



**TVA Standard
Programs and
Processes**

TITLE
**Expressing Concerns and Differing
Views**

TVA-SPP-11.8.4
Rev. 0000
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Revision Log

Revision or Change Number	Effective Date	Affected Page Numbers	Description of Revision/Change
0	09-23-2010	All	Initial Issue - Conversion from Communications Practice 5 - Policy wiki - Expressing Concerns and Differing Views in its entirety and modifications to reflect the implementation of TVA's Non-Nuclear Employee Concerns Program and other identified alternate concerns resolution avenues. Reviewed September 23, 2010, and will be reviewed again by September 23, 2011.

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1.0 PURPOSE

TVA encourages the voluntary expression of concerns and differing views. Employees, contractors, and others who support TVA functions are encouraged to express concerns and differing views, cooperate, and participate in the investigation of concerns and in the development of concern resolution without fear of reprisal, thus furthering the employees' fulfillment of duties, productive efforts, observance of standards and a safety conscious work environment.

2.0 SCOPE

TVA is committed to ensuring a safety conscious work environment that encourages employees to feel free to raise concerns and/or offer opinions without fear of retaliation.

This procedure applies to all TVA employees, contractors, and others who support TVA functions.

TVA places special emphasis on differing views on substantive public health, environmental and safety matters.

Review Cadence: This procedure will be reviewed annually with the review documented in the revision log.

3.0 PROCESS

Employees are encouraged to seek resolution of concerns and differing views with their immediate supervisor and to proceed up their management chain if necessary to achieve resolution. However, differing views may be voiced to any management level at any time.

Every employee has the right to have his or her concerns or point of view heard by management when the employee considers the issue significant and the view differs from a management decision which has been made or is pending. It is TVA policy that every responsible view is valuable and should be heard and appropriately considered in decision-making processes

Harassment, intimidation, retaliation, or discrimination will not be tolerated. Any person found guilty of such acts will be subject to disciplinary action, up to and including termination.

Employees who believe they have been subjected to reprisal (which includes any form of harassment, intimidation, retaliation, or discrimination) for **expressing concerns or differing views** should report it to any member of TVA's management team, his or her human resource representative, Office of the Inspector General, or to an alternative concerns resolution source identified in Section 3.2, Instructions.

Employees who disagree with the final disposition of an occupational health or safety issue may file a complaint in writing to the:

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3.0 PROCESS (continued)

Occupational Safety and Health Administration
Regional Office
61 Forsyth Street, SW
200 Constitution Avenue, N.W.
Atlanta, Georgia 30303

Telephone: (404) 562-2300
Fax: (404) 562-2295

Employees who believe violations of Nuclear Regulatory Commission (NRC) rules or terms of the license have occurred associated with the design, construction or operation of a TVA nuclear plant should report suspected violations immediately to their supervisor. Employees are free to contact the NRC directly with issues associated with the design, construction, or operation of a TVA nuclear plant. Employees may contact the NRC through an NRC inspector or contact the:

U.S. Nuclear Regulatory Commission, Region II
Marquis One Tower
245 Peachtree Center Avenue, NE
Atlanta, Georgia 30303-1257
Telephone: (404) 997-4000
Toll Free: (800) 577-8510

NRC Toll Free Safety Hotline:

Toll Free: (800) 695-7403

3.1 Roles and Responsibilities

3.1.1 Employees, Contractors, and Others who Support TVA Functions

- Are encouraged to resolve issues directly with their immediate supervisor and to proceed up their management chain if necessary so corrective action may be handled promptly and at the working level.
- May at any time express their concerns or differing views to any management level or to any alternate concerns resolution source identified in Section 3.2.

3.1.2 Supervisors

- Have principal responsibility for ensuring the implementation of the procedure.
- Ensure that concerns and differing views are heard and appropriately considered in decision-making processes.
- Provide protective measures to encourage participation without fear of reprisal.
- Refer unresolved issues through the chain of command as far as necessary.

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3.1.3 Line Management

- Pursue concerns and differing views whether they are received directly or brought to them by an alternate concerns resolution method.
- Ensure a work environment that encourages the voluntary expression of concerns and differing views involving all aspects of its activities.
- Inform management through chain of command of differing views and/or concerns that have not been resolved.
- Detect and correct any perception of retaliation.

3.1.4 Executive Leadership

- Administer this procedure for their organizations.
- Inform the CEO through the chain of command of differing views that have not been resolved to the satisfaction of the employee.
- Ensure a work environment that encourages the voluntary expression of concerns and differing views involving all aspects of its activities.
- Detect and correct any actual or perceived issues of harassment, intimidation, retaliation, or discrimination.

3.1.5 Executive Vice President and Chief Nuclear Officer, Nuclear Generation

- Is responsible for matters relating to receiving, assessing and, as appropriate, reporting to the NRC defects and noncompliances related to nuclear safety for TVA's operating nuclear plant sites.

3.1.6 Senior Vice President, Nuclear Generation Development and Construction

- Is responsible for matters relating to receiving, assessing and, as appropriate, reporting to the NRC defects and noncompliances related to nuclear safety for TVA's nuclear construction sites.

3.1.7 TVA Employee Concerns Program (Nuclear and Nonnuclear)

- Receives concerns and differing views from employees, contractors, and others who support TVA functions:

On referral, after line management and the employee have been unable to resolve the issues, or

Directly, if the employee believes that pursuit of the issues with line management would be ineffective.

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**3.1.7 TVA Employee Concerns Program (Nuclear and Nonnuclear)
(continued)**

- May receive and act upon concerns or differing views that are made in confidence or anonymously.
- Executes a confidentiality understanding at the request of the employee.
- Provides its findings to the responsible organization.
- Notifies employees of investigation findings and corrective actions.
- Evaluates unresolved issues/concerns appropriately to ensure timely resolution.
- Refers to the Inspector General:

Alleged violations of law and employee conduct regulations, including allegations of reprisal.

Allegations of waste, fraud, and abuse.

Other matters within the Inspector General's investigative jurisdiction.

3.1.8 Operating Support and Fleet Governance, Safety Programs

- Represents the Designated Agency Safety and Health Official in matters involving differing views on occupational health and safety issues.
- Receives, investigates, and provides for resolution of differing views on issues of occupational health and safety associated with TVA activities.
- May receive concern and/or differing views:
 - On referral, after line management and the employee have been unable to resolve the issue, or
 - Directly, if the employee believes that pursuit of the issues with line management would be ineffective.
- May receive and act upon differing views made in confidence or anonymously.
- Maintains confidentiality at the request of the employee.
- Provides follow-up reports with findings and recommendations both to the employee and the responsible organization.
- Monitors implementation of recommendations.
- Makes recommendations to the appropriate corporate officer where further action by the responsible organization is deemed necessary.

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3.1.8 Operating Support and Fleet Governance, Safety Programs

- Refers reports of reprisal to the Inspector General for investigation and, as requested, assists in the health and safety aspects of such investigations.
- Refers reports of nuclear safety issues to TVA's Nuclear Power Group or to Nuclear Generation Development and Construction, as appropriate, for investigation and, as requested, assists with the occupational health and safety aspects of such investigations.

3.1.9 Office of the Inspector General

- Receives and as the Office of the Inspector General determines appropriate investigates:

Allegations of known or suspected violations of laws, regulations, or TVA policies and procedures.

Concerns about the efficiency and economy of TVA programs and operations, including allegations of mismanagement, waste, fraud, and abuse.

Allegations of reprisal by superiors or coworkers for expression of differing views.

- May receive allegations in confidence or anonymously.
- As appropriate, consults with and provides information to Human Resources, Health & Safety, on occupational health and safety issues.
- As appropriate, consults with and provides information to TVA's Nuclear Power Group or to Nuclear Generation Development and Construction on nuclear safety issues.

3.1.10 TVA Ombudsman

- Serves as an independent, TVA-wide consultant-mediator for internal and external (general public) concerns not addressed through an existing formal concern resolution process.
- May receive concerns in confidence or anonymously.
- As appropriate, refers internal or external concerns to an existing formal concerns resolution process for handling.
- As appropriate, consults with and provides input and information to TVA organizations relative to resolution of concerns.
- As appropriate, monitors concerns to ensure closure.

3.1.11 Human Resources

- A. Receives, investigates, and provides for resolution of concerns and differing views on personnel management issues.

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3.1.11 Human Resources (continued)

- B. May receive differing views:
- a. On referral, after line management and the employee have been unable to resolve the issue, or
 - b. Directly, if the employee believes that pursuit of the issue with line management would be ineffective.
- C. May receive and act upon differing views made in confidence or anonymously.
- D. Maintains confidentiality at the request of the employee.
- E. Provides follow-up reports with findings and recommendations both to the employee and the responsible organization.
- F. Monitors implementation of recommendations.
- G. Makes recommendations to the appropriate corporate officer where further action by the responsible organization is deemed necessary.
- H. Refers reports of reprisal to the Inspector General for investigation and, as requested, assists in such investigations.
- I. Refers reports of nuclear safety issues to TVA's Nuclear Power Group or to Nuclear Generation Development and Construction, as appropriate, for investigation and, as requested, assists with the occupational health and safety aspects of such investigations.
- J. As appropriate, consults with and provides information to the General Manager, Safety Programs regarding safety issues.

3.1.12 TVA Labor Relations Staff

Receives, investigates, and provides for the resolution of concerns and differing views associated with represented workers.

3.1.13 Equal Opportunity Compliance (EOC) Staff

Counsels, investigates, and provides for the resolution of matters relating to federal regulations governing discrimination or retaliation on the basis of genetics, sex, race, national origin, religion, age, or disability. EOC staff processes and impartially resolves complaints filed by persons who believe they have been discriminated against in employment matters as defined in TVA-SPP-11.7.2, Equal Opportunity Compliance.

3.1.14 Ethics Staff

- Represents the Designated Agency Ethics Official in matters involving concerns and/or differing views on business ethics and integrity.
- Provides advice and counsel to individuals and business units on applicable ethics laws and standards.

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3.1.15 President and Chief Executive Officer

Reviews and acts upon concerns and/or differing opinions expressed by employees to management that have not been resolved to the satisfaction of the employee and informs the Board as necessary.

3.2 Instructions

Employees are strongly encouraged to seek resolution of concerns and/or differing views with their immediate supervisor and to proceed up their management chain if necessary to achieve resolution. However, differing views may be voiced to any management level at any time or through an avenue identified below.

Individuals who . . .	Should contact . . .
believe they have been subject to reprisal (which includes any form of intimidation, harassment, or discrimination) for expressing concerns or differing views .	Appropriate TVA Manager or Office of the Inspector General.
disagree with the final disposition of an occupational health or safety issue .	Occupational Safety and Health Administration Regional Office 61 Forsyth Street, SW Atlanta, Georgia 30303 Telephone: (404) 562-2300 Fax: (404) 562-2295
believe violations of Nuclear Regulatory Commission (NRC) rules or terms of the license have occurred associated with the design, construction, or operation of a TVA nuclear plant.	Their supervisor immediately. Employees are also free to contact the NRC directly: NRC Inspector (or) U.S. Nuclear Regulatory Commission, Region II Marquis One Tower 245 Peachtree Center, Suite 1200 Atlanta, Georgia 30303-1257 Telephone: (404) 997-4000 Toll Free: 1-800-577-8510 (or) NRC Toll Free Safety Hotline: 1-800-695-7403
have concerns about discrimination or retaliation in the workplace on the basis of genetics, sex, race, national origin, religion, age, or disability .	Equal Opportunity Compliance Staff 400 West Summit Hill Drive, WT 7D-K Knoxville, Tennessee 37902 Telephone: (865) 632-8981
have concerns about the ethical conduct of TVA employees and/or contractors or questions regarding ethics laws and regulations.	Designated Agency Ethics Officer 400 West Summit Hill Drive, WT 7C-K Knoxville, Tennessee 37902 Telephone: (865) 632-4222

3.2 Instructions (continued)

<p>have concerns that they have not been successful in getting resolved with line management <i>OR</i> believe that pursuit of the issues with line management would be ineffective.</p>	<p>Nuclear Employee Concerns Program Telephone: (423) 751-8989 - Corporate (256) 729-4569 - Browns Ferry (423) 843-6954 - Sequoyah (423) 365-3497 - Watts Bar Mail to: ecp-bfn@tva.gov ecp-sqn@tva.gov ecp-wbn@tva.gov</p> <p>TVA Non-Nuclear Employee Concerns Program Telephone: (865) 632-8500 Mail to: empconcerns@tva.gov</p> <p>Nuclear Construction Employee Concerns Telephone: (423) 365-3271; (256) 574-8211 Mail to: ecp-ngdc@tva.gov</p> <p>TVA Ombudsmen Telephone: (865) 632-8133 Mail to: tvaombudsman@tva.gov</p>
<p>suspect violations of laws, regulations, or TVA policies and procedures.</p>	<p>Office of the Inspector General Empowerline: 1 (855) 882-8585 E-mail: www.oigempowerline.com</p>
<p>have concerns about the efficiency and economy of TVA programs and operations, including allegations of mismanagement, waste, fraud, and abuse.</p>	<p>Office of the Inspector General</p>
<p>have concerns or questions associated with represented work.</p>	<p>Labor Relations Telephone: (865) 632-7870</p>
<p>have concerns or questions about a TVA decision or issue.</p>	<p>Open Line Interoffice mail: SP 2B-C Web access from InsideNet</p>

3.3 QA Records

None

3.4 Non-QA Records

None

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4.0 DEFINITIONS

None - None