

LICENSEE: Northeast Nuclear Energy Company (NNECO) June 25, 1997

FACILITIES: Millstone Nuclear Power Station Units 1, 2, and 3

SUBJECT: SUMMARY OF JUNE 3, 1997, MEETING WITH LITTLE HARBOR CONSULTANTS, INC. (LHC), AND NNECO TO DISCUSS ONGOING LHC ACTIVITIES AND FINDINGS

On June 3, 1997, the Special Projects Office (SPO) staff of the Office of Nuclear Reactor Regulation (NRR) participated in a publicly observed meeting with LHC and NNECO representatives. The purpose of the meeting was to discuss LHC's proposed changes to the Communications and Reporting sections of its proposed oversight plan and for LHC to present the findings from its ongoing oversight activities of NNECO's programs for handling employee safety concerns at the three Millstone units. During this meeting, LHC provided an update of its evaluation of the Millstone culture survey and the results of its programmatic review of NNECO's Employee Safety Concerns Program.

Enclosure 1 is a list of the principal attendees at the meeting. Enclosure 2 is the handout provided by NNECO that responds to questions raised by the NRC in correspondence and previous meetings with NNECO. Enclosure 3 is the handout used by LHC during its presentation.

Original signed by:

Helen N. Pastis, Senior Project Manager
Millstone ESCP and ITPOP Oversight
Special Projects Office - Licensing
Office of Nuclear Reactor Regulation

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

Enclosures: As stated (3)

cc w/encl: See next page

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Docket File

PUBLIC

SPO-L Memo

SPO Reading

OGC (w/o encls 2&3)

ACRS (w/o encls 2&3)

E-MAIL (w/encl 1 only)

SCollins/FMiraglia

RZimmerman

WTravers

PMcKee

SDembek

LBerry

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

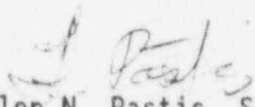
WASHINGTON, D.C. 20555-0001

June 25, 1997

LICENSEE: Northeast Nuclear Energy Company (NNECO)
FACILITIES: Millstone Nuclear Power Station Units 1, 2, and 3
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Helen N. Pastis, Senior Project Manager
Millstone ESCP and ITPOP Oversight
Special Projects Office - Licensing
Office of Nuclear Reactor Regulation

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

Enclosures: As stated (3)

cc w/encl: See next page

LIST OF ATTENDEES
June 3, 1997

NAME	ORGANIZATION
Phil McKee	NRC
Steve Reynolds	NRC
Drew Persinko	NRC
Carl Mohrwinkle	NRC
Bruce Kenyon	NNECO
Neil S. Carns	NNECO
David M. Goebel	NNECO
Ed Morgan	NNECO
Michael Brothers	NNECO
Pat Loftus	NNECO
John Beck	LHC
John Griffin	LHC
James Perry	LHC

Communications and Reporting

- **5.1 Introduction**
- **5.2 Requests For Information**
- **5.3 Formal Meetings and Written Reports**
- **5.4 Issuance of Observations, Conclusions and Recommendations**
 - **5.4.1 Observations**
 - **5.4.2 Conclusions**
 - **5.4.3 Recommendations**

Communications and Reporting

- **5.5 Press or Media Communication**
- **5.6 Communication Related to NRC Oversight of LHC**

5.0 COMMUNICATIONS AND REPORTING

5.1 Introduction

The oversight team considers stakeholders to be persons or organizations whose self-interest is impacted by the actions of the personnel and effectiveness of the management team at the Millstone site. This would include, but would not necessarily be limited to, the NRC, various state and local governmental entities, neighbors of the Millstone site, grass-roots organizations formed out of concern with past events or happenings at Millstone, former and current employees and the licensee management.

All of these stakeholder interests must be acknowledged as the independent oversight team proceeds with its activities. The oversight team will seek out and establish communications as early as possible with all stakeholders, particularly with those located off-site. Team members will document contacts and maintain confidentiality if requested.

5.2 Requests for Information

The nature of the Oversight Program is such that there will be a continuing need to request and receive information from NNECo. LHC will use a standard information request memorandum when seeking documents from NNECo. These memoranda will be maintained in LHC files for the duration of the project. There will be occasions when information will be provided to LHC during the course of interviews or attendance at site meetings. These transmittals will be documented in interview notes or notes summarizing meeting attendance.

5.3 Formal Meetings and Written Reports

The NRC Order requires that the oversight organization report at least quarterly on their activities. LHC intends to provide a detailed, written report to the NRC (provided to all stakeholders) on a quarterly frequency. In addition to the quarterly report, there will be pre-announced meetings on a frequency determined by the availability and significance of the results of LHC activities. LHC is of the view that the most efficient mechanism for providing such information to the stakeholders is to do so by having public meetings. This will simultaneously provide the information to the NRC, NNECo and the public. The materials presented in these meetings will be docketed by providing them in writing to the NRC and all parties on the NRC service list shortly after such meetings.

In cases where time is of the essence in providing feedback to the stakeholders, LHC will make such information available to the appropriate stakeholders either verbally or in writing, and follow up with verbal or written information to all stakeholders within three working days of such verbal or written notice. This subsequent communication to the public may be at a previously scheduled public meeting if it occurs within three working days of a time-sensitive need, or in writing by transmittal to the NRC service list. Copies of the summary will be made available to the public at the Waterford public library. Should any member of the public desire further elaboration regarding the material, a mutually agreeable time and setting for a discussion with LHC personnel will be arranged.

The intent of the LHC team is to reach a consensus for conclusions or recommendations made as a result of the team's work. This objective creates an atmosphere in which team members must vigorously defend their individual representations to other involved team members, should there be initially differing views. The objective of consensus also tends to weed out potentially extraneous positions quickly and thus raise the level of any debate regarding an issue. Should there be an instance where a team consensus is not established, the oversight report will include a clear delineation of the issue or issues and any minority views, including the basis for the departure from consensus. The minority views will be prepared by the team member or members who hold such views, thus assuring a full and fair presentation.

5.4 Issuance of Observations, Conclusions and Recommendations

LHC team feedback to the stakeholders will be either in writing or simultaneously presented at public meetings. There will be three categories used:

- 5.4.1 Observations, which will be used to describe a circumstance or emerging issue where the investigation or review has not been completed, but where enough information has been gathered to warrant bringing the subject to the attention of the stakeholders.
- 5.4.2 Conclusions, which will be used to describe a circumstance or issue where the facts are sufficiently clear and further review or investigation is highly unlikely to alter the facts.
- 5.4.3 Recommendations, which will be made when conclusions lead the team to specify a change in how NNECo management addresses a particular issue or circumstance, either by approaching the issue or circumstance in a different manner, or by incorporating previously unused actions. The team will not indulge in providing consulting advice to NNECo management, but will, in accordance with the requirements of the NRC Order, make

recommendations as appropriate when circumstances call for them.

5.5 Press or Media Communication

Press or media communication will be handled by the team leaders or by their specific direction to other team members.

5.6 Communications Related to NRC Oversight of LHC

The NRC will be exercising their required oversight of the LHC team by use of telephone conference calls, site visits and meetings. These communications will not require the presence of NNECo or the public.

MILLSTONE EMPLOYEE CULTURE SURVEY UPDATE

**Millstone
June 3, 1997
1:00 PM**

6/3/97

Employee Culture Survey Update

Expectation

- Ability to Measure Safety Culture at Millstone

6/3/97

Employee Culture Survey Update

Process for Evaluation

- Met With Developer of 1996 FPI Surveys
- Reviewed Alternative Safety Culture Survey
- Reviewed Nuclear Leadership Assessment

6/3/97

Employee Culture Survey Update

Conclusion 1: 1996 FPI Surveys Did Not Measure Safety Culture at Millstone

6/3/97

Employee Culture Survey Update

Conclusion 2: Alternative Safety Survey Will Measure Safety Culture If

- NU Adds:
 - "Conservative Decision Making" Questions; and
 - "Senior Management Endorses a Worker's Right to Raise Safety Issues Without Fear" Questions.

6/3/97

Employee Culture Survey Update

Conclusion 3: Nuclear Leadership Assessment Is Not a Safety Culture Survey

- Upward Performance Feedback Management Tool
- Employee Concerns Questions Added to Nuclear Leadership Assessment Are Redundant
- Administration Raises Concerns of Validity

6/3/97

Employee Culture Survey Update

Recommendations

- **Survey Must be Properly Administered to Deliver Meaningful Results**
- **Must Be Committed to Act on the Results**

6/1/97

Employee Culture Survey Update

Alternative Safety Culture Survey

1. General Importance of Safety at NU
2. Fear of Retaliation
3. Management Willingness to Listen
4. Management's Accountability Regarding Safety
5. Supervisor's Orientation Regarding Safety
6. Next Level Manager's Orientation Regarding Safety
7. Timeliness of Response to Concerns
8. Organizational Changes Effect on Safety
9. Conservative Decision Making's Effect on Safety
10. Senior Management Endorsing a Worker's Right to Raise Safety Issues

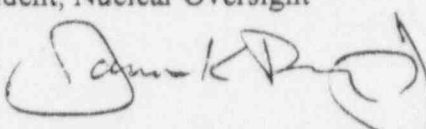
6/1/97

Employee Culture Survey Update

ITPOP Memorandum

Date: May 30, 1997

To: D. M. Goebel, Vice President, Nuclear Oversight

From: James K. Perry, Jr., LHC 

Subject: Addendum to Survey History - Review of "Safety Culture" Questions Added to June 1997 Survey

Reference: Attached 29 May, 1997 Letter to Michael Brown from Dr. Robert R. Albright

Because of the time sensitivity of this matter, I am providing my conclusions to you in writing. Per the draft protocol, the NRC has been sent a copy of this memo and it will be reviewed at the public meeting on June 3, 1997.

Conclusions—the use of Dr. Albright's "Safety Culture" constructs and their associated test items are found to be a potentially useful enhancement to your current (1996) survey instrument provided that :

- They are randomly distributed throughout the other survey questions in the same manner as was recommended for the NU group of employee concerns questions.
- A "conservative decision making" construct and associated test items is added.
- A "senior management endorses a policy that supports the workers' right to raise safety issues without fear of harassment, discrimination, or intimidation" construct and associated test items is also added.
- Be consistent, either use a 4 point scale for all like the one used in the FPI survey or convert to a 5 point scale as Dr. Albright recommends.

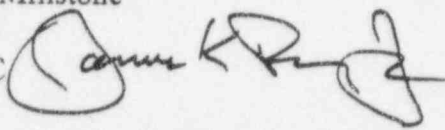
Attachment

cc: NRC-Russ Arrighi-Resident Inspector Unit 3

ITPOP Memorandum

Date: May 30, 1997

To: D. M. Goebel, Vice President, Nuclear Oversight
NNECo-Millstone

From: James K. Perry, Jr., LHC 

Subject: Addendum to Nuclear Leadership Assessment — Summer 1997

Because of the time sensitivity of this matter, I am providing my conclusion to you in writing. Per the draft protocol, the NRC has been sent a copy of this memo and it will be reviewed at the public meeting on June 3, 1997.

Conclusion:—The ten (10) employee concerns questions proposed for addition to the Nuclear Leadership Assessment are redundant to the anticipated culture survey.

cc: NRC-Ted Easlick SRI-Unit 1

PROGRAMATIC REVIEW OF NORTHEAST UTILITIES EMPLOYEE CONCERNS PROGRAM (ECP)

Millstone
June 3, 1997
1:00 PM

6/3/97

LHC Review of Employee Concerns Program

Expectations for the ECP

- Support by Senior Management
- Independence From Line Organizations
- Clearly Communicated to Employees Regarding Scope and Responsibilities
- Concerns Addressed in Thorough and Timely Manner by Competent Investigators
- Timely Corrective Actions Taken for Substantiated Concerns
- Mechanisms Provided for Feedback to and From Employees

6/3/97

LHC Review of Employee Concerns Program

Expectations for the ECP (Cont.)

- Management Overview of the Process
- Comprehensive Reports Providing Trending and Effectiveness to Management
- Site-wide Consistency for Organizations Outside of Line Who Receive and Process Employee Concerns
- Clearly Defined Interfaces Between the Above Organizations
- Supervisors/Managers Trained in ECP
- Staff Qualification Standards Established and Applied

6/3/97

LHC Review of Employee Concerns Program

Process for Evaluating the ECP

- Reviewed the ECP Manual Dated 4/14/97
- Reviewed the ECP Communications Plan Dated 3/27/97
- Interviewed Seven Members of the ECP Organization
- Discussed Interfaces and Other Protocol With 5 Managers of Organizations Outside the Line Who Receive and Process Concerns
- Reviewed Drafts of:
 - Rev 1 to ECP Manual
 - ECP Self-Assessment
- ECP Monthly Reports

6/3/97

LHC Review of Employee Concerns Program

Conclusion 1: The Documented Program Contains the Basics for an Improved ECP at Millstone

- Senior Management Support Is Evident
- Is Independent From Line Organizations and Reports to the VP Nuclear Oversight, With Dotted Line to the President and CEO Nuclear and to the NU Board of Trustees
- Provides for Communication of the ECP
- Describes an Adequate Approach for Receiving, Prioritizing, Investigating and Closing Concerns by the ECP Organization
- Provides for Confidentiality and Anonymity

6/3/97

LHC Review of Employee Concerns Program

Conclusion 2: The ECP Manual Does Not Address the Full Breadth of Employee Concern Processing

- Relies on Human Resources, Industrial Safety and Health, Internal Audit, System Security, and Site Security Organizations for Effective Intake, Investigations and Closure of Concerns
- Does Not Fully Address Expectations, Training and Consistencies Between These Organizations
- No Currently Developed Protocol to Govern Interfaces Between Organizations Addressing Employee Concerns

6/3/97

LHC Review of Employee Concerns Program

Conclusion 3: Does Not Provide for Expected Management Overview

- Management Review of Employee Concerns Is Not Described
- Data Base Is Not Adequately Detailed to Contain Information Needed to Generate Expected Trending
- ECP Monthly Report Lacks Expected Level of Detail

6/3/97

LHC Review of Employee Concerns Program

Conclusion 4: ECP Manual Lacks Some Elements

- Manual Does Not Contain Requirement for Conducting an Annual External Assessment of the ECP as Committed to in the CP (Action Item 10-13)
- Requires All NU Employees to Participate in an Exit Interview; However, Site Exit Process Does Not Assure They Will be Directed to the ECP

6/3/97

LHC Review of Employee Concerns Program

Conclusion 4: ECP Manual Lacks Some Elements (Cont.)

- Manual Does Not Address Coverage for Contractors at Off-Site Locations
- Handling of NRC Referred Allegations Is Not Covered
- Does Not Address Personnel Qualification and Training

6/3/97

LHC Review of Employee Concerns Program

ECP Self-Assessment Identified Deficiencies

- The ECP Concerns Resolution Process Is Flawed in Several Key Respects:
 - The Process Does Not Address How Investigative Findings Are Translated Into Corrective Actions
 - There Is No Formal Process for Corrective Action Tracking
 - There Is No Process for Evaluating the Effectiveness of Corrective Actions

6/3/97

LHC Review of Employee Concerns Program

Recommendations

NNECo Should Review and Revise the ECP Manual to Address the Following:

- Develop Common Standards and Criteria for Processing Concerns by All the Organizations Handling Employee Concerns
- Develop Clear Interfaces, Expectations Between These Organizations
- Implement a Management Overview of the Concern Process
- Provide Comprehensive Monthly Reports to Management Addressing Concerns Handled by All Organizations

6/3/97

LHC Review of Employee Concerns Program

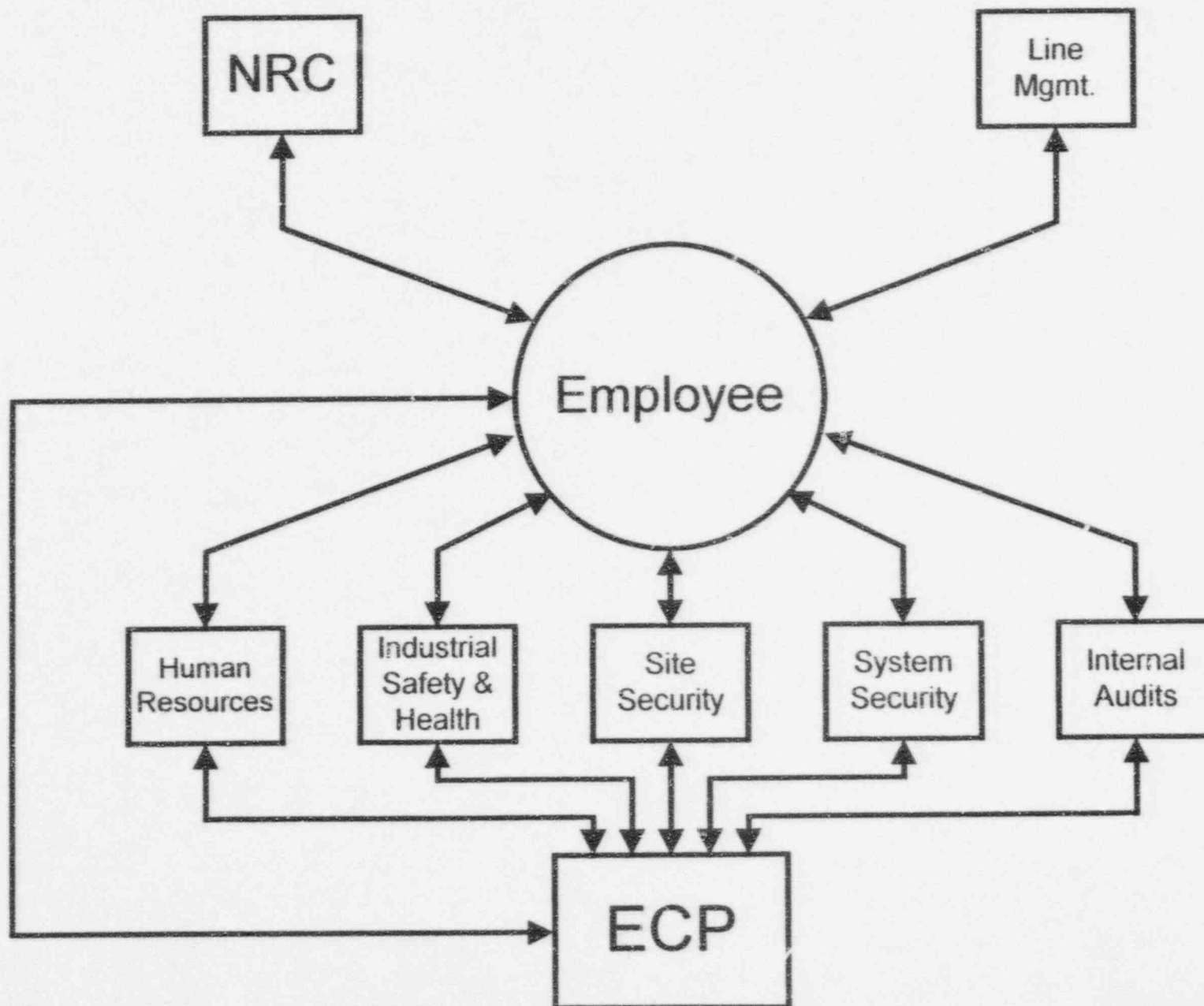
Recommendations (Cont.)

- Ensure the Elements Referenced in Conclusion 4 Are Addressed
- Implement Corrective Action for Self-Assessment Identified Items

6/3/97

LHC Review of Employee Concerns Program

ECP Interfaces



June 3, 1997

Attached is the Northeast Nuclear Energy Company's (NNECO) supplemental response to NRC letter from W. D. Travers to N. S. Carns, "Questions and Comments on NNECO's Plan for Addressing Employee Concerns," dated April 22, 1997. Specifically, Question #8 states:

"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 [MIRG] Report is difficult to follow and it is not clear that all root causes have been addressed."

NNECO concurs that the correlation of the Action Items in the Plan to the MIRG Report is difficult to follow. Therefore, we have developed a table (see attached) that clearly correlates the various Action Items to the MIRG Report.

This supplements the NNECO responses provided to the NRC at the May 21, 1997 public meeting.

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
The listing order does not imply relative significance of items.)

**MIRG Report
Root Cause No.**

MIRG Root Cause:

PROBLEM RESOLUTION AND PERFORMANCE MEASURES

7.1

"The [MIRG] team concluded that ineffective problem resolution processes have contributed to continued employee concerns at Millstone, forcing reliance on the Nuclear Safety Concerns Program (NSCP) process to resolve concerns that should have been corrected by routine processes. Examples of problem areas are faulty root cause processes, ineffective corrective action follow-through, lack of appropriate performance measures (especially in the area of measuring employee trust and confidence), and cumbersome management decisionmaking processes. The team also concluded that a lack of visible progress in resolution of the concerns identified by a 1995 NSCP self-assessment team has further eroded the confidence of Millstone employees that NU is serious about correcting the fundamental problem described in that self-assessment. Furthermore, several employees expressed concern that, based on experience, top management is unlikely to support the fundamental actions needed to effect change at Millstone."

<u>Comp. Plan Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF Tracking No.</u>
1- 1	Initiate Condition Reports (CRs) and/or track CRs submitted to implement corrective actions required or agreed to as a result of an ECP concern.	ECPS- 1
1- 2	Provide feedback to the Concerned Individual (CI) on a regular basis (or a memo to file if the CI is unknown).	ECPS- 2
1- 5	Provide accurate, real-time input to the ECP database system so that tracking and trending of activities can be completed.	ECPS- 5
1- 6	Escalate to the ECP Director those concerns that have not been properly dispositioned.	ECPS- 6
1- 9	Conduct or coordinate investigations to resolve concerns within 45 days.	ECPS- 9
2- 3	HR to conduct self assessment activities and report the results.	HR- 3
2- 5	Communicate philosophy, mission, and responsibilities of HR to all employees.	HR- 5
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.	HR- 6
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 opinions as positive attributes which gain employees positive recognition. HR to identify, review and revise procedures with ECP assistance.	HR- 9
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.	HR-11
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.	HR-14

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.

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3- 1	Define Employee Concerns Oversight Panel goals and objectives. Include the responsibilities of Paragraph 2.6 of the Plan as a minimum.	COP- 1
3- 3	Review Requests for Third Party Reviews submitted by ECP Director from Concerned Individuals.	COP- 4
4- 1	Develop, implement and complete initial ECP training for all employees.	T- 1
4- 3	Revise Managing For Nuclear Safety course to include ECP procedural requirements, and expected competencies.	T- 3
4- 5	Ensure adequate resources are made available to provide support staff (i.e. HR) training for addressing employee concerns.	T- 5
4- 6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T- 6
4- 8	Ensure that courses required for ECP Intake and Investigator staff are readily available for personnel to complete per the ECP performance goals.	T- 8
5- 1	Announce the NU Program for Addressing Employee Concerns and the new ECP.	CNO- 1
5- 3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.	CNO- 3
5- 5	Issue a statement of support for the Employee Concerns Oversight Panel to all Millstone personnel.	CNO- 5
5- 6	Issue an open letter to all Millstone personnel requesting identification of any new concerns.	CNO- 6
5- 7	Establish and post expectations to the work force regarding employee concerns.	CNO- 7
6- 9	Ensure supervisors complete a course on professional dissent.	SUP- 9
7- 2	All employees to cooperate in investigations.	EMP- 2
9- 3	Draft a letter, signed by CEO, Nuclear, inviting Millstone personnel who have interest in the Employee Concerns Oversight Panel to attend an orientation session.	ECPD- 3
9- 4	Conduct orientation for potential Employee Concerns Oversight Panel members.	ECPD- 4
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-15	Notify Employee Concerns Oversight Panel of action items not completed satisfactorily.	ECPD-15
9-17	Attend NRC meetings and briefings at Millstone on ECP-related issues.	ECPD-17
9-24	Provide to senior management, the Independent Third Party Oversight Panel (ITPOP), and Employee Concerns Oversight Panel current trend analyses of ECP activities.	ECPD-24
9-28	Assist the Training Department in review and revision of initial ECP orientation class. Include new expectations, policies, and procedures.	ECPD-28

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.

The listing order does not imply relative significance of items.)

9-30	Ensure contractors cooperate with NU in the completion of required investigations.	ECPD-30
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
10- 1	Increase executive visibility in the work place - "walking the talk", promote the new culture, ECP, and welcome the identification of concerns.	EXEC- 1
10- 2	Direct and support the issuance of the Problem Resolution Standard for Supervisors.	EXEC- 2
10- 5	Intervene as needed to ensure unresolved concerns are provided the necessary attention.	EXEC- 5
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.	EXEC- 7
10- 8	Complete the Managing For Nuclear Safety Course or be briefed on the revisions if the course has already been completed.	EXEC- 8
10- 9	Review action items not completed as reported by the ECP Director and determine what additional actions are necessary to support completion.	EXEC- 9
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.	EXEC-10
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.	EXEC-11
10-12	Ensure adequate resources are provided to execute the Plan.	VP- 1
10-14	Promulgate the roles and responsibilities of the Legal Department.	L- 1
10-15	Require the Legal Department to inform the ECP Director of employee concerns made known to them which have not been previously documented.	L- 2

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.

The listing order does not imply relative significance of items.)

MIRG Report
Root Cause No.

MIRG Root Cause:

SENSITIVITY TO EMPLOYEE NEEDS

7.2

"The [MIRG] team noted that some NU employees continue to perceive some managers as being insensitive to employee needs, thus creating some work environments in which dissent is discouraged."

<u>Comp. Plan</u> <u>Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF</u> <u>Tracking No.</u>
1- 3	ECP staff reinforce the need for all supervisors and employees to address concerns.	ECPS- 3
1- 7	Increase ECP visibility in the work place.	ECPS- 7
1- 9	Conduct or coordinate investigations to resolve concerns within 45 days.	ECPS- 9
2- 4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.	HR- 4
2- 5	Communicate philosophy, mission, and responsibilities of HR to all employees.	HR- 5
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.	HR- 6
2-11	Reinvigorate a management led program to celebrate and reward employees for the identification and resolution of significant concerns.	HR-10 HR-12 EXEC-12
2-16	Modify the supervisor assessment survey to ask questions that will allow the identification of "hot spots".	HR-17
4- 6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T- 6
5- 4	Recognize employees who identify and/or help resolve significant employee concerns.	CNO- 4
5- 7	Establish and post expectations to the work force regarding employee concerns.	CNO- 7
6- 1	Review, sign and post a copy of the Problem Resolution Standard for Supervisors in their work areas.	SUP- 1
6- 2	Actively solicit input from employees and address all identified issues per established procedures.	SUP- 2
6- 3	Respond to requests for information and assist in ECP investigations to support agreed schedules.	SUP- 3
6- 4	Complete required corrective actions per ECP Investigation.	SUP- 4
6- 5	Subordinates that are weak in any of the expected competencies will be evaluated and remedial action taken.	SUP- 5

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.

The listing order does not imply relative significance of items.)

6- 6	Ensure that Millstone Station personnel view the ECP video and discuss the ECP process semi-annually.	SUP- 6
6- 7	Include ECP performance goals in annual performance plans.	SUP- 7
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.	SUP- 8
6- 9	Ensure supervisors complete a course on professional dissent.	SUP- 9
8- 3	Assist the Nuclear Training Department in producing a management video to introduce the new ECP with emphasis on new culture, personnel and line managements resolution.	COM- 3
8- 8	Facilitate the ECTF's issue of a thank-you letter to all Millstone personnel.	ECTF- 4
9- 6	Assist in placing the permanent Employee Concerns Oversight Panel Administrator.	CNO- 9
9-10	Maintain safeguards to protect the confidentiality of Concerned Individuals who request confidentiality.	ECPD-10
9-12	Ensure PEER procedure is updated to reflect ECP revisions. Integrate PEER program into overall ECP communications plans.	ECPD-12
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-15	Notify Employee Concerns Oversight Panel of action items not completed satisfactorily.	ECPD-15
9-23	Develop a newly formatted ECP monthly report which will provide more insightful information to those reading it.	ECPD-23
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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 of retaliation.	ECPD-32
9-33	Ensure an adequate ECP knowledge base is present in the contractor work force demonstrated by completion of ECP training, and spot surveys.	ECPD-33
9-35	Draft a letter, signed by CEO, Nuclear, to former Millstone personnel seeking their input of potential technical concerns.	ECPD-35

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
The listing order does not imply relative significance of items.)

**MIRG Report
Root Cause No.**

MIRG Root Cause:

RELUCTANCE TO ADMIT MISTAKES

7.3

"The [MIRG] team concluded that management's reluctance to admit its mistakes has significantly impeded efforts to improve the corporate attitude toward Millstone employees who raise concerns. Among the significant examples of this tendency are a legalistic approach to dealing with employees and their concerns, protracted study of problems, continued denial of discrimination findings, the prevalence of a "shoot the messenger" attitude, and a failure to recognize the need for credible, independent assessment of discrimination concerns at Millstone."

<u>Comp. Plan Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF Tracking No.</u>
1- 2	Provide feedback to the Concerned Individual (CI) on a regular basis (or a memo to file if the CI is unknown).	ECPS- 2
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.	HR- 2
2- 3	HR to conduct self assessment activities and report the results.	HR- 3
2- 4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.	HR- 4
2- 5	Communicate philosophy, mission, and responsibilities of HR to all employees.	HR- 5
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.	HR- 6
2- 7	Support the ECP through timely responses to investigation requests in accordance with set schedules.	HR- 7
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.	HR- 8
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 opinions as positive attributes which gain employees positive recognition. HR to identify, review and revise procedures with ECP assistance.	HR- 9
2-10	Implement a survey to provide all employees the opportunity to participate in an assessment of their supervisor's performance. Establish a goal of 90% participation.	HR-11
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.	HR-14

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
The listing order does not imply relative significance of items.)

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.	COP-10
3-11	Review for potential "chilling effect" and determine if work place intervention is required by management.	COP-12
4- 6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T- 6
5- 2	CEO participate in a video presentation to introduce the Comprehensive Plan and the new ECP.	CNO- 2
5- 3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.	CNO- 3
5- 4	Recognize employees who identify and/or help resolve significant employee concerns.	CNO- 4
5- 5	Issue a statement of support for the Employee Concerns Oversight Panel to all Millstone personnel.	CNO- 5
5- 6	Issue an open letter to all Millstone personnel requesting identification of any new concerns.	CNO- 6
5- 7	Establish and post expectations to the work force regarding employee concerns.	CNO- 7
6- 9	Ensure supervisors complete a course on professional dissent.	SUP- 9
7- 4	Maintain a questioning attitude and make suggestions for improvement, question the status quo, and raise concerns as appropriate.	EMP- 4
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-16	Notify Employee Concerns Oversight Panel of alleged harassment, intimidation, discrimination & retaliation instances.	ECPD-16
9-17	Attend NRC meetings and briefings at Millstone on ECP-related issues.	ECPD-17
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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.	EXEC- 7
10-14	Promulgate the roles and responsibilities of the Legal Department.	L- 1

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
The listing order does not imply relative significance of items.)

MIRG Report
Root Cause No.

MIRG Root Cause:

MANAGEMENT STYLE AND SUPPORT FOR CONCERNED EMPLOYEES

7.4

"Several individuals at various organizational levels expressed the view that top leadership at NU has condoned an arrogant management style, for both technical and administrative functions, and has not been supportive of concerned employees. They felt that this deficit had been particularly noticeable in the human resources area, where the tendency to develop a legalistic approach to contest DOL findings of discrimination was evident. The [MIRG] team concluded that this perceived style had the potential to stifle dissenting views."

<u>Comp. Plan</u> <u>Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF</u> <u>Tracking No.</u>
1- 2	Provide feedback to the Concerned Individual (CI) on a regular basis (or a memo to file if the CI is unknown).	ECPS- 2
1- 7	Increase ECP visibility in the work place.	ECPS- 7
1- 9	Conduct or coordinate investigations to resolve concerns within 45 days.	ECPS- 9
2- 4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.	HR- 4
2- 5	Communicate philosophy, mission, and responsibilities of HR to all employees.	HR- 5
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.	HR- 6
2- 7	Support the ECP through timely responses to investigation requests in accordance with set schedules.	HR- 7
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.	HR- 8
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 opinions as positive attributes which gain employees positive recognition. HR to identify, review and revise procedures with ECP assistance.	HR- 9
2-11	Reinvigorate a management led program to celebrate and reward employees for the identification and resolution of significant concerns.	HR-10 HR-12 EXEC-12
2-16	Modify the supervisor assessment survey to ask questions that will allow the identification of "hot spots".	HR-17
3- 4	Provide assistance in dispute resolution for those case files as requested by the ECP Director.	COP- 5
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.	COP- 9

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
The listing order does not imply relative significance of items.)

3-11	Review for potential "chilling effect" and determine if work place intervention is required by management.	COP-12
4-6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T-6
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.	T-9
5-1	Announce the NU Program for Addressing Employee Concerns and the new ECP.	CNO-1
5-2	CEO participate in a video presentation to introduce the Comprehensive Plan and the new ECP.	CNO-2
5-3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.	CNO-3
5-5	Issue a statement of support for the Employee Concerns Oversight Panel to all Millstone personnel.	CNO-5
5-7	Establish and post expectations to the work force regarding employee concerns.	CNO-7
5-8	CEO announce approved recommendations contained in ECTF Report. Respond by letter to the ECTF to explain rationale for those items not approved.	CNO-8
6-1	Review, sign and post a copy of the Problem Resolution Standard for Supervisors in their work areas.	SUP-1
6-2	Actively solicit input from employees and address all identified issues per established procedures.	SUP-2
6-3	Respond to requests for information and assist in ECP investigations to support agreed schedules.	SUP-3
6-5	Subordinates that are weak in any of the expected competencies will be evaluated and remedial action taken.	SUP-5
6-6	Ensure that Millstone Station personnel view the ECP video and discuss the ECP process semi-annually.	SUP-6
6-7	Include ECP performance goals in annual performance plans.	SUP-7
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.	SUP-8
6-9	Ensure supervisors complete a course on professional dissent.	SUP-9
8-3	Assist the Nuclear Training Department in producing a management video to introduce the new ECP with emphasis on new culture, personnel and line managements resolution.	COM-3
8-5	Invigorate the PEER program by reintroducing the Peer Representatives to the work force.	COM-5
8-8	Facilitate the ECTF's issue of a thank-you letter to all Millstone personnel.	ECTF-4

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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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.	ECPD- 2
9- 3	Draft a letter, signed by CEO, Nuclear, inviting Millstone personnel who have interest in the Employee Concerns Oversight Panel to attend an orientation session.	ECPD- 3
9- 4	Conduct orientation for potential Employee Concerns Oversight Panel members.	ECPD- 4
9-12	Ensure PEER procedure is updated to reflect ECP revisions. Integrate PEER program into overall ECP communications plans.	ECPD-12
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-18	Develop a specific Community Outreach Plan as part of the overall communication plan to update Concerned Individuals and Groups on the ECP progress.	ECPD-18
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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 of retaliation.	ECPD-32
9-33	Ensure an adequate ECP knowledge base is present in the contractor work force demonstrated by completion of ECP training, and spot surveys.	ECPD-33
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.	ECPD-34
10- 1	Increase executive visibility in the work place - "walking the talk", promote the new culture, ECP, and welcome the identification of concerns.	EXEC- 1
10- 2	Direct and support the issuance of the Problem Resolution Standard for Supervisors.	EXEC- 2
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.	EXEC- 3
10- 4	Introduce the Managing For Nuclear Safety course (on a rotating basis).	EXEC- 4
10- 6	Support the goals of the ECP by effectively dealing with negative trends and poor supervisor, performance as identified by the ECP Director and/or Employee Concerns Oversight Panel.	EXEC- 6
10- 8	Complete the Managing For Nuclear Safety Course or be briefed on the revisions if the course has already been completed.	EXEC- 8
10-12	Ensure adequate resources are provided to execute the Plan.	VP- 1

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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**MIRG Report
Root Cause No.**

MIRG Root Cause:

COMMUNICATIONS AND TEAMWORK

7.5

"Communications appeared to be a continuing problem area, characterized by poor inter-departmental interaction, general failure to encourage questioning attitudes, and a tendency to manage by memorandum. Ineffective implementation of the concept of teamwork also appears to have contributed to employee concerns at Millstone."

<u>Comp. Plan Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF Tracking No.</u>
1- 7	Increase ECP visibility in the work place.	ECPS- 7
2- 5	Communicate philosophy, mission, and responsibilities of HR to all employees.	HR- 5
2- 7	Support the ECP through timely responses to investigation requests in accordance with set schedules.	HR- 7
2-12	Assign HR Reps to participate in ECP Intake/Investigator training.	HR-13
3- 4	Provide assistance in dispute resolution for those case files as requested by the ECP Director.	COP- 5
3- 6	Report assessment findings with recommendations to the CEO and to the Nuclear Committee of the Board of Trustees. (NCAT)	COP- 7
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.	COP- 9
3-10	Review ECP trend data.	COP-11
4- 1	Develop, implement and complete initial ECP training for all employees.	T- 1
4- 6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T- 6
5- 6	Issue an open letter to all Millstone personnel requesting identification of any new concerns.	CNO- 6
5- 7	Establish and post expectations to the work force regarding employee concerns.	CNO- 7
5- 8	CEO announce approved recommendations contained in ECTF Report. Respond by letter to the ECTF to explain rationale for those items not approved.	CNO- 8
6- 2	Actively solicit input from employees and address all identified issues per established procedures.	SUP- 2
6- 9	Ensure supervisors complete a course on professional dissent.	SUP- 9
7- 1	Report unresolved issues and concerns.	EMP- 1
7- 2	All employees to cooperate in investigations.	EMP- 2
7- 3	Participate in supervisory assessments and company surveys.	EMP- 3

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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7- 4	Maintain a questioning attitude and make suggestions for improvement, question the status quo, and raise concerns as appropriate.	EMP- 4
8- 1	Assist in the advertisement of the new ECP and other elements of the communication plan developed by the ECP Director.	COM- 1
8- 3	Assist the Nuclear Training Department in producing a management video to introduce the new ECP with emphasis on new culture, personnel and line managements resolution.	COM- 3
8- 4	Determine if a "Rumor Control Hotline" to address rumors and general questions is warranted and implement per a set schedule.	COM- 4
8- 5	Invigorate the PEER program by reintroducing the Peer Representatives to the work force.	COM- 5
8- 6	Facilitate the ECTF attendance at a public meeting to explain and promote the Comprehensive Plan.	ECTF- 2
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.	ECPD- 2
9- 3	Draft a letter, signed by CEO, Nuclear, inviting Millstone personnel who have interest in the Employee Concerns Oversight Panel to attend an orientation session.	ECPD- 3
9-12	Ensure PEER procedure is updated to reflect ECP revisions. Integrate PEER program into overall ECP communications plans.	PEER- 1
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-17	Attend NRC meetings and briefings at Millstone on ECP-related issues.	ECPD-17
9-18	Develop a specific Community Outreach Plan as part of the overall communication plan to update Concerned Individuals and Groups on the ECP progress.	ECPD-18
9-19	Develop an Intranet NU ECP Web page.	ECPD-19
9-23	Develop a newly formatted ECP monthly report which will provide more insightful information to those reading it.	ECPD-23
9-24	Provide to senior management, the Independent Third Party Oversight Panel (ITPOP), and Employee Concerns Oversight Panel current trend analyses of ECP activities.	ECPD-24
9-26	Develop protocol with the licensing department to investigate concerns referred by the NRC.	ECPD-26
9-27	Inform senior line management of concerns.	ECPD-27
9-28	Assist the Training Department in review and revision of initial ECP orientation class. Include new expectations, policies, and procedures.	ECPD-28
9-30	Ensure contractors cooperate with NU in the completion of required investigations.	ECPD-30

**CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT
CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS**

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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 of retaliation.	ECPD-32
9-33	Ensure an adequate ECP knowledge base is present in the contractor work force demonstrated by completion of ECP training, and spot surveys.	ECPD-33
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.	ECPD-34
10- 1	increase executive visibility in the work place - "walking the talk", promote the new culture, ECP, and welcome the identification of concerns.	EXEC- 1
10- 2	Direct and support the issuance of the Problem Resolution Standard for Supervisors.	EXEC- 2
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.	EXEC-10
10-15	Require the Legal Department to inform the ECP Director of employee concerns made known to them which have not been previously documented.	L- 2

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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**MIRG Report
Root Cause No.**

MIRG Root Cause:

MANAGEMENT ACCOUNTABILITY

7.6

"A general lack of management accountability and sense of ownership appeared to have contributed to current problems at Millstone. Managers were perceived as providing more emphasis on justifying the status quo, than on aggressively addressing and resolving employee-identified problems. Also, employees considered that supervisors responsible for discriminating against employees were not routinely disciplined in an appropriate manner."

<u>Comp. Plan Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF Tracking No.</u>
2- 1	Matrix the site HR organization to the President and CEO for a minimum of two years.	HR- 1
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.	HR- 2
2- 3	HR to conduct self assessment activities and report the results.	HR- 3
2- 4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.	HR- 4
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.	HR- 6
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.	HR- 8
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.	HR-11
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.	HR-14
2-14	Review and revise supervisor and employee position descriptions to address problem identification and resolution.	HR-15
2-15	Establish a leadership assessment which permits 360 degree reviews of site-wide supervision.	HR-16
3- 2	Develop and implement an operating procedure for the Employee Concerns Oversight Panel's activities.	COP- 2
3- 5	Oversee the performance and effectiveness of the ECP.	COP- 6
3- 6	Report assessment findings with recommendations to the CEO and to the Nuclear Committee of the Board of Trustees. (NCAT)	COP- 7

**CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROCT
CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS**

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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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.	COP-8
3-10	Review ECP trend data.	COP-11
3-12	Ensure audits and assessments of HR's and ECP's performance are completed on a periodic basis.	COP-13
4-6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T-6
5-1	Announce the NU Program for Addressing Employee Concerns and the new ECP.	CNO-1
5-3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.	CNO-3
5-5	Issue a statement of support for the Employee Concerns Oversight Panel to all Millstone personnel.	CNO-5
5-7	Establish and post expectations to the work force regarding employee concerns.	CNO-7
6-4	Complete required corrective actions per ECP investigation.	SUP-4
6-5	Subordinates that are weak in any of the expected competencies will be evaluated and remedial action taken.	SUP-5
6-7	Include ECP performance goals in annual performance plans.	SUP-7
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.	SUP-8
6-9	Ensure supervisors complete a course on professional dissent.	SUP-9
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.	PTF-1
7-2	All employees to cooperate in investigations.	EMP-2
7-3	Participate in supervisory assessments and company surveys.	EMP-3
8-2	Assist ECP Director in holding initial orientation meeting with employees.	COM-2
8-6	Facilitate the ECTF attendance at a public meeting to explain and promote the Comprehensive Plan.	ECTF-2
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-15	Notify Employee Concerns Oversight Panel of action items not completed satisfactorily.	ECPD-15
9-16	Notify Employee Concerns Oversight Panel of alleged harassment, intimidation, discrimination & retaliation instances.	ECPD-16

**CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT
CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS**

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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9-24	Provide to senior management, the independent Third Party Oversight Panel (ITPOP), and Employee Concerns Oversight Panel current trend analyses of ECP activities.	ECPD-24
9-25	Implement a database to identify and trend work place environment issues i.e., "chilling effect".	ECPD-25
9-26	Develop protocol with the licensing department to investigate concerns referred by the NRC.	ECPD-26
9-29	Solicit personnel to become members of the Employee Concerns Oversight Panel.	ECPD-29
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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.	ECTF-1
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.	EXEC-3
10-5	Intervene as needed to ensure unresolved concerns are provided the necessary attention.	EXEC-5
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 Employee Concerns Oversight Panel.	EXEC-6
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.	EXEC-7
10-8	Complete the Managing For Nuclear Safety Course or be briefed on the revisions if the course has already been completed.	EXEC-8
10-9	Review action items not completed as reported by the ECP Director and determine what additional actions are necessary to support completion.	EXEC-9
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.	EXEC-11
10-13	Commission an assessment of the ECP by an external evaluator (e.g. annually).	VP-2
10-15	Require the Legal Department to inform the ECP Director of employee concerns made known to them which have not been previously documented.	L-2

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

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MIRG Report
Root Cause No.

MIRG Root Cause:

NSCP IMPLEMENTATION

7.7

"On the basis of the large number of allegations received by the NRC, the [MIRG] team concluded that the NSCP has not been an effective vehicle for resolving employee concerns at Millstone. The team noted some indication of management support deficiencies, including inadequate NSCP resources, and insufficient independence and authority for NSCP to fully resolve issues."

<u>Comp. Plan</u> <u>Action Item No.</u>	<u>Comprehensive Plan Action Item Description</u>	<u>ECTF</u> <u>Tracking No.</u>
1- 2	Provide feedback to the Concerned Individual (CI) on a regular basis (or a memo to file if the CI is unknown).	ECPS- 2
1- 3	ECP staff reinforce the need for all supervisors and employees to address concerns.	ECPS- 3
1- 4	Implement and support the requirements of the ECP.	ECPS- 4
1- 8	Complete the intake/triage process within 5 working days after the Concerned Individual concurs with the concern being accurately documented or upon receipt of anonymous concerns.	ECPS- 8
1- 9	Conduct or coordinate investigations to resolve concerns within 45 days.	ECPS- 9
1-10	Complete required ECP Intake/Investigator training.	ECPS-10
2- 1	Matrix the site HR organization to the President and CEO for a minimum of two years.	HR- 1
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.	HR- 2
2- 4	Change the performance management competencies listed in LINKS to reflect those expectations from the new ECP Plan.	HR- 4
2- 7	Support the ECP through timely responses to investigation requests in accordance with set schedules.	HR- 7
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 opinions as positive attributes which gain employees positive recognition. HR to identify, review and revise procedures with ECP assistance.	HR- 9
2-12	Assign HR Reps to participate in ECP Intake/Investigator training.	HR-13
2-14	Review and revise supervisor and employee position descriptions to address problem identification and resolution.	HR-15
2-16	Modify the supervisor assessment survey to ask questions that will allow the identification of "hot spots".	HR-17
2-17	Provide for tracking and feedback to Concerned Individuals of the status of their concerns.	Not in ECTF

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

(Items are listed sequentially by Comprehensive Plan Action Item Number.
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3- 1	Define Employee Concerns Oversight Panel goals and objectives. Include the responsibilities of Paragraph 2.6 of the Plan as a minimum.	COP- 1
3- 2	Develop and implement an operating procedure for the Employee Concerns Oversight Panel's activities.	COP- 2
3- 3	Review Requests for Third Party Reviews submitted by ECP Director from Concerned Individuals.	COP- 4
3- 4	Provide assistance in dispute resolution for those case files as requested by the ECP Director.	COP- 5
3- 5	Oversee the performance and effectiveness of the ECP.	COP- 6
3- 6	Report assessment findings with recommendations to the CEO and to the Nuclear Committee of the Board of Trustees. (NCAT)	COP- 7
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.	COP- 3
3-10	Review ECP trend data.	COP-11
3-12	Ensure audits and assessments of HR's and ECP's performance are completed on a periodic basis.	COP-13
3-13	Define the role and reporting relationship of the Employee Concern Oversight Panel Administrator and Chairman.	Not in ECTF
4- 1	Develop, implement and complete initial ECP training for all employees.	T- 1
4- 2	Revise Plant Access Training to include an expanded ECP section.	T- 2
4- 3	Revise Managing For Nuclear Safety course to include ECP procedural requirements, and expected competencies.	T- 3
4- 4	Assist ECP Director in the identification, development, and delivery of ECP staff training.	T- 4
4- 5	Ensure adequate resources are made available to provide support staff (i.e. HR) training for addressing Employee Concerns.	T- 5
4- 6	Support the ECP Director by developing and implementing a new course for supervision addressing professional dissent.	T- 6
4- 7	Update Plant Access Training to include questions pertaining to the ECP.	T- 7
4- 8	Ensure that courses required for ECP Intake and Investigator staff are readily available for personnel to complete per the ECP performance goals.	T- 8
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.	T- 9
4-10	Provide for training of "Peer Representatives."	PEER- 2
5- 1	Announce the NU Program for Addressing Employee Concerns and the new ECP.	CNO- 1

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

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5- 2	CEO participate in a video presentation to introduce the Comprehensive Plan and the new ECP.	CNO- 2
5- 3	Hold assigned individuals responsible for implementing corrective actions for substantiated concerns.	CNO- 3
5- 4	Recognize employees who identify and/or help resolve significant employee concerns.	CNO- 4
5- 6	Issue an open letter to all Millstone personnel requesting identification of any new concerns.	CNO- 6
5- 7	Establish and post expectations to the work force regarding employee concerns.	CNO- 7
5- 8	CEO announce approved recommendations contained in ECTF Report. Respond by letter to the ECTF to explain rationale for those items not approved.	CNO- 8
6- 6	Ensure that Millstone Station personnel view the ECP video and discuss the ECP process semi-annually.	SUP- 6
6- 9	Ensure supervisors complete a course on professional dissent.	SUP- 9
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.	PTF- 1
7- 1	Report unresolved issues and concerns.	EMP- 1
7- 2	All employees to cooperate in investigations.	EMP- 2
8- 1	Assist in the advertisement of the new ECP and other elements of the communication plan developed by the ECP Director.	COM- 1
8- 2	Assist ECP Director in holding initial orientation meeting with employees.	COM- 2
8- 3	Assist the Nuclear Training Department in producing a management video to introduce the new ECP with emphasis on new culture, personnel and line managements resolution.	COM- 3
8- 5	Invigorate the PEER program by reintroducing the Peer Representatives to the work force.	COM- 5
8- 6	Facilitate the ECTF attendance at a public meeting to explain and promote the Comprehensive Plan.	ECTF- 2
8- 7	Help produce ECTF program recommendations, concept diagram, timelines and flow charts.	ECTF- 3
8- 8	Facilitate the ECTF's issue of a thank-you letter to all Millstone personnel.	ECTF- 4
9- 1	Retain temporary experienced investigator assistance to reduce the backlog and provide mentoring to staff.	ECPD- 1
9- 5	Format, implement, and maintain new ECP procedures and guidelines specified by the Plan. (i.e. Employee Concerns Resolution Form)	ECPD- 5

CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRG REPORT ROOT CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS

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9-6	Assist in placing the permanent Employee Concerns Oversight Panel administrator.	CNO-9 ECPD-9
9-7	Facilitate interviews for Employee Concerns Oversight Panel applicants.	ECPD-7
9-8	Attend first Employee Concerns Oversight Panel meeting to facilitate start-up.	ECPD-8
9-9	Establish and publish internal performance goals and objectives for inclusion in ECP staff's performance reviews.	ECPD-9
9-11	Implement new ECP procedure to address concerns.	ECPD-11
9-12	Ensure PEER procedure is updated to reflect ECP revisions. Integrate PEER program into overall ECP communications plans.	ECPD-12 PEER-1
9-13	Complete training for Vice President and Director level personnel in employee concerns and professional dissent.	ECPD-13
9-14	Update and distribute a revised ECP brochure.	ECPD-14
9-20	Develop job descriptions for intake and investigative personnel.	ECPD-20
9-21	Identify and select appropriate permanent staff to support the new ECP.	ECPD-21
9-22	Develop and publish an ECP organization chart.	ECPD-22
9-26	Develop protocol with the licensing department to investigate concerns referred by the NRC.	ECPD-26
9-28	Assist the Training Department in review and revision of initial ECP orientation class. Include new expectations, policies, and procedures.	ECPD-28
9-29	Solicit personnel to become members of the Employee Concerns Oversight Panel.	ECPD-29
9-31	Ensure all contractor supervisors on-site for more than six months have completed the Managing For Nuclear Safety and Professional Dissent courses.	ECPD-31
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 of retaliation.	ECPD-32
9-33	Ensure an adequate ECP knowledge base is present in the contractor work force demonstrated by completion of ECP training, and spot surveys.	ECPD-33
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.	ECPD-34
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.	ECTF-1
9-37	Provide Peer Representatives with necessary training.	PEER-2

**CORRELATION OF COMPREHENSIVE PLAN ACTION ITEMS, MIRC REPORT ROOT
CAUSES, AND EMPLOYEE CONCERNS TASK FORCE (ECTF) ACTION ITEMS**

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10- 4	Introduce the Managing For Nuclear Safety course (on a rotating basis).	EXEC- 4
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.	EXEC-10