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ACCESSION NBR:9008300167 DOC.DATE: 90/08/23 NOTARIZED: NO DOCKET #
 FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SUBJECT: Discusses effect of NRC maint insp interface record on candor of personnel.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 23, 1990
G02-90-141

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NO. NPF-21
EFFECT OF "NRC MAINTENANCE INSPECTION INTERFACE
RECORD" ON CANDOR OF PERSONNEL

Reference: Letter, R.P. Zimmerman (NRC) to A.L. Oxsen (SS),
same subject, dated July 17, 1990

In the referenced correspondence which was received on July 24, 1990, the NRC presented a concern pertaining to the use by the Supply System of an "NRC Maintenance Inspection Interface Record" form during the recent Maintenance Team Inspection. The NRC was concerned that Supply System personnel may have understood the requests to fill out the forms as an infringement on their right to speak privately with NRC personnel. As requested in the reference, the purpose of this letter is to provide information on the steps taken to minimize the potential effects of this form on the candor of Supply System personnel when talking with NRC inspectors. Also included is an evaluation of whether the use of this form had the effect of limiting candor of those personnel.

The Supply System Interface Record was created only as a means to gather information and address any potential NRC concerns in a positive and timely manner during the Maintenance Team Inspection. This type of form has been used during past NRC team inspections as a successful tool for ensuring effective communication between Supply System and NRC personnel. The forms are used to tabulate team concerns, and identify all available related information which may support resolution of those concerns prior to the end of the inspection period. The NRC Maintenance Inspection Team was made aware that the Interface Record was being used during the inspection.

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During the inspection there was never a desire or an attempt on the part of Supply System personnel to force anyone to complete one of these forms (as a means of communicating with the NRC). The completed forms were not placed on any distribution list and remained in the custody of the Supply System Maintenance Inspection Coordinator. Although information on the completed forms was discussed with an eight member team which was supporting the Coordinator, the forms were not discussed with the individuals who completed them except in a few cases where clarification was necessary. Furthermore, an evaluation was performed which disclosed that only 51 Plant personnel submitted a completed form during the 15-day inspection performed by seven inspectors. As a result, it appears that forms were not filled out for many of the contacts made between Supply System personnel and the team, given the extensive amount of time dedicated for the inspection by NRC personnel. This suggests that the majority of Supply System personnel involved in the inspection did not view completion of the form as being a requirement for discussing information with the NRC. However, if there were instances during the inspection where Plant personnel did not feel they could talk directly and candidly with the NRC, such a viewpoint would be contrary to Supply System written policy and training provided to our employees.

The Supply System has an established, written policy which states that all employees are responsible for ensuring any information they provide to be disseminated to a regulatory agency is complete and accurate in all material respects. In addition, all managers and supervisors are responsible for ensuring that employee rights to take health and safety issues or concerns directly to the Nuclear Regulatory Commission are maintained as described in 10CFR50.7, "Employee Protection," and 10CFR19, "Notices, Instructions, and Reports to Workers; Inspections."

Furthermore, the Managing Director and Management Staff are responsible for assuring that the Supply System does not discharge or otherwise discriminate against any Supply System employee who contacts or is contacted by the NRC regarding any investigation the NRC may conduct within the scope of its authority involving the Supply System.

In addition, requirements related to employee rights to discuss issues directly with the NRC are also presented to Supply System and contractor personnel during both the General Employee and Advanced Radiological Training classes. There is also a "Direct Line" telephone number available where employees can report concerns or improvements regarding operations activities at WNP-2. This is a 24-hour recorded message that is confidentially reviewed by the Assistant Managing Director for Operations.


Page Three

EFFECT OF "NRC MAINTENANCE INSPECTION INTERFACE
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August 23, 1990

However, to further emphasize the regulations and ensure that personnel understand their rights pertaining to discussions with the Commission, forms such as the NRC Maintenance Inspection Interface Record will in the future include a statement from Plant Management that employees always have the right to communicate openly with the NRC without the threat of discrimination. A statement will also be included to the effect that, although the forms are used by Supply System management to address issues in a timely manner, completion of such a form is not a requirement.

Very truly yours,


G. D. Bouchey, Director
Licensing & Assurance

JDA/bk

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

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