

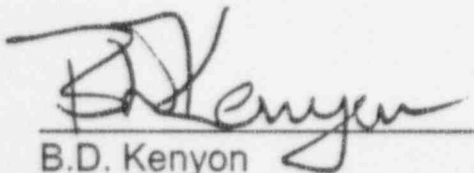


Northeast
Utilities System

Northeast Utilities Plan for Addressing Employee Concerns

January 31, 1997

Approved by:



B.D. Kenyon
President and CEO

Executive Summary

On October 24, 1996, the Nuclear Regulatory Commission (NRC) issued to Northeast Nuclear Energy Company (NNECo), an order to "...develop, submit for NRC review, and begin to implement a comprehensive plan for (a) reviewing and dispositioning safety issues raised by its employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination." Additionally, the Order required NNECo to address "root causes" identified by key NRC and NNECo review teams, "...with the objective of meeting a goal of achieving a safety-conscious environment".

This Plan, consisting of six (6) major elements, responds to and complies with this order. The major elements are interdependent and are meant to enhance management/employee relations while not usurping management prerogatives. These elements are:

- A commitment to rebuilding employee, regulatory and public trust,
- A new Employee Concerns Program,
- Specific organizational, policy and procedure changes,
- Training and orientation to provide specific skills to reinforce a healthy management/employee relationship,
- Development of Action Items and assignment of responsibility for implementation, and
- Creation of a Concerns Oversight Panel.

The incorporation of the plan into the day to day operation of Millstone represents a new commitment by 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.

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1.0 Introduction

On October 24, 1996 the Nuclear Regulatory Commission (NRC) issued an order to Northeast Nuclear Energy Company (NNECo) requiring NNECo, the Licensee, to "...develop, submit for NRC review, and begin to implement a comprehensive plan for (a) reviewing and dispositioning safety issues raised by its employees and (b) ensuring that employees who raise safety concerns are not subject to discrimination."

In response to this order the Licensee, herein referred to as Northeast Utilities (NU) established a task force of volunteer employees, including representatives of exempt staff, non-exempt staff, contractors and union, to design and develop a plan to address work environment and Employee Concerns Program changes for submission to the NRC. Two facilitators with extensive background in employee concerns were employed to assist the task force in developing the new program. The task force convened on December 2, 1996, and worked through January 21, 1997, to develop the concepts on which this plan is based.

While developing the plan, the Employee Concerns Task Force (ECTF) actively solicited input from the Millstone employee population for consideration in the formulation and preparation of the plan and the revised Employee Concerns Program (ECP).

Numerous individuals were interviewed. The interviewees included representatives from Human Resources, the present Employee Concerns Program, and work force members. Several NU vice presidents and directors, the president of the Nuclear organization, an ex-employee active in the area of nuclear safety issues, a senior counsel from the NU corporate legal group, and a local politician were also interviewed. This effort yielded many suggestions, which were included in the deliberations of the team.

Employee Concerns Programs of other utilities were reviewed and evaluated for background information. The ECTF analyzed significant audits, reviews and reports that identified management and cultural problems, including independent assessments and the NRC Order.

The ECTF then undertook the development of a program that fit the needs of the Millstone Station. This development relied on the team's collective understanding of the Millstone culture, its history and the root causes which ultimately led to the decline in overall nuclear performance. These factors led to the development of each program component. Northeast Utilities believes that the implementation of the plan relies on the adoption of the program elements described herein.

Northeast Utilities adopted the premise that whatever final product evolved, the ECP can succeed only if there is a commitment of individuals at all levels to support that success, in that:

"It's not the paper, it's the people"

1.1 Background of Employee Concern Issues at Millstone

On April 2, 1982, Northeast Utilities (NU) established procedure NEO 2.15, "Employee Complaint Grievances" per 10CFR19. During the mid to late eighties an increasing number of concerns were expressed by employees. It became evident by the growing number of concerns being expressed that NU would need a department devoted to handling employee concerns. A formal concerns program was established on December 4, 1989. On January 1, 1990, a Director-level position was established to head the new Nuclear Safety Concern Program (NSCP). In 1996, the program name was changed to The Employee Concerns Program, and the program director was tasked to serve as the focal point for the concerns at NU Nuclear, safety as well as non-safety related.

Over the past ten years Millstone has had a high number of employee concerns and allegations related to the safety of plant operations, and related to the harassment, intimidation, retaliation, and discrimination against employees raising such issues. NU's response to many of these allegations has been considered inadequate and adversarial by employees, the NRC, and the public. The NRC conducted inspections and investigations that substantiated many of the employee concerns and allegations, including the inability of NU to address concerns in a competent and responsive manner. As a result, NU has been cited for violations and escalated enforcement action has been taken. Both the NRC and NU's internal audits have concluded that the company has not been effective in the area of handling employee concerns, nor in implementing effective corrective action for problems that have been identified by concerned employees. The two most notable reports are the Fundamental Cause Assessment Team (FCAT) Report dated July 12, 1996 and the NRC MIRG (Hannon Report) of October 1996. As a result, many employees have apparently lost faith in the current Employee Concerns Program and NU management's willingness or ability to address concerns. Consequently, the handling of employee concerns at NU has been the topic of discussion from the public town meeting level to the United States Congressional level.

1.2 Northeast Utilities Employee Concerns Goals and Fundamental Approach

The goal of Northeast Utilities is to establish an environment in which employees and supervisors are able to resolve concerns without discouragement or fear of retaliation.

The fundamental approach to achieving this goal is to hold line management responsible for the creation of a work environment in which fear does not exist, trust is ingrained, and in which line management is responsible for and proficient in the resolution of employee concerns. This will be principally accomplished by setting as objectives the correction of the root causes identified in the FCAT and Hannon Reports. These objectives are provided in Attachment I along with specific action items which address the deficient conditions.

This plan recognizes however that until fear can be driven out, trust reestablished, and line management concern resolution proficiency established, it is necessary to have a robust and responsive Employee Concerns Program as an alternative concerns resolution path. This plan provides for such a program.

1.3 Measures of Success

Implementation of the actions specified in this plan may not, in and of themselves, lead to the changes necessary for the establishment of the environment envisioned in the plan goal. It is likewise recognized that the ratio of actions completed to actions outstanding is not a true reflection of plan success, but only a measure of effort expended. There are in addition to self assessment, two independent ways of assessing success. The first is the reports of the Employee Concerns Oversight Panel, an independent peer assessment group, whose make up and principal duties are described in this plan. The second is the

assessment trends of the third party Independent Oversight Team, established per the requirement of the Nuclear Regulatory Commission. Northeast Utilities intends to carefully consider the reports of these groups and make adjustments as required.

2.0 Northeast Utilities Plan for Addressing Employee Concerns

The Northeast Utilities Plan for Addressing Employee Concerns, hereafter called the Comprehensive Plan, consists of six key elements, summarized below. Most of these elements require new or revised programs at Millstone. Implementing these programs is expected to bring about a break with past practices, and restore a culture based on respect and recognition of employee contribution to a safe and productive environment. The Comprehensive Plan allows for revisions based upon experience and plan implementation.

Northeast Utilities believes that the implementation of this plan will bring Millstone back to the forefront of the nuclear industry.

2.1 Rebuilding Employee, Regulatory and Public Trust

The ultimate measure of the success of this Comprehensive Plan is the day-to-day interaction of employees and supervision to identify and resolve concerns without discouragement or retaliation. Rebuilding trust involves open communication, positive actions, and enforcement of the process to ensure complete and fair treatment of employees. This Comprehensive Plan is a commitment by Northeast Utilities management to take those steps that will result in an environment that welcomes the identification of employee concerns, and resolves raised issues while treating each employee in a fair manner.

The success of the Comprehensive Plan is contingent on full management and employee support and participation. The plan requires measurement of the work environment atmosphere to judge progress, identification of problem areas, and provides a mechanism to establish and maintain accountability. The Comprehensive Plan provides for reinvigoration of a management led program to reward employees for the identification and resolution of significant concerns. The plan incorporates orientation and training, and integrates awareness on handling of employee concerns into the process. As the work environment improves and management begins to assume responsibility and accountability for handling concerns, elements of this plan may be changed to recognize this fact.

2.2 Employee Concerns Program

Although the ultimate measure of success will be employees' confidence in addressing and resolving concerns with first line management, this plan recognizes that there will be instances when concerned employees choose to use the ECP. The Employee Concerns Program (ECP) provides employees the resources and options necessary to help ensure that concerns unable to be resolved by line management are handled in a fair and competent manner.

The restructured Employee Concerns Program has three phases: Intake, Triage and Investigation. Figure I shows the process diagram used to develop the program. An implementing procedure for the program is under development.

In the Intake Phase, an interviewer receives the employee concern and assures it is accurately described in writing and the write up is accepted as accurate by the concerned individual (CI). The interviewer will attempt informal resolution or referral if appropriate. For example, the employee will be encouraged to attempt resolution with line management, or the employee will be referred to the corporate organization charged with the resolution of the identified concern, i.e., sexual harassment allegations will be referred to the Human Resources department, security infractions to Security, etc. The concerns received and referred successfully back to line management for resolution or assigned to another corporate agency for resolution will not become Employee Concerns Program tracked cases however they will be assigned a case number and followed to completion by the ECP.

If the issue cannot be immediately resolved, or referred, and the concernee alleges for example, the existence of a safety concern that is being suppressed, or retaliation for reporting any concern, or alleges fear of raising a concern with line management, the concern is passed to the Triage phase. Here, a team approach is undertaken by a group of selected individuals considered knowledgeable to produce resolution. Each facet of the concern is reviewed and evaluated. Ideally, the Triage phase will develop a resolution path acceptable to the CI. Concerns passed to the Triage phase will be assigned an Employee Concerns Program case number and will be tracked to closure. Concerns classified as nuclear safety concerns will be uniquely identified and separately tracked.

If necessary, concerns can be investigated by a competent investigator or an independent investigation team. (Third phase)

Once the Triage and Investigation phases are completed and agreed-to resolution actions have been initiated, the case will be considered resolved. However the ECP Director will continue to track the case to insure agreed corrective actions are completed, at which time the case will be closed. In cases of disagreement, the CI may request a case review by the Concerns Oversight Panel. The Concerns Oversight Panel will consider all requests for third party reviews, and may recommend additional actions, assist in resolution, or agree that the case was adequately resolved.

It is intended that the CI will remain an active part of the employee concern process throughout the resolution process. Concerns received anonymously by ECP will be processed in a similar manner to the extent possible. The ECP Director will assign an ECP staff member to represent the interests of the anonymous, concerned individual.

There are currently employee "Peers" assigned to each Millstone unit to serve as an interface between concerned individuals and the ECP. This contribution to the overall program will be continued.

The ECP Director will ensure that senior line management (VPs/Unit Directors) are aware of general employee concern issues within their organization so that they can address and correct the root cause for the inability of some line management to communicate with employees and vice versa. Confidentiality of concernees will be maintained during this information exchange except where maintaining confidentiality would prevent the correction of imminent safety issues or notification of a condition required to be reported in accordance with Federal Regulations. Should disclosure of requested confidentiality be required in these cases, every effort will be made to notify the CI before the release is made.

It is recognized that information exchange between the Director ECP and senior management creates a situation in which a concernee's identity could possibly be revealed by nature of the subject matter. Prior to any information exchange the employee will be made aware of this potential. Normally the notification will occur during the Intake or Triage phase. Protocols are intended to specify that confidentiality will be maintained to the extent possible and that traceability is in place should confidentiality be breached due to negligence, and that the individual responsible will be held accountable.

2.3 Organizational, Policy and Procedure Changes

Northeast Utilities has reviewed the programmatic weaknesses and root causes that led to the present situation at Millstone. In developing the Comprehensive Plan to respond to the NRC's October 24, 1996, order and to restore Millstone to a healthy and functional work force, Northeast Utilities will undertake some organizational changes, revisions to policies and procedures, and the development of new expectations. Actions required to effect these changes are appended as Attachment II. Examples include:

- NU intends to assign a senior Human Resources individual to be matrixed to the President and CEO, Nuclear who will be responsible for human resource matters at the nuclear facilities.
- NU intends to perform a review and modification of Human Resources procedures, performance review processes, and the supervisory selection process to ensure that successful addressing of employee concerns and handling dissenting/differing opinions are viewed as positive supervisory attributes that gain positive recognition. Protocol, expectations and goals for HR and ECP interfacing are also under development.
- NU intends to revise training, performance review processes and the promotion and selection criteria for supervisory positions within nuclear to include competencies and goals related to handling employee concerns.
- NU intends to recognize individuals bringing forward significant nuclear safety issues and other enhancements, not limited to technical domains.
- NU intends to develop a new corporate Peer Review Process to supersede the existing NU grievance procedure and to incorporate its provisions at Millstone Station.

2.4 Training and Orientation Program

The goal of creating a healthy work environment can be considered to be fulfilled when the majority of concerns are successfully handled between the employee and their first line supervisor. To help facilitate meeting this goal, enhanced skills are needed across all levels of the work force to create an environment where employee concerns are addressed in a full, fair and final manner.

A critical element in reversing the present culture will be the training of the Millstone work force in new expectations for management - employee relations, the Comprehensive Plan and the new Employee Concerns Program. Training in the new ECP will commence with top level management, and proceed through officers, directors, managers, first line supervisors, and then the general work force. The program

elements for raising and handling employee concerns and professional dissent are intended to be set forth and clearly state the role, responsibility and accountability of all employees. Additionally, a plan to make local area former NU employees, state and local government leaders and interested members of the general public aware of the new Employee Concerns Program will be developed.

Senior Management (Vice-President and Director Level)

Senior Management will receive a full briefing on the Comprehensive Plan and the new Employee Concerns Program. Training for senior management in the new accountabilities and expectations of the ECP will be conducted, in so far as practicable, prior to manager and supervisor training in order that senior management be able to set the example for the level of management reporting to them, especially first line supervision. Understanding and enforcing the elements of effective management of professional dissent is a key aspect of the new culture.

Managers and First Line Supervision

Resolving differing professional opinions is neither natural nor easy. Northeast Utilities has identified that a training module needs to be developed and incorporated into site training. The Nuclear Training Department has been assigned responsibility to develop required courses.

All Employees

Employees will receive training about the new ECP program and the expectations set forth which detail the responsibilities of management and non-management employees as part of plan introduction and on a continuing basis as part of initial and annual Plant Access Training (PAT).

ECP Investigators and Intake Staff

The ECP staff requires skill sets that take into account the varied nature and responsibilities of their work. They need to be able to properly obtain information that may ultimately lead to formal investigations, and also need to be objective listeners and skilled report writers. The following areas are intended to be included in ECP staff development for increased awareness:

- Interviewing Skills
- Legal Issues In Employment
- Investigative Report Writing
- Investigative Planning
- Time Management
- Effective Writing
- Plant Systems
- Interpretive Skills (HPES / Root Cause Analysis)
- Communicating with Regulators and Auditors
- Team Building

Human Resources Staff

Past audits and reports have determined that a majority of the concerns expressed by employees are rooted in areas traditionally under the purview of Human Resources (i.e., performance appraisals, wage and hour issues, assignments). The revised ECP program does not attempt to substitute for the traditional role of Human Resources; however, the ECP may receive these concerns.

This plan requires a dynamic working relationship between the ECP Staff and the Human Resources Department. Therefore, the HR staff requires some of the same training as the ECP staff including:

- Interviewing Skills
- Investigative Report Writing
- Investigative Planning
- Effective Writing
- Listening Skills
- Team Building
- Legal Issues in Employment Training

It is intended that selected Human Resource personnel attend this type of training.

2.5 Comprehensive Plan Action Items

Action items have been developed to assist with the successful implementation of this Comprehensive Plan and individuals have been assigned responsibility for their completion. Action items and included elements are necessary to be accomplished by various work groups (i.e., ECP Director, Human Resources, Concerns Oversight Panel, Legal, Executive Management, supervision, and employees). The item elements support the correction of the root causes as required by the NRC order, which are tabulated in Attachment I, "Plan Objectives".

2.6 The Concerns Oversight Panel

The Concerns Oversight Panel is a panel composed of Millstone employees, exempt and non-exempt, whose function is to provide oversight of and assess the Employee Concerns Program and Millstone station employee concerns environment.

The Concerns Oversight Panel is intended to have the following responsibilities:

- Review conduct of the Employee Concerns Program
- Aid in Harassment, Discrimination, Intimidation and Retaliation Identification
- Review workplace environment for Chilling Effect
- Evaluate requests for Third Party Review
- Respond to special requests of the ECP Director
- Review cases where an individual who has been involved in protected activity has been terminated.
- HOTSPOT* Identification

Concerns Oversight Panel members will be selected through a formal process.

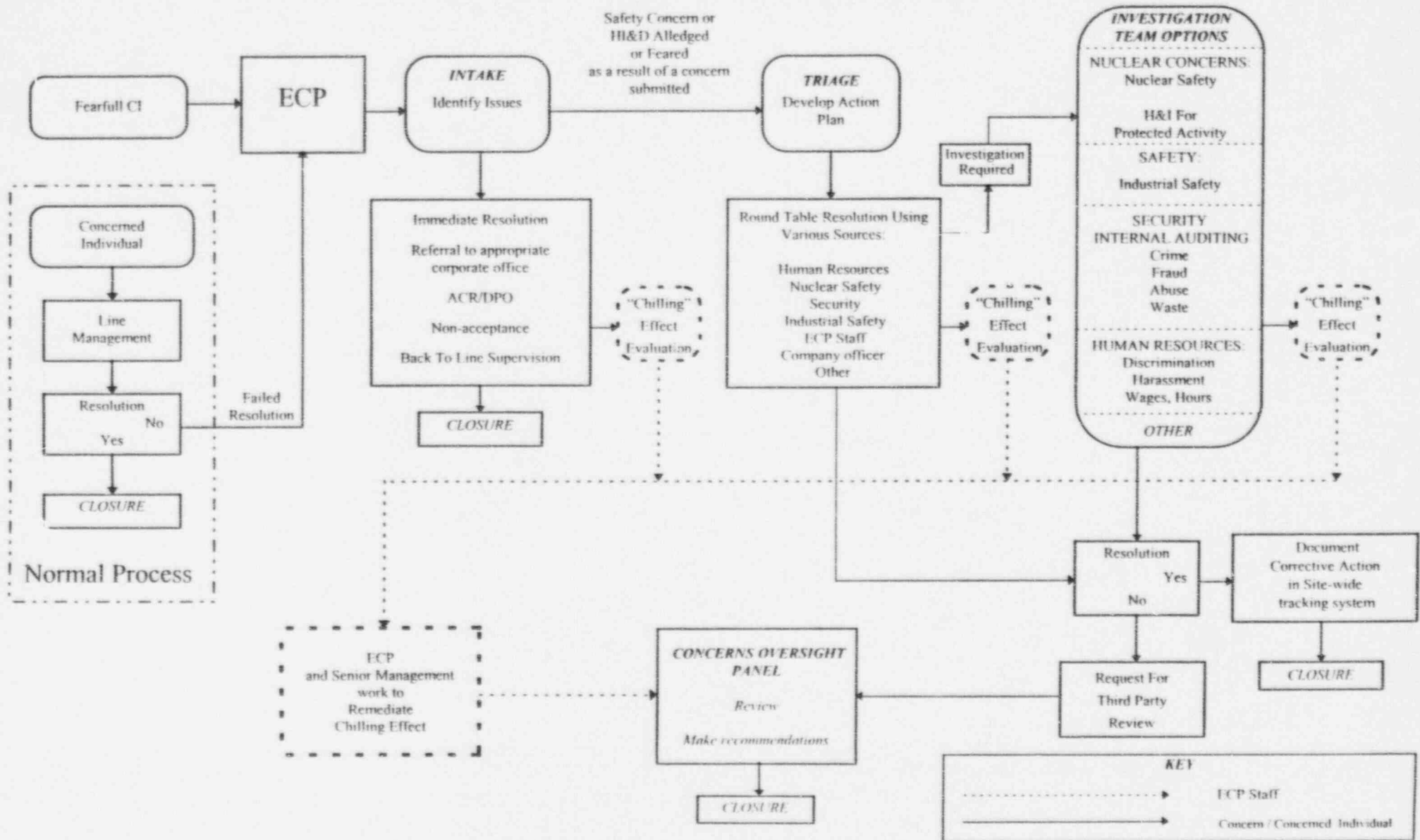
Charter development and adoption is expected to be a principal first order of business for the individuals selected to the first Concerns Oversight Panel.

The panel has been created to promote the practice of "doing the right thing", and to ensure that the action elements of this plan are implemented and sustained. A quarterly report will be submitted to the President and CEO documenting the panel assessment of progress in these areas, with copies to the ECP Director and VP, Nuclear Oversight.

* A "HOTSPOT", for purposes of this plan is defined as an organization or organizational sub-group from which employee concerns are generated that are not resolved by line management.

Figure I

Employee Concern Program Development Diagram



PLAN OBJECTIVES

The Fundamental Cause Assessment Team (FCAT) Report dated July 12, 1996 and the NRC MIRG (Hannon Report) of October 1996 determined root causes for the decline in performance and increase in Employee Concerns which were unable to be resolved by line management. The root causes from each of these reports have been summarized and grouped in tabular format in Attachment I. For each grouping of root causes, an objective has been identified for improvement.

Many of the action items and elements specified by the plan were specifically developed to address and correct the root causes determined by the FCAT and Hannon reports. These action items and elements are tabulated in Attachment II, however they are grouped in categories based on the individual responsibilities for their execution. In Attachment I they have been associated with the objective they are intended to support.

PLAN OBJECTIVES

PLAN OBJECTIVES	Comprehensive Plan Corrective Action Elements
Objective I: Exercise effective leadership Precipitating Root Causes <ul style="list-style-type: none"> • Vision and direction were not consistently in conformance with the fundamental needs of a well-performing program • Emphasis on justifying <i>status quo</i> rather than resolving problems • Ineffective response to mounting indications of serious problems 	5:1-8 2:1, 4, 6, 9, 10, 11, 14, 15, 17 5:1-8 6:1-10 7:1-4 10:1-15
Objective II: Establish and maintain high standards Precipitating Root Causes <ul style="list-style-type: none"> • Management and personnel standards did not ensure conservative decisions • Deficient conditions were overlooked, not corrected, or corrected slowly with a narrow focus • Prevailing attitude towards regulatory standards were not consistently appropriate for nuclear excellence 	2:2, 3, 4, 6, 9, 17 3:1-13 4:1-10 5:1-8 6:1-10 7:1-4 10:1-13
Objective III: Strengthen leadership, management, and interpersonal skills Precipitating Root Causes <ul style="list-style-type: none"> • Communications and interpersonal skills of management did not foster trust, teamwork, or good morale • Management was ineffective in responding to many employee concerns • Resource allocation, plan implementation, and prioritization did not support improvement, self assessments not done • Organizational role not clearly or appropriately defined 	1:10 2:2, 3, 4, 6, 9, 10, 11, 14, 15, 17 4:1-10 6:1, 2, 9 10:1-13
Objective IV: Establish effective problem resolution and performance measures <ul style="list-style-type: none"> • Cumbersome decision-making process • Lack of resolution of concerns raised in FCAT, failure to use originators of report effectively in resolution process, generation of "chilling effect" • Top management unwilling to support fundamental actions necessary to effect change • Lack of correct root cause analysis and ineffective corrective action follow through • Lack of performance measures, especially for measuring employee trust and confidence, training effectiveness 	1:5, 8, 9 2:2, 7, 9, 17 3:1-13 6:1, 4 10:2, 3, 5, 7
Objective V: Increase sensitivity to employee needs Precipitating Root Causes <ul style="list-style-type: none"> • Lack of expeditious workplace "chilling effect" intervention • Creation of some work environments where dissent is discouraged through insensitivity by management • Predictable pattern of denial of adverse findings regarding harassment and intimidation • Claim of "blacklisting" by some employees for the raising of issues • Determination of general insensitivity to employee needs 	1:8, 9 2:5, 9, 17 3:1-13 6:9 10:1, 2, 4, 10
Objective VI: Freely admit mistakes Precipitating Root Causes <ul style="list-style-type: none"> • Use of lawyers, and too legalistic an approach, particularly with respect to Human Resources Dept. • Several current and former employees have expressed the opinion that management has used HR Dept. to discredit or intimidate concerned employees, believe filing concerns with ECP futile • A "shoot the messenger" attitude. Some employees feel a questioning attitude is neither encouraged or appreciated • The above 3 items are all "chilling effects" 	1:4 2:1, 2, 3, 5 6:2 10:3, 10, 14, 15

PLAN OBJECTIVES	Comprehensive Plan Corrective Action Elements
<ul style="list-style-type: none"> • Use of a succession of consultants to refute NRC or DOL findings • Issuance of memoranda to employees and public denying or minimizing culpability for adverse DOL, NRC findings within hours of receipt • Some employees felt NU dismisses findings of consultants who substantiate negative findings and usually does not rehire them for work 	
<p>Objective VII: Develop supportive management styles and support for concerned employees</p> <p>Precipitating Root Causes</p> <ul style="list-style-type: none"> • Condoned an arrogant management style in both administrative and technical functions • Perception that management has not taken disciplinary action against supervisors for retaliatory actions against subordinates who raise issues because the presence of retaliation is not acknowledged • A technical conceit influences decision making, results in a lack of conservatism, promoting an atmosphere not conducive of the raising of safety concerns • Lack of support for concerned employees - including poor follow-up, no positive incentives for raising safety concerns, no encouragement or recognition of a questioning attitude • Current promotion process that favors technical vs. people skills • Human Resources Dept. tendency to develop "legalistic approaches" to contest DOL findings of discrimination 	1:10 2:1,2,5 4:1-10 5:1-8 6:1,2,5,8 10:1-13
<p>Objective VIII: Develop effective communication and teamwork</p> <p>Precipitating Root Causes</p> <ul style="list-style-type: none"> • Ineffective communications between and among corporate managers, site management, and employees • Ineffective communications of the basis of performance evaluations, reasons for disciplinary actions • Ineffective communications of delay in resolving concerns to involved parties • DPO not effectively championed • Process, meaning of confidentiality in ECP not effectively communicated to work force • Managers not aware of the magnitude of problems outside their organization • Management by memo • Misapplication of the "teamwork concept", resulting in it's improper use to lower concernee performance reviews, to discourage a questioning attitude, inappropriate competition between units, forcing of consensus that impedes proper decision making 	1:10 2:12,17 3:1-13 6:8 7:1-4 8:1-8 10:1,4,10,12,14

PLAN OBJECTIVES	Comprehensive Plan Corrective Action Elements
<p>Objective IX: Establish accountability Precipitating Root Causes</p> <ul style="list-style-type: none"> • General lack of accountability and ownership • Some managers lacked a proactive attitude towards aggressively resolving employee concerns • Abrogation of accountability by management in inappropriate referral of employee concerns to Legal, HR, and ECP Depts. • Perception by some employees that supervisors considered responsible for discriminating against employees were not disciplined in an appropriate manner • Management reluctant to use independent evaluation, discounts independent evaluation findings when adverse • Lack of effective position descriptions for some employees left both parties uncertain of duties, responsibility, and authority • More time spent justifying status quo than in addressing and resolving issues 	<p>1:5 2:1,17 3:1-13 5:3,4,7 7:1-4 10:1,3,5,9,12,15</p>
<p>Objective X: Establish an effective ECP Precipitating Root Causes</p> <ul style="list-style-type: none"> • Insufficient resources, independence, and authority to fully resolve issues led to frustration and raising of allegations to the NRC • Poor corrective action process, failure to deal with concerns in a timely manner • Lack of management support for the program 	<p>1:1-10 2:7,12,17 3:1-13 4:1-10 5:1,2,4,5,6,7 8:1-8 9:1-37 10:12,13,15</p>

Comprehensive Plan Action Items

Specific actions are required to enable reaching the goals set out in the Comprehensive Plan. The actions that follow require the development, promulgation, and follow through of ten specific actions to create, correct, or modify processes and behaviors necessary to attain the plan's goal. Each action item has been assigned a required completion date and designates a responsible individual.

Where applicable, specific action item elements have been included within Attachment I, to tie them to the root causes identified in the Fundamental Cause Assessment Team and MIRC reports.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 1	
Develop an ECP Operating Procedure which incorporates the actions contained in the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E. L. Morgan
ID#	ELEMENT
1-1	Initiate CRs and/or track CRs submitted to implement corrective actions required or agreed to as a result of an ECP concern.
1-2	Provide feedback to CIs on a regular basis (or a memo to file if the CI is unknown).
1-3	ECP staff reinforce the need for all supervisors and employees to address concerns
1-4	Implement and support the requirements of the ECP.
1-5	Provide accurate, real-time input to database system so that tracking and trending of activities can be completed.
1-6	Escalate to the ECP Director those concerns that have not been properly dispositioned.
1-7	Increase ECP visibility in the work place.
1-8	Complete the intake/triage process within 5 working days after the CI concurs with the concern being accurately documented or upon receipt of anonymous concerns.
1-9	Conduct or coordinate investigations to resolve concerns within 45 days.
1-10	Complete required ECP intake/investigator training.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 2	
Develop a Human Resources Department specific Employee Concerns Action Plan and/or policy statements which incorporate the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E. Richters
ID#	ELEMENT
2-1	Matrix the site HR organization to the President and CEO for a minimum of two years.
2-2	Establish protocol, expectations and goals for HR-ECP interfaces. Define and clarify the expectations of the on-site HR representatives in the handling of issues brought to their attention.
2-3	Conduct self assessment activities and report the results..
2-4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.
2-5	Communicate philosophy, mission, and responsibilities of HR to all employees.
2-6	Review performance reviews and promotion/selection criteria for supervisory/non-supervisory positions in the nuclear division to include competencies/goals related to handling employee concerns, thus reducing the opportunities that result in peer pressure deterring co-workers from identifying concerns.
2-7	Support the ECP through timely responses to investigation requests in accordance with set schedules.
2-8	Develop and implement, with the assistance of the ECP, a plan for a Non-Union Peer Review Process to supersede the existing NU grievance process.
2-9	Review and modify HR procedures, performance review processes and supervisory selection criteria to address the attributes of addressing employee concerns and handling dissenting professional opinion as positive attributes which gain employees positive recognition. HR to identify, review and revise procedures with ECP assistance.
2-10	Implement a survey to provide all employees the opportunity to participate in an assessment of their supervision's performance. Establish a goal of 90% participation.
2-11	Reinvigorate a management led program to celebrate and reward employees for the identification and resolution of significant concerns.
2-12	Assign HR Reps to participate in ECP Intake/Investigator training.
2-13	Develop and implement a policy in which quantified survey results identifying poor performing supervisors are addressed and an action plan for improvement is developed. All such actions shall be documented.
2-14	Review and revise supervisor and employee position descriptions to address problem identification and resolution.
2-15	Establish a leadership assessment which permits 360 degree reviews of site-wide supervision.
2-16	Modify the supervisor assessment survey to ask questions that will allow the identification of "hot spots".
2-17	Provides for tracking and feedback to CIs of the status of their concerns.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 3

Establish a Concerns Oversight Panel which is chartered and empowered to accomplish the actions contained within the elements listed below.

DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: D. M. Goebel
ID#	ELEMENT
3-1	Define Concerns Oversight Panel goals and objectives. Include the responsibilities of paragraph 2.6 of the plan as a minimum.
3-2	Develop and implement an operating procedure for the Concerns Oversight panel's activities.
3-3	Review Requests for Third Party Reviews submitted by ECP Director from CIs.
3-4	Provide assistance in dispute resolution for those case files as requested by the ECP Director.
3-5	Oversee the performance and effectiveness of the ECP.
3-6	Report assessment findings with recommendations to the CEO and to the Nuclear Committee of the Board of Trustees.
3-7	Review instances of past and present activities where evidence of "chilling effect" is apparent as defined by supervisor assessment surveys. Conclusions and recommendations shall be documented.
3-8	Provide constructive recommendation where "protected conduct" is being viewed as poor performance in order to avoid issues of harassment, intimidation, discrimination or retaliation.
3-9	Develop a protocol for the panel to be notified of terminations and review terminations and planned reductions in the permanent work force to determine if there is evidence that employees involved in a protected activity are being singled out. Provide recommendations as appropriate.
3-10	Review ECP trend data.
3-11	Review for potential "chilling effect" and determine if work place intervention is required by management.
3-12	Ensure audits and assessments of HR's and ECP's performance are completed on a periodic basis.
3-13	Defines the role and reporting relationship of the Concern Oversight Panel Administrator and panel chairman.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 4	
Develop a Sitewide Employee Concerns Training Action Plan which incorporates the actions contained within the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: H.F. Haynes
ID#	ELEMENT
4-1	Develop, implement and complete initial ECP training for all employees.
4-2	Revise Plant Access Training to include an expanded ECP section.
4-3	Revise Managing For Nuclear Safety course to include ECP procedural requirements and expected competencies.
4-4	Assist ECP Director in the identification, development, and delivery of ECP staff training.
4-5	Ensure adequate resources are made available to provide support staff (i.e. HR) training for addressing Employee Concerns.
4-6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.
4-7	Update Plant Access Training to include questions pertaining to the ECP.
4-8	Ensure that courses required for ECP Intake and Investigator staff are readily available for personnel to complete per the ECP performance goals.
4-9	Identify a training liaison to work with the ECP Director in the overall implementation of training requirements to support the NU Program for Addressing Employee Concerns.
4-10	Provide for training of "Peer Representatives."

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 5	
Develop an Employee Concerns Specific Action Plan which incorporates the elements listed below for the President's signature.	
DUE DATE: 2/28/97	RESPONSIBLE INDIVIDUAL: E.L. Morgan
ID#	ELEMENT
5-1	Announce the NU Program for Addressing Employee Concerns and the new ECP program.
5-2	CEO participate in a video presentation to introduce the Comprehensive Plan and the new ECP program.
5-3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.
5-4	Recognize employees who identify and/or help resolve significant employee concerns.
5-5	Issue a statement of support for the Concerns Oversight Panel to all Millstone personnel.
5-6	Issue an open letter to all Millstone personnel requesting identification of any new concerns.
5-7	Establish and post expectations to the work force regarding employee concerns.
5-8	CEO announce approved recommendations contained in ECTF Report. Respond by letter to the ECTF to explain rationale for those items not approved.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 6	
Develop for the President's signature, an Employee Concerns Specific Action Plan addressed to First Line Supervisors, Managers, and Directors incorporating the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E.L. Morgan
ID#	ELEMENT
6-1	Review, sign and post a copy of the Problem Resolution Standard for supervisors in their work areas.
6-2	Actively solicit input from employees and address all identified issues per established procedures.
6-3	Respond to requests for information and assist in ECP investigations to support agreed schedules.
6-4	Complete required corrective actions per ECP Investigation.
6-5	Subordinates that are weak in any of the expected competencies will be evaluated and remedial action taken.
6-6	Ensure that Millstone Station personnel view the ECP video and discuss the ECP process semi-annually.
6-7	Include ECP performance goals in annual performance plans.
6-8	Complete Managing For Nuclear Safety Training by third quarter of 1997. Personnel promoted into supervisory positions should complete course within 90 days of effective promotion date.
6-9	Complete a course on professional dissent.
6-10	Review NGP's, other select procedures, and departmental policies as required, to include appropriate elements of the new ECP in the documents and subsequent training requirements.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 7	
Develop for the President's signature and promulgate an Employee Concerns Policy Statement addressed to all employees which incorporates the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E.L. Morgan
ID#	ELEMENT
7-1	Report unresolved issues and concerns.
7-2	Cooperate in investigations as appropriate.
7-3	Participate in supervisory assessments and company surveys.
7-4	Maintain a questioning attitude and make suggestions for improvement, question the status quo, and raise concerns as appropriate.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 8	
Develop and promulgate an Employee Concerns Specific Communication Action Plan which incorporates the elements listed below.	
DUE DATE: 2/28/97	RESPONSIBLE INDIVIDUAL: S. Baranski
ID#	ELEMENT
8-1	Assist in the advertisement of the new ECP and other elements of the communication plan developed by the ECP director.
8-2	Assist ECP Director in holding initial orientation meeting with employees.
8-3	Assist training to produce a management video to introduce the new ECP with emphasis on new culture, personnel and line managements resolution.
8-4	Determine if a "Rumor Control Hotline" to address rumors and general questions is warranted and implement per a set schedule.
8-5	Invigorate the PEER program by reintroducing the Peer Representatives to the work force.
8-6	Facilitate the ECTF attendance at a public meeting to explain and promote the Comprehensive Plan.
8-7	Help produce ECTF program recommendations, concept diagram, timelines and flow charts.
8-8	Facilitate the ECTF's issue of a thank-you letter to all Millstone personnel.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 9	
Develop an Employee Concerns Program Action Plan which incorporates the actions contained in the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E.L. Morgan
ID#	ELEMENT
9-1	Retain temporary experienced investigator assistance to reduce the backlog and provide mentoring to staff.
9-2	Develop and implement a comprehensive communication plan to promote the changes occurring at NU. Address training, employee recognition, community outreach, executive management involvement, and long-term plans. Target audiences include all employees, NRC and general public.
9-3	Draft a letter, signed by CEO, Nuclear, inviting Millstone personnel who have interest in the Concerns Oversight Panel to attend an orientation session.
9-4	Conduct orientation for potential Concerns Oversight Panel Members.
9-5	Format, implement, and maintain new ECP procedures and guidelines specified by the Plan. (i.e. Employee Concerns Resolution Form)
9-6	Assist in placing the permanent Concerns Oversight Panel administrator.
9-7	Facilitate interviews for Concerns Oversight Panel applicants.
9-8	Attend first Concerns Oversight Panel meeting to facilitate start-up.
9-9	Establish and publish internal performance goals and objectives for inclusion in ECP staff's performance reviews.
9-10	Maintain safeguards to protect the confidentiality of Concerned Individuals who request confidentiality.
9-11	Implement new ECP procedure to address concerns.
9-12	Ensure PEER procedure is updated to reflect ECP program revisions. Integrate PEER program into overall ECP communications plans.
9-13	Complete training for Vice President and Director level personnel in Employee Concerns and Professional Dissent.
9-14	Update and distribute a revised ECP brochure.
9-15	Notify Concerns Oversight Panel of action items not completed satisfactorily.
9-16	Notify Concerns Oversight Panel of alleged H, I, D & R instances.
9-17	Attend NRC meetings and briefings at Millstone on ECP related issues.
9-18	Develop a specific Community Outreach Plan as part of the overall communication plan to update Concerned Individuals and Groups on the ECP Program progress.
9-19	Develop an Intranet NU ECP Web page.

9-20	Develop job descriptions for intake and investigative personnel.
9-21	Identify and select appropriate permanent staff to support the new ECP program.
9-22	Develop and publish an ECP Organization chart.
9-23	Develop a newly formatted ECP monthly report which will provide more insightful information to those reading it.
9-24	Provide to senior management, IOT and Concerns Oversight Panel current trend analyses of ECP activities.
9-25	Implement a database to identify and trend work place environment issues i.e., "chilling effect".
9-26	Develop protocol with the licensing department to investigate concerns referred by the NRC.
9-27	Inform senior line management of concerns.
9-28	Assist the Training Department in review and revision of initial ECP orientation class. Include new expectations, policies, and procedures.
9-29	Solicit personnel to become members of the Concerns Oversight Panel.
9-30	Ensure contractors cooperate with NU in the completion of required investigations.
9-31	Ensure all contractor supervisors have completed Managing For Nuclear Safety Course and applicable course (i.e. professional).
9-32	Establish and implement in collaboration with ECP personnel appropriate monitoring measures to evaluate the work place environment being conducive for workers to raise concerns without fear or retaliation.
9-33	Ensure an adequate ECP knowledge base is present in the contractor work force demonstrated by completion of ECP training, and spot surveys.
9-34	Evaluate PEER Representatives augmentation of ECP staff for functions such as information gathering, looking for/at "hot spots", and promoting the new program.
9-35	Draft a letter, signed by CEO, Nuclear, to former Millstone personnel seeking their input of potential technical concerns.
9-36	Include members of ECTF in follow on meetings to brief them on the status of the implementation of this plan and to obtain their assistance in plan implementation.
9-37	Provide Peer Representatives with necessary training.

COMPREHENSIVE PLAN ACTION ITEMS

ITEM: 10	
Develop for the President's signature and promulgate an Employee Concerns Specific Action Plan directing executive management to complete the actions contained within the elements listed below.	
DUE DATE: 3/30/97	RESPONSIBLE INDIVIDUAL: E.L. Morgan
ID#	ELEMENT
10-1	Increase executive visibility in the work place - "walking the talk", promote the new culture, ECP, and welcome the identification of concerns.
10-2	Direct and support the issuance of the Problem Resolution Standard For Supervisors.
10-3	Direct line supervision and support organizations to include ECP accountability goals and competencies in each supervisor's and employee's performance review plan.
10-4	Introduce the Managing for Nuclear Safety course (on a rotating basis).
10-5	Intervene as needed to ensure unresolved concerns are provided the necessary attention.
10-6	Support the goals of the ECP by effectively dealing with negative trends and poor supervisory performance as identified by the ECP Director and/or Concerns Oversight Panel.
10-7	Direct the responsible organization to revise the supervisor assessment survey to include questions which will result in corrective actions for poor supervisory performance.
10-8	Complete the Managing For Nuclear Safety Course or be briefed on the revisions if the course has already been completed.
10-9	Review action items not completed as reported by the ECP Director and determine what additional actions are necessary to support completion.
10-10	Directors, Managers and first line supervisors complete or demonstrate proficiency in the following courses: Seven Habits, Myers-Briggs, Labor Relations, Principle Centered Leadership, Interpersonal Skills, Interviewing Skills, Handling Professional Dissent and Chilling Effect.
10-11	Ensure all employees are provided the opportunity to participate and complete an assessment of their supervision's performance. A goal of 90% participation is set.
10-12	Ensure adequate resources are provided to execute the ECP plan.
10-13	Commission an assessment of the ECP by an external evaluator (e.g. annually).
10-14	Promulgates the roles and responsibilities of the Legal Department.
10-15	Requires the Legal Department to inform the ECP Director of employee concerns made known to them which have not been previously documented.

Docket Nos. 50-245

50-336

50-423

B16154

Attachment 3

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

Employee Concerns Task Force Team Report

January 1997



Memo

January 22, 1997

Mr. Bruce D. Kenyon
President and CEO, NU Nuclear
Millstone Nuclear Power Station
Rope Ferry Road,
Waterford, Connecticut
06385

Dear Mr. Kenyon:

The Millstone Employee Concerns Task Force is pleased to provide under cover of this letter, a Comprehensive Plan to address Millstone's workplace environment for raising concerns, including a vastly modified Employee Concerns Program. The plan and program are responsive to the Nuclear Regulatory Commission's (NRC) October 24, 1996, Order relating to employee concerns at Millstone.

The Plan was developed by a group of twenty (20) Millstone employees who responded to a published request for volunteers to work on this endeavor. The group became known as the Employee Concerns Task Force (ECTF). The Task Force is comprised of a broad cross-section of the Millstone workforce and includes contract, union, non-exempt and exempt employees, a few of whom have served in management positions at Millstone. The Task Force was authorized to begin with a "blank sheet of paper" using the expertise of two independent Employee Concerns Program development consultants as facilitators. The guiding phrase, "It's not the paper --- it's the people", was used as a reminder that the success or failure of any program will depend upon the commitment of the people charged with its implementation. The Task Force recognized that any new process had to be designed to foster employee and management participation and accountability. The objectives of the new programs are to rebuild mutual trust, encourage communications and demand zero tolerance for harassment, intimidation and discrimination, using a process that will bring employee concerns to full, fair and final closure. A summary description of the Comprehensive Plan is provided in Section 2.0 of our program document.

The plan describes a living program containing some elements that will need to be developed prior to or during the early stages of implementation. Nevertheless, the plan represents what we believe are the best recommendations for recovering the work environment at NU.

Members of the ECTF, while soon returning to their regular assignments, will remain available on an Ad Hoc basis to provide any assistance you may desire. The experience of our involvement has revealed how vitally important the inclusion of all sectors of the workforce in the formulation of this plan has been. It was our pleasure to have been involved in this very important activity.

Respectfully submitted,

Sheila R. Hall *Richard D. Deveau* *Candy Marien*
Sheila Hall, Richard DeVeau, Candy Marien,
Performance Evaluation Nuclear Materials Health Facility

Jim Bennett *Zackary Haff* *Chuck Mihalko*
Jim Bennett, Zackary Haff, Chuck Mihalko,
Nuclear Training U-2 Operations Employee Concerns Program

Frances DiCarlo *Steve Steele* *George "Skip" Dacier*
Frances DiCarlo, Steve Steele, George "Skip" Dacier,
Assessment Services Myrock Contractor, PQS

Jim McHugh *Jim Rothgeb* *Nancy Cole*
Jim McHugh, Jim Rothgeb, Nancy Cole,
Emergency Planning U-1 I&C Contractor, U-1 Tech Support

John Godinez *Michael Quinn* *Billie Pirner Garde*
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U-2 Maintenance Projects Consultant, Garde Law Office

Karen Shannon *George Pitman* *Thomas Clyde Stewart*
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U-2 Design Engineering Manager, Engineering ECP Consulting Services, Inc.

Michael Kennedy *Barry Kreiling* *Jeff Water*
Michael Kennedy, Barry Kreiling, Jeff Water,
U-3 Operations Health Physics Chemistry Consultant

Joe Summa
Joe Summa
Condition Based MNTC