

# THIS DOCUMENT IDENTIFIES AN ALLEGER

Allegation Receipt Report

Date Received: September 3-4, 2003  
 Received via: ☒ Telephone ☐ Facsimile ☒ E-Mail  
 Employee Receiving Allegation: Johnson/Vito Source of information: ☒ former contractor

Alleger Name: Dr. Kymn Harvin, Ph.D  
 Cell Phone: [REDACTED]  
 E-Mail Address: [REDACTED]

Home Address: [REDACTED]  
 City/State/Zip: [REDACTED]

[Individual is currently in South Carolina at Oconee until 9/5/03 when she will move back to her home address in [REDACTED] on 9/12/03.]

Alleger's Employer: PSEG (private contractor) Alleger's Title: Manager, Culture Transformation  
 Facility: Salem/Hope Creek Docket Nos. 50-272, 311, 354

Was alleger informed of NRC identity protection policy? Yes  
 If H&I was alleged, was alleger informed of DOL rights? Yes (Filing a Civil Suit - has attorney - not interested in filing w/DOL)

If a licensee employee or contractor, did they raise the issue to their management? Yes

Does the alleger object to referral of issues to the licensee? No

Provide alleger's direct response to this question verbatim on the line below:

No objection to NRC requesting a written response from PSEG on this matter as part of the review. (from 9/4/03 telecon w/SAC)

Was confidentiality requested? No

Was confidentiality initially granted? No

## Criteria for determining whether the issue is an allegation:

Is it a declaration, statement, or assertion of impropriety or inadequacy? Yes  
 Is the impropriety or inadequacy associated with NRC regulated activities? Yes  
 Is the validity of the issue unknown? Yes

## Allegation Summary:

1. Alleger indicated that there are significant problems with the Safety Conscious Work Environment (SCWE) at Salem/Hope Creek. Alleger's position (Manager, Culture Transformation) has afforded her access to high level management at PSEG (up to and including the Chairman of the Board). Alleger indicated that the focus of these higher level managers has been production over safety, and that her efforts to raise work environment concerns to them have not been received positively (see specific information in Detailed Description of Allegation below).
2. Discrimination - alleger's employment was terminated after raising concerns about the work environment for raising safety issues at Artificial Island to the [REDACTED] and subsequently to the [REDACTED]. A subsequent ECP investigation was conducted, which concluded that the alleger was not discriminated against, but rather that the alleger's position was eliminated. Alleger was employed as contractor for five years.
3. [REDACTED]

Functional Area: ☒ Power Reactor

Discipline for each concern: [1] Other: SCWE [2] Discrimination [3] Wrongdoing

Detailed Description of Allegation:

Safety Conscious Work Environment Issue:

Examples provided:

# THIS DOCUMENT IDENTIFIES AN ALLEGER

- a. 9/02 - Salem equipment operators raised concerns to alleger about an [REDACTED]

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 7C

FOIA-2005-0194

[REDACTED] 7C to keep the plant operating vs. shutting down the plant. Alleger indicated that the concerns of the NEOs were dismissed by PSEG management

- b. Alleger indicated that high levels of management consistently pressure licensed operators to make non-conservative decisions. Example: alleger indicated that a member of Hope Creek Operations management [REDACTED] directed an operator [REDACTED] not to commence shutting down the plant in accordance with an LCO shutdown action statement. The operator did not commence shutdown of the plant until another SRO (would not provide name over the phone) came into the control room and instructed the operator to adhere to the conditions of his license and commence shutdown of the plant and not to be pressured to take the wrong actions. 7C
- c. Alleger indicated that discussions with several high level managers during the week of 3/17/03 indicated that there was considerable pressure from upper level management to return Hope Creek to service following its forced outage. Indicated that this production vs. safety pressure was coming from the highest levels of management. Alleger indicated that she informed the [REDACTED] about these comments during her 3/20/03 discussion with him (see below), and he dismissed them.
- d. The alleger indicated that at her last meeting (March 20, 2003) with the [REDACTED] right before his retirement, she had informed him that high levels of management were telling her that "we are dangerous." [REDACTED] is reported to have stated "we have operators that don't know shit from shinola, and they want to hide behind the safety banner because they don't know what they were doing." 7C
- e. During a 3/20/03 discussion with the [REDACTED] alleger was informed that PSEG management; 7C
  - lacks "defense-in-depth" thinking,
  - decision making and reaction to human performance events are not based on safety;
  - we are one step away from the NRC "taking the keys away;" and
  - was not surprised at the reactions of [REDACTED] (see above) 7C

[NOTE: during telephone conversation with SAC on 9/4/03, alleger indicated that she had taped a number of the conversations she had with managers in late March 2003. Alleger indicated that her former attorney had informed her that "one-way" taping of conversations was permitted in New Jersey.]

#### Other comments:

- safety concerns are given lip-service
- high level managers have informed the alleger that "we focus on appeasing employees vs. resolving their concerns."
- managers are pressured to defend their safety choices

Alleger indicated that she would equate the SCWE at PSEG to that of Millstone (formerly) and Davis-Besse. She indicated that the situation at PSEG is just as bad.

#### Potential H&I

Alleger was called to a meeting with the [REDACTED] on 2/28/03, purportedly to discuss "her bonus." However, after discussing her work environment concerns with the [REDACTED], he informed her that her employment was to be terminated. Alleger indicated that she was initially told that she could stay on board until 4/16/03, but later learned that the [REDACTED] had directed that her departure be "accelerated" and she left the site on 3/28/03. Additional details of alleger's employment termination are provided in the documentation attached to the Allegation Receipt Report. 7C

Regarding the licensee/ECP assertion that the alleger's position was eliminated and that she was not discriminated against, the alleger indicated that people were brought in to perform the function she was performing immediately after her departure.

PSEG Nuclear LLC  
P.O. Box 236, Hancocks Bridge, New Jersey 08038-0236

March 25, 2003



[REDACTED]  
PSEG  
80 Park Plaza  
Newark, NJ 07102

via facsimile and certified US Mail

Dear [REDACTED]:

I am writing to call PSEG's attention to nuclear safety issues that I have tried, without success, to raise with my immediate supervisor, PSEG [REDACTED]. Indeed, as set out below, I have been subjected to unlawful reprisals for my attempts to raise these issues.

In my position as Manager, Culture Transformation, I have repeatedly expressed at formal and informal meetings and discussions among management at PSEG Nuclear that leadership weaknesses, failings, and inadequate attention to employee-raised issues at our site is a matter of nuclear safety. Beginning in about the Spring of 2001, at a weekly staff meeting convened by [REDACTED] where I point-blank stated this concern, and in subsequent monthly one-on-one meetings with [REDACTED] and informal meetings with [REDACTED] I have called attention to the increasing risk of nuclear safety errors at these facilities related to the alienation, poor morale, and lack of empowerment felt by numerous leaders and workers. I have repeatedly called attention to the lack of engagement and involvement by critical leaders with nuclear safety responsibilities and have discussed these matters with each [REDACTED] and [REDACTED]. I have pointed out the disenfranchisement of employees, the increased likelihood of mistakes in judgment and action given the frustration, anger and bitterness (especially with the Salem Nuclear Equipment Operators), concerns that the site is being mismanaged, and that safety concerns are paid lip-service, not real attention. As a high-level manager put it, "We focus on appeasing employees' safety concerns vs. resolving them." Our declining industrial safety performance in 2002 gives credence to these views.

Since I first raised these concerns with [REDACTED] I have been increasingly marginalized. I spent the better part of an hour-long meeting with [REDACTED] on February 28, 2003 reiterating these concerns. At the conclusion of the meeting, [REDACTED] informed me that my employment with the Company would be terminated, effective April 16, 2003. [REDACTED] informed me that I had the option of continuing to work at PSEG Nuclear up to the April 16 termination date.

[REDACTED]

March 25, 2003

Page 2

Last Thursday, March 20, I met again with [REDACTED]. I told him again about my nuclear safety concerns based on information I had received from other members of management at the PSEG nuclear facilities. I told [REDACTED] that the Company's production-at-the-expense-of-safety approach has concerned and pressured members of management to have to defend choices that honor safety first. I told [REDACTED] that these concerns have been voiced by management employees at various levels, including SRO licenseholders. I told [REDACTED] that one of these individuals, who [REDACTED] has told me he trusts and respects, that morning called PSEG Nuclear's current state "dangerous." I told [REDACTED] that this individual and others have told me that they are reluctant to come forward with their concerns for fear of reprisal. I asked [REDACTED] what we should do about this. He said, "We don't do anything because, you know, it is everything you would expect to see...it's a bunch of bullshit." Toward the end of our meeting, [REDACTED] said the words "I appreciate the dialogue." However, his demeanor and tone throughout the meeting gave a very different message. 7C

Later that evening, I met with [REDACTED]. [REDACTED] shared with me many of his concerns, including safe operations of our facilities. [REDACTED] told me he is concerned about our lack of defense-in-depth thinking, our not consistently coming from safety in our decision-making and our under-reaction to human performance events. He also mentioned "other events" that have resulted from these points of concern. They are a matter of record and were summarized in several documents given to the management team. He also confided in me that he has to do the "thinking" for the entire site and is too often the last line of defense. He said, "I believe we are one step away from the NRC taking the keys away." I urged him to get help. He told me he did not know where to turn since [REDACTED] of PSEG Power had not been supportive and wasn't allowing him to make any personnel moves. I told [REDACTED] about my conversation with [REDACTED] including the bottom line that these concerns were "bullshit." [REDACTED] did not seem surprised. He simply shrugged his shoulders. 7C

The following day, Friday, March 21, I received a call from Human Resources asking me to meet with [REDACTED] our site [REDACTED] on Monday. I was told the topic was "your layoff." I met with [REDACTED] yesterday. He told me that [REDACTED] had instructed HR to "accelerate" my departure date to the end of this week. I told [REDACTED] that I wanted to keep working until April 16 in accordance with the termination documents I had received from the Company and in accordance with [REDACTED] express representation to me at the time he told me of the termination. [REDACTED] said that [REDACTED] now wants to be sure I know that my position was eliminated. I told [REDACTED] that I had been told by [REDACTED] that the incoming [REDACTED] had the latitude to retain me if he chose to do so and, for this reason, I wanted to continue 7C

[REDACTED]

March 25, 2003

Page 3

working until April 16 as planned. [REDACTED] said that [REDACTED] had told him that I no longer have this choice and that I have to leave active employment by this Friday, March 28.

It is clear that my employment was terminated by [REDACTED], and I am now being asked to leave active employment early at [REDACTED] request, because I expressed to him the safety, mismanagement and leadership concerns outlined above. PSEG's actions towards me are inconsistent with its own Standards of Integrity, and they are diametrically opposed to your expressed commitment to a PSEG workplace in which safety concerns should be voiced and addressed without fear of this kind of reprisal. 7C

The employee handbook advises that these issues should be raised through the Employee Concerns Department. For this reason, I am copying them on this letter. However, since this department ultimately reports to [REDACTED], I am addressing this letter, these issues, and my concerns about safety at PSEG Nuclear to you. 7C

I have retained legal counsel to represent me in discussions with PSEG Nuclear regarding my separation from employment. They are Stephen Long and Scott Carroll of Drinker Biddle & Reath. The Company's Law Department should expect to hear from them shortly. If PSEG or its lawyers wish to contact my attorneys, they may reach them at Drinker Biddle & Reath's office in Florham Park.

In the meantime, I believe it is vital that the PSEG Nuclear safety issues be the subject of a thorough, impartial and independent investigation. Too many knowledgeable, respected management personnel at both sites have told me that the safety situation is getting out of hand. I urge you to cause an independent investigation to occur without delay.

Respectfully,

Kymn Harvin Rutigliano, Ph.D.  
Manager-Culture Transformation  
PSEG Nuclear

cc: PSEG Nuclear Employee Concerns

PSEG Nuclear LLC  
P.O. Box 236, Hancocks Bridge, New Jersey 08038-0236



TO: Ms. Kymn Harvin

FROM: [REDACTED]

SUBJECT: NUCLEAR QUALITY SAFETY CONCERN NUMBER: 761

OUR REF: ECP 03-009

DATE: July 17, 2003

On March 25, 2003, you raised a concern through the Employee Concerns Program. Your concerns were contained within a three-page letter that you read to me during our meeting. I understood that the same letter was also faxed to PSEG's Chairman of the Board earlier that evening. Your concern was focused in two areas: the work environment and retaliation. The letter asserted that the work environment at PSEG Nuclear was not conducive to raising and addressing nuclear safety concerns. You also alleged that the [REDACTED] retaliated against you for voicing concerns over work environment issues. You indicated that the retaliation was in the form of terminating your employment and accelerating the date of your out-processing.

During our meeting, you informed me that you had retained legal counsel. Per our practice, once legal counsel has been retained I am obligated to engage the PSEG Law Department. As a result, an outside law firm, acting independently from PSEG Nuclear, conducted the investigation. I however, remained a member of the Investigation Team. Although the investigating attorneys were not successful arranging your interview, they conducted the investigation by speaking with pertinent individuals who would have first hand knowledge of work environment issues and issues directly related to those raised in your letter. Below is a brief synopsis of their findings. This is not intended to take the place of the Investigation Team's comprehensive report of findings, but rather is intended to provide you with a brief synopsis of its conclusions.

~~CONFIDENTIAL~~

**Is the work environment conducive to raising and addressing nuclear quality/safety concerns?**

The Investigation Team based its findings on the company's routine assessment of the safety conscious work environment at the site, interviewee comments, and document reviews. The Investigation Team concluded that employees do feel free to raise concerns without a fear of reprisal. No interviewees stated that they were reluctant to come forward with nuclear safety concerns. Furthermore, the Investigation Team concluded that the management team has not been chilled or discouraged from raising concerns of their own. Several interviewees did indicate that there is room for leadership improvement at the site, but that this has not resulted in an inability or unwillingness to raise or address nuclear safety concerns.

**Was Ms. Harvin retaliated against for raising nuclear quality/safety concerns?**

The Investigation Team concluded that your position was eliminated and, thus, your employment terminated, based on legitimate, non-discriminatory, and non-prohibited grounds. The most prevalent issues you discussed were perceived as general leadership-themed matters.

Based on interviewee comments and document reviews the Investigation Team concluded that you were not marginalized for raising issues to the [REDACTED] or other management officers. The decision to eliminate your position was found to be made in late 2002, not as a result of your February 26, 2003 meeting with the [REDACTED]. The position that you held as Principal Organizational Development Consultant was temporary. Our review also found that [REDACTED] made the final processing date decision. K

Thank you I appreciate your utilizing the Employee Concerns Program. Consistent with our practice, due to your notice of retaining legal counsel relative to this issue, I must request that all inquiries regarding this matter be made through our Law Department. You or your counsel may contact Jeffrie J. Keenan, Esq. at (856) 339-5429.

~~CONFIDENTIAL~~

1<sup>st</sup> Quarter 2003 & 4<sup>th</sup> Quarter 2002**SURVEY COMMENTS**

▲ Culture ▲ Employee Concerns Program ▲ Management ▲ Corrective Action Program

▲	When Performance Partnership appraisals are down graded and raises are negatively impacted because concerns over violations of procedure are expressed, one learns to keep the concerns to one's self.
▲	This organization needs much help. There is little help here and morale is low. People are lied to and the liars are running scared. Everyone is so afraid of losing their job that they are afraid to do their jobs. This is a bad condition and we all need to help improve it. We need security to do this.
▲	Our biggest problem continues to be follow-through. We are very good at root cause analysis. We are not good at timely and appropriate implementation of corrective actions. Some of our processes are not working well, budget, work planning/scheduling, and document control. Change is good; change for the sake of change is stupid.
▲	Our biggest problem with our Safety Conscious Work Environment is looking out for each other. Everyday I find at least one person who is not wearing safety glasses in an area where they are required. Why has no one else noticed? Especially if they are working with other people. The worst part of it is seldom does that person appreciate me looking out for their safety. The newest of the Health & Safety Administrators is getting more involved. This is a good thing and in the long run will improve our safety culture. Get more managers, superintendents and directors out in the plant. Workers need to see upper management is involved and concerned with the real world.
▲ ▲	There is a growing amount of finger pointing & managing by intimidation in the MAST environment with upper management.
▲ ▲	I am not afraid to raise issue to my department management, but I am afraid of senior management's response to these issues. There is a "blame the messenger" culture developing. I am afraid for repercussions on my department manager as well as myself.
▲ ▲	Management states they are concerned about safety, but their action, or inaction, doesn't always support their statements. We have a joke that states, "safety is our number one priority as long as it doesn't cost the company any money".
▲ ▲	Sometimes management expresses their safety concerns, but I do not feel they always want you to do what they say. I feel there is a "don't ask don't tell" attitude.
▲ ▲	I believe that what management states to the group and then what is stated to the individual are two sides of the coin. As a group, safety is priority one; as an individual, if you can get the job done faster to get production back quicker, then do it (just don't get caught).
▲ ▲	I believe that upper management is more concerned with #'s and \$'s than they are with the people, and it shows in the attitudes and morale of the employees.
▲ ▲	Not only has safety went away in the past five years, a policy of reverse discrimination now has taken over.
▲ ▲	Too many levels of management. Only qualification is to be a "good ol' boy" from another plant. Concerns never make it to the top because it looks like one of the many levels of management didn't do their job. Been here 18 years and never saw it this bad.
▲ ▲	I think our numbers speak for themselves. The OSHA reportable rate and the CAP program have yet to fix, resolve, or improve safety.
▲ ▲	Management makes decisions on who you are and what your level is. They don't take family life in consideration; it's only about the plants running. Do for some & not others. Retaliation comes and don't realize it until stressed out. Work directly with one supervisor, but not the supervisor who writes appraisals. Appraisals are not handled in timely manner. Supervisor doesn't follow through procedures and policies.
▲ ▲	While I believe most of management is open to frank discussion of safety & quality concerns, I also believe that the discussion may result in reprisals from some management personnel. With the current emphasis on EPS & budgets, I can't imagine raising a concern that may result in a shutdown without significant badgering by managers & VPs. I also don't believe raising issues will result in promotional opportunities.

05/17/2003



1<sup>st</sup> Quarter 2003 & 4<sup>th</sup> Quarter 2002

▲ ▲	Company states one thing, but practices another. I E be safe, but get it done ASAP! In our department, the superintendent threatens the first line supervisors in front of the union. These are just two of the many problems in our dept.
▲ ▲	Not all issues are appreciated, sometimes holding management to the standards they have written, makes their lives more difficult and then the worker is a troublemaker.
▲ ▲	Production, production, production
▲ ▲	My major concern with CAP is that corrective actions identified to resolve issues & prevent recurrence are not carried out to completion. I feel this is due to lack of proper prioritization and lack of commitment of resources (e.g. people & time) to complete the required actions. Also, assignments of evaluations (e.g. for identified issues) still tends to be done as a punitive measure vs. assignment to the person/organization that can best evaluate & correct the issue, thus, ineffective corrective actions result.
▲ ▲	I think that we ask folks to use the corrective action system so much that they use it to their benefit as a faceless person (i.e., don't need to look someone to throw a rock) to get a political agenda item done. The volume becomes so high that we do not do the research to effectively prioritize and resolve issues.
▲ ▲	We have focused on age and quantity vs. effectiveness of corrective actions over the past several years.
▲ ▲	I feel free to report concerns; however, the enormous workload prevents performing an effective and thorough resolution of quality issues. Many times, a deadline on completing a project takes precedence over quality. The constant emergent problems where a lot of people are thrown into round the clock coverage adds to the backlog.
▲ ▲ ▲	I've been subjected to harassment by my peers, lost financial incentives, and been overlooked for promotion. All for identifying a problem, which we corrected the week after I raised the concern. After several years, I'm still subjected to this. #1-I'm still paying for something from years ago, for raising a concern which I was correct about and we stopped doing it! #4- Depends who? #5-I've been singled out for bringing up concerns more than once! #11-What's communicated and wanted are opposite. #13-Only if it's not too inconveniencing. #14-Either to correct or make an example out of someone. #15-I've been continually harassed for years.
▲ ▲ ▲	#7 EC thoroughly investigates, but they do not resolve issues, they leave it to the management to fix and they (management) don't. #15 Among my peers, there is a definite feeling of intimidation from upper management about bringing concerns.
▲ ▲ ▲	I feel that management's tolerance of employees' concerns is directly proportional to cost.
▲ ▲ ▲	There is no safety enforcement. There is not a safety culture. There is no confidentiality in reporting anything, and retaliation is thorough and well directed from the top down in the nuclear organization. The only way to correct this would be to remove many managers and implement a complete re-education program. A daunting and expensive venture in any organization, but especially so here. I simply mentioned that I had concerns to the employee concerns rep and shortly thereafter there were too many pointed questions and accusations thereafter.
▲ ▲ ▲	I do not believe we do a very good job of effectively resolving root causes. In addition, we don't implement the corrective actions in a timely manner. We've got to do better.
▲ ▲ ▲	Look at notification 20117049.
▲ ▲ ▲	I feel that it is all right to raise a concern as long as it does not jeopardize production, Pls, the Manager/Supt's assessments, or departmental standing.. Typically when the outage mode safety is not the primary concern. As a matter of fact, just look at the CAP log and see how many "safety" items are unresolved. People have been fired for making mistakes, why would you bring something up if you thought you would be fired? Supervisors, 1st line, are simply fodder.
▲ ▲ ▲	The effectiveness of corrective actions and the ability to find and fix the true root cause is marginal.
▲ ▲ ▲	Issues take too long to fix after identification. SAP is still not friendly and sometimes not efficient. Safety concerns are taken into account on most issues.
▲ ▲ ▲ ▲	I feel that my management puts productivity in front of safety, and uses "safety first" as a PR Campaign.
▲ ▲ ▲ ▲	We are getting better, I do believe!
▲ ▲ ▲ ▲	This organization has developed a culture that discourages the reporting of issues. Instead of just writing a notification to identify a problem, the identifier must contact people who may be involved first. This often results in overt or tacit intimidation to not report the issue. This appears to have become an unwritten management expectation since many of us are uncertain of our employment in the current business environment, the practice results in under reporting of issues.

05/17/2003

1<sup>st</sup> Quarter 2003 & 4<sup>th</sup> Quarter 2002

▲ ▲ ▲ ▲	I feel that the process that are in place have come a long way and really seem to be working. As we move forward, I believe these processes will help us to reach top quartile.
▲ ▲ ▲ ▲	When a person raises a concern, he himself becomes responsible for solving it. This causes more work for him and his regular work gets delayed. This phenomenon discourages problem identification.
▲ ▲ ▲ ▲	We have a very safety conscious work environment. It is overdone... Relatively minor issues are inappropriately made a big deal with regulatory pressure this may be appropriate.
▲ ▲ ▲ ▲	This place sucks! Employee Concerns sucks!
▲ ▲ ▲ ▲	PS is not effective in totally resolving issues.
▲ ▲ ▲ ▲	Many of these questions I don't know the answer to.
▲ ▲ ▲ ▲	Being that I have just finished my training and reported to shift this week, it is difficult to give fair answers as I have little experience with many of these issues.
▲	The ECP is not effective & is only a tool to protect management, not the employee.
▲	I cannot honestly answer these questions since I have not had experience with Employee Concerns. I would only be answering questions based on hearsay from others and not personal experience.
▲	I do not believe employee Concerns is effective in the management of "personnel" issues. I have seen at least 3 incidents where it failed completely & also believe it is pro-management & this has been a proven fact. Would I go to EC with personnel issues - NO!
▲	ECP is window dressing only!
▲	I don't know much about the ECP.
▲ ▲	Does senior management really back the ECP if the staff has been eliminated from 3 to 1?
▲ ▲ ▲	Issues are usually thoroughly investigated, but resolutions are influenced by cost, DCPs, etc. Safety wise, things are better, but improvement is needed with management's involvement. Need a maintenance team assigned to safety issues. Chemistry area needs to be looked at. Many "work arounds" and equipment in need of repair. Need another maintenance team assigned.
▲	These questions are truly not geared to address upper managements' problems.
▲	If this company doesn't start up-grading equipment, store housing some parts, and listening to the workers & techs about problems here, we're all going to be out of a job. Take off the band-aids -- WAKE UP!
▲	My opinion has changed over the last year. PSEG Nuclear staff generally lack experience at almost every critical position. Management does not meet ANSI minimum requirements. Senior Leadership takes actions that give mediocre near-term results and have no long term plan for improvement.
▲	#14 I have no info for/against. I've high confidence if one were brought it would be addressed promptly.
▲	#14 as long as it doesn't cost any money to fix the problem. Most of the 3's used would probably go to 2.5s if there was a column for "who knows".
▲	Management words on safety are fine, but not consistent with management actions and pressure to meet schedule. It is difficult, if not impossible, to meet the schedule and also meet all of the standards of performance.
▲	The fact that maintenance department is schedule driven and although they preach safety, they really don't care as long as the job gets done. I am unsure of management's expectations, they seem to change so much that every new manager has their own ideas on how things are done.
▲	#12 was marked as such due to the inappropriate treatment of a maintenance supervisor. How can a guy (supervisor) home in bed be held responsible for night shifts actions? If this is the case, why does the axe stop in his back? Why is the superintendent spared? Why not right up the ladder? They are as responsible as he is.
▲	The problems never change; the concerns I bring up to management never get fixed. Getting the job done on time is more important than safety. Any concerns that are brought up are never addressed. Same old thing.
▲ ▲	#15, I feel there is a lack of professionalism, not to the point that we are unsafe, but a climate of inapproachability among peers and resistance to questioning attitudes. People are ashamed to admit when they don't understand, others will harass when they ask. #16-20, I have never heard of "CAP".
▲ ▲	Supervisor actively discourages us from using CAP because it generates too much work. CAP is effective at PSEG, but I have zero confidence in its up to the level of my supervisor. My conclusions are that ability to report concerns depends on who you are and your rank, not what you know.

05/17/2003

1<sup>st</sup> Quarter 2003 & 4<sup>th</sup> Quarter 2002

▲ ▲	Corrective Action Program is not being fully embraced by Maintenance & SWIM leadership. Repeated events indicate corrective actions are not effective as implemented.
▲	CAP is not effective or timely. Long-standing issues are not resolved in CAP.
▲	I don't believe adequate funds are allocated for CAP concerns to be corrected in a timely manner. We still have issues open since 1996-1997.
▲	S21: One 20-minute session on how to write a notification is not enough.
▲	The CAP program determines the action. Maintenance department and/or DEP funding prevents the action from being implemented! See 2CP99, high priority; parts on hand, failed due to lack of action.
▲	Ineffectiveness of CAP may only be a perception. There is zero feedback from CAP. There needs to be a feedback mechanism to ensure the initiator of a CR receives feedback regarding the evaluation. This should be prior to the evaluation being confirmed.
▲	I still do not have a lot of confidence in the SAP computer system. It has improved and I have gotten better at using it, but I still think there must be a better system/way available.
▲	In my opinion there is not enough time and energy spent teaching employees how to follow the CAP through SAP. The SAP portion of the CAP is not user friendly, therefore more educating is required. The old MMIS screens with three levels (names) of ownership at the conclusion to a response seemed more effective.
▲	The CAP itself is broken and ineffective.
▲	A notification written for a light fixture that had become detached from the ceiling took more than 1 year to resolve, even with follow-up calls. Another notification written for repairing a door latch to a security area took almost a year to resolve. Also I think the notification process is used for matters that could be resolved with a phone call in many cases.
▲	CAP is so complicated that feeding the system has become the goal vs. using the program to solve problems. The use of the apparent root causes for level 2's has proven not to be effective in resolving problems. The "apparents" should be labeled and either made Level 3 or get a full root cause.

1. As a nuclear worker, I am responsible for identifying problems and adverse conditions.
2. I believe a culture exists at PSEG Nuclear that is conducive to raising nuclear safety and quality concerns.
3. I believe that if my management had made a non-conservative decision, I could challenge that decision.
4. I feel free to approach management regarding any nuclear safety or quality concern.
5. I believe that I can raise any nuclear safety or quality concern without fear of retaliation.

6. I am familiar with the Employee Concerns Program.
7. I am confident that issues reported through the Employee Concerns Program are thoroughly investigated and appropriately resolved.
8. I believe that upper management supports the Employee Concerns Program.
9. I can use the Employee Concerns Program without fear of reprisal.
10. I believe that the Employee Concerns Program will maintain confidentiality of my concern at my request.

11. Management's expectations regarding safety and quality are clearly communicated.
12. Management's expectations are consistent with performance reviews, rewards, and discipline.
13. I believe that management wants employees to report concerns.
14. My management takes corrective actions on employee concerns brought to them.
15. I believe my work environment is generally professional and open (i.e. free of any harassment, intimidation, discrimination or retaliation).

16. Resolution of potential nuclear safety/nuclear quality issues including root cause and broader implications through the CAP is effective in our organization.
17. Identification of potential nuclear safety/nuclear quality issues through the Corrective Action Program (CAP) is effective in our organization.
18. I feel free to raise nuclear safety/nuclear quality concerns through the CAP without fear of reprisal.
19. I am confident that issues reported through the CAP are prioritized appropriately, thoroughly investigated and

05/17/2003

## 1<sup>st</sup> Quarter 2003 & 4<sup>th</sup> Quarter 2002

resolved in a timely manner.

20. The CAP is utilized effectively by PSEG Nuclear to resolve conditions adverse to quality in a timely manner.

21. I know how to write a Notification and get it into the system.

05/17/2003