

Docket No. 50-423
B14652

Attachment 3

Validation Report for Action Plan 4.4.3
Employee Concerns Program

October 1993

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Validation Report for Action Plan 4.4.3
Employee Concerns Program

Report No.: VAL-4.4.3-93.01
Date of Validation: June 28, 1993 through August 5, 1993
Action Plan Manager: D. G. Diedrick

Purpose of Validation:

The Validation was performed to determine if Action Plan 4.4.3, "Employee Concerns Program", has been effective in implementing the recommendations developed from the findings of the Allegations Root Cause Task Group (ARCTG) to ensure a coordinated, proactive, integrated approach to monitoring the effectiveness of the committed actions.

Scope of Validation:

Action Plan deliverables were validated to determine if the intended effects of the Action Plan were accomplished. The validation addressed each of the following recommendations of the ARCTG:

1. Increase the resource level available to the NSCP (Nuclear Safety Concerns Program) to support a greater field visibility and easier access. Locate personnel at Millstone, Connecticut Yankee, and Berlin.
2. Effectively communicate the program to assure employee awareness and demonstrate support from all levels of management.
3. Staff the program with volunteers throughout NE&O who can relate to employees in their assigned locations and who will be accepted as employee peers.
4. Use the following characteristics for personnel selection and orientation:
 - * strong employee representatives
 - * strong interpersonal skills
 - * capable of being frank with management
 - * known and accepted by employees at all levels
5. Evaluate eliminating the NRT (Nuclear Review Team) from their role in the Nuclear Concerns process once the recommendations concerning the NSCP have been successfully implemented.

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Results:

The Validation Team determined that each of the Action Plan intended effects were achieved.

This determination was based on interviews of approximately eighty-five (85) Nuclear personnel located at Connecticut Yankee, Millstone Point, and Berlin, and a review of relevant NSCP documentation.

The following observations were noted during the validation:

1. Greater field visibility, employee acceptance, and easier access of the NSCP to personnel who want to use the NSCP has been achieved. [Intended Effect 1, 3, 4, and 7]

Employee representatives, or "peers" have been enrolled based on their knowledge of systems and procedures and their reputation for integrity and ability to inspire trust in their peers. Peer representatives work in a broad cross section of departments and locations. They were enrolled based on exhibiting good communication skills, the ability to be frank and candid with management, and most importantly the ability to represent the employee's concern in an aggressive and technically competent manner.

The "Peer Representative Program" has made both a marked improvement in the ease with which an employee can contact the NSCP and in the visibility of the NSCP to the general employee population.

Since early 1992, an NSCP representative has participated in the segment on NSCP procedures included as part of NU's Administrative Procedure Training course, which has enhanced the NSCP's visibility. Further, Revision 9 to NEO 2.15 advised employees of the historical and continuing acceptance of all concerns by the NSCP. This appears to have obviated the perception of any obstacle to using the program.

2. Employee awareness of the NSCP has increased compared to the level of awareness exhibited several years ago. [Intended Effect 2]

The Validation Team did, however, note that newer employee did have a lower level of awareness than longer term employees. The Team's further investigation identified that new employees receive NSCP information in their General Employee Training (GET) which may not always be timely--

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within 30 to 60 days of employment. A recommendation has been provided to review both the timeliness and content of GET to ensure that new employees are made aware of the NSCP in a timely fashion.

Additionally, employees noted that a high level of support for the NSCP is being visibly demonstrated by management through active, i.e., spontaneous discussions of the NSCP with employees and passive (non-spontaneous) support of the program.

3. Based on the recent enhancements made to the NSCP, the NRT's role in addressing safety concerns became somewhat redundant and was not widely used. Therefore, the NRT role in nuclear concerns was eliminated. *[Intended Effect 5]*

This decision was communicated on July 10, 1992 by John Opeka to Robert G. Staker, President, LRS Incorporated. All Nuclear employees were informed of this decision by a letter from William Ellis on July 31, 1992.

4. The NSCP has clearly been structured as an employee concerns program and not limited to a nuclear safety concerns program. This determination was made based on a review of NSCP documentation performed by the Validation Team Leader. *[Intended Effect 6]*
5. The Director, Nuclear Safety Concerns Program, reports to the Chairman of the Board of Trustees and provides periodic updates on the overall status of the NSCP and unresolved issues to the Responsibility Committee of the Board. *[Intended Effect 8]*

Officer incentives are not based directly on the success of the NSCP. (NOTE: A recommendation from the Allegations Root Cause Task Force involved tying Officer incentives directly to the success of the NSCP.) *[Intended Effect 8]*

There is, however, a process in place to tie the Management Incentive Program (MIP) for the Director, Nuclear Safety Concerns Program, to the responsiveness of the NSCP office.

6. Consideration was given to expanding the role of the Human Performance Evaluation System (HPES) Coordinator to be a field resource and advocate for the NSCP. This option was not chosen based on various factors including limited HPES resources and a potential conflict with the HPES function.

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The large number of "peer" volunteers also eliminated the need for additional resources through the HPES function.
[Intended Effect 9]

7. The Validation also reviewed the process that the NSCP office uses to measure "customer feedback". The NSCP office sends a "Concern Resolution Acknowledgement Form", NSCF-14, to each "customer" of the NSCP who is identifiable. The Validation Team reviewed the results of the process with the following observations:

- * a greater than 50% response rate exists
- * a high satisfaction rate occurs, and
- * a process exists and is used to review the specific comments of unsatisfied clients.

Based on this review, the Validation Team Leader determined that the NSCP feedback process in place functions very well and does not warrant any specific improvements.

8. "Service" personnel (e.g., clerks, janitors, etc.) did not believe that the NSCP was directly applicable to them because they did not perform a "line" function.

Recommendations:

The following Recommendation for Improvement was discussed with the Director, Nuclear Safety Concerns Program, who concurred with the recommendation. Implementation of this recommendation is not required as a prerequisite to the closure of this Action Plan.

1. Training for new employees does not appear to effectively inform them of the existence of the NSCP program or of the existence and names of the peer representatives.

One possible explanation for this lack of knowledge may be due to a possible delay between the employee's employment start date and the delivery of GET.

Additionally, it was noted that during GET, a small amount of time is spent on the discussion of the NSCP compared to that of other similarly important programs.

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Consideration should be given to providing each new NE&O employee instructional information about the NSCP soon after the employee starts to work (e.g., within a month).

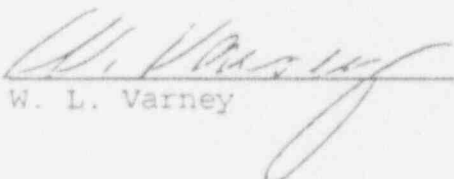
Based on the results of this Validation, the Validation Team believes that the intended effects of Action Plan 4.4.3 have been achieved and that the Action Plan should be closed.

Validation Performed By:


D. O. Nordquist (Team Leader)


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Attachments:

Attachment A: Validation Plan for Action Plan 4.4.3