of "operable" for the 'D' SRM because they had already committed to not starting up with any inoperable.

**#3 - SCHEDULE PRESSURE ISSUES**

- (p. 19 - 20) 1\* line supervisors recognize the emphasis (for outage work mostly but also on-line work) is on getting the system in service versus addressing procedural inadequacies.
- (p. 121 - 130) A fallout of the reactivity excursion event during the "stuck Bypass Valve" down-power was the elimination of the option to use the BPV Jack as a means to control reactor pressure. This means that reactor pressure and temperature are no longer directly controllable between 0 and 150# (the Electro-Hydraulic Control (EHC) system does not control reactor pressure automatically until 150#).

**#4 - LABOR - MANAGEMENT ISSUES**

- (p. 80 & 81) The expectation is that non-bargaining unit supervisory employees should routinely work a lot of overtime without compensation.

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- (p. 82 - 87) Management looks very unfavorably at absences and does not treat people with respect or integrity. Low-mid level managers/supervisors will not raise issues related to free-time, sick-time, or vacation for fear of being designated a complainer and non-team player.
- (p. 92 - 93) [REDACTED] sent an email to the operations department, requesting management and directing union members (all recipients), to draft a letter to him explaining how much they wanted to keep their jobs (all union members refused to honor the directive).
- (p. 137 - 143) There is a perceived lack of accountability in management ... "it's like accountability by dilution in committee"
- (p. 150) "... [there is a] serious gap ... the [REDACTED] and any other senior management position related to the Operations department] should [spend more time familiarizing themselves with the operating crews]"

**#5 - INDUSTRIAL SAFETY ISSUES**

- NONE

**OTHER UNSPECIFIED ISSUES/COMMENTS**

- (p. 18) Hope Creek's "on-the-spot" procedure change process "is a nightmare"
- (p. 49 - 51) There is a long-standing problem with insufficient capacity of the auxiliary boilers to support startup and shutdown operations (boilers were de-rated for an EPA issue and nothing has been done to correct the problem)
- (p. 65) Operations failed to let senior level management know about the reactivity excursion event for several days.