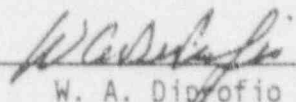


STATION MANAGER'S EVALUATION

OF AO PERFORMANCE CONCERNS


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STATION MANAGER'S EVALUATION OF AO PERFORMANCE CONCERNS

On Sunday, March 1, 1992, a Shift Superintendent (SS) was conducting a quarterly performance monitoring surveillance to determine if an Auxiliary Operator (AO) was appropriately carrying out all of his assigned duties. The SS discovered that the AO had not completed all of the tasks associated with the AO Rover rounds. Specifically, the AO had not entered certain areas to perform the required routine periodic inspections. After confronting the AO with the discrepancy, the SS counseled the AO on his duties and responsibilities. The AO was then relieved by the oncoming shift. The SS informed the Assistant Operations Manager, who in turn notified the Station Manager of the AO performance concern.

The following morning, Monday, March 2, 1992, the Station Manager briefed the Executive Director - Nuclear Production on the AO performance concerns. As a result of the briefing, the Executive Director - Nuclear Production requested that an Independent Review Team (IRT) assessment be performed to determine, among other things, if this was an isolated case or if there were generic implications. Later that day the AO who had not properly completed his rounds was interviewed by the Assistant Operations Manager, his Shift Superintendent, and the Employee Relations Manager. As a result of the interview, the AO was suspended without pay pending further investigation, and his protected area access was revoked.

On Monday, March 2, 1992, the IRT was directed to initiate an assessment of the AO performance concerns. On Wednesday, March 4, 1992, the IRT informed Station Management that based on the preliminary review of the data, additional AOs had not completed all of the required actions during their Rover rounds. It became apparent that additional actions would be necessary outside of the scope of the IRT. This evaluation is intended to summarize those actions, both investigative and disciplinary, taken by Station Management, which were independent of the IRT's assessment. Although the IRT has performed an extensive assessment of the programmatic aspects of the AO performance concerns, care had been taken to ensure separation from Station Management's investigation and subsequent disciplinary actions.

After it was determined that there were concerns with the first AO's performance and the IRT had informed management that there were similar concerns with additional AOs, an interview team consisting of three people was convened

in order to interview the AOs and determine the nature of the performance concerns. The interview team consisted of the Assistant Operations Manager, a Shift Superintendent (soon to become the Assistant Operations Manager), and the Employee Relations Manager. The interview team met with each AO, along with the AO's Shift Superintendent, and asked the AO a series of predetermined questions. The questions were designed to determine if, in fact, there were concerns with an AO's performance and the reasons for such performance concerns. After this meeting, and if warranted, the AO was suspended "pending further investigation." The suspension was designated as "pending further investigation" in order to provide the interview team with sufficient time to verify any information provided by the AO, to review all other data relevant to the investigation and to make a determination as to whether a formal disciplinary action meeting was warranted. If it was determined that a disciplinary action meeting was not warranted, then the suspension would have been lifted and the individual would have been reinstated without prejudice. If, however, disciplinary action was warranted, then the disciplinary action would be determined on a case-by-case basis.

This same method was used to ensure consistency and fairness when interviewing each AO. The interview team used a standard list of questions to ensure that each individual was given a fair and complete airing of his performance issues and to ensure that all relevant questions were asked relating to the issues. Both the questions and the answers were documented during each interview. The interviews were designed to give each individual the opportunity to provide as much data and information in his defense as was possible. It also ensured that the interviews were conducted in a controlled and equitable manner.

Subsequent to this data-gathering interview, a disciplinary action meeting was scheduled if it was determined to be necessary. The disciplinary action meeting was typically held 48 to 96 hours after the interview. This disciplinary action meeting included the interview team members, the Station Manager, Assistant Station Manager, Executive Director - Nuclear Production, the individual and his Shift Supervisor.

Early in the investigation process, a concern arose with regard to the adequacy or completeness of the data being provided by the IRT that identified discrepancies in AO performance. The concern was to avoid any potential for Station Management taking disciplinary action based on preliminary data that

might later be found to be incorrect. The IRT was providing a comparison of AO roundkeeping logs and the computerized Security Department keycard transaction logs. While every effort was being made to verify the accuracy and completeness of the data, it became apparent that in some instances additional sources of information needed to be considered.

Subsequently, the IRT used these additional sources to verify accuracy prior to supplying data to Station Management. This data was verified as complete and accurate by the IRT. This process of verification of the information slowed the pace of Station Management activities, however, it was essential to maintain the accuracy of the data to ensure proper decision making with regard to disciplinary action meetings.

The IRT provided four-months worth of data that compared the AO's log entries with Security Department keycard transaction logs. The four months included January and February of 1992 and November and December of 1991.

As a result of the data analysis, the IRT concentrated their efforts on determining compliance with Technical Specification surveillances for the period of time going back to the issuance of the Full-Power Operating License.

The IRT determined that there were six (6) instances where activities required by Technical Specifications had not been conducted. Five (5) of those instances involved surveillances of the Condensate Storage Tank (CST) and Enclosure. This Technical Specification surveillance is unusual in that completion of the Technical Specification surveillance is logged in the Control Room, however, it is the AO that performs the required activity. At the bottom of the Roving AO's Log Sheet is a "Note B" which states the following with regard to CST Enclosure integrity:

"SAT Condition - No evidence of work activity that may compromise CST Enclosure Seal integrity, CO-V142 (Condensate Low Point Suction) Locked Closed, CO-V154 (EFW-P-37A Suction Isolation) Locked Open, Housekeeping SAT."

It should be noted that the only way to verify the integrity of the Enclosure seals and the status of these valves is to enter the Security Doors into the CST Enclosure areas. The Control Room contacts the Roving AO once per shift,

typically during the first round, and verifies that the AO has completed that portion of his round involving the CST Enclosure integrity surveillance. The AO must signify verbally to the Control Room that he has completed that surveillance, and also document completion of the surveillance on his round sheet.

There were cases where individuals represented to the Control Room that they had completed that surveillance, when in fact the Security Department keycard transaction logs indicated that the individuals had not entered those areas. The actions of individuals who knowingly gave false information to the Control Room, and signified the same in their logs, which resulted in a missed Technical Specification surveillance constituted falsification of documents. It was the determination of Station Management that those individuals could not be remediated. Therefore, the appropriate disciplinary action determined by Station Management was separation of employment from the Company.

Another Technical Specification surveillance requires the determination of the Fuel Storage Building Spent Fuel Pool Cooling Pump area temperature. This Technical Specification surveillance was missed on one occasion. The individual involved represented on his log and to the Control Room that he had entered that area and had taken a local area temperature log reading when in fact the Security Department keycard transaction logs indicated that he had not entered the area. Extensive time was spent trying to resolve this discrepancy, including looking at the previous day's logs to determine if the individual had inadvertently miscopied the previous day's reading from his notes. No reasonable explanation was found. It was therefore concluded that the reading must have been fabricated. The individual was separated from the Company.

Disciplinary actions were evaluated on a case-by-case basis. Each case was reviewed separately to ensure that the individual was given every possible consideration. A standard format was used for each disciplinary action meeting. Each case was reviewed in advance and discussed in detail. The individual was presented with the information available related to his case. He was encouraged to ask questions or to make comments as he desired through the course of the meeting.

The following items summarize the important points of the data gathering, interviews and/or disciplinary action meetings:

- In all cases, when the AOs were asked if their Supervisor or any other individual had told them that it was acceptable to sign-off on their logs as if they had performed an inspection when in fact they had not, the answer was "NO." The signature without action was an assumption of authority that was made by each individual. The AOs did not do what was expected of them by their supervision.
- Similarly, in all cases when the AOs were asked if they had signed-off on any procedures, surveillances, or any other documents as if they had performed an activity when in fact they had not, the answer was "NO." It is clear that the AOs separated the importance of the AO round and log keeping from the normal importance placed on procedure compliance. Since no specific procedure exists for conducting rounds, the AOs assumed the rounds were not as important.
- It was believed by most AOs that if they had told their Supervisor that they had skipped portions of rounds, their supervisor would have found such actions unacceptable, and would have required the individual to complete his rounds correctly. In light of the actions Station Management had taken upon discovering this concern, the AOs now believed their actions were improper although at the time they did not feel that the actions were improper.
- When questioned, the AOs could not explain how they could write "SAT" on the log without entering the area when the criteria for "SAT" was in a note on the bottom of the log. The note requires a visual inspection of the area for specific items. The AOs rationalized that they had the ability to judge what was important and could determine what activities they should conduct and what activities they could delete.
- Some AOs were unclear about why the Technical Specifications are important because they did not understand the function of these specifications in the larger context of Station operation and plant safety. Therefore, they did not appreciate the necessity, the seriousness or the need to check certain locations where equipment was in a standby condition.
- Some AOs had bonafide confusion as to the need to perform rounds on a regular basis at the Service Water Cooling Tower. They remembered using

the notation "Shutdown" for this inspection in the past and equated "SAT" with "Shutdown." Some AOs believed that if the equipment were "Shutdown" (as it normally is) an inspection was not required on each and every round. New Hampshire Yankee has programmatically not allowed "Shutdown" as a log entry for a number of years. However, it was clear from the discussions that some AOs still equated the two entries.

- In all cases the AOs felt they were doing an excellent job. They felt technically qualified and very competent to perform the duties of the position. Each thought he was a "good" AO.

As a result of the above information, I have been meeting with all Station departments. I have not completed all meetings at this date. At these meetings I spend an extensive amount of time discussing the AO performance concerns and the generic implications for the rest of the organization.

The second subject of these meetings is the revision of 10 CFR, Part 2, Section VIII, entitled "Enforcement Actions Involving Individuals," published in the Federal Register on February 18, 1992. I have stressed that this revision makes this enforcement policy directly applicable to all who work at the Station, licensed or unlicensed. I have stressed that the NRC intends to hold each of us personally accountable for our actions or deliberate omissions. Each person receives a copy of the policy and is instructed to read it.

The third subject of these meetings is an extensive discussion of my expectations of Station employees in the areas of job performance, professionalism, procedure compliance, effective training and their general responsibility for the safety of the public and personnel working at the Station. Each person receives a document describing these expectations and is instructed to read it. If there is not a complete understanding of these subjects after reading the material, employees are asked to see their supervisors to ensure all of us understand this material.

In summary, I believe that Station Management's investigative and disciplinary actions in response to the AO performance concerns were comprehensive, effective and equitable.

New Hampshire Yankee
April 10, 1992

ENCLOSURE 3 TO NYN-92045