

EMPLOYEE CONCERNS PROGRAM

SEPTEMBER 27, 1989

Program Approval

PREPARED BY:

John F. Ravert 9/28/89  
John Ravert Date

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Video - Script

THE EMPLOYEE CONCERN PROGRAM

Hello, I'm Bill Conway, Executive Vice President of Arizona Public Service Company. As a member of the Palo Verde Team, I'm here to restate our commitment to nuclear safety and quality and to explain the new Employee Concerns Program to you.

APS personnel at all levels are encouraged and expected to communicate in an active and open manner such that known problems which may affect any aspect of our performance are quickly identified and satisfactorily resolved. This applies to every one of you — managers, supervisors, and all site personnel, including contractors and their employees.

From the beginning of this project, we've emphasized our commitment to safety and quality in all aspects of Palo Verde and stressed the importance of each person's contribution to attaining this commitment. As we've made the transition from construction to operation, the structure of our project has changed, but not our commitment to safety and quality. We continue to depend on each of you in your daily work to serve as an additional pair of "eyes and ears" to help us achieve our safety and quality goals.

Each of you is important to the success of this project. You have talents, skills, and experience which make a positive contribution. As experienced professionals, you recognize safe work practices and know what constitutes quality work. No one person or department can do everything in an immense project such as this. So, it is your responsibility to be a safety

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and quality expert within your special area. But did you know that your managers expect you to report any safety and quality concerns you may have in any areas of the Palo Verde project?

If you know of any condition or situation that may compromise the safe operation or quality of work performed at Palo Verde, it is your duty to report it to your immediate supervisor, or if you feel that this is inappropriate, for whatever reason, you may step out of normal channels and go to a higher level of supervision.

In the past, we've had a "hotline" program to provide you with additional ways of making your concerns known. We've now improved that program to assist you and to help us get to the bottom of any matter you bring to us. Our new Employee Concerns Program has been developed to hear you when you feel you cannot take your concerns directly to your immediate supervisor or manager. In all cases, you can request confidentiality if you wish and every effort will be made not to disclose your identity. We encourage you to visit the Employee Concerns Office located in the North Annex Building or call extension 6701 to set up an appointment.

There is also an Employee Concerns Direct Line: 944-5444. You may call this number from anywhere, including off site. If you call after regular day shift hours, a recording will ask that you leave your name, address, and phone number so that an Employee Concerns Representative can personally contact you to document and track your concern.

Personnel terminating their employment also have the obligation to report concerns. You have the opportunity to request a personal interview prior to



leaving. But if you wish, you may decline the interview, identify your concern on an Employee Concern Disclosure form, seal it, and turn it in to Security as you leave the site. You will be informed of how your concern was handled.

The Employee Concerns Program is more ambitious than any previous program. It will receive and process reports from all areas and activities associated with Palo Verde. Depending on the type of concern — administrative, safety, quality — it will be referred to the right group such as Human Resources, Security, or Safety, for an investigation and report. You will receive a response from the investigating group. Employee Concerns personnel will ensure that your concerns are appropriately resolved.

So, if you have any concern, especially one that involves safety or quality at Palo Verde, please report it. First, you should report to your supervisor or manager. Should you feel hesitant, for any reason, then report it to the Employee Concerns Office.

You are protected by law against harassment, intimidation, or retaliation for identifying nuclear safety concerns. Your rights in this regard as well as other relevant information are summarized in NRC Form 3 which is posted widely throughout PTNGS and other facilities supporting our nuclear operations. Moreover, Arizona Public Service Company will not tolerate harassment, intimidation, discrimination or other acts of retaliation against any employee for identifying any concern to supervision, management, the Employee Concerns Program, or the NRC. If you believe you have been, or are being, discriminated against because you identified a concern, you should



immediately report this directly to the Employee Concerns Program on site.

I would like the Palo Verde organization to have the first opportunity to hear and respond to your concerns. However, you may feel free to take your concerns directly to the Nuclear Regulatory Commission. The site resident inspector can be reached at extension 3737 and the phone number of the Region 5 office, located in Walnut Creek, California is: (414) 943-3700.

I'm taking this opportunity to re-emphasize the vital role and responsibility each of you have as part of the Palo Verde team in expressing your concerns on safety and quality matters and I'll be doing it again to keep reminding you of the importance we attach to your observations. If you have any questions, call the Employee Concerns Office at 6701 or the Direct Line at 944-5444.

Thank you for your time and attention.





**APS**  
Arizona Public Service Company  
COMPANY CORRESPONDENCE

ID #: 035-00072-JML

DATE: October 13, 1989

TO: All Palo Verde Employees

Sta. #  
Ext.FROM: J. M. Levine  
Sta. # 6125  
Ext. 2500

'89 OCT 19 P2:22

FILE:  
SUBJECT.~~89-001-703-89-009-201~~  
POLICY STATEMENT

This year has been a particularly difficult one for us. In 1988, we were an industry leader in generating large quantities of low cost electrical power; however, we failed to achieve the degree of excellence necessary in the areas of vigorous self-criticism, of creating a work environment where criticism is eagerly sought, analyzed and acted upon, of creating a work atmosphere that encourages thoughtful, critical assessment of all phases of plant operation, and one in which operations are conducted in a formal, conservative manner. Our failure to do the aforementioned things acceptably resulted in the problems we had in the early part of this year. We are now embarked upon a vigorous effort to improve our performance in these critical areas and - thanks to your hard work, we are making steady progress.

Our mission as an organization is to create a working atmosphere in which all Palo Verde personnel:

- a. Clearly understand and discharge their responsibilities.
- b. Are held accountable.
- c. Do not proceed in the face of uncertainty.
- d. Feel comfortable when bringing concerns to management that their concerns will be heard and responded to.
- e. Maintain an appropriately questioning attitude to ensure we are executing our activities correctly.

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In May of this year, Mr. Conway provided written performance standards for all APS Nuclear personnel. In essence, they can be summed up in his words "...every Palo Verde employee shall be dedicated to nuclear safety as their number one priority". Additionally, your management expanded Mr. Conway's document to provide specific performance standards for every individual based upon their job classification. You are expected to know, understand and implement these standards. Our success as an organization and your success as an individual will be directly related to how faithfully you follow those precepts.

The key principles to remember are:

- a. Safety, regulatory compliance, and schedule are to be observed in that priority order.
- b. One should always take the time to be sure he/she is right before proceeding.
- c. One should routinely seek confirmation of the appropriateness of his actions from co-workers or supervision (i.e. second check one another).
- d. Activities are to be performed in a planned, controlled, and formal manner, in direct compliance with approved procedures/work or test documents; and when that is not possible, he/she should stop and seek direction from his supervision.
- e. The Shift Supervisor is the senior licensed individual in the plant and must be kept informed of plant conditions so that he may execute his duties properly.
- f. One should immediately consult with his supervisor when he finds himself in a situation in which he is unsure of the correct course of action.
- g. Problems must be identified and resolved in a timely manner consistent with their relative priority and available resources. Sufficient resources will be made available to address safety issues.



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- h. Senior Management is dedicated to the success of every Palo Verde employee and must be kept informed to ensure that success for the individual, as well as, for the organization.

In summary, we are on the way to our goal of excellence in every aspect of our responsibilities here at Palo Verde. We still have much to do and every individual's performance has a large impact on the whole group's ability to achieve success. We are all dependant upon one another. Please do your part by doing your level best to work in conformance with the standards provided to you.

JML/lgs



Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION  
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

ID# 013-11723-ANH

October 25, 1989

'89 NOV 17 A7:23

To: Contract Companies Providing  
Services/Contract Labor to PVNGS

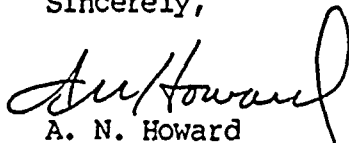
Subject: PVNGS Policy On Employee Communications & Concerns  
FILE: 89-065-220

Quality and Safety are our primary concerns at Palo Verde. Each person is responsible to maintain quality and safety and to immediately report concerns which could have an effect on the safe and reliable operation of PVNGS. Moreover, we solicit the identification of any concern which may adversely affect the performance of our operations so they may be resolved promptly.

To assist us in identifying, addressing, and resolving these concerns, the attached policy has been developed. Please address this policy with all of your personnel who are involved in providing Services to PVNGS so they will be fully aware of this policy and its intent.

Thank you for your assistance and support in such an important matter.

Sincerely,

  
A. N. Howard  
Contracts Department  
Mail Station 6975

AME/BH/jp

Attachment





## PVNGS POLICY ON EMPLOYEE COMMUNICATIONS & CONCERNS

APS PERSONNEL AT ALL LEVELS ARE ENCOURAGED AND EXPECTED TO COMMUNICATE IN AN ACTIVE AND OPEN MANNER SUCH THAT KNOWN PROBLEMS WHICH MAY AFFECT ANY ASPECT OF OUR PERFORMANCE ARE QUICKLY IDENTIFIED AND SATISFACTORILY RESOLVED.

THIS POLICY APPLIES TO ALL EMPLOYEES INCLUDING MANAGEMENT AND SUPERVISION, CONTRACTORS, AND THEIR EMPLOYEES.

ARIZONA PUBLIC SERVICE COMPANY (APS) IS COMMITTED TO QUALITY AND SAFETY IN THE OPERATION OF THE PALO VERDE NUCLEAR GENERATING STATION AND THROUGHOUT THE APS NUCLEAR GENERATING PROGRAM. APS AS A WHOLE, AND EACH EMPLOYEE, IS RESPONSIBLE FOR ASSURING THAT THIS COMMITMENT IS MET. CONCERNS WHICH COULD HAVE AN ADVERSE IMPACT ON THE SAFE AND RELIABLE OPERATION OF THE STATION OR WHICH MAY ADVERSELY AFFECT OUR NUCLEAR OPERATIONS MUST BE REPORTED PROMPTLY AND BE ADEQUATELY RESOLVED.

EACH SUPERVISOR AND MANAGER SHOULD ACTIVELY SOLICIT FROM THEIR EMPLOYEES ANY KNOWN SAFETY CONCERN AND PROBLEM. SUPERVISORS AND MANAGERS ARE RESPONSIBLE TO THOROUGHLY REVIEW IDENTIFIED SAFETY CONCERNS AND EMPLOYEE PROBLEMS, OBTAIN EFFECTIVE CORRECTIVE ACTION WHERE APPROPRIATE, AND FEEDBACK TO THE EMPLOYEE THE RESULTS OF THEIR ACTIONS. IF THE EMPLOYEE IS NOT SATISFIED WITH THE RESULTS PRESENTED, SUPERVISION SHOULD ENCOURAGE AND, IF REQUESTED, ASSIST THE EMPLOYEE IN ESCALATING HIS CONCERN OR PROBLEM TO THE NEXT HIGHER LEVEL OF APS SUPERVISION.

EACH EMPLOYEE IS EXPECTED TO BRING THEIR SAFETY CONCERNS AND PROBLEMS TO THE ATTENTION OF THEIR IMMEDIATE SUPERVISOR. SHOULD EMPLOYEES HAVE A REASON TO FEEL THAT THEIR SAFETY CONCERNS OR PROBLEMS HAVE NOT BEEN OR WILL NOT BE ADEQUATELY ADDRESSED THROUGH THE USE OF THESE NORMAL CHANNELS, THEY SHOULD REPORT THEIR CONCERN OR PROBLEM TO THE EMPLOYEE CONCERNS PROGRAM. THERE ARE SEVERAL WAYS TO DO THIS:

1. CALL THE EMPLOYEE CONCERNS OFFICE - EXTENSION 6701;
2. VISIT THE EMPLOYEE CONCERNS OFFICE - NORTH ANNEX (ROOM 227);
3. CALL THE EMPLOYEE CONCERNS DIRECT LINE - 944-5444;
4. COMPLETE AN EMPLOYEE CONCERN DISCLOSURE FORM WHEN EXITING;
5. HAVE A PERSONAL INTERVIEW WHEN EXITING.

WHEN REPORTING A CONCERN TO THE EMPLOYEE CONCERNS PROGRAM, EMPLOYEES MAY REQUEST CONFIDENTIALITY, EVERY EFFORT WILL BE MADE NOT TO DISCLOSE THEIR IDENTITY OUTSIDE THE EMPLOYEE CONCERNS PROGRAM.

CONCERNS REPORTED UNDER THE EMPLOYEE CONCERNS PROGRAM WILL BE INVESTIGATED, RESOLVED, AND DOCUMENTED. IN CASES WHERE ACTION IS REQUIRED TO CORRECT A REPORTED CONDITION, THE COMPLETION OF THE ACTION WILL BE VERIFIED. A DESCRIPTION OF THE ACTIONS TAKEN TO ADDRESS THE CONCERN WILL BE AVAILABLE TO THE EMPLOYEE WHO RAISED THE CONCERN.

ALTHOUGH EMPLOYEES HAVE A DUTY TO REPORT THEIR CONCERNS TO APS, CONCERNS MAY ALSO BE IDENTIFIED DIRECTLY TO THE NUCLEAR REGULATORY COMMISSION, REGION V (415) 943-3700, OR SITE RESIDENT (602) 393-3737.



EMPLOYEES ARE PROTECTED BY LAW AGAINST HARASSMENT, INTIMIDATION OR RETALIATION FOR IDENTIFYING NUCLEAR SAFETY CONCERNS. THEIR RIGHTS IN THIS REGARD AS WELL AS OTHER RELEVANT INFORMATION ARE SUMMARIZED IN NRC FORM 3 WHICH IS POSTED WIDELY THROUGHOUT PVNGS AND OTHER FACILITIES SUPPORTING OUR NUCLEAR OPERATIONS.

MOREOVER, ARIZONA PUBLIC SERVICE COMPANY WILL NOT TOLERATE HARASSMENT, INTIMIDATION, DISCRIMINATION OR OTHER ACTS OF RETALIATION AGAINST ANY EMPLOYEE FOR IDENTIFYING ANY CONCERN TO EITHER SUPERVISION, MANAGEMENT, THE EMPLOYEE CONCERNS PROGRAM, OR THE NRC. IF AN EMPLOYEE BELIEVES THEY HAVE BEEN OR ARE BEING, DISCRIMINATED AGAINST BECAUSE OF IDENTIFYING A CONCERN, THEY SHOULD IMMEDIATELY REPORT THIS DIRECTLY TO THE EMPLOYEE CONCERNS PROGRAM ON SITE.

  
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W. F. CONWAY  
EXECUTIVE VICE PRESIDENT - NUCLEAR

