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FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
AUTH. NAME AUTHOR AFFILIATION
PARRISH, J.V. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
PERKINS, K.E. Region 5 (Post 820201)

SUBJECT: Provides summary of licensees planned actions & schedule for completion re employee concerns program status. Licensee response to special Insp Rept 50-397/93-51 can be separated into three general areas.

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February 11, 1994
G02-94-039

Docket No. 50-397

Mr. K.E. Perkins
Acting Regional Administrator
U.S. Nuclear Regulatory Commission
1450 Maria Lane
Walnut Creek, California 94596

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Dear Mr. Perkins:

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
EMPLOYEE CONCERNS PROGRAM STATUS**

Reference: Letter dated January 12, 1994, from S.A. Richards (NRC) to J.V. Parrish (Supply System), "NRC Special Inspection Report No. 50-397/93-51".

The referenced special inspection report documents a review of the Supply System's employee concerns program conducted by the NRC in December 1993. The transmittal letter and the attached inspection report identified a number of observed weaknesses with our program. The program weaknesses were consistent with several of those previously identified by the Supply System. The Supply System has initiated a course of action to address the program weaknesses and the specific concerns noted in the inspection report. This letter provides a summary of our planned actions and schedule for their completion.

The Supply System's response to Special Inspection Report 93-51 can be separated into three general areas. First, programmatic improvements will be implemented with revisions to the existing procedures and the development of new instructions to specify the methodology for handling each employee concern, as appropriate. Target areas for procedural enhancement include the requirements for the process of receiving, evaluating, tracking, and closing employee concerns, and the provisions for protecting employee confidentiality, when requested. Program access will be enhanced by encouraging employees to express their concerns through peer representatives, by submitting written concerns or by using the existing dedicated phone line.

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Mr. K.E. Perkins

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In addition, the program custody will be transferred to the Quality Assurance Directorate where a dedicated staff will be assigned to operate the program on a full time basis to provide an increased level of attention. Routine status reports will be provided to the Assistant Managing Director, Operations (AMDO) to keep him apprised of the concerns and their disposition. Independent internal assessments will be scheduled on a regular basis to assure program quality and responsiveness. Finally, we recognize that the program description and procedures are only part of the necessary improvements. Training will be provided to better equip and sensitize our managers and supervisors on the importance of effectively dealing with their employees' issues when they arise.

Second, in regard to the September 1, 1993 employee concern related to fire seals, we are evaluating the handling of this concern from the perspective of assessing the propriety and thoroughness of steps taken to address concerns and questions as they arose. This evaluation will also determine if there is evidence to support if discrimination occurred to this individual as a result of expressing his concerns. Finally, the investigation will address the technical issues related to fire seals and the other concerns raised by the employee to date. The Supply System plans to brief you no later than March 18, 1994 on the conclusions reached on the handling of this employee's concerns and the progress to date on addressing the associated technical issues.

The last area of our response involves a review of past employee concern files, including the two cited in the inspection report. The review of the concerns dated December 4, 1992 and September 30, 1993 will determine whether any additional actions are necessary to address potential discriminatory activities. Additionally, the remainder of the program files will be reviewed to the extent necessary to ensure that potential nuclear safety issues and cases of potential intimidation or harassment were dealt with properly. The completion of these reviews and the steps being taken to strengthen the program should convey to Supply System employees that we are fostering an environment that provides them confidence that their concerns will be addressed.

The schedule for completion of the actions described above is as follows:

Programmatic improvements, and the transfer of the program to the Quality Assurance organization will be complete by April 4, 1994.

Training will be developed concurrent with the implementation of the program improvement. This training will be conducted by April 4, 1994.

The evaluation of the handling of the September 1, 1993 employee concern including a review of the potential for discrimination will be completed by March 7, 1993.

The technical reevaluation of the fire seal issues will be completed by April 4, 1994.

Mr. K.E. Perkins

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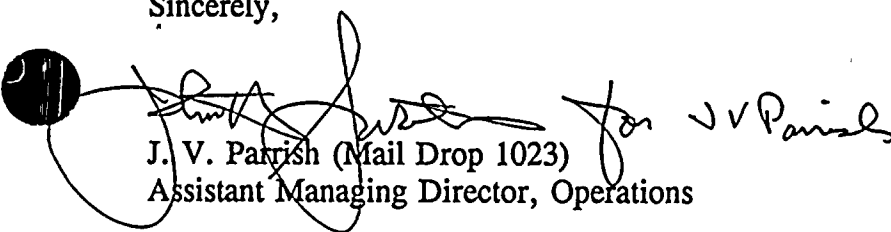
EMPLOYEE CONCERNS PROGRAM STATUS

The evaluation of potential discrimination for the December 4, 1992 and September 30, 1993 employee concerns will be completed by August 1, 1994.

The review of all previous employee concern files to assure proper handling will be completed by December 31, 1994.

The Supply System recognizes that the employee concerns program is an important aspect of our overall effort to provide an open work environment in which employees feel free to raise concerns without fear of retaliation. Our recognition of the importance of this matter is evidenced by the improvement initiatives initiated by us prior to your inspection. We take the NRC observations noted in the inspection report seriously, and understand that they reflect the need to effect more program improvements in a timely manner. Any questions that members of your staff may have on our efforts to enhance our program should be directed to Mr. James C. Gearhart, Director, Quality Assurance at (509) 377-8368.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

JFS/JAB/WAK/bk

cc: NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 927N
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