

UNITED STATES NUCLEAR REGULATORY COMMISSIONNORTHEAST UTILITIESMILLSTONE NUCLEAR POWER STATION, UNIT 1DOCKET NO. 50-245ISSUANCE OF DIRECTOR'S DECISION UNDER 10 CFR 2.206

Notice is hereby given that the Acting Director, Office of Nuclear Reactor Regulation, has taken action with regard to a Petition dated December 30, 1994, by Mr. Anthony J. Ross (Petition for action under 10 CFR 2.206). The Petition pertains to Millstone Nuclear Power Station, Unit 1.

In the Petition, the Petitioner asserted that (1) the licensee does not adequately control work and procedure compliance at Millstone, as evidenced by the use of standard commercial-grade lugs in a gas turbine fuel forwarding pump and motor that are quality assurance (QA) subsystems of the emergency gas turbine generator and which had apparently been crimped using diagonal pliers; improper Raychem splices, cable bend radius, and connections in the connection boxes of major safety-related QA equipment; and installation of non-QA lugs and improperly performed crimping in fire protection QA emergency lights and (2) the Petitioner was subjected to ridicule by the gas turbine system engineer for raising concerns regarding the lugs on the gas turbine fuel forwarding pump and motor. The Petitioner requested that the U.S. Nuclear Regulatory Commission (NRC) (1) "force" Northeast Utilities (NU) to review all existing work orders for the past 10 or 12 years, with NRC oversight, to ensure that quality assurance motor and connection work does not have certain deficiencies; (2) assess a Severity Level I violation against NU and its

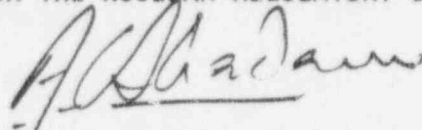
managers for apparent violations of 10 CFR 50.7 and a Severity Level III violation against a gas turbine system engineer at Millstone for his apparent violation of 10 CFR 50.7 and NU's "Code of Conduct and Ethics;" and (3) institute sanctions against the system engineer and NU and its managers for engaging in deliberate misconduct in violation of 10 CFR 50.5.

The Acting Director of the Office of Nuclear Reactor Regulation has determined to deny the Petition. The reasons for this denial are explained in the "Director's Decision Pursuant to 10 CFR 2.206" (DD-96-17), the complete text of which follows this notice and is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Learning Resources Center, Three Rivers Community-Technical College, 574 New London Turnpike, Norwich, Connecticut, and at the temporary local public document room located at the Waterford Library, ATTN: Vince Juliano, 49 Rope Ferry Road, Waterford, Connecticut.

A copy of the Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c) of the Commission's regulations. As provided by this regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance unless the Commission, on its own motion, institutes a review of the Decision in that time.

Dated at Rockville, Maryland, this 31st day of October 1996.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in dark ink, appearing to read 'Ashok C. Thadani', is written over a horizontal line.

Ashok C. Thadani, Acting Director
Office of Nuclear Reactor Regulation



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

12/30/94

From:

EDO

Document Date: Date Received Task Basis No:

01/09/95

01/09/95

9500081

Request Type: GRNB

Pending Before:

Facility: (-)

Description:

EDO- 0000017--NO. 2.206 PETITION RE: MILLSTONE
(GAS TURBINE FUEL FORWARDING PUMP)

Referred to:

Date Due:

Date Received:

02/09/95

01/09/95

CHANDLER

02/09/95

SOLDEERG

02/09/95

Remarks:

FOR REVIEW EDO 0000017 NO. 2.206 PETITION

Comments:

Do NR
2/9/95

Lexis Yes: No:
OGC Subject Files Yes: No:

If Yes, indicate file location using
OGC Subject Files Index.

EDO

ACTION

EDO Principal Correspondence Control

FROM:

DUE: 02/09/95

EDO CONTROL: 0000017

DOC DT: 12/30/94

FINAL REPLY:

Anthony J. Ross
Waterford, Connecticut

TO:

James Taylor

FOR SIGNATURE OF :

** GRN **

CRC NO:

DESC:

.206 PETITION REGARDING MILLSTONE (GAS TURBINE
UEL FORWARDING PUMP)

ROUTING:

Taylor
Milhoan
Thompson
Blaha
Lieberman, OE
Russell, NRR
TMMartin, RI

DATE: 01/09/95

ASSIGNED TO:

CONTACT:

OGC

CVI

SPECIAL INSTRUCTIONS OR REMARKS:

9500081

Anthony J. Ross
16 Fulmore Drive
Waterford, Connecticut 06385

December 30, 1994
File: TR-5-001
Certified U.S. Mail # Z 439 901 354

Mr. James Taylor
Executive Director for Operations
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT

10 CFR 2.206 Petition Requesting Nuclear Regulatory Commission Action for Escalated Enforcement Per 10 CFR 2 App. C., Implementation of 10 CFR 50.5 Deliberate Misconduct Rule, and Implementation of 10 CFR 50.7 Employee Protection Rule.

Dear Mr. Taylor,

In accordance with the above captioned references, I Anthony J. Ross, employed by Northeast Utilities as a Station Electrician "A", in the Unit 1 Maintenance Department, at Millstone Nuclear Power Station located in Waterford, Connecticut request escalated enforcement action as outlined in 10 CFR 2 APP. C.

As a protected employee I am further requesting that specific actions be implemented against the individuals outlined below under the provisions of 10 CFR 50.5 Deliberate Misconduct Rule, and 10 CFR 50.7 Employee Protection Rule.

BACKGROUND INFORMATION

On Tuesday December 27, 1994, I was given the assignment of disconnecting the ac and dc motors, on the "A" gas turbine fuel forwarding pump, so the pump could be overhauled. The "A" and "B" gas turbine fuel forwarding pumps and motors are QA-CAT 1 subsystems, of the emergency gas turbine generator, which is designed and required to auto-start under emergency conditions. I found the lugs on the dc motor and the incoming dc supply to the motor in extremely bad condition, and a few of the lugs were not properly crimped (the lugs were apparently crimped by a pair of diagonal pliers) and the lugs were of two different types, both types were not QA-CAT 1, but standard commercial grade lugs that are kept in our electrical shop to use on NON-QA applications. I notified my first line supervisor, John Kiskunes, of the problem with the lugs, he looked at the bad lugs and we both agreed, the inferior lugs should be replaced. At that point, Mr. Kiskunes indicated to me that he would get another work order to replace the deficient lugs.

ALLEGED VIOLATIONS

1. Inadequate compliance with the provisions of 10 CFR 50.5 Deliberate Misconduct Rule, and 10 CFR 50.7 Employee Protection Rule.

On Wednesday December 28, 1994, I was in the maintenance shop waiting for Mr. Kiskunes to supply me with the work order to re-lug the motor as stated above. I had noticed the gas turbine system engineer, Mr. Dwayne Basler, inspecting the pump parts

and standing by the motor. At that point, I told Mr. Basler, the dc motor lugs were NON - QA, and they looked like they had been crimped by using a pair of diagonal pliers. At that point Mr. Basler stated, "don't worry we have redundancy." At that point I said, "yea but I am worried, what if the other one has the same type of shabby workmanship." (referring to the "B" gas turbine fuel forwarding pump motors) At that point Mr. Basler started yelling, "are you taping me, are you taping me, are you taping me." Mr. Basler then stated, "why don't you mind your own business," and continued to yell, are you taping me a couple more times until a coworker standing nearby and listening to the whole conversation stated to Mr. Basler, "why don't you get out of here." By this time, a number of coworkers in the shop at the time were looking at me, that's how loud he was yelling. I just stood there looking at him not saying a word. At that point I turned and started to walk away when Mr. Basler yelled to me, "your always starting trouble around here."

My first line supervisor came out of his office and asked me if I was OK, and further indicated to me, why don't you come in my office and relax. I told Mr. Kiskunes I would be back in a few minutes, and proceeded directly to the NRC Office and filed an allegation with Mr. David Beaulieu of the NRC.

I left the NRC Office and went to see the company doctor. I was told by the nurse he would be in the office a little after 1 o'clock.

Upon my returning to the shop Mr. Kiskunes asked me if I was OK. I told him that I was upset and I would like to see the company doctor at 1 o'clock. At that point Mr. Kiskunes clearly knew I was upset, and he directed me to simply sit down and take it easy until I could see the company doctor at 1 o'clock. Mr. Kiskunes gave me the work order for re-lugging the motor, and told me not to work on the re-lugging of the motor, but directed me to review the work order if I wanted to.

At 1 o'clock I went to the health facility to see the company doctor. Clearly, the company doctor could see how upset I was and didn't want me working the rest of the day, so he sent me home.

Later the same day, I saw my personal doctor for my weekly appointment, my doctor recommended to me because of the severe stress I was under because of the ridicule and harassment, he has me out of work, and under his care for at least a week. (copy of doctors note enclosed)

It is quite clear to me, either the NRC or Northeast Utilities Management must have communicated with Mr. Basler about me, clearly Mr. Basler was aware of me taping conversations. It's my understanding through conversations with my attorneys, in addition to other communications that the NRC has submitted to the legislators, via the chairman of the NRC, it is acceptable to tape conversations where by I expect violations of wrongdoing by the licensee or employee protection provisions of the NRC regulations are being violated.

Enclosed please find a NU memorandum dated October 24, 1994, from C. W. Grise, with applicable enclosures, the subject is the "Code of Conduct and Ethics" which was sent to all NU employees.

Quite clearly Mr. Basler willfully violated 10 CFR 50.5 & 10 CFR 50.7, and he is well aware of NU's programs regarding conduct towards individuals raising legitimate safety concerns. Additionally, Mr. Basler willfully violated NU's October 24, 1994, "Code of Conduct and Ethics" and he has clearly violated my rights under 10 CFR 50.7.

Furthermore, I find this type of ridicule is severely disturbing to me, over the past 2 years similar situations have occurred within my department, where certain individuals raise legitimate concerns with regards to equipment problems, procedure problems, and issues like the "A" gas turbine fuel forwarding pump dc motor issue as stated above, and in return individuals within the department and associated departments have subjected those individuals to ridicule, as a result for bringing those concerns forward. As the NRC is well aware, this particular problem has yet to be properly addressed by all levels of Millstone and Corporate Management. Additionally, I had explained how I am being treated by some coworkers to Northeast Utilities Counsel, Mary F. Riley in a meeting on December 20th 1994, and still the managers of Northeast Utilities have taken the same stance, let whistleblowers be harassed, intimidated, and retaliated against by the entire company, inspire of the commitments and programs NU has tried to institute since 1987.

2. Inadequate work control and procedure compliance.

In spite of the many programs NU has tried to institute since 1988 concerning procedure non compliance, and work order control, the example below shows how these programs just don't work.

Clearly, whoever re-lugged the QA-CAT 1, "A" gas turbine fuel forwarding pump dc motor in the past, used standard commercial grade lugs, that had been apparently crimped by using a pair of diagonal pliers or the like. Additionally, it is quite clear the procedure apparently was not used to perform the lug selection and the proper crimping tool selection.

Quite frankly your agency clearly needs to look at the past work orders for this equipment and other equipment. Clearly you will probably find no procedure was used and no inspection plan, for the quality characteristics of lugging and crimping were followed.

This problem as well as another problem I identified, in detail, recently to Mr. David Vito, Mr. Paul Swetland, and Mr. Larry Nicholson of the NRC, concerning the improper, raychem splices, cable bend radius, and the connections in the connection boxes of major safety related QA equipment, (LPSI and CORE SPRAY MOTORS) makes one wonder how many other QA motors, and QA connections have been connected the same way in the past.

In a additional concern supplied to the NRC on September 9, 1994, FPQA emergency lights, 1-ELU-21, and 1-ELU- 29, has similar problems as far as NON-QA lugs installed, and crimping not being performed properly. The ELU deficiencies were shown to the resident NRC inspector in a walk down.

Certainly in my opinion your agency should force NU to review all existing work orders for the past 10 or 12 years, with NRC oversight, to ensure no other QA motor and connection work has the same problems as stated above.

REQUESTED ACTION

Issue a severity level 1 violation against Northeast Utilities and it's Managers for their apparent violations of the provisions of 10 CFR 50.7 as outlined above, and a severity level 3 violation against the system engineer for his apparent violation of the

provisions of 10 CFR 50.7 as outlined above and violating the company's "Code of Conduct and Ethics."

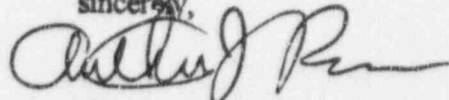
Institute sanctions against the system engineer for engaging in deliberate misconduct regarding the above situations as outlined in 10 CFR 50.5, and Institute sanctions against Northeast Utilities and its Managers for engaging in deliberate misconduct regarding the above situations as outlined in 10 CFR 50.5.

As verified by the Inspector General and the documented history of Whistleblower complaints, the program of harassment, intimidation, retaliation, and discrimination practiced by Northeast Utilities against those of us raising legitimate safety concerns is alive and well.

Moreover, in my opinion this shows the neglect demonstrated by many NU managers and NU employees with regard to someone who is deeply concerned with the safety of the public and his coworkers.

Most importantly, it is a well documented fact, at Northeast Utilities as soon as one raises a legitimate safety concern he is subjected to a rash of rude and crude comments by many of his coworkers and managers. Clearly the chilling effect is alive and well at the Millstone Station.

sincerely,



Anthony J. Ross
(203) 442-4244

cc: Senator Joseph Lieberman
Mr. David Williams - OIG
Ernest C. Hadley, Esquire
John R. Williams, Esquire

ALL ENCLOSURES

DEA # APT271578

LOUIS H. REICH, M.D.
292 MONTAUX AVENUE
NEW LONDON, CT 06320
203-443-1200
CT LIC. NO. 15247

NAME Tony Ross

ADDRESS _____ DATE 12-28-94

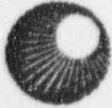
R MR. Ross continues to
be stressed by ridicule
and harassment from
NU personnel. I have
recommended he stay out
of work for one week
until I can reason
☐ Label him on 1/4/95.

Refill _____ times PER _____ NR _____
Louis H. Reich

To insure brand name dispensing, prescriber must write "No Substitution"
on the prescription

04/08/94

0403-K11853731



Northeast
Utilities System

ANTHONY J ROSS
817 MP1 MAINTENANCE
M80 MILLSTONE UNIT 1
51 NORTHEAST NUCLEAR ENERGY CO
MILLSTONE

Memo

October 24, 1994

To: NU Employees
From: C. W. Grisé (x2197) *Cheryl Grisé*
Subject: Code of Conduct and Ethics

As we go about our daily work activities, each of us makes decisions that have ethical or legal implications. In most cases you instinctively determine what are the "right" steps to be taken. Sometimes, however, knowing what ethical or legal steps are appropriate in particular instances isn't that easy.

To help us better understand the ethical and legal standards of behavior the company requires of us, NU is introducing the new Compliance Program. A centerpiece of this program is the attached Code of Conduct and Ethics.

Over the next several weeks, your management will be scheduling meetings to briefly review the Compliance Program with you. I encourage you to prepare for that by reading the attached Code of Conduct and Ethics.

As we face a demanding competitive future, it is up to each of us to continually demonstrate a commitment to preserve NU's long-standing tradition of ethically and legally appropriate conduct.

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A Message from the President and Chief Executive Officer

Dear Employees:

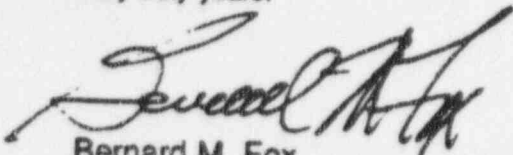
It has always been the tradition of the Northeast Utilities System companies to conduct Company business with the highest respect for standards of integrity and in full compliance with the letter and spirit of the law. This tradition carries with it an ever-present obligation to our employees, customers, shareholders, and the communities in which we live and work to see that we are uncompromising and consistent in our adherence to the evolving laws and ethical standards under which we operate.

The *Code of Conduct and Ethics* contains the standards of behavior the Company requires of all its trustees, directors, officers, employees, contractors, suppliers, and agents. In the past, policies defining our expectations were dispersed throughout our many operating companies and in various procedure manuals, employee handbooks, and other publications. As an integral part of the Company's Corporate Compliance Program, the *Code of Conduct and Ethics* defines, in a single source, the standards that serve as a framework for ensuring we operate ever mindful of our legal, regulatory, and ethical obligations.

Understanding and following these guidelines is essential to our individual and collective successes. Please give this material your personal attention. If you have questions, discuss them with your supervisor or Personnel Manager. If they can't answer your questions, they will direct you to someone who can.

The Company cannot succeed without the trust, hard work, dedication, loyalty, and personal integrity of each of you. As we enter an ever-changing competitive environment in the electric utility industry, it becomes even more important that compliance with the law and responsible, ethical behavior be the instinctive reaction of each of us as we perform our day-to-day activities.

Very truly yours,



Bernard M. Fox
President and Chief Executive Officer

About the *Code of Conduct and Ethics*

The purpose of the *Code of Conduct and Ethics* is to provide general notice to all trustees, directors, officers, employees, contractors, suppliers, and agents of the Company's legal and ethical expectations. Understanding and complying with the *Code of Conduct and Ethics* will help us "do the right thing" when performing our jobs. It also provides a mechanism for providing checks and balances for maintaining order in the workplace.

The *Code of Conduct and Ethics* applies to all Company trustees, directors, officers, employees, contractors, suppliers, and agents of all Northeast Utilities System companies (the "Company"). Each of us has the responsibility to live up to the letter and the spirit of the standards contained in the *Code of Conduct and Ethics*. While the *Code of Conduct and Ethics* puts these standards into writing, in truth, standards of integrity and ethics are not only found in corporate commitments or policies but in the everyday behavior of each and every one of us, on and off the job. Your day-to-day activities will offer ethical dilemmas that you must face. If you have doubts as to what action to take, ask yourself the following questions:

- 1. Is my conduct legal?
- 2. Will my actions comply with the intent and purpose set forth in the *Code of Conduct and Ethics* and with Company policies and procedures?
- 3. Would I or the Company be compromised or embarrassed if the situation were disclosed to supervision, co-workers, or the general public?
- 4. Could my actions ever appear inappropriate to others?

The Company's aim is not to just adhere to the law, but to conduct its business ethically. You have an obligation to identify activities that do not comply with the *Code of Conduct and Ethics* and to report them to management. Management, in turn, is responsible for overseeing activities in its operating areas and taking prompt action to investigate and correct any noncompliance.

***The Company's aim is not to just adhere to the law,
but to conduct its business ethically.***

The *Code of Conduct and Ethics* is an integral part of the Company's Corporate Compliance Program. Much of the information in the *Code of Conduct and Ethics* came from the "You and Your Job" handbook distributed to Connecticut- and Massachusetts-based employees, or the applicable ethics policies in place in New Hampshire. However, a great deal of the *Code of Conduct and Ethics* is new, and some of the old rules have been replaced. Therefore, it is very important for you to take the time to read the *Code of Conduct and Ethics* and make sure you refamiliarize yourself with the old rules and understand the new ones. This new format is designed to give you all the information in one, easily referenced booklet.

The Company takes all instances of noncompliance seriously. If you knowingly or negligently violate the standards contained in the *Code of Conduct and Ethics*, you will be subject to disciplinary action in

accordance with Company policies and procedures and collective bargaining unit contracts. You must recognize that you are ultimately responsible for your own actions. Disciplinary action may include termination. The Company may also seek restitution for losses or damages and may pursue civil or criminal prosecution.

The statements made in the *Code of Conduct and Ethics* are not intended to nor do they constitute any form of an employment contract. Any stated policy may be changed unilaterally by the Company at any time, without prior notice.

The *Code of Conduct and Ethics* cannot include every situation you may encounter. If you have questions about provisions of the *Code of Conduct and Ethics* or about ethical practices in general, you should consult with your supervisor. If you need further assistance, or if you are not satisfied with the response you receive, you are encouraged to contact the head of the department responsible for the activity in question, your Personnel Manager, or the Company's Compliance Officer. Further, a confidential Compliance Hotline will also be available after the first of the year, 1995. If you prefer, you may write down your concern and send it in an envelope marked "confidential" to: Compliance Officer, Human Resources, NU East, Floor 1, Berlin, Connecticut.

The most important outcome is that we all understand and do what is right. If you think something in question would be wrong or might be viewed by others as wrong, don't do it.

Workplace Relations



The Company is committed to fostering a work environment that is healthy, safe, productive, and mutually beneficial to all. Further, the Company recognizes that a positive working environment that supports courtesy, respect, pride in, and identification with the Company is essential to the Company achieving its current and long-range goals.

The Company expects fair and ethical conduct at all times. You are expected to exercise good judgment in all matters involving business ethics and integrity and to refrain from any conduct that is, or could be perceived as, unethical. Consideration of your co-workers and others and respect for their sensitivities and rights are essential.

Company policy requires you to:

- ▶ conduct yourself so you do not mistreat fellow co-workers or others; or interfere with their ability to carry out their duties and meet their responsibilities;
- ▶ avoid all forms of harassment (sexual, racial, or otherwise), fighting, "horseplay," threatening others with bodily injury, and the use of indecent, abusive, or threatening language; and
- ▶ abstain from operating a lottery or participating in any professional gambling on Company property other than an occasional social contest (e.g., a football or basketball pool).

If you have questions regarding working relations issues, you are encouraged to discuss them with your supervisor. Your Personnel Manager is also available to provide guidance.

The Company is committed to fostering a work environment that is healthy, safe, productive, and mutually beneficial to all.

Equal Employment Opportunity



The Company is committed to adherence to the letter and spirit of the laws which define equal employment opportunity and is pledged to affirmative action. This policy is clearly communicated to employees through the Company's employee handbook and on bulletin boards throughout the system. In addition, the Company periodically revises its Affirmative Action Plans and distributes them to supervisory personnel.

It is against Company policy and unlawful to:

- ▶ discriminate because of race, religion, color, age, sex, national origin/ancestry, sexual orientation, marital status, physical or mental disability, or veteran status;
- ▶ refuse to make reasonable accommodations for employees with physical or mental disabilities, or whose religious obligations might occur on a scheduled workday;
- ▶ fail to treat employees according to their qualifications when recruiting, screening, hiring, training, developing, transferring, promoting, or disciplining; or
- ▶ coerce, interfere, or discriminate against employees for filing a complaint or assisting in an investigation.

Any knowledge of violation of equal employment opportunity laws or questions should be directed to your supervisor, Personnel Manager, or the Equal Employment Opportunity section of Human Resources.

Sexual Harassment



The Company prohibits sexual harassment of or by its employees in any form. Sexual harassment is unwelcome behavior that is sexual in nature. Sexual harassment weakens working relationships, undermines employee morale, and reduces productivity. Further, sexual harassment violates Title VII of the Civil Rights Act of 1964, and state laws in Connecticut, Massachusetts, and New Hampshire.

The Company prohibits sexual harassment of or by its employees in any form.

It is against Company policy and unlawful to:

- ▶ make unwelcome sexual advances, requests for sexual favors, or engage in other verbal or physical conduct of a sexual or otherwise offensive nature in connection with your job;
- ▶ make submission to, or rejection of, such conduct the basis for employment decisions affecting an individual;

- ▶ unreasonably interfere with an individual's work performance or create an intimidating, hostile, or offensive work environment by such conduct; or
- ▶ coerce, interfere, discriminate or retaliate against any employee who files a sexual harassment complaint or assists in the investigation of a complaint.

It is important to remember that sexual harassment may occur in different forms. For example, you would be in violation of the law and Company policy if you:

- ▶ physically make unwanted contact including intentionally touching, patting, pinching, brushing against the body, or assaulting an individual;
- ▶ verbally make suggestive comments, jokes with sexual connotations, sexual propositions or threats; or
- ▶ visually display sexually oriented materials including (but not limited to) posters, calendars, magazines, or photos where men or women are dressed in a suggestive manner, or wear tee shirts, hats, etc., where sexual inferences may be drawn. Another form of nonverbal harassment is entertainment where men and/or women are presented as sexual objects. Such forms of nonverbal harassment are not allowed on Company property or at any Company-sponsored functions.

If you experience any form of sexual harassment, or if you have any questions about what constitutes sexual harassment, you should promptly contact your supervisor, Personnel Manager, or the Equal Employment Opportunity section of Human Resources.

Health and Safety



Every task you perform, both large and small, can and must be performed safely. In support of this position, the Company expects you to accept responsibility to:

- ▶ attain and maintain a safe, healthy, and productive work environment for your benefit, and that of your family, co-workers, contractors, suppliers, visitors, and the general public;
- ▶ conduct work activities in full compliance with all federal, state, and local health and safety laws, regulations, and Company policies and procedures;

Every task you perform, both large and small, can and must be performed safely.
