Memorandum from the Office of the Inspector General

November 23, 2026

Joseph Quinn

REQUEST FOR FINAL ACTION – EVALUATION 2026-17642 – NUCLEAR ANONYMOUS CONDITION REPORT PROCESS

The Nuclear Regulatory Commissions' (NRC) policy statement, "*Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Fear of Retaliation,*" includes the expectation that licensees subject to NRC authority will establish and maintain a safety-conscious work environment in which employees feel free to raise concerns both to their own management and the NRC without fear of retaliation. This includes the ability to report issues with anonymity. The Tennessee Valley Authority (TVA) Nuclear Power Group (NPG) utilizes condition reports (CR) as a way for employees to report concerns with contact information or anonymously. CRs can be submitted anonymously by dropping paper copies in designated drop boxes at all sites or in the company mail system. Due to the importance of employees reporting identified concerns, we performed an evaluation to determine if nuclear anonymous CRs were handled in compliance with procedures.

We determined nuclear anonymous CRs were generally being handled in compliance with select procedural requirements. Specifically, we determined anonymous CRs were properly classified, routed to required individuals, and actions were completed timely. However, we identified areas of noncompliance related to completion and retention of documentation including CRs missing required information, CR routing documentation not being properly maintained, and a handwritten CR not being typed before routing. In addition, we identified an opportunity for improvement for routing of corporate-level anonymous CRs.

We recommend the Vice President, Fleet Support, (1) reinforce the importance of completing and retaining CR documentation as required and (2) evaluate routing requirements for corporate-level CRs. In response to our draft report, TVA management agreed with our recommendations and provided planned actions to address the recommendations. See the Appendix for TVA management's complete response.

BACKGROUND

To provide employees the ability to report issues with anonymity, paper CRs can be put into designated drop boxes at all sites or in the company mail system. As part of the anonymous CR process, CRs are required to be routed to specific individuals[1] and

[1] NPG-SPP-01.16, *Condition Report Initiation*, requires anonymous CRs to be routed to specific individuals including, Site Management, Office of the General Council, the NRC resident, the Chief Nuclear Officer, and other corporate personnel.

documentation they were sent to each individual is required to be maintained. NPG-Standard Programs and Processes (SPP), 01.16, *Condition Report Initiation*, outlines anonymous CR requirements including:

- Original paper CRs should be marked as "Sensitive Information."
- The CR number should be documented on the original paper-written CR.
- When an anonymous CR is submitted in handwritten format, the CR will be typed prior to routing.

CRs documenting Conditions Adverse to the Quality Assurance Program, Management Review Committee regulations, or plant license requirements, are considered Corrective Action Program (CAP)[2] issues. Conditions that do not meet the threshold for entry into CAP are addressed as Non-CAP issues. NPG-SPP-22.600, *Issue Resolution*, provides guidance for Non-CAP issue resolution and NPG-SPP-22.300, *Corrective Action Program*, provides guidance for CAP issue resolution.

Due to the importance of employees reporting identified concerns, we performed an evaluation of the nuclear anonymous CR process.

OBJECTIVE, SCOPE, AND METHODOLOGY

The objective of our evaluation was to determine if nuclear anonymous CRs were handled in compliance with procedures. Our scope included compliance with select procedural requirements for all anonymous CRs submitted between October 1, 2024, and May 31, 2026. This included two CAP (C-Level) and 94 Non-CAP (E-Level) anonymous CRs. To achieve our objective, we:

- Reviewed relevant Nuclear SPPs and interviewed corporate and site nuclear personnel to gain an understanding of the anonymous CR process. Specifically, we reviewed the following:
  - NPG-SPP-01.16, *Condition Report Initiation*
  - NPG-SPP-22.300, *Corrective Action Program*
  - NPG-SPP-22.600, *Issue Resolution*
- Reviewed documentation for the two CAP and a random non-statistical selection of 15 of the 94 Non-CAP anonymous CRs to determine if select procedure requirements for processing and resolving anonymous CRs were followed. For each anonymous CR, we determined compliance with criteria related to CR initiation and resolution. Specifically, we determined if (1) CRs were classified properly, (2) original CRs had required information, (3) CRs were typed before being routed if the original was handwritten, (4) CRs were routed to required individuals, (5) original CRs and routing records were stored in TVA's document management system, and (6) CRs were resolved timely.

[2] CAP is a formal, rigorous process designed to meet NRC regulations that require dedicated resources and management commitment to implement and drive the correction of conditions.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

We determined nuclear anonymous CRs were generally being handled in compliance with select procedural requirements. Specifically, we determined CRs were properly classified, routed to required individuals, and actions were completed timely. However, we identified areas of noncompliance related to completion and retention of documentation including CRs missing required information, CR routing documentation not being properly maintained, and a handwritten CR not being typed before routing. In addition, we identified an opportunity for improvement for routing of corporate-level anonymous CRs.

NONCOMPLIANCE WITH COMPLETION AND RETENTION OF DOCUMENTATION REQUIREMENTS

NPG-SPP-01.16, *Condition Report Initiation*, directs personnel to mark the original paper-written CR as Sensitive Information and transmit the CR and routing record to Management Services for retention in TVA's document management system. In addition, the SPP states personnel should document the CR number on the original paper-written CR and CRs submitted in handwritten format should be typed prior to routing. We reviewed two CAP anonymous CRs and 15 of the 94 Non-CAP anonymous CRs and identified areas of noncompliance related to anonymous CR completion and retention of documentation. Specifically,

- One CAP CR and six Non-CAP CRs did not have original CR documentation in TVA's document management system.
- All 17 CRs we reviewed had routing records that were not in TVA's document management system.
- Two Non-CAP CRs were not marked Sensitive Information as required.
- Seven Non-CAP CRs did not have the CR number documented on the original CR.
- One Non-CAP handwritten CR was not typed prior to routing. According to TVA personnel, this requirement was put in place to prevent handwriting from being recognized.

OPPORTUNITY FOR IMPROVED ROUTING OF ANONYMOUS CRs

In addition, we noted a lack of guidance on who corporate CRs should be routed to in NPG-SPP-01.16. While NPG-SPP-01.16 included a routing list for site-level anonymous CRs, there was no list of who should receive the corporate-level anonymous CRs.

Routing anonymous CRs to incorrect personnel or personnel not required could have an impact on the anonymity of the CR.

RECOMMENDATIONS

We recommend the Vice President, Fleet Support:

1. Reinforce the importance of maintaining all required documentation for CRs in the required document management system.

   TVA Management's Comments – TVA management agreed with the recommendation and stated they will conduct a session with applicable stakeholders to review the revised process requirements and ensure consistent understanding of expectations associated with the handling and processing of anonymous CRs. See the Appendix for TVA management's complete response.

   Auditor's Response – We agree with TVA management's planned action.

2. Reinforce the importance of documenting CRs with required information.

   TVA Management's Comments – TVA management agreed with the recommendation and stated they will conduct a session with applicable stakeholders to review the revised process requirements and ensure consistent understanding of expectations associated with the handling and processing of anonymous CRs. See the Appendix for TVA management's complete response.

   Auditor's Response – We agree with TVA management's planned action.

3. Evaluate the routing requirements for corporate CRs.

   TVA Management's Comments – TVA management agreed with the recommendation and stated they will evaluate the routing requirements for corporate anonymous CRs and revise the process accordingly. See the Appendix for TVA management's complete response.

   Auditor's Response – We agree with TVA management's planned action.

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This report is for your review and final action. Your written comments, which addressed your management decision and actions planned, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our observations, please contact Lindsay J. Denny, Director, Evaluations – Operations at (865) 633-7349. We appreciate the courtesy and cooperation received from your staff during the evaluation.

Greg Stinson

Greg Stinson
Assistant Inspector General
(Audits and Evaluations)

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OIG File No. 2026-17642

November 17, 2026

Greg Stinson, WT 2C-K

RESPONSE TO REQUEST FOR COMMENTS - 2026-17642 – Nuclear Anonymous Condition Report Process

This letter is in response to the 2026-17642 – Nuclear Anonymous Condition Report Process

TVA Nuclear Fleet Support appreciates Kristin S. Leach, Lindsay J. Denny and the Office of Inspector General's thorough evaluation of Nuclear Anonymous Condition Report Process.

Recommendations:

1. **We recommend the Vice President, Fleet Support, reinforce the importance of maintaining all required documentation for CRs in the required document management system.**

   Response: Agree

   Fleet Support will conduct a teach-and-learn session with applicable stakeholders to review the revised process requirements and ensure consistent understanding of expectations associated with the handling and processing of anonymous condition reports.

2. **We recommend the Vice President, Fleet Support, reinforce the importance of documenting CRs with required information.**

   Response: Agree

   Fleet Support will conduct a teach-and-learn session with applicable stakeholders to review the revised process requirements and ensure consistent understanding of expectations associated with the handling and processing of anonymous condition reports.

3. **We recommend the Vice President, Fleet Support, evaluate the routing requirements for corporate CRs.**

   Response: Agree.

   Fleet Support will evaluate the routing requirements for corporate anonymous CRs and revise the process accordingly.

Greg Stinson
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