ADMINISTRATIVE PROCEDURE



EMPLOYEE CONCERNS PROGRAM

Page 1 of 7





Title NAME DATE

Approval Authority

MODIFICATION LOG

Date Revision Number Description of Change Pages Affected

0 New Procedure All

Effective Date - ______

Effective Date	
Responsible Department	
Next Periodic Review Date –XX/XX/XXXX	

ADMINISTRATIVE PROCEDURE



EMPLOYEE CONCERNS PROGRAM

Page 2 of 7 Revision 0

Tab	Γable of Contents Pa		
1.0	INTR	RODUCTION	3
	1.1 1.2	PurposeScope	
2.0	INFC	INFORMATION	
	2.12.22.3	Terms and Definitions Acronyms General Information	3
3.0	RESI	PONSIBILITIES	4
	3.1 3.2 3.3	Vice President Power Operations Superintendent Labor Relations AmerenUE and Contractor Employees	4
4.0	PRO	CEDURE	5
	4.1 4.2	Initiating and Processing an Employee ConcernPreparing Semi-annual Public Service Commission Report	
5.0	REC	ORDS	7
	5.1	Records Generated	7
6.0	REF	ERENCES	7
	6.1 6.2	Source Requirements Development References	
7.0	ADD	ENDA	7
	7.1	Attachments	7

ADMINISTRATIVE PROCEDURE	
EMPLOYEE CONCERNS PROGRAM	Page 3 of 7
EINIFLUTEE CONCERNS PROGRAIN	Revision 0

GEN-ADM-XXXX

1.0 INTRODUCTION

1.1 Purpose

Describe the AmerenUE Power Operations Employee Concerns Program.

1.2 Scope

The AmerenUE Power Operations Employee Concerns Program applies to current and former AmerenUE employees and current and former contractor employees.

2.0 INFORMATION

2.1 Terms and Definitions

- 2.1.1 Anonymous A Concerned Individual whose identity is not known. Also, a Concerned Individual who is initially known to the Superintendent Labor Relations but who requests to be treated as unknown after the initial contact.
- 2.1.2 Confidentiality The protection of information or data that directly or otherwise might identify the person raising a concern.
- 2.1.3 Corrective Action Any action taken to address and correct a concern/issue. It may or may not refer to Corrective Actions included in the Corrective Action Program.
- 2.1.4 Employee(s) Current, or past, employee(s) of AmerenUE, or employee(s) of contractors who are (or were) employed by AmerenUE.
- 2.1.5 Employee Concern A declaration, statement, or assertion of impropriety or inadequacy, the validity of which may not have been substantiated.
- 2.1.6 Resolution A process that identifies; 1) relative facts, 2) formulates appropriate corrective actions, 3) identifies appropriate corrective action owners, and 4) ensures closure of the assigned corrective actions.

2.2 Acronyms

2.2.1 ECP – Employee Concerns Program

ADMINISTRATIVE PROCEDURE		
GEN-ADM-XXXX	EMPLOYEE CONCERNS PROGRAM	Page 4 of 7
	EINIPLOTEE CONCERNS PROGRAIN	Revision 0

2.3 General Information

2.3.1 AmerenUE Power Operations relies on employees to serve as the primary means for discovery of conditions which may affect plant operations, maintenance, and security, and which may otherwise be adverse to safety or quality.

3.0 RESPONSIBILITIES

3.1 Vice President Power Operations

- 3.1.1 Establish expectations regarding involvement in employee concerns and for overseeing compliance with those expectations.
- 3.1.2 Establish and describe policies to support an Employee Concerns Program.

3.2 Superintendent Labor Relations

- 3.2.1 Maintain the Employee Concerns Program in accordance AmerenUE Power Operations expectations, regulatory requirements, and industry standards.
- 3.2.2 Keep the Vice President Power Operations informed of the status of the Employee Concerns Program, including status of safety and compliance concerns identified to ECP and the resolution of those concerns.
- 3.2.3 Resolve all concerns identified to ECP in a fair, thorough and prompt manner.
- 3.2.4 Respect and maintain the level of confidentiality of all individuals who raise concerns.

3.3 AmerenUE and Contractor Employees

3.3.1 Comply with the expectations set by the Vice President Power Operations for Employee Concerns.

ADMINISTRATIVE PROCEDURE		
GEN-ADM-XXXX	EMPLOYEE CONCERNS PROGRAM	Page 5 of 7
GEN-ADM-XXXX	EMPLOTEE CONCERNS PROGRAM	Revision 0

- 3.3.2 Promptly report concerns relating to:
 - A potential of an adverse effect on safety or quality
 - Non-conformance with license requirements, company policies, or procedures
 - Any work environment that discourages employees from raising concerns

4.0 PROCEDURE

4.1 Initiating and Processing an Employee Concern

NOTE - This Section of the procedure should be used if the Employee believes that all other means of resolving their concern have been exhausted.

All (Report Initiator)

- 4.1.1 Report the concern to the Superintendent Labor Relations using any of the following methods:
 - Mail any written notification by internal company mail or U.S. Mail to the Superintendent Labor Relations
 - NOTE Interviews may be scheduled away from the site to facilitate confidentiality
 - Request a person-to-person interview with the Superintendent Labor Relations
 - Telephone, using the number for Superintendent Labor Relations or the Employee Concerns Hotline
 - E-Mail
 - Intranet

Superintendent Labor Relations

- NOTE Regardless of the method of receipt, the Superintendent Labor Relations must maintain the anonymity of reporting individuals.
- 4.1.2 Review reported concerns.
 - 4.1.2.1 If the reported concern contains information that indicates an immediate threat to life or health exists, then immediately notify the Vice President Power Operations or designee.
- 4.1.3 Conduct an initial investigation with consideration given to all available facts, including the existence of credible, contrary facts.

	ADMINISTRATIVE PROCEDURE	
GEN-ADM-XXXX	EMPLOYEE CONCERNS PROGRAM	Page 6 of 7
		Revision 0
4.1.4	When the initial investigation is complete communicat	e the following to

- 4.1.4 When the initial investigation is complete communicate the following to the Vice President Power Operations:
 - The original concern.
 - The results of the initial investigation.
 - Any recommendations resulting from the initial investigation.

Vice President Power Operations

- 4.1.5 Review reported concern, results of initial investigation, and recommendations from the Superintendent Labor Relations.
- 4.1.6 If required, assign appropriate personnel to conduct an in-depth investigation or to initiate appropriate corrective action.
- 4.1.7 If required, forward the concern to the appropriate Ameren division for further review and resolution.
- 4.1.8 Return initial package to the Superintendent Labor Relations.

Superintendent Labor Relations

- 4.1.9 Track the status of any open concern.
 - 4.1.9.1 Verify status of open concerns on a quarterly basis.
- 4.1.10 If identity of initiating employee is known, then notify employee of concern status.
 - 4.1.10.1 If the Superintendent Labor Relations does not resolve the concern to the employee's satisfaction, the employee may report the concern directly to the AmerenUE Vice President Power Operations who is an officer of AmerenUE.

4.2 Preparing Semi-annual Public Service Commission Report

Superintendent Labor Relations

- 4.2.1 On June 15th and December 15th of each year, prepare a semi-annual report detailing the status of the Employee Concerns Program.
- 4.2.2 Submit the semi-annual report to the Vice President Power Operations.
- 4.2.3 Submit the semi-annual report to the Managing Associate General Counsel for transmittal to the Missouri Public Service Commission.

ADMINISTRATIVE PROCEDURE		
GEN-ADM-XXXX	EMPLOYEE CONCERNS PROGRAM	Page 7 of 7
GEN-ADIVI-AAAA	EWIPLOTEE CONCERNS PROGRAW	Revision 0

5.0 RECORDS

The following documents are Quality Records, as a result of performing this procedure:

5.1 Records Generated

- 5.1.1 Any case file generated by this procedure
- 5.1.2 Semi-annual Public Service Commission Report

6.0 REFERENCES

6.1 Source Requirements

6.1.1 Missouri Public Service Commission Report Case *ES-2007-0474

6.2 Development References

- 6.2.1 29 CFR 1977, Occupational Safety and Health Act
- 6.2.2 Section 11C, 1970 Occupational Safety and Health Act
- 6.2.3 29 CFR 24.8, Environmental Protection Agency (EPA)
- 6.2.4 Missouri Fair Labor Statute
- 6.2.5 National Pollutant Discharge Elimination System (NPDES)

7.0 ADDENDA

7.1 Attachments

None.