



UNITED STATES
NUCLEAR REGULATORY COMMISSION
TECHNICAL TRAINING CENTER
DISPOSAL OFFICE CENTER, BENTON
CHATTANOOGA, TN 37417

OCT 18 1985

MEMORANDUM FOR: Vincent S. Noonan, Project Director
Comanche Peak Task Force

FROM: James E. Gagliardo, Chairman
Comanche Peak Intimidation Panel

SUBJECT: REPORT OF COMANCHE PEAK INTIMIDATION PANEL

The enclosed report documents the results of the review and evaluation of intimidation and harassment issues at the Comanche Peak Steam Electric Station (CPSES). This review was performed by the Comanche Peak Intimidation Panel (Panel) and by a Study Team composed of a group of consultants.

The Study Team performed an in-depth review and evaluation of alleged incidents of intimidation and harassment (Attachments 1 & 2 of the Report). Both the Study Team and the Panel concluded that some instances of intimidation did occur. These are described in the Study Team's report. However, the Study Team concluded, and the Panel concurs, that there was no "climate of intimidation" at CPSES.

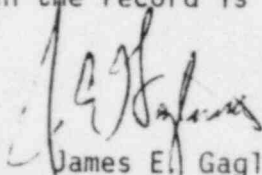
In their reports, the Study Team addressed the management style and interface problems as reported in depositions and in the surveys. The Study Team noted that a number of management practices existed which may not have been conducive to good job performance and which may have generated mistrust and suspicion and contributed to a lack of management credibility.

The Panel shares the concern of the Study Team that certain management practices at CPSES could create a work environment in which the chemistry would exist for actual or perceived intimidation to occur, given the right set of circumstances. The Panel recognizes that the environment created by these management practices would not necessarily lead to intimidation or result in improper construction or quality control. Indeed, neither the Study Team nor the TRT findings suggest that poor quality work resulted from the incidents of intimidation that did apparently occur. The Panel is aware that projects have been built effectively by entities with an autocratic management style. The Panel is also aware that recent changes in management personnel have been made at Comanche Peak that could result in changes in the management practices of concern.

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Nonetheless, the Panel recommends that the licensee address itself to the questionable management practices identified by the Study Team to determine whether additional changes are necessary to ensure that its management style is conducive to producing a quality product. We recommend that TUEC's management take an objective look at the incidents described in this report, as well as the current situation at the site, and take whatever steps are necessary to assure the establishment of a "quality first" attitude by its management and employees. The overall effort should be directed at establishing trust between the employees and management which will minimize fear of reprisals for identifying safety concerns or questioning safety procedures.

The Panel and the Study Team's review were based upon materials in the hearing record and OI reports completed by June 28, 1985. The Panel is aware that OI is investigating other allegations of intimidation and harassment and that the hearing on the Lipinsky issues is not completed. Accordingly, the Panel and the Study Team may need to review additional materials that pertain to these issues to determine whether their overall conclusions need to be changed as a result of new information. The Panel requests that you notify them when the record is sufficiently complete to close out this issue.



James E. Gagliardo, Chairman
Comanche Peak Intimidation Panel

Enclosure: As stated

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