



ALLEGATION PROGRAM

ANNUAL TRENDS REPORT

Calendar Year 2009

**U.S. Nuclear Regulatory Commission
Office of Enforcement
Washington, DC 20555**

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EXECUTIVE SUMMARY

U.S. Nuclear Regulatory Commission (NRC) Management Directive 8.8, "Management of Allegations," dated February 4, 1999, requires that the Agency Allegation Advisor prepare an annual report for the Executive Director for Operations that analyzes allegation trends. This annual report fulfills that commitment by providing national, regional, and site-specific trend analyses.

In addition, significant staff activity in calendar year (CY) 2009 involving the Allegation Program and related policies warrants mention in this report. The agency continued to address lessons learned regarding the handling of allegations of inattentive security officers at the Peach Bottom Atomic Power Station, resulting in enhancements to the allegation process. In addition, the allegation staff continues to implement the agency-sponsored alternative dispute resolution process (Early-ADR) for discrimination allegations. Sixteen percent of the discrimination cases raised in CY 2009 that were offered Early-ADR reached settlement.

With regard to allegation trends, after declining slightly since CY 2005, the total number of allegations received increased for the second straight year by about 10 percent. The increase is primarily due to substantive increases in allegations received at several reactor facilities and one fuel cycle facility, and does not appear to be the result of a general industry issue or other external factor. Each allegation can include multiple concerns and in CY 2009, coinciding with the overall increase in allegations received, the total volume of allegation concerns received increased in all of the regions. In particular Regions II and III, each received approximately 30 percent more concerns this calendar year. Regarding the subset of concerns involving materials licensees, Region II experienced a significant increase of approximately 125 percent primarily concerning three fuel facilities, with 20 percent of the allegations including four or more concerns. The largest percentage of concerns received nationwide continues to be related to security, although fewer concerns were received involving security in CY 2009 than in recent years. In the aftermath of the 2007 event involving inattentive security officers at the Peach Bottom Atomic Power Station, there has been considerable effort to improve security force working conditions and to treat the security force as a more integral part of facility activities at many sites. That, coupled with increased familiarity with post 9/11 security requirements, is believed to have contributed to a reduction in the number of concerns raised at most sites.

In CY 2009, the NRC reviewed the effectiveness of nine Agreement State programs' responses to allegations and concluded that the Agreement States continue to promptly address concerns raised, thoroughly document their investigations and closeout actions, inform the allegers of the outcomes, and protect the identity of allegers.

For some reactor licensees, the NRC received allegations in numbers that warranted additional analysis.¹ In preparing this report, the staff reviewed a 5-year history of allegations for reactor and materials licensees and vendors to identify adverse trends. The analysis focused on allegations that originated from onsite sources to help inform the NRC's review of the Safety Conscious Work Environment (SCWE). The staff selected eleven reactor sites and one fuel cycle facility for a more in-depth review: San Onofre Units 2 and 3; Diablo Canyon Units 1 and 2; Saint Lucie Units 1 and 2; Palo Verde Units 1, 2 and 3; Susquehanna Units 1 and 2; Turkey Point Units 3 and 4; Limerick Units 1 and 2; Oyster Creek; Prairie Island Units 1 and 2; Indian

1 The total number of allegations received concerning reactor licensees from all sources, as well as other information concerning the Allegation Program, appears on the NRC's public Web site at <http://www.nrc.gov/about-nrc/regulatory/allegations/statistics.html>.

Point Units 2 and 3; South Texas Units 1 and 2; and the National Enrichment Facility. The report discusses allegation trends at each of these sites. In summary, the trends in most cases did not suggest a concern about the environment for raising concerns. In other cases, the trends are indicative of a weakening SCWE and the NRC has engaged the licensee and is closely monitoring the licensee's activities to address the weaknesses. Finally, because of concerns about the SCWE, the NRC issued a chilling effect letter to one licensee requesting an action plan to improve the SCWE that specifically addresses how each avenue for raising concerns will be improved. No vendors were the subject of allegations at a level that warranted additional analysis.

OVERVIEW OF SIGNIFICANT PROGRAM ACTIVITIES

In calendar year (CY) 2009, the U.S. Nuclear Regulatory Commission (NRC) undertook certain significant activities that affected the Allegation Program and related policies and that warrant discussion in this report. The agency continued to address lessons learned regarding the handling of allegations in CY 2007 of inattentive security officers at the Peach Bottom Atomic Power Station, resulting in enhancements to the allegation process. In addition, the allegation staff continues to implement the agency-sponsored alternative dispute resolution (Early-ADR) process for discrimination allegations. Sixteen percent of the discrimination cases offered Early-ADR in CY 2009 reached settlement. These areas are discussed in more detail below.

Enhancements to the Allegation Process

The staff continued its efforts to address lessons learned regarding the handling of allegations in March 2007 and September 2007 of inattentive security officers at the Peach Bottom Atomic Power Station (Peach Bottom). As background, in March 2007 the NRC received an allegation from a former contract security manager that security officers at Peach Bottom were sleeping on duty as a result of fatigue caused by excessive overtime. In addition to identifying one specific location where the officers were allegedly sleeping, the allegor indicated that the security officers were also using other nonspecified locations. The allegor requested that the NRC not contact him about the concerns, and the staff, respecting his request and following the then-existing common practice to honor an allegor's request for no further contact, did not contact him to ask about other potential locations or to discuss other aspects of the concerns and the agency's proposed handling of them.²

The staff requested that the licensee conduct an evaluation of the specific concerns that the allegor had raised in the March 2007 Peach Bottom allegation and provide a written response to the NRC for review, including documentation of any corrective actions that it had taken in response to the evaluation. The licensee did not substantiate the concerns. The NRC reviewed the licensee's response, gathered some additional information, and similarly was unable to substantiate the concerns.

Notwithstanding that assessment, the NRC received a second allegation in September 2007 from a reporter that included video evidence of a number of apparently inattentive security officers at Peach Bottom in the ready room (a room where security officers who are not on patrol are allowed to read, study, or eat, among other things, but must remain ready to respond). The agency promptly dispatched an augmented inspection team and initiated a range of inspection and investigative activities to determine the extent of the condition and the required corrective actions. The NRC assessed the safety significance of this concern and issued a "white" finding in February 2008 (Agencywide Documents Access and Management System (ADAMS))

2 As part of the staff's evaluation of an allegation, it is the agency's policy to request a written evaluation of allegation concerns from the licensee in all cases involving an overriding safety issue, and for other allegation concerns whenever possible and appropriate, after considering certain conditions, such as whether doing so could compromise an allegor's identity. When conditions do not inhibit the agency from issuing such a request, the NRC considers it an effective approach to allegation evaluation because the licensees have primary responsibility for ensuring safe operation of the facility and can promptly address issues through ready access to site personnel, equipment, and documentation related to the concerns. Furthermore, engaging the licensee in the evaluation of an allegation provides the agency with unique insights into the licensee's handling of employee concerns, and provides the licensee with unique insights into their own safety culture. The staff is directed to review and independently verify the licensee's response and it is the staff's evaluation and conclusions that provide the basis for closure. Historically, the agency has made such requests for approximately 40 percent of allegations.

Accession No. ML080440012) with cross-cutting aspects in both the safety conscious work environment and human performance areas and issued a civil penalty in January 2009 for the related violation following an NRC Office of Investigations (OI) investigation (ADAMS Accession No. ML083530084). In addition, because the September 2007 video evidence demonstrated that the March 2007 allegation, although less specific, was valid, the agency subsequently conducted several internal reviews to determine what it could have done better in response to the March 2007 allegation and what clarifications or modifications should be made to the NRC allegation process to provide the staff with better opportunities to discover such inappropriate activity earlier.

Lessons-learned reviews included an assessment made by the Agency Allegation Advisor, a Region I review team analysis, and a Senior Executive Review Panel evaluation of the events related to the Peach Bottom allegations. The Commission approved recommendations for enhancing the Allegation Program resulting from these reviews and directed the staff to discuss pending changes with internal and external stakeholders (ADAMS Accession No. ML081610572). On February 13, 2009, the staff conducted a public workshop to solicit external stakeholder input on Allegation Guidance Memorandum (AGM) 2008-001, "Interim Guidance in Response to Lessons Learned from the Allegation Assessment of Inattentive Security Officers at Peach Bottom Atomic Power Station," dated December 29, 2008. Revision 1 to AGM 2008-001 was presented to the Commission and finalized in early 2010 and reflects enhancements based on the stakeholder comments.

The guidance for the NRC staff responsible for handling allegations was enhanced in the following program areas:

- allegation terminology
- contacting alleged
- licensee-initiated Alternative Dispute Resolution processes
- allegation requests for information (RFIs)
- NRC assessment of licensee responses to RFIs
- resident and nonresident inspector knowledge of allegation activity
- allegation closure documentation involving a licensee response to an RFI
- public discussion of specific allegation-related information
- alleged responses after closure

Safety Conscious Work Environment

The 1996 NRC Policy Statement, "Freedom of Employees in the Nuclear Industry To Raise Safety Concerns Without Fear of Retaliation," outlines the agency's expectations that licensees and other employers subject to NRC authority establish and maintain a Safety Conscious Work Environment (SCWE). The NRC defines a SCWE as an environment in which (1) employees are encouraged to raise safety concerns to their employers or the NRC without fear of retaliation, (2) concerns are promptly reviewed, given the proper priority, and appropriately resolved, and (3) timely feedback is provided.

The staff gathers insights into the SCWE at a particular site in several ways, including reviewing the number and nature of allegations concerning that site and documenting its observations concerning a site's SCWE based on interviews with licensee employees and reviews of pertinent documents during the baseline problem identification and resolution inspections. Should the staff discern that a work environment is "chilled," (i.e., not conducive to raising safety concerns), the NRC may request, in writing, information concerning the licensee's SCWE. Such

correspondence is called a chilling effect letter. The agency also initiates chilling effect letters after a finding of discrimination related to raising safety concerns by the U.S. Department of Labor under Section 211 of the Energy Reorganization Act of 1974, as amended, or by the NRC under the following employee protection regulations:

- Title 10 CFR Part 19, “Notices, Instructions and Reports to Workers: Inspection and Investigations,” (10 CFR Part 19)
- 10 CFR Part 30, “Rules of General Applicability to Domestic Licensing of Byproduct Material”
- 10 CFR Part 40, “Domestic Licensing of Source Material”
- 10 CFR Part 50, “Domestic Licensing of Production and Utilization Facilities”
- 10 CFR Part 60, “Disposal of High-Level Radioactive Wastes in Geologic Repositories”
- 10 CFR Part 61, “Licensing Requirements for Land Disposal of Radioactive Waste”
- 10 CFR Part 63, “Disposal of High-Level Radioactive Wastes in a Geologic Repository at Yucca Mountain, Nevada”
- 10 CFR Part 70, “Domestic Licensing of Special Nuclear Material”
- 10 CFR Part 72, “Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste”
- 10 CFR Part 76, “Certification of Gaseous Diffusion Plants”
- 10 CFR Part 150, “Exemptions and Continued Regulatory Authority in Agreement States and in Offshore Waters under Section 274”

In CY 2009, the agency issued one chilling effect letter concerning the Susquehanna Steam Electric Station (Susquehanna) outlining the agency’s concern with the progress and effectiveness of their actions in 2008 to address indications of a declining SCWE and negative employee perceptions, as it may impact employee willingness to raise safety concerns at Susquehanna. Moreover, the NRC stated that it was not clear full alignment had been achieved within the first-line supervisor and mid-level management ranks regarding support of efforts to improve the SCWE. This issue is discussed in more detail later in this report.

In October 2004, the staff implemented the alternative dispute resolution (ADR) program which included the opportunity for using ADR early in the allegation process for cases of alleged discrimination before the NRC investigates the allegation. This allows additional opportunities for the parties to resolve their differences outside of the normal regulatory framework. Early-ADR involves the use of a neutral third-party to facilitate discussion and the timely settlement of the discrimination concern. The NRC believes that voluntary dispute resolution by the parties using the communication opportunities afforded in the Early-ADR process can stem the inherent damage such disputes can inflict on the SCWE more quickly than an investigation can. At any time, either party can exit the ADR process and, if the allegor still wants to pursue the discrimination matter, the option of an NRC investigation remains. If a settlement is reached, however, the staff will not pursue an investigation or subsequent enforcement of discrimination

findings. The NRC also considers settlements resulting from licensee-initiated mediation as equivalent to settlements reached under the Early-ADR Program.

The NRC made 45 Early-ADR offers in association with discrimination allegations raised in CY 2009, of which 15 (33 percent) resulted in agreements to mediate. Of those 15 cases, 7 (47 percent) mediated discrimination concerns resulted in the parties reaching a mutually agreeable settlement.

TRENDS IN ALLEGATIONS

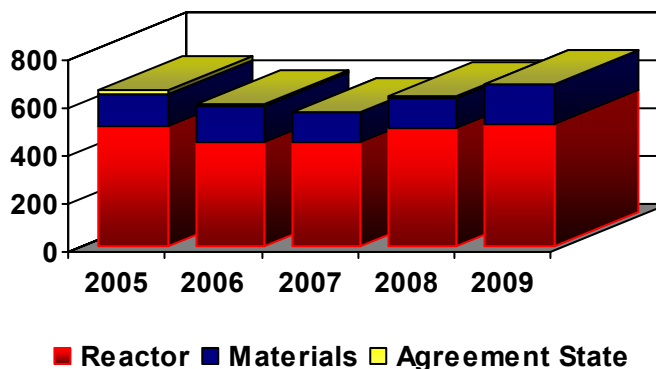
The NRC monitors allegations to discern trends or marked increases that might prompt the agency to question a licensee about the causes of such changes or trends. In preparing this report, the staff reviewed a 5-year history of allegations received for reactor and materials licensees and vendors. The staff focused on those allegations that have the potential to provide insights into the SCWE at a given facility. Such allegations include those submitted by current or former licensee or contractor employees or by anonymous sources that indicate an unwillingness to raise safety concerns internally. For power reactor facilities, the staff analyzes recent allegation activity twice a year in support of the Reactor Oversight Process (ROP) mid-cycle and end-of-cycle assessments. In addition, the staff may perform an analysis for a particular site or licensee whenever allegations or inspection findings indicate that such an analysis is warranted.

The staff also conducts reviews to identify national trends for reactor and materials allegations received, shifts in users of the Allegation Program, and the effect of Allegation Program implementation on the workload in the regions and program offices. The following section discusses these trends.

National Trends

National trends are of interest because they provide general information to the staff about the effect of external factors, plant events, and industry efforts to improve the SCWE at NRC-licensed facilities. In addition, they can be useful in developing budget and planning assumptions to support future agency and Allegation Program needs. Figure 1 shows there was a slight declining trend in the total number of allegations received by NRC from CY 2005 through CY 2007. In each of CY 2008 and CY 2009 however, the total number of allegations received increased by about 10 percent over the previous year, primarily due to substantive increases in allegations received at several reactor facilities and one fuel cycle facility. The increases do not appear to be the result of a general industry issue or other external factor as the reasons for the increases in allegations at these facilities were plant-specific and varied (e.g., significant outage activity, construction activity, work environment issues, work planning or corrective action program changes).

FIGURE 1 - ALLEGATIONS RECEIVED BY CALENDAR YEAR



The number of allegations processed by the NRC that involve Agreement State matters continues to decline to a minimal level as additional States achieve Agreement State status. The Commonwealth of Virginia and State of New Jersey both became Agreement States in CY 2009, bringing the total number of Agreement States to 37 by the end of calendar year. Most individuals who contact the NRC with concerns about Agreement State licensees indicate a willingness to contact and be contacted directly by Agreement State personnel about the

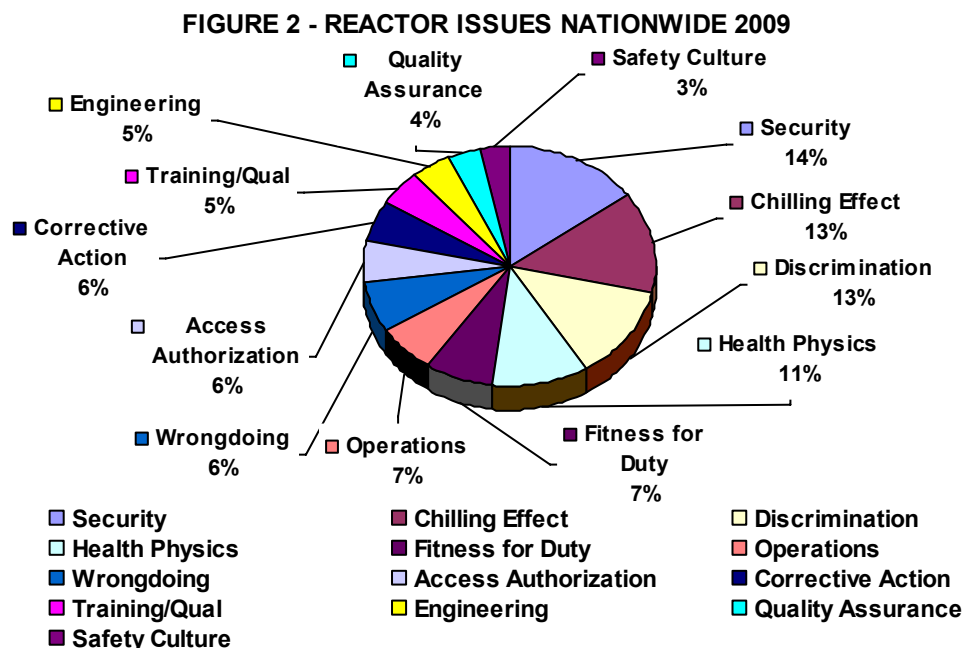
evaluation of their concern(s), once the Agreement State program is explained to them. Such matters are forwarded to the Agreement State and are not processed by the NRC as allegations. Generally, the NRC employs the Allegation Program only to track the evaluation of concerns about Agreement State licensees when the concerned individual does not want his or her identity to be revealed to the Agreement State.

Because each allegation can include multiple concerns, the number of concerns received can provide more specific information on the staff effort needed for an appropriate response. Over the last several years, in all but one year,³ the trend in the total number of concerns has paralleled the trend in total allegations; e.g., if the number of allegations decreased, so did the number of concerns. In CY 2009, the number of allegations and concerns increased in every region. Regions II and III each received approximately 30 percent more concerns this calendar year. Regarding the subset of concerns involving materials licensees, Region II experienced an increase of approximately 125 percent; primarily concerning three fuel facilities, with 20 percent of the allegations including four or more concerns.

Reactor Licensee Trends

To provide further insight into areas in which the NRC is allocating resources on reactor-related allegation follow-up, Figure 2 depicts the 13 functional areas that represent approximately 80 percent of the issues received nationwide in CY 2009.⁴

As indicated in Figure 2, security issues comprised the largest percentage of allegation concerns received in CY 2009. Since the terrorist attacks of September 11, 2001, security-related concerns have continued to represent the greatest percentage of allegation concerns received in



3 In CY 2007, although the total number of allegations decreased, the number of concerns actually increased for reactor facilities in almost every region and program office.

4 The agency received few concerns in the areas not depicted in Figure 2, which represent the remaining 20 percent of the issues received. These areas include Chemistry; Civil/Structural; Construction; Cyber Security; Electrical; Emergency Preparedness; Employee Concerns Programs; Environmental; Falsification; Fatigue/Overtime; Fire Protection; In-service Testing; Instrumentation and Control; Licensing; Mechanical; Non-Destructive Examination; Radwaste; Safeguards; and Other.

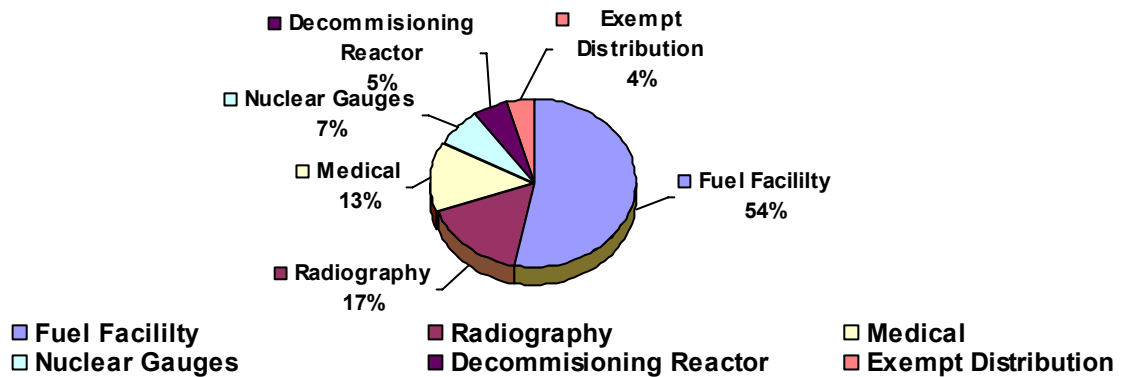
each subsequent calendar year. Since CY 2005, the overall percentage of reactor security concerns has steadily decreased, but the actual number of concerns has increased indicating that concerns in this area remain prominent following 2001. In CY 2009, both the percentage of security-related concerns and the actual number decreased. In the aftermath of the 2007 event involving inattentive security officers at the Peach Bottom Atomic Power Station, there has been considerable effort to improve security force working conditions and to treat the security force as a more integral part of facility activities at many sites. That, coupled with increased familiarity with post 9/11 security requirements, is believed to have contributed to a reduction in the number of concerns raised at most sites.

Between CY 2004 and CY 2007, the NRC received a sustained 8-9 percent of chilling effect or chilled work environment concerns alleging work environments not conducive to raising safety concerns. That percentage increased in CY 2008 and again in CY 2009. The overall percentage of reactor-related chilling effect concerns in CY 2009 increased to 13 percent of all reactor allegations concerns received, largely due to a sharp increase in SCWE-related concerns at one reactor. There was a notable increase in the number and percentage of discrimination concerns raised in the reactor area in CY 2009. Between CY 2004 to CY 2008, the percentage remained consistent at approximately 10 percent per year. In CY 2009; however, the volume increased and the percentage rose to 13 percent. Approximately half of the discrimination concerns raised in the reactor area in CY 2009 came from workers in the functional areas of maintenance, security, and health physics.

Materials Licensee Trends

Because of the many different types of materials licensees and because the activities performed by these licensees varies greatly, a comparison of the types of issues received does not produce meaningful results. For insights into the areas where the NRC focused its attention regarding materials-related allegations, Figure 3 depicts the six types of materials licensees that accounted for approximately 80 percent of allegation concerns received by the NRC nationwide.⁵

FIGURE 3 - MATERIALS LICENSEE TYPES NATIONWIDE 2009



5 The agency received few concerns about the materials licensee types not depicted in Figure 3, which represent the remaining 20 percent of the issues received. These licensee types include Academic; Casks; Decommissioning Materials; General Licensee; Irradiators; Nuclear Pharmacies; Special Nuclear Material; Test/Research Reactor; Waste Disposal; Well Logging; and Other.

Since CY 2004, the number of allegations related to fuel cycle facilities constituted the highest percentage (30-50 percent) of the allegation concerns received by the NRC in the materials area. In CY 2009, the number of fuel facility-related concerns increased to a level higher than in any of the prior five years. The substantive increase was due to a sharp increase in allegation concerns related to a fuel facility that continues to transition from construction to operating status.

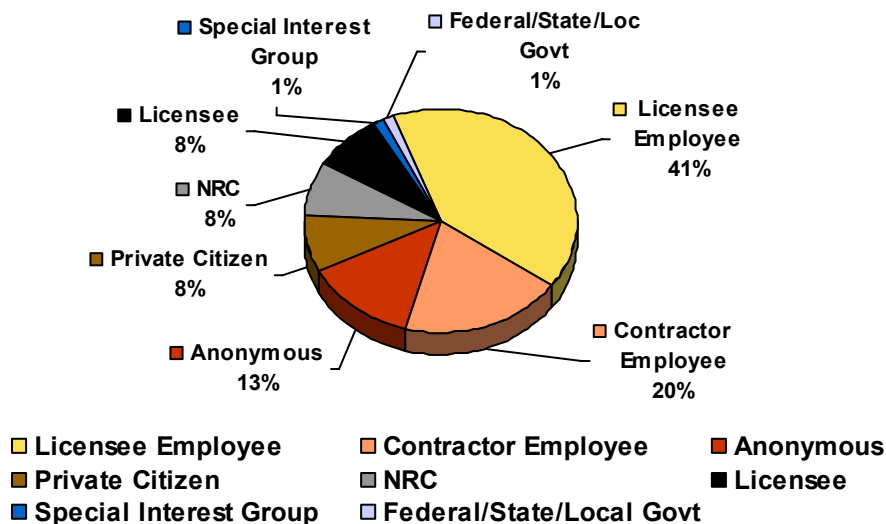
The medical area has for a number of years comprised the second highest percentage of materials-related allegation concerns at about 20 percent per year between CY 2004 and CY 2008. However, the volume of allegations concerning the medical facilities dropped significantly in CY 2009.

Source Trends

Figure 4 provides a breakdown of 99 percent of the sources for reactors and materials allegations received in CY 2009.⁶ The data indicate that the distribution of source categories remained consistent between CY 2005 and CY 2009. That is, the primary sources of allegations continue to be employees of licensees (or former employees) and contractors (or former contractors). It follows that the percentage of reactors and materials allegations from other sources has also remained largely unchanged over the review period.

In considering those allegation sources previously mentioned as having the potential to provide insights into the SCWE at a given facility (i.e., allegations submitted by current or former licensee or contractor employees or by anonymous sources), it is notable that the percentage of allegations from these sources since CY 2005 has remained consistently in the mid-70 percent.

FIGURE 4 - ALLEGATIONS BY SOURCE CATEGORY 2009



In comparing the sources of materials allegations to those of reactor allegations over the past five years, the largest source for both is consistently licensee (or former licensee) employees. For reactor allegations, the next largest sources are contractor (or former contractor) employees,

⁶ The NRC received few concerns from the News Media representing only 1 percent of sources.

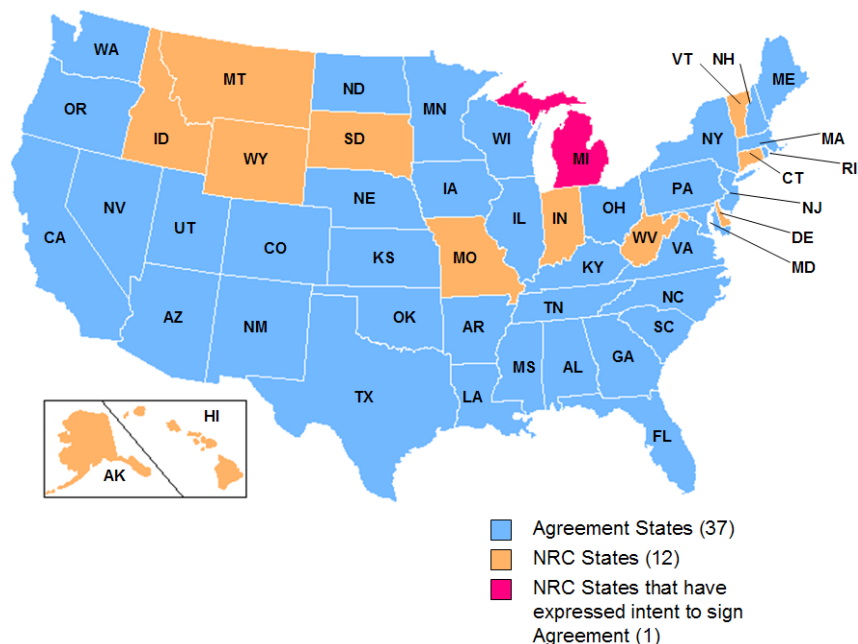
anonymous allegers, and private citizens, in that order. Private citizens are the second most frequent source of materials-related allegations, followed by anonymous allegers and contractor (or former contractor) employees. This is understandable since materials licensees employ fewer contract personnel and their activities involve more direct interaction with the public.

Two of the source categories deserve some explanation. The source category “NRC” designates an NRC staff member who suspects that a regulatory requirement has been violated deliberately or as a result of careless disregard, prompting the initiation of an investigation by the NRC Office of Investigations. The source category “Licensee” denotes that a licensee representative, acting in his or her official capacity, has reported a potential wrongdoing to the NRC. The agency staff assigns an allegation process tracking number to such items to allow it to track the progress of the wrongdoing issue’s evaluation.

Agreement State Trends

Under the authority granted in Section 274b of the Atomic Energy Act (the Act), as amended, the NRC may relinquish its authority to regulate certain byproduct, source, and limited quantities of special nuclear material to a State government through a mutual agreement. A State that has entered into this agreement with NRC is called an Agreement State. Prior to entering into this agreement, States must first demonstrate that their regulatory programs are adequate to protect public health and safety and compatible with NRC’s program. By the end of CY 2009, there were 37 Agreement States. Virginia became an Agreement State in March 2009, and New Jersey became an Agreement State in September 2009. Figure 5 below depicts the current 37 Agreement States.

FIGURE 5 - AGREEMENT STATES



To ensure that Agreement States maintain a program that is adequate to protect public health and safety and compatible with NRC’s program, NRC has a statutory responsibility to periodically review the actions of the Agreement States. This authority is granted under Section 274j of the Act. NRC uses the Integrated Materials Performance Evaluation Program (IMPEP)

to satisfy its statutory responsibility. For more information on NRC's Agreement State Program or IMPEP, please visit the NRC's Office of Federal and State Materials and Environmental Management Programs website at <http://nrc-stp.ornl.gov/>.

In CY 2009, NRC conducted routine IMPEP reviews of nine Agreement State programs. The review teams evaluated the effectiveness of the Agreement State programs' responses to allegations by reviewing casework and documentation for 48 allegations cumulatively received by all of the programs reviewed. Of the 48 allegations reviewed, NRC referred 14 to the Agreement State programs; the States received the other allegations directly from concerned individuals. In all cases, the review teams concluded that the States consistently took prompt and appropriate action in response to concerns raised and that the States documented the results of their investigations and closeout actions, including notifications to the allegeders of the outcomes of the investigations when the allegeders' identities were known. The review team determined that the States that were reviewed in CY 2009 adequately protected the identity of any allegeders that requested anonymity. In general, the results of the CY 2009 IMPEP Reviews demonstrate that the Agreement States continue to rank response to allegations as a high priority in protecting public health and safety.

Allegation Trends for Selected Reactor Sites

Trending the number and nature of allegations concerning individual reactor sites is one method the NRC staff uses to monitor the SCWE at reactor sites. The appendix to this report provides statistics on allegations concerning all operating reactor sites. The NRC received the listed allegations during the 5-year period between January 2005 and December 2009 and included only allegations received from onsite sources (i.e., those that may be indicative of the health of the SCWE). Onsite sources include current or former licensee employees, current or former contractor employees, or anonymous alлегers. For the purpose of this analysis, the NRC assumes that anonymous allegations come from onsite personnel.

In determining which reactor sites should receive a more indepth review, the staff applied the following criterion:

- The number of onsite allegations exceeds three times the median value for reactor sites.

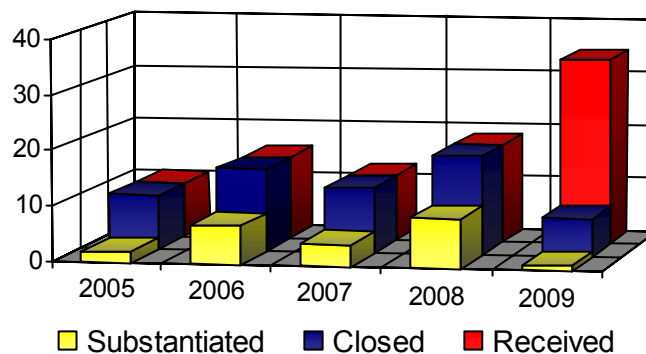
For CY 2009, the median number of onsite allegations per reactor site was 3.5. The 11 reactor sites that met this criterion are: San Onofre Units 2 and 3 (34); Diablo Canyon Units 1 and 2 (15); Saint Lucie Units 1 and 2 (15); Palo Verde Units 1, 2 and 3 (15); Susquehanna Units 1 and 2 (15); Turkey Point Units 3 and 4 (14); Limerick Units 1 and 2 (14); Oyster Creek (14); Prairie Island Units 1 and 2 (14); Indian Point Units 2 and 3 (12); and South Texas Units 1 and 2 (12). Each of these sites is discussed below.

San Onofre Units 2 and 3

The number of chilling effect, discrimination, and anonymous concerns raised to the NRC concerning the San Onofre Nuclear Generating Station in CY 2009 increased significantly as compared to previous years. Half of the concerns received asserted a chilled work environment, and more than half of those were submitted in the last quarter; this is consistent with a period of significant activity at the site, namely the Unit 2 steam generator replacement outage. The allegations received from onsite sources in CY 2009 were not localized to a particular department; rather, the allegations covered a wide range of disciplines.

Because of continuing substantive cross-cutting issues in the areas of human performance and problem identification and resolution, on March 4, 2009, in "Annual Assessment Letter—San Onofre Nuclear Generating Station" (ADAMS Accession No. ML090640307), the NRC asked the licensee to perform an independent assessment of the safety culture. The licensee conducted the assessment in spring 2009. Although the licensee

FIGURE 6 - SAN ONOFRE ALLEGATIONS



reported that the safety culture was sufficient at San Onofre to support safe plant operations, it also identified a number of corrective actions to preserve and improve the site's safety culture.

The NRC performed an inspection in November 2009 and February 2010 to review the results of the safety culture assessment and licensee efforts to establish corrective actions in response to the assessment. The inspection team conducted a number of focus group interview sessions involving more than 500 personnel, as documented in the NRC inspection report (ADAMS Accession No. ML100601207). The interviewees represented various functional organizations and included both contractors and licensee staff. From the interviews, the NRC concluded that some employees in multiple workgroups at San Onofre had the perception that they are not free to raise safety concerns using all available avenues, and that management had not been effective in encouraging employees to use all available avenues without fear of retaliation. The NRC did not identify any safety issues that were not reported through some available avenue.

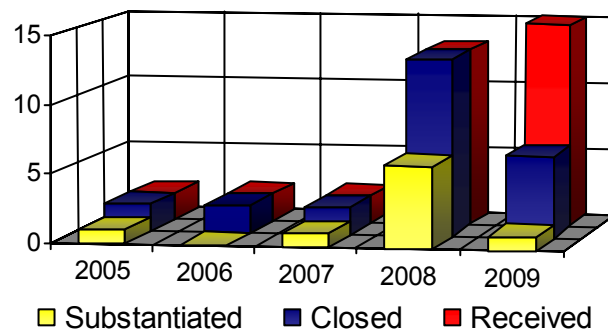
In early March 2010, the NRC issued the licensee a chilling effect letter (ADAMS Accession No. ML100601272). The letter asked the licensee to provide an action plan to improve the SCWE at San Onofre and specifically address how it will improve each avenue for raising concerns, including making the corrective action program more user friendly, improving the workforce's knowledge and use of the employee concerns program, ensuring the availability of the NRC as an avenue for raising safety concerns, and enhancing the licensee's open door policy. The NRC also asked for information about the licensee's measures to determine the action plan's effectiveness. The NRC will interface publicly with the licensee periodically to discuss the progress on and outcomes of SCWE improvement activities and will monitor progress through the baseline inspection program and allegation trend reviews.

Diablo Canyon Units 1 and 2

The number of allegations received from onsite sources regarding the Diablo Canyon site in CY 2008 and CY 2009 increased significantly compared to the previous 3 years. However, the concerns received in the past year do not indicate any significant discipline, source, or SCWE-related trends, and in the past 5 years very few allegations have related to discrimination. The NRC received the majority of the allegations in the first and fourth quarters of CY 2009. This is consistent with periods of significant activity at the site, namely the Unit 1 steam generator replacement outage and the Unit 2 fall outage.

The most recent NRC problem identification and resolution inspection team at Diablo Canyon observed that all employees interviewed were willing to raise safety concerns through at least one of the avenues available to them. As documented in the NRC inspection report (ADAMS Accession No. ML083660204), the team also found that some employees were hesitant to raise concerns via one or more of those avenues, including their

FIGURE 7 - DIABLO CANYON ALLEGATIONS



supervisor, the corrective action program, and the employee concerns program. Although a number of less significant issues had been raised through the employee concerns program, a review of the files indicated that the program had received no nuclear safety or quality issues, other than those allegations for which the NRC requested an evaluation, in the 2 years before the inspection.

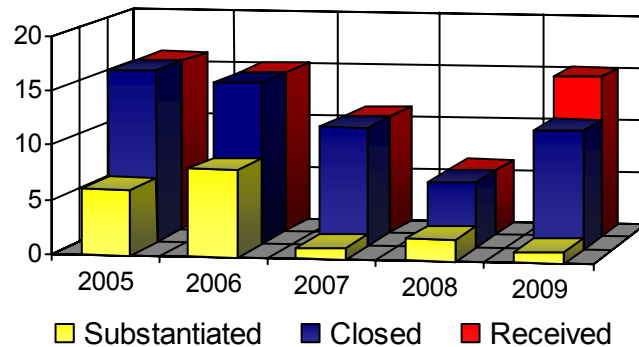
The NRC will maintain its oversight of the SCWE at Diablo Canyon through allegation trend analysis and normal inspection activities.

Saint Lucie Units 1 and 2

Allegations concerning Saint Lucie increased significantly in CY 2009. The rate at which the concerns were received declined over the year. An analysis of the subject matter of the allegations received in CY 2009 indicates a SCWE-related trend in security concerns. The number of discrimination allegations also increased at Saint Lucie in CY 2009.

In the latter half of 2008, the licensee conducted a fleetwide 20–30 question survey of the SCWE. More than 600 employees at each site responded. The results for Saint Lucie indicated declining satisfaction with the three primary avenues for raising concerns internally (i.e., management, the corrective action program, and the employee concerns program). With regard to the employee concerns program specifically, the results showed that licensee employees were familiar with the program; however, a notable percentage of the respondents did not have confidence that management would address their concerns or maintain their confidentiality. A similar percentage did not believe management supported the program or that they could use the program without fear of retaliation.

FIGURE 8 - SAINT LUCIE ALLEGATIONS



The licensee has conducted a root cause evaluation and initiated a plan to improve its corporate safety culture, including formalizing the management of employee concerns, initiating a review of nuclear safety culture issues by the corporate nuclear review board, benchmarking SCWE programs at other facilities, and planning for effectiveness reviews. In early 2010, NRC inspectors verified that the licensee was implementing planned actions on schedule, including training senior managers on SCWE management and initiating the management review of safety culture issues on a routine basis. The NRC interviewed site workers and found that they are willing to raise nuclear safety concerns and are knowledgeable of the various methods available for raising nuclear safety concerns.

Saint Lucie experienced a number of significant senior management changes in CY 2009. NRC inspectors met with the newly appointed station employee concerns program coordinator and manager. Activities initiated to facilitate more awareness and understanding of the employee

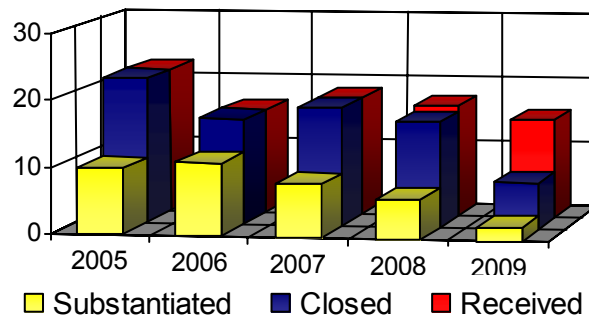
concerns program include involving the program coordinator in departmental meetings, relocating the employee concerns program office to address accessibility concerns, and developing procedures for the intake of concerns and management of concern resolution. Most significantly, the licensee revised the process to perform 3-month followup for nuclear safety concerns brought to the program to assess the effectiveness of corrective actions taken in response.

The NRC will interface publicly with the licensee periodically to discuss the progress on and outcomes of SCWE improvement activities and will monitor progress closely through the baseline inspection program and allegation trend reviews.

Palo Verde Units 1, 2, and 3

The licensee has made significant improvements in the SCWE at Palo Verde since the issuance of a confirmatory action letter (CAL) in February 2008 (ADAMS Accession No. ML080460653) that documented the followup efforts committed to by the licensee after an inspection in CY 2007 based on Inspection Procedure 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs or One Red Input" (ADAMS Accession No. ML080320562). In March 2009, after the last of numerous CAL followup inspections, the NRC closed the CAL based on the licensee's improved safety performance and reasonable assurance that the performance improvements are sustainable. Also closed at this time were substantive cross-cutting issues in the areas of human performance and problem identification and resolution.

FIGURE 9 - PALO VERDE ALLEGATIONS



Although the number of allegations received has been comparatively high over the past 5 years, the trend has been declining. The NRC received allegations from onsite sources consistently throughout CY 2009, with concentrations in the first and fourth quarters; this is consistent with periods of significant activity at the site, namely the Unit 3 refueling outage in the first part of the year and the Unit 2 refueling outage at the end of the year. There was no significant concentration of allegations received from any particular source or discipline. In CY 2009, only one allegation concern was raised about the SCWE at Palo Verde. However, the number of discrimination concerns did increase in CY 2009 compared to prior years. The discrimination concerns in CY 2009 were received throughout the year and were not focused in any particular discipline or as a result of any particular event or activity.

The results of the most recent NRC problem identification and resolution inspection completed in February 2009 demonstrated the overall willingness of workers at Palo Verde to raise safety concerns (ADAMS Accession No. ML090790431). Most of the workers interviewed indicated that the Palo Verde site has experienced significant improvement in the SCWE and safety culture in general. Much of the improvement was attributed to the new management team and its commitment to improved performance. Workers understood the various ways to raise

concerns, although some employees were not aware of the employee concerns program. The licensee has since taken steps to improve the visibility of the program. Those workers who were aware of the program found it to be a viable option to raise concerns. The workers indicated that the improvements to the corrective action program are driving overall performance improvement but noted that some additional improvements could still be made. Many workers noted an improved level of quality in the evaluation of issues raised.

The NRC will maintain its oversight of the SCWE at Palo Verde through allegation trend analysis and normal inspection activities, including monitoring the state of Palo Verde's improvement initiatives.

Susquehanna Units 1 and 2

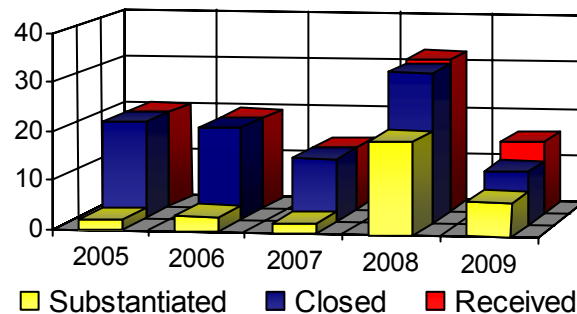
The volume of onsite allegations received in CY 2009 declined significantly from the previous year. The rate at which the NRC received concerns was fairly steady throughout the year. An analysis of the allegations' subject matter indicates that the concerns involved a variety of disciplines and programs, with indications of a SCWE-related trend in the health physics organization. Approximately one quarter of the allegations came from anonymous sources, with the majority of those in the second half of the assessment period. The NRC saw a declining trend in allegations related to discrimination in CY 2009.

On January 28, 2009, the NRC issued the licensee a chilling effect letter (ADAMS Accession No. ML090280115) expressing concern with the progress and effectiveness of its actions to address indications of a declining

SCWE at Susquehanna. As discussed in the 2009 midcycle performance assessment letter (ADAMS Accession No. ML092440270), issuance of the chilling effect letter met the first criteria for consideration of a SCWE substantive cross-cutting issue over the next three plant assessment cycles.

During 2009, the NRC reviewed the licensee's action plans and root cause evaluation to address SCWE issues at the site, performed targeted inspection samples and trend reviews to monitor progress, and reviewed the results of an independent culture survey (ADAMS Accession Nos. ML091330762, ML092230158, ML093170375, and ML100321652). The inspections documented an improving work environment, SCWE metrics, and sitewide safety culture survey results. In addition, NRC management conducted several site visits and held a public meeting in July 2009 to discuss work environment issues. Furthermore, the licensee made several key management changes, addressed several high-interest policy issues, and developed additional means for workers to raise issues.

FIGURE 10 - SUSQUEHANNA ALLEGATIONS



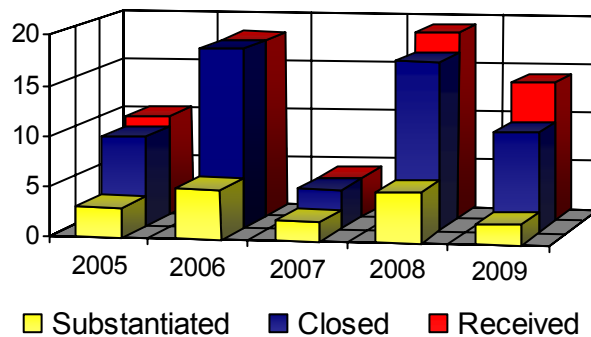
Based on direct inspection, allegation trend data, SCWE metrics, and survey results, the NRC concluded that the licensee has made reasonable progress in addressing SCWE issues at Susquehanna during 2009. Therefore, the staff concluded that at the end of the second of three assessment cycles, an SCWE substantive cross-cutting issue did not exist.

Nonetheless, the NRC will continue to monitor the licensee’s progress in addressing SCWE issues at Susquehanna through the baseline inspection program.

Turkey Point Units 3 and 4

The number of allegations received concerning the Turkey Point site decreased slightly in CY 2009 as compared to CY 2008, but it was still high as compared to others in the industry, and the volume has been high for 4 of the previous 5 years. The NRC received the concerns for Turkey Point at a steady rate over all four quarters. An analysis of the subject matter of the allegations received in CY 2009 indicates a SCWE-related trend in security at the site. The number of discrimination allegations decreased at Turkey Point in CY 2009.

FIGURE 11 - TURKEY POINT ALLEGATIONS



In early 2008, the NRC requested information from the licensee about the SCWE, based on allegations concerning an event at Turkey Point in late 2007 in the operations department. The licensee conducted an independent assessment of the effect of that event on employees in the operations department with regard to their willingness to raise safety concerns. It concluded that the event did not impact the SCWE. Notwithstanding that conclusion, the licensee committed to enhance communications between plant operators and senior management to ensure constructive interactions.

In the latter half of 2008, the licensee conducted a fleetwide 20–30 question survey of the SCWE. More than 600 employees at each site responded. The results for Turkey Point showed that a significant number of respondents in the Operations, Security, and Radiation Protection organizations were dissatisfied with the three primary avenues for raising concerns internally (i.e., management, the corrective action program, and the employee concerns program).

With regard to the employee concerns program specifically, the results showed that licensee employees were familiar with the program; however, a notable percentage of the respondents did not have confidence that management would address their concerns or maintain their confidentiality. A similar percentage did not believe that management supported the program or that they could use the program without fear of retaliation. In response, the licensee conducted a root cause evaluation and initiated a plan to improve its corporate safety culture, including formalizing the management of employee concerns, initiating a review of nuclear safety culture issues by the corporate nuclear review board, benchmarking the SCWE at other facilities, and planning for effectiveness reviews. NRC inspectors met with the newly appointed station

employee concerns program coordinator and manager. Activities initiated to facilitate more awareness and understanding of the employee concerns program include involving the program coordinator in departmental meetings, relocating the employee concerns program office to address accessibility concerns, and developing procedures to take in concerns and manage concern resolution. Most significantly, the licensee revised the process to perform a 3-month followup for nuclear safety concerns brought to the program to assess the effectiveness of corrective actions taken in response.

The NRC will interface publicly with the licensee periodically to discuss the progress on and outcomes of SCWE improvement activities and will closely monitor progress through the baseline inspection program and allegation trend reviews.

Limerick Units 1 and 2

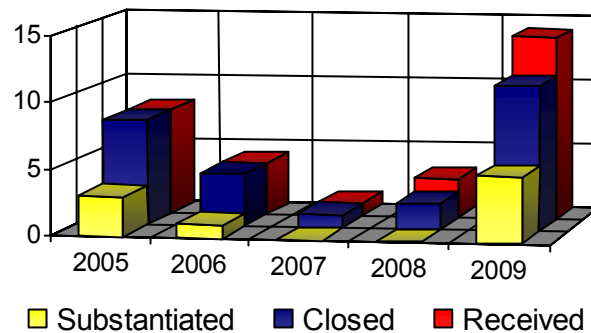
The number of allegations received concerning the Limerick site increased significantly in CY 2009. The NRC received allegations in a wide range of disciplines; however, an analysis of the subject matter of the allegations indicates a specific SCWE-related trend in the radiation protection department. The number of allegations asserting discrimination also increased significantly. Several of the allegations involved a distinct event on site.

Although the plant conducted a planned refueling from mid-March to mid-April 2009, only a small number of concerns raised during that period appear to relate directly to plant activities at that time. During the outage period, however, an anonymous Web posting alleged poor site management, which prompted the site to conduct interviews throughout the site to address the concerns noted in the posting.

The NRC requested information from the licensee via the Allegation Program, independently verified and evaluated the situation, and substantiated several concerns related to a poor SCWE within the radiation protection department. In response to the substantiated concerns, the licensee developed and provided to the NRC a work environment improvement plan. In the fourth quarter of CY 2009, NRC inspectors reviewed corrective action program data and interviewed radiation protection department technicians regarding the work environment. The inspectors concluded that the SCWE was improving and the workforce felt free to raise safety issues without fear of retaliation.

The NRC will maintain oversight of the SCWE at the Limerick site through baseline inspections, particularly monitoring the site for further indications of a declining SCWE in the radiation protection department, and take additional action if necessary.

FIGURE 12 - LIMERICK ALLEGATIONS



Oyster Creek

The number of allegations received at Oyster Creek increased significantly in CY 2009. A review of the allegations' subject matter indicates a trend involving the radiation protection and operations departments, with many concerns raised about the inappropriate use of management authority and tools. Several of the chilled work environment concerns received related to perceived retaliation associated with raising safety concerns.

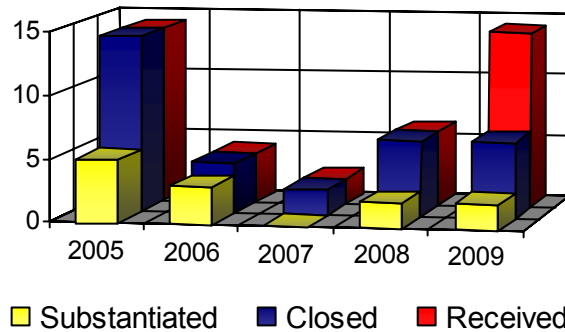
In spring 2009, Oyster Creek completed a nuclear safety culture survey. Overall, the results demonstrated that the station was aligned with the Institute of Nuclear Power Operations' eight principles of a strong nuclear safety culture. However, the licensee developed a plan to address the rising trend in allegations.

In the third quarter of CY 2009, NRC inspectors reviewed the licensee's identification of employee concerns through various processes, including the corrective action and employee concerns programs, as well as the licensee's evaluation of those issues. The inspectors also reviewed the licensee's action plan to improve the site's SCWE. This review resulted in no negative findings and concluded that the SCWE action plan should help to improve performance in this area.

Late in the calendar year, the licensee conducted another survey specifically on the employee concerns program. The survey identified that the staff lacks confidence in both the independence of the program and that management acts on the program investigations appropriately. The licensee has initiated corrective actions to address the survey results.

The NRC will maintain oversight of the SCWE at the Oyster Creek site through normal inspection activities and allegation trend analysis, particularly in the areas discussed above, and will review performance as actions in the site's SCWE action plan are completed.

FIGURE 13 - OYSTER CREEK ALLEGATIONS

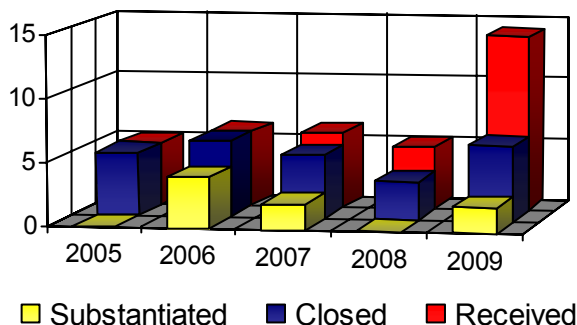


Prairie Island Units 1 and 2

The number of both technical and discrimination allegations received concerning the Prairie Island site increased, although the rate at which they were received declined throughout the year. The concerns raised indicate a SCWE-related trend in one group.

The licensee was aware of the work environment challenges in that organization and has taken, throughout the CY, a number of actions to address the issue, including conducting focus groups to better define the issues, coaching and training the involved individuals, and reorganizing the department to address issues related to group dynamics. An assessment of the results of a recent survey is in the preliminary stages at the time of this report, but the licensee believes it indicates an improving work environment. Other sitewide activities related to the SCWE include the completion of SCWE training for new employees and refresher training for current employees in early 2009.

FIGURE 14 - PRAIRIE ISLAND ALLEGATIONS

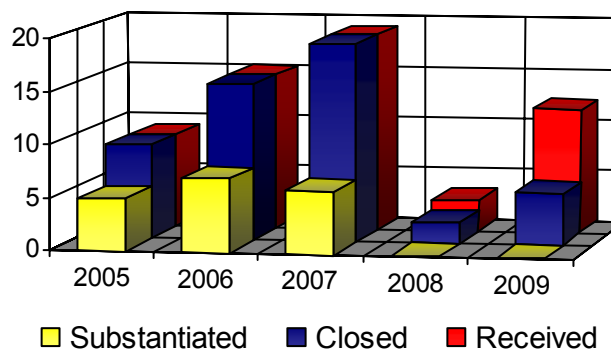


The NRC conducted an inspection in August 2009 (ADAMS Accession No. ML092680208) and, based on the condition reports generated, discussions with employees, and survey results, found no issues or concerns with the SCWE or the ability to raise safety issues. It appears that a distinct event at Prairie Island challenged the SCWE. The licensee is addressing this issue, and allegations are trending down since actions were taken to address what the licensee characterizes as a harassing environment. The NRC continues its review of discrimination allegations and will closely monitor the licensee’s efforts to address the issue, particularly its response to the more recent survey of the one group.

Indian Point Units 2 and 3

Although the total number of allegations received concerning Indian Point increased significantly as compared to the previous year, and several of the allegations relate to a chilled work environment, the number does not appear to indicate an SCWE concern at Indian Point. While the number of allegations in CY 2009 represents a four-fold increase over CY 2008, based on the number of allegations received in several prior years, it is likely that the low number in 2008 was not representative of historical trends. Most of the chilled work environment concerns are related to

FIGURE 15 - INDIAN POINT ALLEGATIONS



distinct security issues. In discussions with the NRC, site employee concerns program personnel noted that they also observed a large number of concerns related to security.

In June 2009, inspectors found that plant staff expressed a willingness to use the licensee's corrective action program to identify plant issues and deficiencies (ADAMS Accession No. ML092040278). The inspectors noted that none of the interviewees stated that he or she personally experienced or was aware of a situation where there were indications that an individual had been hesitant to raise a safety issue. All persons interviewed demonstrated an adequate knowledge of the corrective action and employee concerns programs for raising safety issues. Based on these limited interviews, the inspectors concluded that there was no evidence of significant challenges to the free flow of information regarding safety concerns.

In the middle of the year, the licensee also conducted a sitewide safety culture survey that identified the security organization as needing management focus. The licensee has developed an action plan to address the survey findings.

Because the number of allegations received in CY 2009 is consistent with the historical 5-year average, and the concerns raised do not contain a prevalent or significant theme involving an SCWE element, the NRC concludes that the allegation activity does not indicate an inadequate or unhealthy SCWE at Indian Point. The NRC will maintain its oversight of the SCWE at Indian Point through normal inspection activities, with particular focus on the security area and actions taken by the licensee to address survey findings.

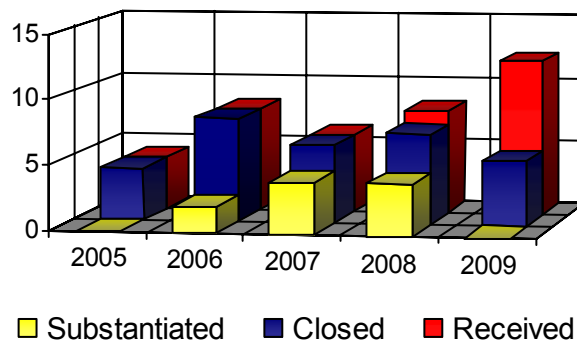
South Texas Units 1 and 2

There do not appear to be any significant negative trends in the willingness of employees to raise concerns at South Texas. The number of allegations received from onsite sources did increase 50 percent from the number received in CY 2008, but the concerns received indicate no significant discipline, source, or SCWE-related trends. Discrimination concerns received also increased in CY 2009, but they do not indicate a work environment issue in a particular plant department.

The NRC completed the most recent problem identification and resolution inspection team at the site in August 2008 and concluded that a healthy SCWE exists at the site (ADAMS Accession No. ML082720004). The licensee conducted SCWE training of several hundred managers on site in the third quarter of CY 2009. A focused assessment of the maintenance shop

was conducted by the licensee in December 2009 in response to issues received during the year. South Texas is also piloting an industry initiative to standardize nuclear safety culture assessments. The pilot involved the administration in December 2009 of a 70-question survey based on Institute of Nuclear Power Operations safety culture principles and followup interviews

FIGURE 16 - SOUTH TEXAS ALLEGATIONS



by a team consisting of personnel familiar with SCWE and safety culture from other utilities.

The NRC will maintain its oversight of the SCWE at the South Texas site through normal inspection activities, in particular of actions taken in response to the licensee's surveys taken at the end of CY 2009, and allegation trend analysis.

Allegation Trends for Selected Materials Licensees

The NRC Web site posts allegation statistics for certain fuel cycle facilities (see the appendix to this report). Because of the small number of allegations involving other smaller materials licensees and because of the potential for a licensee or contractor to identify an alleger, the NRC does not publicly provide or include in this report allegation statistics for materials licensees other than fuel cycle facilities.

National Enrichment Facility

In CY 2009, the NRC received allegations at a rate greater than three times the industry median from onsite sources at one large fuel cycle facility, the National Enrichment Facility operated by Louisiana Energy Services in Eunice, NM.

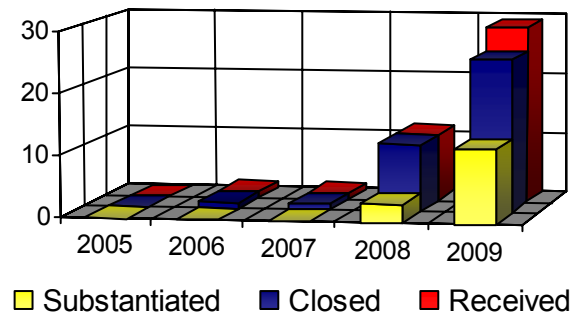
The NRC received allegations at a steady rate throughout the year concerning this facility. The facility is currently transitioning toward operation from its construction phase that began in August 2006. The number of personnel on site decreased by almost 50 percent in 2009, and this trend will continue as the licensee prepares for operational status. It is not unusual to see a substantive increase in allegations as a large facility transitions from construction to operation (i.e., as contractors complete their activities and transition the oversight of facility systems, structures, and components to the licensee). Nonetheless, the NRC is always concerned when it receives volumes of allegations of this magnitude and is monitoring the situation closely.

The licensee indicated that its employee concerns program received a number of concerns involving management behaviors and their impact on the SCWE.

The licensee saw a large increase from CY 2008 to CY 2009 in the number of concerns raised as the facility staffing level has been reduced. It received the largest number of concerns in the third quarter, which coincided with the largest reduction in workforce for the year. In response to the high number of concerns raised internally and externally, the licensee recently conducted SCWE training for managers and supervisors.

The NRC conducted an operational readiness review team inspection in early 2010. The purpose of the inspection was to determine whether activities associated with initial plant operation could be conducted safely and in accordance with NRC and license requirements. The inspection included a review of the licensee's employee concerns program procedures,

FIGURE 17 - NATIONAL ENRICHMENT FACILITY ALLEGATIONS



databases, and files to ensure adequate documentation, review, and prioritization of nuclear safety concerns. The NRC also reviewed employee concerns program files to ensure that confidentiality was maintained and to verify that employees received feedback in a timely manner on the resolution of their concerns. The inspectors reviewed concern resolutions and closure to determine the adequacy of corrective actions and the use of the corrective action program, when appropriate. The inspectors reviewed the program's organizational structure and use of contracted investigators to verify that the licensee staff impartially reviewed concerns independent of the line organization and reviewed SCWE training material to verify that employees were made aware of how to report safety concerns when they were reluctant to report them to their line organization. The inspectors reviewed the results of the 2008 safety culture assessment and internal and external audits and trends to verify that the licensee was monitoring the data and that management received recommendations and lessons learned. The inspectors noted recent enhancements to the files, implemented in response to findings identified by internal audits. Lastly, the inspectors noted changes to the program to ensure adequate oversight of contractor employee concerns programs. The inspectors determined that the licensee adequately implemented the program to ensure an environment where employees felt free to raise nuclear safety concerns (ADAMS Accession No. ML100850424).

The NRC will closely continue to monitor allegation activity regarding the National Enrichment Facility through normal inspection activities as the facility continues to downsize in its approach to operational status.

Allegation Trends for Selected Vendors

Because none of the vendors received a sufficient number of allegations to discern a trend or pattern or to provide insights into the work environment, this report does not include more indepth reviews of specific vendors. The report also does not provide statistics by contractor or vendor because publishing the number of allegations could identify an alleger.

CONCLUSIONS

From CY 2005 through CY 2007, the trend in the total number of allegations received by the NRC declined slightly. However, in CY 2009, the total number of allegations received increased for the second straight year by about 10 percent. The increase is primarily a result of substantive increases in allegations received at several reactor facilities and one fuel cycle facility, and it does not appear to be the result of a general industry issue or other external factor.

The largest percentage of concerns received nationwide continues to be related to security, although the actual number of security-related concerns declined in CY 2009. The number of allegations processed by the NRC involving Agreement State matters continues to decline to a minimal level as additional States achieve Agreement State status. Most individuals who contact the NRC with concerns about Agreement State licensees agree to have their concerns forwarded to the Agreement State for resolution, and the NRC does not process these concerns as allegations. To ensure that Agreement States maintain a program that is adequate to protect public health and safety and that is compatible with the NRC's program, the agency periodically reviews the actions of the Agreement States. The results of these reviews in CY 2009 demonstrate that the Agreement States continue to rank response to allegations as a high priority in protecting public health and safety.

The analyses of allegations have provided insights into the SCWE at several facilities. The staff has taken action to engage licensees concerning their work environment when warranted and will continue to monitor these sites with interest.

Finally, the NRC developed enhanced guidance for the staff responsible for handling allegations in a number of program areas based on input from both internal reviews and external stakeholder comments on the lessons learned from the handling of allegations of inattentive security officers. The areas enhanced include communicating with alleged; the process for requesting information from a licensee related to an allegation; informing the NRC inspectors of allegation activity, as appropriate; expectations for review and documentation of allegation closure information involving a licensee response to an RFI; and handling alleged feedback after the allegation is closed. The NRC staff presented final Allegation Program policy guidance to the Commission, which approved it for implementation in early 2010.

APPENDIX

ALLEGATION STATISTICS
OPERATING REACTORS AND FUEL CYCLE FACILITIES

OPERATING REACTOR ALLEGATIONS RECEIVED FROM ONSITE SOURCES

Site	2005	2006	2007	2008	2009
ARKANSAS 1 & 2	4	4	8	6	3
BEAVER VALLEY 1 & 2	7	3	1	3	1
BRAIDWOOD 1 & 2	4	6	5	3	3
BROWNS FERRY 1, 2 & 3	24	17	11	18	8
BRUNSWICK 1 & 2	3	1	3	2	5
BYRON 1 & 2	12	3	9	8	9
CALLAWAY	11	3	17	2	2
CALVERT CLIFFS 1 & 2	1	2	1		
CATAWBA 1 & 2			2	3	2
CLINTON	1	3	1	1	4
COLUMBIA PLANT	7	3	3	1	9
COMANCHE PEAK 1 & 2	9	3	4	5	1
COOK 1 & 2	7	7	3	5	5
COOPER	1	3	2	3	2
CRYSTAL RIVER	2	5	4	2	4
DAVIS-BESSE	9		4	1	
DIABLO CANYON 1 & 2	2	2	2	13	15
DRESDEN 2 & 3	9	7		8	5
DUANE ARNOLD	1	1	1	2	1
FARLEY 1 & 2	4	4	5	5	6
FERMI	2	3	10	3	3
FITZPATRICK	3	3	1	2	3
FORT CALHOUN	2	6		1	3
GINNA	2	2	2	4	2
GRAND GULF	7	4	8	4	2
HARRIS	9	14	14	1	2
HATCH 1 & 2	3	1	6	7	5
INDIAN POINT 2 & 3	9	15	19	3	12
KEWAUNEE	3	4	1		3
LASALLE 1 & 2	2	1	5	1	
LIMERICK 1 & 2	8	4	1	3	14
MCGUIRE 1 & 2	2			3	3
MILLSTONE 2 & 3	10	9	5	8	5
MONTICELLO	2	2	1	2	2
NINE MILE POINT 1 & 2	4	5	6	1	
NORTH ANNA 1 & 2	2	1	3	1	1
OCONEE 1, 2, & 3	3	2	2	1	1
OYSTER CREEK	14	4	2	6	14
PALISADES	3	6	5	6	8
PALO VERDE 1, 2, & 3	22	16	18	17	15
PEACH BOTTOM 2 & 3	5	6	8	3	8
PERRY	4	1	1	6	9

Site	2005	2006	2007	2008	2009
PILGRIM	9	6	7	8	2
POINT BEACH 1 & 2	13	2	1	5	4
PRAIRIE ISLAND 1 & 2	5	6	6	5	14
QUAD CITIES 1 & 2	2	1	4	4	2
RIVER BEND	2	3	2	8	5
ROBINSON	1	1		1	
SALEM/HOPE CREEK	23	14	16	11	7
SAN ONOFRE 2 & 3	10	15	12	18	34
SEABROOK	10	4	4	10	2
SEQUOYAH 1 & 2	10	11	13	19	6
SOUTH TEXAS 1 & 2	4	8	6	8	12
ST LUCIE 1 & 2	16	15	11	6	15
SUMMER		3		2	3
SURRY 1 & 2	2		1	2	2
SUSQUEHANNA 1 & 2	20	19	13	32	15
THREE MILE ISLAND	4	1	1	2	9
TURKEY POINT 3 & 4	10	18	4	19	14
VERMONT YANKEE	1	4	3	1	2
VOGTLE 1 & 2	5	5	7	1	2
WATERFORD	2	2	2	4	3
WATTS BAR 1	2	6	3	9	4
WOLF CREEK	3	1	1	7	6

FUEL CYCLE FACILITY ALLEGATIONS RECEIVED FROM ONSITE SOURCES

Site	2005	2006	2007	2008	2009
AMERICAN CENTRIFUGE PLANT			2		
BWX TECHNOLOGIES, INC.		3	1		2
FRAMATONE-RICHLAND		1			
GLOBAL NUCLEAR FUEL	2		1	1	7
HONEYWELL	7		1	4	7
LOUISIANA ENERGY SERVICES		1	1	11	29
NUCLEAR FUEL SERVICES, INC.	6	1	3	3	5
PADUCAH	7	3	5	3	4
PORTSMOUTH	2	6	2	2	
SHAW AREVA MOX SERVICES			2	1	1
WESTINGHOUSE	8	2	2	4	2
YUCCA MOUNTAIN				1	5