



January 31, 1997

Docket Nos. 50-245

50-336

50-423

B16154

F. J. Miraglia, Acting Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Comprehensive Plan for Reviewing and Dispositioning Safety Concerns

By Order dated October 24, 1996, the Nuclear Regulatory Commission required, among other things, that Northeast Nuclear Energy Company (NNECO), within 60 days, develop, submit for NRC review, and begin to implement a comprehensive plan for (a) reviewing and dispositioning safety issues raised by employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination. Our letter dated December 20, 1996, noted that an Employee Concerns Task Force (ECTF) had been formed to develop the comprehensive plan and requested an additional 30 days to finalize their work. Our letter dated January 22, 1997 noted that NU senior management was evaluating a report submitted by the ECTF containing recommendations for a comprehensive plan and requested an extension to submit and begin implementation of the comprehensive plan to no later than February 4, 1997. We have since completed our evaluation of the ECTF report and finalized NNECO's comprehensive plan (the Plan). This letter transmits the Plan for your review.

Attachment 2, "Northeast Utilities Plan for Addressing Employee Concerns," provides the Plan as required by the Order. The Plan consists of the following six interdependent elements:

- A commitment to rebuilding employee, regulatory and public trust;
- A new Employee Concerns Program;

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- Specific organizational, policy, and procedure changes;
- Training and orientation to provide specific skills to reinforce healthy relationships between management and employees;
- A list of Action Items and assignment of responsibility for implementation; and
- Creation of a Concerns Oversight Panel.

This plan supersedes all our earlier concerns programs. It also should be noted that while the order required a plan to review and disposition safety issues raised by employees, our plan is designed to review and disposition any issue an employee might raise regardless of the issue's nature. Further, the Plan should be reviewed in light of our established line processes to report and disposition issues.

The order stated that the comprehensive plan shall address the root causes of past performance failures as described in NU's July 12, 1996, *Report of the Fundamental Cause Assessment Team (FCAT)* and the NRC's September 1996 report of *Millstone Independent Review Group (MIRG)*, with the objective of meeting a goal of achieving a safety-conscious environment. A matrix contained within the Plan identifies the root causes from each of these reports, an objective for improvement, and the Action Items which address them.

Also provided as Attachment 3 to this letter is the "Employee Concerns Task Force Team Report." This report, submitted to the President of NNECO by the ECTF, includes recommendations for the comprehensive plan and specific recommendations for implementing parts of the plan.

Elements of the Plan have begun to be incorporated into the day to day operations at Millstone Station. Implementation of the Plan represents a new commitment by NNECO management to take those steps which will result in employee concerns being addressed in a comprehensive and fair manner. The success of the plan will be apparent when management and employees work together to resolve concerns without fear of harassment, intimidation, discrimination or retaliation. As the work environment improves and line management assumes greater responsibility and accountability for resolving concerns, elements of the Plan may be changed to recognize this fact.

Attachment 1 contains a list of NNECO's commitments made in this letter.

Please contact me if you have any questions regarding this request.

Very truly yours

NORTHEAST NUCLEAR ENERGY COMPANY



David M. Goebel
Vice President - Nuclear Oversight

Attachments (3)

cc: W. D. Travers, Dr., Director, Special Projects Office
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W. D. Lanning, Deputy Director, Special Projects Office
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Connecticut Nuclear Energy Advisory Council

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2, 3

NNECO's Commitments

January 1997

List of Regulatory Commitments

The following table identifies those actions committed to by NNECO in this document. Any other actions discussed in the submittal represent intended or planned actions by NNECO. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Director - Nuclear Licensing at the Millstone Nuclear Power Station of any questions regarding this document or any associated regulatory commitments.

Commitment	Committed Date or Outage
B16154-1: Develop an Employee Concerns Program Operating Procedure incorporating the elements identified in Action Item #1 of the Plan.	March 30, 1997
B16154-2: Develop an Employee Concerns-specific Human Resources Department Action Plan which incorporates the elements listed in Action Item #2 of the Plan.	March 30, 1997
B16154-3: Establish a Concerns Oversight Panel which is chartered and empowered to accomplish the elements identified in Action Item #3 of the Plan.	March 30, 1997
B16154-4: Develop a sitewide Employee Concerns-specific Training Action Plan which incorporates the elements listed in Action Item #4 of the Plan.	March 30, 1997
B16154-5: Develop for the president's signature an Employee Concerns-specific Action Plan which incorporates the elements listed in Action Item #5 of the Plan.	February 28, 1997
B16154-6: Develop for the President's signature an Employee Concerns-specific Action Plan addressed to all First Line Supervisors, Managers, and Directors, which incorporates the elements listed in Action Item #6 of the Plan.	March 30, 1997
B16154-7: Develop for the President's signature and promulgate an Employee Concerns Policy Statement which incorporates the elements listed in Action Item #7 of the Plan.	March 30, 1997
B16154-8: Develop and Promulgate an Employee Concerns-specific Communications Action Plan which incorporates the elements listed in Action Item #8 of the Plan.	February 28, 1997
B16154-9: Develop an Employee Concerns Program Action Plan which incorporates the elements listed in Action Item #9 of the Plan.	March 30, 1997

Commitment	Committed Date or Outage
B16154-10: Develop for the President's signature and promulgate an Employee Concerns-specific Executive Management Action Plan, which incorporates the elements listed in Action Item #10 of the Plan.	March 30, 1997

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Plan for Addressing Employee Concerns

January 1997