



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
Washington, D.C. 20555

INSPECTION AND ENFORCEMENT MANUAL

DI

TEMPORARY INSTRUCTION 2512/15

INSPECTION OF WATTS BAR NUCLEAR PLANT EMPLOYEE CONCERNS PROGRAM

2512/15-01 PURPOSE

The purpose of this Temporary Instruction (TI) is to provide guidance for performing inspections of the Employee Response Team (ERT) program presently being conducted at TVA's Watts Bar Nuclear Plant (WBNP).

2512/15-02 OBJECTIVE

The objective of this inspection program is to gather sufficient information to make a determination as to whether or not TVA's ERT program has satisfactorily addressed employee concerns for nuclear safety that were identified during the employee interviews and that these concerns have been satisfactorily resolved.

2512/15-03 RESPONSIBILITIES

The inspection will utilize personnel from Region II, NRR, IE, and OI. Office responsibilities in terms of team leadership, inspection scheduling, report preparation, etc., will be determined through discussions with Region II, IE and NRR management.

2512/15-04 BACKGROUND

04.01 TVA has implemented the ERT program at WBNP to systematically collect and investigate employee concerns relating to the design and construction of WBNP specifically and the TVA nuclear power program in general. TVA's independent Nuclear Safety Review Staff (NSRS) has been assigned the responsibility for the ERT program. An independent contractor, Quality Technology Corporation (QTC), has been hired by TVA to perform employee interviews and investigate concerns in accordance with procedures approved by NSRS.

The ERT program provides for QTC to interview approximately 5,000 employees, including those at the Watts Bar site and TVA Office of Engineering employees assigned to the Watts Bar

Issue Date: 11/18/85

Project. Concerns raised by the employees during interviews or via a special telephone hotline are documented by QTC. Documents transmitted by QTC to NSRS are only those from which all items identifying the employee(s) raising the concern have been deleted. Potentially safety related concerns are generally investigated by either QTC or NSRS. Concerns involving intimidation and harrassment of employees are referred to TVA's Office of the General Council (OGC). ERT Investigation Reports are forwarded to the TVA line organizations for evaluation and corrective action.

QTC maintains a confidential file, for each concern, which contains information that could be used to identify the person expressing the concern. TVA, including NSRS, has no access to these files. ERT Investigation Reports prepared by QTC are summaries of the investigation which have been purged of all information which QTC believes could be used to identify the person expressing the concern. It is possible that the summarization or purging could result in an ERT Investigation Report which does not adequately represent the specific concern or reflect its relationship to the entire design and construction process.

Extreme care is being taken by QTC to protect the anonymity of the employees raising concerns. NRC personnel should handle this information as required by NRC procedures defining methods to be used to protect confidential sources during investigations.

- 04.02 The completed ERT Investigation Reports are forwarded by NSRS to the appropriate TVA line organization. The line organization evaluates the deficiency(cies) for specific corrective action, generic implications, applicability to other TVA nuclear plants, and required action(s) to prevent recurrence, etc. The line organization reports the results of their evaluation, and any necessary corrective actions, back to NSRS, and through NSRS to QTC. Either NSRS or QTC can request further review or changes to the proposed corrective action. After NSRS and QTC are satisfied with the TVA line organization response, QTC notifies the employee who raised the concern of the corrective action.
- 04.03 An initial inspection of the ERT program was performed July 15-18, 1985 by Region II, IE and NRR personnel. ERT procedures were reviewed, QTC and NSRS personnel were interviewed, and a limited number of reports for completed investigations were reviewed (see IR 50-390/85-49). The inspection concluded that the implementing procedures, documentation of results, qualifications of personnel, and program independence were generally adequate.

2512/15-05 INSPECTION REQUIREMENTS

- 05.01 An inspection plan should be developed which includes both monitoring of the ERT program and periodic inspections of ERT program activities and results. (An initial inspection of the ERT program and adequacy of its initial procedures and implementation has been performed. See Section 04.03 above.)
- 05.02 At least two additional inspections should be made, one when acceptable TVA line organization responses have been received by NSRS for about 40 percent of the concerns, and one when acceptable TVA line organization responses have been received by NSRS for the majority of the concerns. The first inspection will provide the bases for any necessary recommendations for changes in the program, and the second inspection will provide a basis for final evaluation of the ERT program. Other inspections involving an increased sample size may be necessary as indicated by the results of the monitoring program.
- 05.03 The following actions should be accomplished, as necessary, during inspection of the ERT program:
- a. Review ERT procedures.
 - b. Review statements of concerns (Employee Concern Assignment Requests).
 - c. Review ERT Investigation Reports.
 - d. Review potentially reportable concerns (Requests for Reportable Evaluation).
 - e. Interview QTC and NSRS supervisors and managers.
 - f. Interview QTC interviewers.
 - g. Interview QTC and NSRS investigators.
 - h. Review QTC files.
 - i. Review QTC trending of concerns.
 - j. Perform independent confirmatory inspections to verify ERT Investigation Reports.
 - k. Review proposed TVA corrective actions.
 - l. Interview TVA line organization supervisors and managers.
 - m. Perform independent inspections to verify implementation of corrective actions.

- 05.04 Personnel participating in development and implementation of the inspection plan should be familiar with the ERT program and procedures. (A previous inspection has found these procedures to be generally adequate. See Section 04.03 above.)
- 05.05 Through execution of the two (or more) inspections described in Section 05.02, above, a substantial sample of the final ERT Investigation Reports should be reviewed--approximately 20 percent for potentially safety-related concerns and approximately 5 percent for nonsafety-related concerns. The reports for nonsafety-related concerns should be evaluated for whether their classification as nonsafety-related appears appropriate. The reports for potentially safety-related concerns should be evaluated for such items as:
- Was the investigation adequate to establish the facts?
 - Had the deficiency identified by the concerns been previously identified and corrected if required (i.e. unsatisfactory inspection reports, nonconformance reports, design change requests, corrective action plans, etc.)?
 - Was potential reportability per 10 CFR 50.55(e) and 10 CFR 21 correctly determined?
 - Is the concern sufficiently specific for NRC inspectors to verify through inspection that the description of the discrepancy(ies) is correct?

A subset (about half) of this sample of final ERT Investigation Reports, selected as most significant to safety, shall be identified for in-depth review. The QTC files for this subset should be requested and reviewed. Where appropriate, interviews should be held with QTC interviewers and investigators and NSRS investigators.

- 05.06 A sample (about 20 percent) of reports completed by the TVA line organization should be reviewed for such items as:
- Was the evaluation by the line organization adequate?
 - Is the planned corrective action appropriate?

A subset (approximately half) of this sample, selected as most significant to safety, shall be reviewed in detail to verify that the corrective action has been implemented. The review shall include interviews with the TVA line personnel who evaluated the concern(s) and performed inspection of the corrective actions, and independent NRC inspection of the completed work.

05.07 In general, the samples selected in Sections 05.05 and 05.06, above, should include concerns which cover the spectrum of disciplines, i.e., design, procurement, construction (electrical, instrumentation, mechanical, civil, structural, welding and NDE), quality assurance and quality control.

The selection of subsets of concerns for in-depth review should be based on evaluation of individual technical significance, possible generic implications, trends of discrepancies and apparently inadequate corrective action programs.

05.08 Review TVA Quality Assurance Audit Reports (and associated records) pertaining to the ERT program.

2512/15-06 EXPIRATION

This TI will remain in effect until the close of FY 86 or the above described inspection is completed, whichever occurs earlier.

2512/15-07 IE CONTACT

Questions regarding this TI should be addressed to K. Hooks, IE/DI/RCPB, phone number 301-492-4143.

2512/15-08 MODULE TRACKING SYSTEM INPUT

The hours expended in performing the above inspection should be reported under module 2512/15 on NRC Form 766.

END