

## Attachment C

From Steve Whitely, Chief Steward, Beaver Valley Power Station

In 2003 when the NRC issued the order restricting overtime for armed responders at nuclear power plants, Beaver Valley Power Station (Shippingport, Pa.), owned and operated by 1<sup>st</sup> Energy Corp., was not prepared for various reasons to fully comprehend and implement the order as instructed.

Let us review the environment to understand the Beaver Valley case. 1<sup>st</sup> Energy contracts its security requirements to Securitas Security Services, USA, at Beaver Valley while maintaining its own security force at its two other nuclear sites. When the order was implemented, no one, from the contractor to the licensees' management had a full understanding. Therefore the front line management and officers were ignorant of the full intent and requirements of restricted overtime. There were no training requirements relating to the order for seasoned officers or new hires.

The contractor was experiencing an abnormal amount of employee turnover in the officers' ranks. The extraordinary amount of turnover amounted to one or more officers a day resigning, which reflected a major problem with the fatigue order requirement.

The licensee's security managers position was filled by an engineer without a security background. This also contributed to implementation problems.

Contractor and licensee's people skills managing the security force were non-existent which led to the resignation of 60-plus officers in nine months.

Front line responders (officers) were calling the regional office of the NRC complaining of excessive overtime (violations) and treatment of officers. Letters were written to the company's president outlining the many problems.

Officers finally made contact with the Project On Government Oversight, who launched an investigation which resulted in the Washington, D.C., office of the NRC starting its own probe of Beaver Valley.

At the conclusion of these investigations and meetings in Washington, Beaver Valley Power station went into a complete transformation, as follows:

- 1) Licensee assigned a security manager from its Perry Plant with an extensive security background;
- 2) Management set goals for improvement and posted items for all to track progress and completion;

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3) Contractor changed hiring practices whereby recruiting candidates with a mature work history and background who could be retained;

4) Management asked for input from union committee representing response officers;

5) Training department initiated training on the fatigue order as part of new hire training;

6) Licensee set a 60 hour administrative limit on total hours worked per week (7 days);

7) Officers started being treated with dignity and respect. Input and suggestions were encouraged and welcomed. Officers started taking part in shift briefings and staff meetings;

8) Senior leadership teams (site) acknowledged past mistakes and supported new approach as related to the entire security department.

In summary, when we all set a work environment that starts with mutual respect and dignity, involving your officers in security decisions you solve the retention issue which makes compliance with the fatigue order was not only the proper thing to do as it relates to responding to a hostile attack, it also allows officers a family and social life, with some normalcy which fosters good employee relations. This is Beaver Valley today, not perfect, but 100 percent better than yesterday.