

Mr. Neil S. Carns
Senior Vice President
and Chief Nuclear Officer
Northeast Nuclear Energy Company
c/o Mr. Richard T. Laudenat
Director - Regulatory Affairs
P.O. Box 128
Waterford, CT 06385

April 22, 1997

Dear Mr. Carns:

The U.S. Nuclear Regulatory Commission's (NRC's) Order to Northeast Nuclear Energy Company (NNECO), dated October 24, 1996, required NNECO to submit a comprehensive plan for NRC review, for resolving the Millstone station employees' safety concerns. By letter dated January 31, 1997, NNECO submitted Northeast Utilities Plan for Addressing Employee Concerns (Plan).

Our review has noted that a number of topics identified in the list of the Plan's 10 action items are not explicitly addressed. The Plan states that eight action plans are under development to implement the action items; therefore, we recognize that related procedures and processes are currently being developed to address these topics in greater detail.

So that we may gain a better understanding of your plans for upgrading programs for handling employee concerns, we plan to schedule a meeting open to the public, to cover the specifics of your plan. At this meeting we request that your presentations cover the enclosed questions and comments. This meeting should be useful in formulating the NRC's inspection of NNECO's programs to handle employee concerns.

Please contact Phillip McKee at (301) 415-2040 if you need any additional information or clarification of the enclosure.

Sincerely, ORIGINAL SIGNED BY

William D. Travers, Director
Special Projects Office
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336,
and 50-423

Enclosure: Questions and Comments on Northeast
Nuclear Energy Company's
Comprehensive Plan

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 22, 1997

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and Chief Nuclear Officer
Northeast Nuclear Energy Company
c/o Mr. Richard T. Laudenat
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P.O. Box 128
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Please contact Phillip McKee at (301) 415-2040 if you need any additional information or clarification of the enclosure.

Sincerely,

William D. Travers, Director
Special Projects Office
Office of Nuclear Reactor Regulation

Docket Nos. 50-245, 50-336,
and 50-423

Enclosure: Questions and Comments on Northeast
Nuclear Energy Company's
Plan for Addressing Employee Concerns

cc w/encls: See next page

Northeast Nuclear Energy Company

Millstone Nuclear Power Station
Units 1, 2, and 3

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Hartford, CT 06106

Questions and Comments on Northeast
Nuclear Energy Company's Comprehensive Plan

1. Northeast Utilities Plan for Addressing Employee Concerns (Plan) emphasizes handling concerns once they emerge outside line management. Discuss those actions in the Plan focused on improving and providing for a safety-conscious work environment as the long-term goal.
2. ESCP should report to a sufficiently senior level in the organization to establish the independence and credibility of the ESCP. Also, reporting to a high level in the organization supports effective and lasting corrective actions. The Plan does not identify the location or reporting chain of the ESCP within the organization. What is the structure of the ESCP organization? What are the responsibilities and authority of the ESCP Director?
3. Discuss how independent assessment of discrimination concerns at Millstone will be performed pending completion of in-house training.
4. Discuss the resources necessary to achieve timely and thorough resolution of the action items.
5. Discuss how the Plan will use acceptable performance indicators. Section 2.4 discusses training for the new ESCP and states that "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[s] and their first line supervisor." How will this be measured? Similarly, items 2-10 and 10-11 establish a 90 percent goal when 100 percent would appear achievable.
6. How does the Plan address the findings and recommendations of the independent, third-party oversight program (ITPOP) organization?
7. Is there a distinction between identity-protection and confidentiality and associated measures needed to protect individuals raising concerns?
8. The method used to link actions identified in the Plan to the Action items identified in the Employee Concerns Task Force Report and the root causes identified in the Millstone Independent Review Group Report is difficult to follow and it is not clear that all root causes have been addressed.
- *9. The Plan emphasizes the importance and need for training on many aspects related to handling employee concerns. The Plan also refers to action plans to develop and implement this training. Regarding these training plans:
 - (a) What training will be provided to persons working at the Millstone Station related to the new ESCP? What training will be provided to persons who work in the corporate offices but have responsibilities at Millstone? What training will managers receive related to improvement of management and interpersonal skills?

Enclosure

- (b) When will training on "management - employee relations" be developed, implemented, and completed? What is training on "management - employee relations?" Will all personnel onsite complete the training? Will this training be provided to corporate personnel? How will the effectiveness of this training be measured?
 - (c) When will training of "Senior Management" be completed? What training will senior management receive? How many senior managers will receive this training? How will the effectiveness of the training be determined?
 - (d) What training will be provided to "Managers and First Line Supervisors?" When will this training be completed? Will all managers and first line supervisors be required to attend? How will completion of training be tracked? How will the effectiveness of the training be determined?
 - (e) When will "All Employees" training be completed? Will this training include contractors and other non-NU personnel? What training will be provided? How will the effectiveness of the training be determined?
 - (f) Discuss the training that will be provided to "ESCP Investigators and Intake Staff." When will the training be developed? Who will develop the training? What is the expected completion date? Will investigators and staff be required to complete the training prior to conducting investigations?
 - (g) Discuss the training that will be provided to "Human Resources Staff." When will the training be developed? Who will develop the training? How many people will receive this training? Will these people be assigned harassment, intimidation, and discrimination (HI&D) investigation responsibilities on a full-time basis? Will the human resources staff be required to complete the training prior to conducting investigations?
10. Section 1.2 states that line management is responsible for modifying the existing work environment. How far up the management chain does this responsibility go?
11. Section 2.2 states that the ultimate measure of success will be employee confidence in first-line management's ability to address and resolve concerns. How will employee confidence in those managers above the first-line level be measured? How will employee confidence in the revised ESCP be measured?
12. Discuss the process for referring concerns, which are brought to the ESCP, back to line management or other corporate offices. Discuss how these concerns will be tracked to completion using the ESCP.

- *13. What are the procedures to be followed if it is not possible to notify an individual that his or her identity could be compromised?
- 14. What are the criteria for becoming a member of the "Triage team?" Will the individuals be assigned on a full-time or part-time basis? Will their activities as triage team members be considered primary or collateral duties? What training will the team members receive?
- *15. Discuss how concerns presented to the ESCP will be tracked and trended.
- 16. Will the ESCP be able to identify the inability of some line management to communicate with employees? If so, how will such cases be dealt with?
- 17. What information will be provided to an individual that is not satisfied with the outcome of the Concerns Oversight Panel (COP) review?
- *18. Section 2.6 describes the COP. How many persons will be on this panel? The Plan only refers to the "intended" responsibilities of the COP. What will be the actual responsibilities of the COP? Who will select the members of the COP? What training will the COP members receive? What are the criteria for COP membership?
- 19. What is a "Chilling Effect Evaluation?" Who conducts this evaluation? Who are possible recipients of the evaluation?
- 20. What is the purpose of "employee peers" who serve as an interface between concerned individuals and the ESCP? What is the new corporate Peer Review Process, which supersedes the existing NU grievance procedure?
- 21. How will an investigation be performed, especially in a case that requires technical expertise that the ESCP staff does not have and was referred to the ESCP because the case could not be resolved by the line organization?
- 22. Discuss the mechanisms and controls that will be in place to ensure that the ESCP will continue to receive management support in the intermediate to long-term.
- * These topics were covered to various extents in Northeast Utilities' February 28 and March 27, 1997, letters to the NRC that provided action plans related to elements of the comprehensive plan. Discussion of these topics could include amplification on the information already provided.