

# OVERSIGHT PLAN

Northeast Nuclear Energy Company - Millstone Site

Independent Third Party Oversight Program (ITPOP)

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## APPENDIX A

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## **1.0 PURPOSE**

The purpose of this plan is to describe the process by which the Independent Third Party Oversight Program (ITPOP) team, established in response to the NRC Order dated October 24, 1996, will monitor and evaluate Northeast Nuclear Energy Company's (the licensee's) efforts to improve the safety culture at the Millstone Station.

## **2.0 SCOPE**

The independent third-party shall monitor and oversee the licensee's efforts to correct and prevent repetition of its past failures in its treatment of employee concerns and of those employees who raised such concerns. The oversight plan shall include observation and monitoring of the licensee's activities, performance of technical and audit reviews, investigation of concerns, and assessment of changes in the licensee's treatment of employee concerns as compared to past practices. This oversight will be comprehensive in scope and cover all NRC-regulated activities at the Millstone facilities. This oversight will continue until such time that the NRC determines that the licensee has demonstrated by its performance that the conditions that led to the requirement for the oversight have been corrected and that safety issues raised by employees are being evaluated and resolved in a timely manner.

The LHC team evaluation will consist of four principal activities:

- 1) Identifying (bench-marking) the past and present safety culture at Millstone.
- 2) Evaluations of Programs and Processes
- 3) Evaluation of Implementation of Programs and Processes
- 4) Measurement of Effectiveness of Program and Process Implementation

The LHC team will utilize several types of activities in the conduct of its evaluations; structured interviews with representative members of employee and contractor populations, employee surveys, observations of day to day activities at the Millstone facilities including work in progress, and the conduct of focus groups consisting of employees and contractor personnel. The LHC team will also conduct technical evaluations and audits of the licensee's responses to employee concerns and monitor the effectiveness of corrective actions taken to resolve these concerns.

The evaluations will focus on the licensee's efforts to correct and prevent repetition of past failures in its treatment of employee concerns, evaluate actions to create an environment in which employees and contractors are encouraged and feel free to



raise concerns, determine if the concerns once raised, are reviewed and resolved in a timely manner, and conduct assessments and evaluations of changes in the programs associated with employee concerns.

The first major activity will consist of "bench-marking" the existing conditions at Millstone with respect to the prevailing safety culture. Specifically, the oversight team will perform an assessment to determine the prevailing attitudes of the site population regarding all aspects of the handling of employee concerns. The oversight team will also conduct a detailed review of existing documentation, including internal and external evaluations and inspections, program descriptions, and procedures to identify programmatic issues that have contributed to the current problems.

Second, the oversight team will evaluate all programs and processes that are associated with the identification and resolution of employee concerns. Activities conducted to determine the adequacy of the programs and processes currently in place will include independent technical reviews and audits to validate the results of past evaluations and the status of on-going evaluations. During this phase, LHC will evaluate the Comprehensive Plan submitted by the licensee to determine if problems identified in past evaluations and the NRC's Order of October 24, 1996, are adequately addressed by the Plan. LHC will also make a determination whether the proposed actions contained in the Comprehensive Plan will correct the identified problems.

Upon completion of the first two activities, the oversight plan will be further refined to focus on specific activities identified as critical to improving the safety culture at Millstone and to measure progress toward creating an open and fair environment for addressing safety issues and employee concerns.

The third activity of the plan will consist of monitoring and evaluating the implementation of the various programs and processes associated with employee concerns. This activity will include the evaluation of plans developed to implement corrective actions; determining effectiveness of corrective actions; and determining the effectiveness and compliance with programs and procedures that fall within the framework of the employee concerns program. Programs and processes will be regularly observed and monitored to assure the proper components are incorporated and implementation is satisfactory.

The fourth activity will consist of monitoring the effectiveness of all activities at Millstone intended to improve the safety culture. This will be done using the various techniques described above. The oversight team will identify and quantify (where possible) changes in the environment at Millstone. The team will evaluate the licensee's self-assessment and performance effectiveness capability. This will be



done to assure that a safety-conscious work environment will be maintained at the Millstone site in the future.

### **3.0 ASSESSING MILLSTONE SAFETY CULTURE**

As stated above, one of the elements of the Oversight Plan focuses on the safety culture at Millstone and the licensee's efforts to improve it. As used in this plan, a healthy safety culture consists of a safety conscious environment in which employees are encouraged and feel free, without fear of retaliation, to raise concerns to their management, confident that the concerns will be addressed and resolved in a timely manner.

While it is difficult to define organizational cultures with precision, it is possible to identify general attributes that, when evaluated collectively, will describe the environment that exists within an organization. In the case of Millstone, the independent oversight team has developed a set of attributes that reasonably describe an "ideal" safety culture. These attributes will be used to measure the licensee's openness and receptivity to the timely identification and resolution of potential safety issues and concerns identified by employees.

#### **3.1 Assessment Approach**

The first major activity in the Oversight Plan is to perform an evaluation to characterize the current Millstone safety culture and thus establish a baseline. The LHC oversight team will review applicable reference material, including the results of internal and external assessments previously performed, inspections performed by the NRC, the results of employee surveys conducted by the licensee in the past five years and other information that may provide insight regarding the cause and characteristics of past and current problems. Using the information gained from these activities, the LHC team will design and conduct structured interviews with a representative sample of the site work force. It is anticipated that, based on past experience with similar activities, the combination of document reviews and structured interviews will provide sufficient information for the oversight team to characterize the attributes of the existing Millstone culture accurately. Once the site culture is sufficiently characterized by the LHC oversight team, the attributes of the current environment will be compared with those of an "ideal" environment as described below. Using this comparison as a template, methods will be developed to monitor progress toward achieving an environment closer to the "ideal" state.

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### 3.2 Attributes of an "Ideal" Safety Culture

This section identifies a set of attributes that, when present in an organization, generally indicates the existence of a strong safety culture. This culture is evidenced by the following behaviors and conditions:

3.2.1 Senior management endorses a policy that places priority on nuclear safety over production, supports the workers' right to raise safety issues and ensures that workers will not be subjected to harassment, discrimination or intimidation (H/I/D) if they do so. This policy is:

- Evidenced by senior management through the daily demonstration of their support for the policy and their individual actions;
- Communicated to employees on a wide basis through such means as newspapers, postings, training, and meetings.
- Discussed on a frequent basis to ensure that all management and supervision are aware of the policy, its consistent implementation, and senior management expectations;
- Supportive of an open door policy that allows and encourages employees to bring issues to higher levels of management.

3.2.2 Employee perceptions of the policy and its implementation are favorable.

3.2.3 Senior management provides training to all managers and supervisors to ensure that they understand and employ good management practices when dealing with employees who have safety concerns and do so with understanding. This training covers the following areas at a minimum:

- Policy and expectations,
- Responsibilities for all employees,
- Management/supervisory skills and techniques,
- Mutual respect at all levels,
- Laws and regulations governing employee rights,
- Establishing a good working environment,
- How the ECP functions and how to use it.

3.2.4 Members of the workforce have a sense of identity and are committed to the publicly stated goals and objectives of the organization, have respect for each other, communicate effectively both horizontally and vertically, and feel responsible for their own behavior.

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- 3.2.5 People at all levels of the organization treat each other with mutual respect
- 3.2.6 Employees exhibit a "Questioning Attitude" toward work and the work environment with respect to nuclear safety.
- 3.2.7 Positive recognition is given to employees who identify safety issues.
- 3.2.8 An effective and efficient corrective action program is functioning and all employees recognize that the normal (and preferred) method for addressing safety issues is through the line organization.
- 3.2.9 Senior management recognizes that some concerns may not be addressed through the normal line organization and has established an Employee Concerns Program (ECP) for handling such concerns. This program has been implemented to meet the following objectives:
- Respond effectively and thoroughly to concerns processed through it,
  - Protect employees who use the program,
  - Provide timely feedback to concernees,
  - Operate independent of line organizations.
- 3.2.10 There is no evidence that an atmosphere exists that has a "chilling effect" on the willingness of employees to report safety issues. Some conditions that could create a "chilling effect" are:
- An atmosphere where employees are reluctant to ask questions or raise safety concerns because of fear of reprisal,
  - Managers and supervisors belittle or punish employees for raising concerns,
  - Management personnel fail to respond to concerns and safety issues in a timely and adequate fashion,
  - Management personnel fail to take prompt and adequate actions against individuals who have intimidated other employees.
- 3.2.11 Independent and self-assessments are performed periodically to monitor performance and correct identified deficiencies.

### **3.3 Structured Interviews**

This section describes the approach that the LHC oversight team will take to conduct structured interviews to establish a baseline against and to



measure subsequent changes in the safety culture. It is important to compile information from a broad cross-section of the organization; however, selection of those to be interviewed will not be based on methodology intended to provide statistically significant results. The reason for not using a selection methodology that would yield statistically significant results is that such methodology requires completely random selection from the population to be sampled, and carries the additional requirement that the sampled population must be homogeneous. The team feels that the nature of the issues involved at the Millstone site is such that the selection of those interviewed should focus on obtaining a good cross-section of the site population with respect to organizational elements and location within the organizational hierarchy. The concepts of sample population homogeneity and random selection simply do not apply to a task of this nature.

The LHC oversight team will review the Millstone organizational charts and make decisions regarding the overall sample size needed to accomplish the requirements. The oversight team interviews will include individuals from each unit, department and each major organizational level -- manager, supervisor and worker. The actual selection process for interviewees will be quasi-random in that, aside from a few employees specifically identified to be interviewed because they occupy positions of special relevance to the overall objectives, individuals will be arbitrarily selected based only on attaining a comprehensive sample across the site organization. The oversight team will also meet with former employees and others. The team believes that former employees and concerned citizens have a unique perspective and can make significant contributions to the oversight activities.

Before the structured interviews are conducted, a site-wide announcement will be made to inform the organization about the interviews. Background information about the LHC oversight team's assessment will be provided to the site workforce. The communication effort will be designed to reach the entire site to assure that a solid understanding of the purpose of the LHC oversight team and the assessment effort exists. It will be noted in this announcement that the selection process is quasi-random, but that any employee who specifically wants to talk with the oversight team may do so. Employees and contractors will also be advised that all interviews are considered voluntary; i.e., anyone can decline to be interviewed without stating a reason and there will be absolutely no prejudice associated with that choice. It is expected that both individual and group interviews will be scheduled since peer groups provide an interactive dynamic that is often lost if only individuals are interviewed. The LHC oversight team leaders will select the specific individuals to be interviewed. Substitutions will be allowed only in circumstances which would result in severe impact on other site activities and only after consultation with the oversight team leader.

LHC oversight team members will concentrate on making the interview process and atmosphere conducive for interviewees to be candid and forthcoming about their perceptions, concerns, and recommendations for improvement. Each interview session will be started by advising the interviewees of the nature of the LHC oversight team mission, that the interviews are voluntary and informing them that the results of the interviews will not be attributed to any single individual. The thrust of the questions will be to determine the employees' perspectives on Millstone's overall safety culture and the mechanisms in place for reporting worker issues and concerns. The employee's perception of the effectiveness of those mechanisms will be probed. It will be determined if cultural factors are directly affecting willingness to express concerns, and whether more general cultural factors, including perceptions of management and Millstone's future might have an indirect affect on an individual's willingness to report a concern.

Once the data are gathered from the reviews of the reference material and from the interviews, the oversight team will analyze the information and characterize the predominant cultural elements at the Millstone site. This analysis will be done in accordance with an internal instruction. It is possible that the team will find a number of primary cultural elements, and a spectrum of sub-cultures within the three Millstone units. To the extent that degrees of sub-culture characteristics exist within any given unit, any variation within the sub-cultures will be identified if possible.

### **3.4 Employee Surveys**

The oversight team will review employee survey results with the primary objective of determining how the employees perceived the site safety culture. The LHC team will be particularly interested in which factors the employees feel were the most influential with regard to their willingness to bring forth safety concerns. Some of the factors that experience suggests may be present include:

- 3.4.1 Confidence in management,
- 3.4.2 Leadership skills evidenced by supervisors and managers,
- 3.4.3 Level of team work within each Millstone unit and between units,
- 3.4.4 Response of management to identified concerns involving both technical and human issues,
- 3.4.5 Mutual trust and respect between workers and management,
- 3.4.6 Presence of a questioning attitude,
- 3.4.7 Confidence in Corrective Action Programs,

3.4.8 Confidence in the Employee Concerns Program,

3.4.9 Absence of a "chilling effect",

3.4.10 Managements reaction to issues involving harassment, intimidation and discrimination,

### **3.5 Observations**

An additional assessment tool that will be employed by the oversight team will be the observation and monitoring of daily activities at the Millstone Station. Oversight team observations will include, but not be limited to:

- Daily planning meetings where problems are identified to management,
- Meetings where identified problems are categorized and prioritized,
- Meetings where corrective actions to identified problems are discussed,
- Maintenance activities,
- Safety meetings,
- Shift turnover meetings,
- Control room observations,
- ECP activities,
- Training classes for supervisors on handling employee concerns,
- Meetings where the root cause of identified problems is discussed,
- Inspection and audit activities.

Observation can provide insights to the morale of the workforce, identify issues that are of importance to employees, provide an indication of the level of confidence that employees have in their management team, and detect if management communications are being disseminated effectively throughout the organization. These factors will all provide insight to the nuclear safety culture present at Millstone.

Observations will be conducted during normal working hours, and on back shifts and weekends. The observation activities will be conducted with the



intent of assessing the extent to which the Millstone site reflects the characteristics of healthy safety cultures as described earlier in this plan.

Oversight team members conducting observations will be required to document their observations. This documentation will include date, time, unit, description of the work activity or meeting, and a detailed list of what was observed. In addition, the documentation will include any concerns or questions that resulted from the observation activity. The observation reports will be distributed to other team members for subsequent review and analysis to determine the extent to which the observed activities or behavior exhibited by employees or contractors provide insight into the prevailing safety culture at Millstone.

Results of the observations, including the conclusions reached as a result of analysis by the oversight team, will be provided to stakeholders in each quarterly report. In addition, the findings and conclusions of the team will be used to focus and direct future LHC oversight activities.

#### **4.0 PROGRAMMATIC EVALUATIONS**

A key element of the oversight activities to be conducted by the LHC oversight team is verification that the programs being used to correct existing problems at the site and to prevent recurrence of these problems have been properly designed and subsequently implemented by the licensee. This section identifies these programs and describes the approach to be taken by the LHC oversight team to conduct its oversight of these programmatic activities.

##### **4.1 General Approach**

The LHC oversight team will employ a consistent approach for evaluating the several licensee programs whose successful implementation LHC believes will contribute significantly to an improved safety culture at Millstone. These programs include at a minimum the following:

###### **4.1.1 The licensee's Comprehensive Plan.**

The licensee's Comprehensive Plan should serve as the guiding document for all of the licensee's efforts to identify and correct safety concerns and to establish a climate at the Millstone site such that any safety concerns identified in the future are resolved properly and timely. The LHC oversight team will conduct a thorough programmatic evaluation of this plan as one of its initial efforts to assure that it is comprehensive in scope, broadly focused and that its approaches are technically sound. Any subsequent revisions to the plan will also be reviewed programmatically by the LHC oversight team. The licensee's implementation of the plan will be subject to continuing oversight by the team.

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#### 4.1.2 The Employee Concerns Program (ECP).

The licensee is obligated to maintain an ECP that provides an alternate means for all site personnel to report safety issues. LHC will review the ECP using the evaluation process described in Section 4.2.

The first phase of the LHC evaluation will be to perform a programmatic evaluation of the ECP to assure that the program has been designed with the appropriate attributes to achieve effective performance. This programmatic evaluation will include attributes that specifically examine needed improvements in the treatment of employee concerns compared to past practices.

The second phase of the LHC evaluation will address implementation of the full range of ECP activities associated with the handling of employee concerns. Examples of anticipated oversight activities include:

- Auditing and reviewing the handling of specific concerns
- Evaluating the timeliness and thoroughness of investigations
- Determining how employees are kept informed of the results of reviews
- Examining how confidentiality is maintained
- Observing ECP interactions with concerned individuals
- Reviewing the qualifications and training of investigators
- Evaluating reporting and communications with management
- Reviewing how anonymous concerns are handled
- Measuring the effectiveness of the overall implementation of the ECP

As part of the overview of implementation of the ECP, the LHC team will also perform some independent investigations of concerns and cases of alleged harassment, intimidation and discrimination, independent technical reviews, and make recommendations to address specific concerns.

#### 4.1.3 Various corrective action programs that are intended to provide for the day-to-day identification of problems/issues and to assure the adequate resolution of these problems/issues.

The licensee is obligated to maintain a corrective action program (such as the Adverse Conditions Report process) that enable personnel to identify items of potential safety concern, such as plant

hardware deficiencies, inadequacies or errors in procedures, inaccuracies in drawings, etc. In a properly functioning safety-conscious environment, such programs will be used to capture and track to successful resolution and closure the vast majority of problems and concerns that arise. Therefore, such programs will be the subject of both programmatic and implementation evaluations by LHC, as described in Section 4.2.

The programmatic evaluation will focus on ensuring that the appropriate attributes are included within the normal corrective action programs. These attributes will cover all of the essential activities including identification, classification, analysis, resolution, tracking and trending.

The implementation evaluation will include many of the same oversight activities that are detailed in Section 4.2, and will focus on the collective effectiveness of process performance. The implementation evaluations will address the human interaction aspects associated with performing the process as well as compliance with the purely administrative requirements.

#### 4.1.4 The Root Cause Evaluation Program through which actions are identified for implementation to prevent the recurrence of problems.

The licensee's root cause evaluation program, if properly designed and implemented, will play a continuing role in identifying the cause(s) of problems/failures that have safety significance. Corrective actions derived from root cause analyses will have to be properly implemented to assure that the cause(s) do not reoccur. The oversight team will evaluate the licensee's root cause evaluation program using the approach described in 4.2 to ensure that it is properly designed and implemented.

#### 4.1.5 Various programs used at Millstone to conduct technical evaluations that are required to resolve problems/issues.

Once an identified potential problem or concern is determined to require an evaluation by the licensee's engineering organization, these programs are employed to determine whether or not the identified item is a valid problem and, if so, guide the development of a technical solution to the problem. As such, these programs represent critical barriers that prevent the plant's hardware and its operation from deviating from its design and license basis.



Therefore, they will be subjected to programmatic evaluations by the LHC oversight team.

## **4.2 Evaluation Process**

The approach to be used to evaluate these programs will consist of the following disciplined steps:

- 4.2.1 Identify the objectives established by the licensee for the program being evaluated. This will be accomplished by reviewing program documentation and interviewing personnel responsible for designing and implementing the program.
- 4.2.2 Based on the knowledge of the LHC oversight team members and available industry documentation of good practices, establish an objective set of attributes that the program, once implemented, would be expected to meet.
- 4.2.3 Compare the program documentation (manuals, procedures, etc.) of the program of concern with the attributes established above to identify strengths and weaknesses in the design of the program.
- 4.2.4 Evaluate implementation of the program in the field. This will be accomplished by comparing a representative sample of both in-process and completed documents generated through operation of the program of concern with relevant attributes from the set established for the program. In addition, structured interviews will be conducted with people who are managing operation of the program and people who have identified problems/issues that were subsequently processed through the program.
- 4.2.5 Scrutinize further any examples of less-than-adequate outputs from the program to determine cause(s) for the poor performance, weaknesses in program design, weaknesses in program implementation, lack of training or clear instructions on program usage for the user in the field, etc.
- 4.2.6 Document any program weaknesses and report overall conclusions, including specific strengths and weaknesses, and provide timely feedback to licensee management (in accordance with communications protocol) so that actions can be taken to correct the weaknesses.
- 4.2.7 If necessary, conduct further evaluations of the program or specific elements following this same general approach until the data gathered clearly demonstrate successful implementation of the program of concern.

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## **5.0 COMMUNICATIONS AND REPORTING**

**5.1 Introduction** The primary reporting and communication obligation for the oversight team will be to the NRC and the licensee. Because of the degree of interest in events at the Millstone site within the community at large, other persons and entities will be included in communications by the oversight team. The team considers these other stakeholders to include 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, and former and current employees at Northeast Utilities who were associated with Millstone. All of these stakeholder interests will be acknowledged as the LHC oversight team proceeds with its activities. The oversight team will seek out and establish communications with all stakeholders. Team members will document contacts and maintain confidentiality if requested.

### **5.2 Administration and Scheduling**

There will be a continuing need throughout the course of the project to schedule meetings and interviews with licensee personnel and handle administrative support matters such as office space, access processing, mailing, bulk reproduction and temporary visitor access to the site. This type of contact will be carried out in the routine course of business. There will also be a need from time to time to deal with commercial matters that arise in the normal course of a business engagement. These administrative and commercial matters are outside the scope of oversight matters which are the legitimate interest of the NRC and other interested stakeholders, and will be dealt with as needed without notifying the other parties.

### **5.3 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 the licensee. These memoranda will be maintained in LHC files for the duration of the project. Information provided to LHC during the course of interviews or attendance at site meetings will be documented in interview notes or notes summarizing meeting attendance.

### **5.4 Formal Meetings and Written Reports**

The NRC Order requires that, "Reports on oversight activities, findings, and recommendations shall be provided to both the licensee and the NRC at least quarterly following NRC approval of the oversight plan." In accordance

with the NRC Order, LHC intends to provide a detailed, written report to the licensee and NRC (also provided to other stakeholders) quarterly. In addition to the quarterly report, there will be pre-announced meetings with the licensee 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 licensee, NRC, and other stakeholders is to do so by having meetings open to the public. During these meetings, LHC will present observations, conclusions and recommendations to the licensee. It is expected that the licensee will take advantage of these meetings to respond to previously docketed recommendations or to ask for any clarifications of currently provided information or recommendations. 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 licensee, LHC will make such information available to the licensee either orally or in writing, and follow up with oral or written information to all stakeholders within three working days of such oral 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.

## **5.5 Characterization of Observations, Conclusions and Recommendations**

LHC team feedback to the licensee and the NRC will be either in writing or simultaneously presented at meetings open to the public. There will be three categories used in reporting the results of team activities:

- 5.5.1 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 licensee.
- 5.5.2 Conclusions (findings), 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.
- 5.5.3 Recommendations, which will be made when conclusions lead the team to specify the need for a change in how licensee 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



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provide consulting advice to licensee management, but will, in accordance with the requirements of the NRC Order, make recommendations as appropriate when circumstances call for them.

- 5.5.4 Consensus. 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.

## **5.6 Press or Media Communication**

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

## **5.7 Communications Related to NRC Oversight of LHC**

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

## 6.0 MEMBERSHIP

This section establishes the responsibilities that will be assigned to the various members of the LHC oversight team. It also describes the process that will be used to add new or replacement members to the oversight team.

### 6.1 Responsibilities

The table below lists the responsibilities assigned to members of the LHC oversight team.

**LHC Oversight Team Member Responsibilities**

Name	Specific Responsibilities	Global Responsibilities
John W. Beck	<ul style="list-style-type: none"> <li>• Serve as Team Leader</li> <li>• Communicate with all stakeholders</li> <li>• Assure development of LHC oversight team infrastructure               <ul style="list-style-type: none"> <li>– Project plans, including closure plan</li> <li>– Team procedures</li> <li>– Schedule for team activities</li> </ul> </li> <li>• Provide direction to team members as appropriate</li> <li>• Provide reports to stakeholders</li> <li>• Provide for overall administration of team affairs</li> <li>• Revise plans and schedules and redirect team efforts as appropriate in response to team findings and the changing environment</li> <li>• Monitor and evaluate team performance</li> <li>• Select replacement and/or additional team members as needed</li> <li>• Participate in structured interviews to characterize site safety culture</li> </ul>	<p><b>The responsibilities listed below in this cell apply to all team members.</b></p> <ul style="list-style-type: none"> <li>• Conduct all activities to high ethical and professional standards</li> <li>• Treat all sensitive material in a confidential manner</li> <li>• Adhere to the team's administrative requirements, including procedures and other administrative guidelines</li> <li>• Avoid fraternizing with or soliciting work from any stakeholder</li> </ul>

Name	Specific Responsibilities	Global Responsibilities
John M. Griffin	<ul style="list-style-type: none"> <li>• Serve as Deputy Team Leader</li> <li>• Assist Team Leader in carrying out his responsibilities</li> <li>• Serve as Acting Team Leader in absence of Team Leader</li> <li>• Participate in assessing Millstone site safety culture by conducting interviews of site employees</li> <li>• Monitor and evaluate team performance</li> <li>• Provide direction for technical assessments</li> <li>• Develop a plan for communicating with all stakeholders</li> </ul>	
R. F. Englmeier	<ul style="list-style-type: none"> <li>• Perform a programmatic assessment of licensee's Comprehensive Improvement Plan</li> <li>• Perform a programmatic assessment of licensee's ECP</li> <li>• Perform ongoing assessments of the implementation of licensee's Comprehensive Improvement Plan</li> <li>• Perform ongoing assessments of the implementation of licensee's ECP</li> <li>• Assist in assessing the site safety culture by conducting employee interviews</li> </ul>	<p><b>The responsibilities listed below apply to the team members listed from here to the end of this table.</b></p> <ul style="list-style-type: none"> <li>• Participate in other team activities as directed</li> <li>• Provide team leaders with reports of his activities and recommendations as appropriate</li> </ul>
B. P. Garde	<ul style="list-style-type: none"> <li>• Provide legal input to the team</li> <li>• Investigate selected cases of alleged harassment and intimidation (H&amp;I) and/or discrimination. This will include both current and past cases as appropriate</li> <li>• Perform assessments of Millstone site's safety culture</li> <li>• Communicate with external stakeholders</li> <li>• Perform assessments of Millstone ECP and implementation</li> </ul>	
D. P. Irwin	<ul style="list-style-type: none"> <li>• Provide legal input to the team</li> <li>• Investigate selected cases of alleged harassment and intimidation (H&amp;I) and/or discrimination. This will include both current and past cases as appropriate</li> </ul>	



Name	Specific Responsibilities	Global Responsibilities
A. B. Cutter J. W. Poston D. R. Ferguson T. K. Snyder	<ul style="list-style-type: none"> <li>• Conduct technical evaluations and reviews</li> <li>• Perform audits</li> <li>• Provide reports and recommendations to the team leaders</li> <li>• Assist in the assessment of the Comprehensive Improvement Plan and ECP implementation</li> </ul>	
J. D. E. Jeffries	<ul style="list-style-type: none"> <li>• Conduct periodic comprehensive self-assessments of the LHC oversight team's activities and assure that corrective actions are taken to remedy any deficiencies</li> </ul>	
J. M. Perry	<ul style="list-style-type: none"> <li>• Design and direct Millstone surveys</li> <li>• Assist in performing assessments of Millstone site's safety culture</li> <li>• Perform assessment of licensee's Comprehensive Improvement Plan</li> </ul>	
A. Ward	<ul style="list-style-type: none"> <li>• Manage office administrative business</li> <li>• Respond to team members' needs for administrative and clerical assistance</li> </ul>	
Clerk	<ul style="list-style-type: none"> <li>• Perform various clerical activities as directed</li> </ul>	

## 6.2 Selection of Team Members

The selection criteria for the original members of the LHC oversight team were based on the technical, management and organizational aspects of the NRC order that directed the formation of the team and the licensee's request for proposal for creation and operation of the team. Criteria used in the selection of team members include:

- 6.2.1 Prior experience assessing employee concerns programs
- 6.2.2 Management experience
- 6.2.3 Identification of any prior direct involvement with the licensee, its subsidiaries, or Millstone site activities subject to oversight. No team member will be allowed to participate in any oversight activity with which the team member was previously involved
- 6.2.4 Possession of sound and mature judgment and a reputation for objectivity and for maintaining high standards of professional and ethical conduct
- 6.2.5 Experience in assessing organizational performance

6.2.6 Commitment to support the project

6.2.7 Technical experience in various identified areas

In the event that a team member needs to be replaced or aspects of the tasks that the team must perform require that additional and/or different expertise be available, replacement or additional members will be selected based on the considerations and criteria that were used in the selection of the original team members. The Team Leader will notify the NRC and the licensee of any additional or replacement team members.

## 7.0 SECURITY

One aspect of maintaining team independence and effectiveness is assuring that information obtained by the team is adequately secured, protected and communicated only to those with a need to know. Contacts with stakeholders, other than for the routine collection of information for the LHC oversight team's work, will be originated or authorized by the Team Leader or Deputy Team Leader.

Security has two distinct elements: (1) protection of information in the LHC oversight team's possession, and (2) protection of the identity of sources of information. Protection of the identity of sources is set out in Section 9 below. The techniques listed below will be followed by all team members to assure that effective security is maintained over information in the team's possession:

- 1) Documents containing confidential information will be kept secure in an approved locked cabinet; they will not be left unattended.
- 2) Confidential information will be discussed only with people having a need to know and limited to as few people as possible. Confidential information will be discussed with persons outside the team only with the advance authorization of the Team Leader or Deputy Team Leader.
- 3) Password-protect functions will be used when processing confidential files using electronic media (by E-mail, on floppy discs, on hard drives, or over local area networks). Computers will be turned off when users are not present, or the password-protected program that contains any sensitive documentation will be exited.
- 4) Good judgment is expected when discussing or using confidential information. For example:
  - Close office doors, limit use of speaker phones, etc.
  - If it becomes necessary to retrieve or identify a document that contains a concerned individual's name, an effort will be made to

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get the document with other documents of the same type at the same time so that the relevant document is masked by others.

- If it becomes necessary to review a document with someone outside the oversight team, the names on the document will be obliterated. If necessary to protect the identity, the oversight team member(s) will review similar, but irrelevant, documents of the same type as well as the relevant document.
- All pages of documents containing confidential information shall be marked "CONFIDENTIAL".

## **8.0 SELF-ASSESSMENT**

A system of checks and balances, primarily in the form of a self-assessment process, will be implemented as an integral part of the independent oversight plan. The self-assessment process will follow well-established principles and be performed at two levels. The first, or fundamental level, of self-assessment will be focused on the LHC oversight team's performance regarding their ability to meet the specific objectives contained in the oversight plan and the NRC Order of October 24, 1996. The second level of self-assessment will be conducted to verify that the team and team members are maintaining the appropriate level of independence and objectivity.

Members of the LHC oversight team will be instructed in the practical elements of self-assessment, and be well-versed on the performance objectives of this project. This orientation and instruction will provide a level of consistency, and help assure that each team member contributes to the self-assessment process in a meaningful way. The team will use a defense-in-depth oversight model to aid in the communication of the results of our self-assessments. This model may also provide a framework for determining where the oversight team might apply its resources to be more effective.

Approximately once per quarter, an assessment will be conducted to evaluate the performance of the oversight team to-date. This evaluation will cover specifically how the oversight team has dealt with the implementation of scheduled activities in the oversight plan and NRC order. Actual progress will be assessed against expected progress towards achieving stated objectives. Oversight team work products will be evaluated for quality and conformance with the plan, and the allocation of resources will be reviewed to assure the appropriate level of involvement has occurred. In addition, the oversight plan will be reviewed to assure it still contains the right set of activities, mid-course corrections will be recommended and the oversight plan modified as appropriate.



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## 9.0 ALLEGATIONS BROUGHT TO THE LHC OVERSIGHT TEAM

The LHC oversight team recognizes that, due to its role in the licensee's recovery efforts and its independent status, it is possible that an individual or a group may bring a nuclear safety, harassment, intimidation, or discrimination issue directly to the team. In the event this occurs, the following actions will be taken:

- 1) The concerned individual will be treated in a respectful and confidential manner.
- 2) At the very outset the concerned individual will be advised of the limitations of the NRC Order of October 24, 1996, in regards to confidentiality as explained below. Assuming the individual is comfortable with continuing the discussion, the role and functions of the LHC oversight team will be briefly described.
- 3) Discussions will be held in a private setting, and with a minimum needed number of persons present. When appropriate, discussions may be held at off-site locations or outside normal working hours to enhance confidentiality.
- 4) The concerned individuals will be asked if they have:
  - Brought the concern to their supervisor or manager through normal channels (*i.e.*, told their direct supervisor, told a higher level manager, written a work order, *etc.*)
  - Taken it to the Employee Concerns Program. If they have not, they will be asked to explain why in an effort to understand the problem. In addition there will be an attempt to encourage and facilitate the reporting of safety concerns through existing channels.
- 5) If they decline to use normal channels, they will be told that the team must document any information received about their concern and submit it to the NRC.
- 6) Concerns received anonymously (*i.e.*, in the mail, pushed under the door, *etc.*) will also be submitted to the ECP and copied to the NRC without the concerned individual's identity.
- 7) Confidential logs of all concerned individual contacts and their concerns will be maintained by the LHC oversight team.

The NRC's Order of October 24, 1996, requires that neither the identity of persons with safety concerns nor information relating to safety concerns or harassment, intimidation

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or discrimination be withheld from the NRC. The LHC oversight team will assure, as outlined in items 1-7 above, that any safety or harassment, intimidation or discrimination information or allegations received are transmitted to the NRC. The team will not withhold any individual's name, but will honor individual requests for protection of their identity in the manner set out in steps 1-7 above.

### Appendix A, Requirements Matrix

Requirements of the Order	Location Where Addressed in Plan
1. Develop and submit an oversight plan for NRC approval.	Section 1.0
2. Oversee the implementation of NNECo's Comprehensive Plan.	Section 4.1
3. Monitor and oversee efforts to correct and prevent repetition of its past failures in its treatment of employee concerns and of those employees who raised such concerns.	Section 2.0
4. Make recommendations to Licensee's programs and processes for handling concerns.	Section 4.1
5. Assess changes in Licensee's treatment of employee concerns.	Sections 3.3 and 4.1
6. Audit and review Licensee's handling of employee concerns.	Section 4.1
7. Oversee investigations of concerns.	Sections 4.1
8. Determine timeliness and thoroughness with which concerns are reviewed and resolved, including how employees are informed of results.	Section 4.1
9. Make recommendations to address specific concerns.	Section 4.1
10. Audit and determine adequacy of investigations into H, I&D.	Section 4.1
11. Investigate, when necessary, cases of alleged H, I&D.	Section 4.1
12. Observation and monitoring of Licensee activities.	Section 2.0 and 3.5



### Appendix A, Requirements Matrix

13.	Performance of technical and audit reviews.	Section 4.1
14.	Assessing and monitoring Licensee's performance.	Section 2.0
15.	Monitor corrective actions.	Section 4.1
16.	Examine actions to create an environment where employees and contractors are encouraged to raise concerns.	Section 4.1
17.	Conduct employee surveys (structured interviews).	Section 3.3 and 3.4
18.	Report concurrently to NRC and NNECo, at least quarterly, results of activities, findings and recommendations.	Section 5.4
19.	Develop procedure for concurrent reporting of oversight activities, findings and recommendations to the NRC and NNECo.	Section 5.4
20.	Develop procedure to protect identity of allegeders.	Section 7.0
21.	Handle allegations received by LHC.	Section 9.0