



ALLEGATION PROGRAM

ANNUAL TRENDS REPORT

Calendar Year 2024

**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 January 25, 2024, requires the Agency Allegation Advisor to 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, this report discusses staff activity in calendar year (CY) 2024 involving the Allegation Program and related policies.

During the 5-year period from 2020 through 2024, the NRC received between 170 and 270 allegations annually related to reactor plants, materials facilities, and their vendors.¹ The total number of reactor- and materials-related allegations in 2024 remained relatively consistent with number for the previous year, reflecting volumes last observed in 2018. A downward trend that began in 2015 reversed in 2021, contributing to the recent stability. It is important to note that a single allegation may include multiple concerns. While not universally the case, the trend in the total number of concerns has generally paralleled the trend in total allegations—that is, increases or decreases in allegations have generally corresponded with similar changes in the number of concerns. In 2024, the total number of allegation concerns decreased by 12 percent, consistent with the stabilization in allegation volume. On average, approximately 22 percent of reactor-related concerns and 47 percent of materials-related concerns were substantiated over the past 5 years.

At the national level, discrimination concerns represented the highest percentage of allegations received at the national level. Wrongdoing concerns ranked second overall. However, wrongdoing allegations encompass subcategories such as falsification and counterfeit, fraudulent, and suspect items. When these subcategories are combined, the total volume of wrongdoing-related concerns surpasses that of any other category, making wrongdoing the most prevalent issue overall. Of the wrongdoing concerns raised in 2024, the majority—48 percent—were identified by licensees acting in their official capacity and reported through the Allegation Program.

The volume of discrimination concerns in 2024 was comparable to that of 2023 but declined over the course of the year. In contrast, while the total number of wrongdoing-related concerns decreased by 25 percent compared to the previous year, there was an uptick in concerns during the last two quarters. The allegation staff continues to facilitate the agency-sponsored preinvestigation alternative dispute resolution (ADR) process for discrimination allegations. The NRC believes this preinvestigation process is beneficial to the environment for raising concerns. The preinvestigation ADR process gives individuals and their employer (or former employer) the opportunity to resolve an allegation of discrimination through mediation, potentially avoiding lengthy litigation, an NRC investigation, or both. For CY 2024, eight of the preinvestigation ADR offers the NRC made in association with discrimination allegations resulted in agreements to mediate. One of the mediated cases concluded with a mutually agreeable settlement. Two ADR cases remain open.²

Chilling effect concerns represented the third highest category of issues reported throughout the year, following a slightly consistent trend. However, the overall volume was 40 percent lower than in 2023 and more aligned with 2022 levels. With respect to regional distribution, a notable

¹ Management Directive 8.8 defines an allegation as “a declaration, statement, or assertion of impropriety or inadequacy associated with NRC regulated activities, the validity of which has not been established.”

² <https://www.nrc.gov/about-nrc/regulatory/enforcement/adr/trending-data.html>

concentration of chilling effect concerns (about 79 percent), originated from Region II facilities. Of these, 30 percent were specifically associated with the Saint Lucie Plant (STL). The allegations involving a chilled work environment within the STL Operations Department were substantiated. Additional details related to the safety-conscious work environment at STL are provided later in this report.

In alignment with the elevated number of chilling effect concerns attributed to STL, as discussed above, the staff identified two reactor sites, Quad Cities Nuclear Power Station and STL, whose allegation volumes warranted further evaluation. To support this analysis, the staff conducted a 5-year review of allegations received from reactor and materials licensees and vendors, focusing specifically on concerns submitted by onsite sources. This approach was intended to inform the NRC's understanding of the local environment for raising concerns, as a high volume of onsite allegations may reflect a degraded or chilled safety-conscious work environment. As a result of this assessment, the NRC selected STL and Quad Cities for a more comprehensive review.

TRENDS IN ALLEGATIONS

The U.S. Nuclear Regulatory Commission (NRC) monitors allegations to discern trends or marked increases that might prompt the agency to question a licensee about the causes of such changes. 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 allegations with the potential to offer insights into the environment for raising concerns (i.e., the safety-conscious work environment (SCWE)) at a given facility. Those allegations include reports from current or former licensee employees, contractor employees, or anonymous sources that may suggest a reluctance to raise safety concerns internally. For power reactor facilities, the staff analyzes recent allegation activity in support of the Reactor Oversight Process end-of-cycle assessments. In addition, the staff might analyze a particular site or licensee whenever allegations or inspection findings indicate that such an analysis is warranted.

The staff also analyzes national trends in reactor and materials allegations, changes in the volume of users of the NRC's Allegation Program, and the program's impact on workload in NRC regional and program offices. The following section explores these trends.

National Trends

National trends inform the staff about the effect of external factors, plant events, and industry efforts to improve the SCWE at NRC-licensed facilities. The staff can use national trends to help develop budget and planning assumptions to support future agency and Allegation Program needs.

Figure 1 shows that the NRC received a total of 261 allegations concerning reactor and materials licensees, as well as their vendors. This represents a modest decrease of approximately 3 percent from the 268 allegations received in 2023. The volume of allegations remains significantly higher than in 2020–2022, continuing the upward trend that began in 2021.

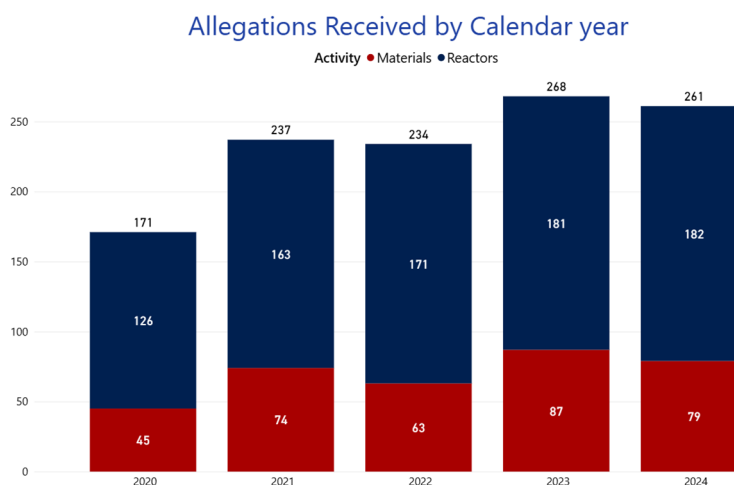


Figure 1 Allegations Received by Calendar Year

Because each allegation can include multiple concerns, the necessary staff effort to prepare an appropriate response is based on the number of concerns received. Typically, each allegation represents one to three concerns. In most years, including the previous four analysis periods, the total number of concerns has paralleled the trend in total allegations (i.e., as the number of allegations has increased or decreased, the number of concerns has increased or decreased correspondingly). In 2024, the total number of concerns decreased by 12 percent, while the allegations decreased by only 3 percent. While the number of allegations remained constant in reactors, there was an 11 percent decline in the number of concerns. More notably, the number of allegations increased modestly in Region II by 20 percent, while Region III experienced a significant increase of 120 percent in reactor-related allegations. One potential contributing factor to the increase in Region III was the higher volume of allegations received from the Quad Cities Nuclear Power Station, which is discussed in greater detail later in this report. Although Region II experienced an overall increase in

allegations, the total number of individual concerns decreased by 22 percent. In contrast, Regions I and IV experienced decreases in overall allegations, by 24 percent and 57 percent respectively, with most of these reductions occurring in reactor-related allegations. NRC Headquarters, which addresses allegations such as those related to decommissioned and operating research and test reactors, security force-on-force exercises, the inappropriate sale of radioactive material on the internet, and the improper import or export of radioactive material, received approximately 8 percent fewer allegations in 2024, but the number of concerns remained fairly constant.

The proportion of substantiated reactor allegations, indicated by the percentage on the red bars in figure 2, ranges from 18 to 26 percent, with the highest rate occurring in 2023. Despite fewer total closed allegations in 2024, the percentage of substantiated cases remained relatively low at 18 percent.

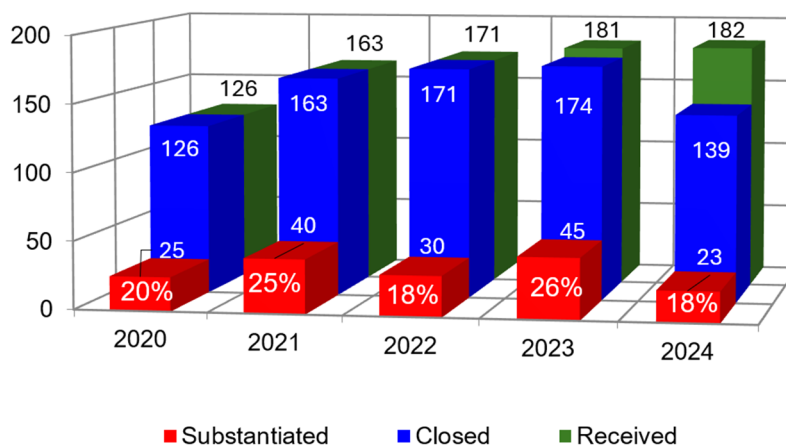


Figure 2 Reactor Allegations Closure

As shown in figure 3, the percentage of substantiated material concerns also rose during this 5-year period, reaching a high of 56 percent in 2023. However, in 2024, the substantiation rate dropped to 39 percent, but some concerns are still open. More concerns in materials were substantiated compared to reactor concerns.

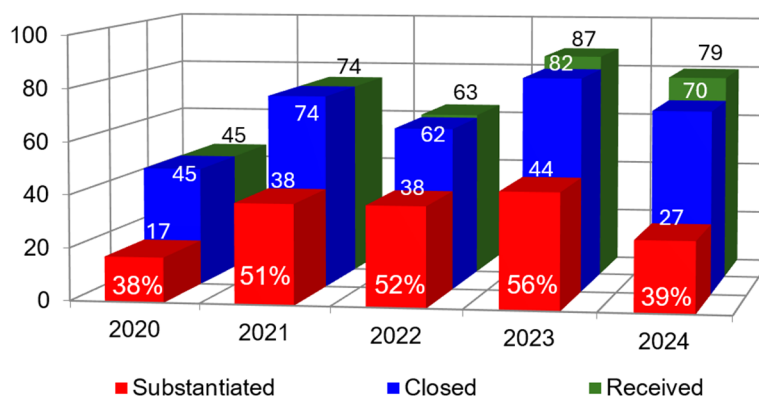
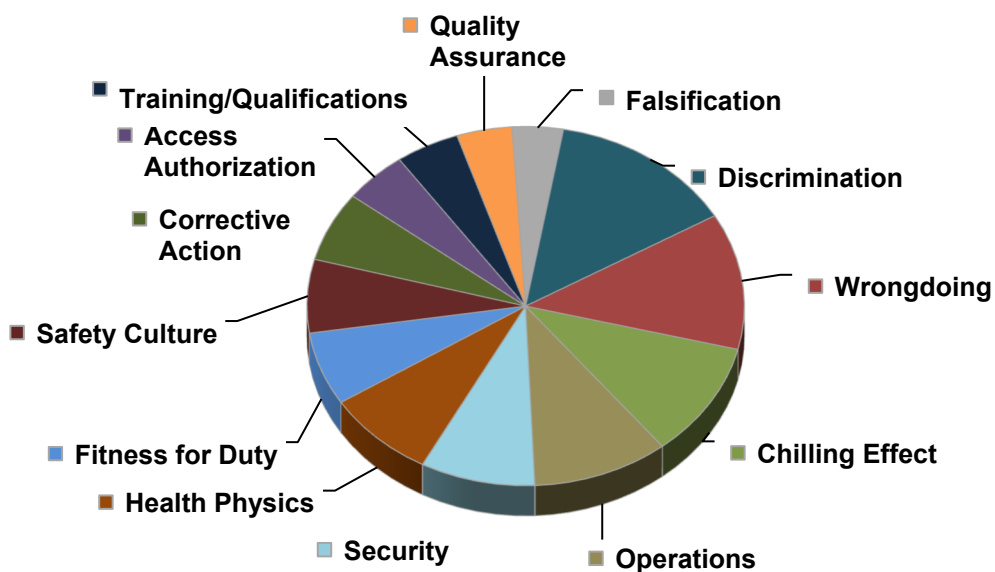


Figure 3 Material Closure Allegations

Reactor Licensee Trends

Figure 4 provides insight into the areas in which the NRC is allocating resources for the evaluation of reactor-related allegations. The figure highlights 13 functional areas that accounted for about 80 percent of the allegation issues received nationwide in 2024. The following sections present a detailed analysis of the three functional areas with the highest volume of allegations.³

Figure 4 Reactor Concerns Nationwide, 2024



Discrimination

Discrimination concerns represented the highest percentage of allegations received at the national level. However, wrongdoing concerns ranked second overall. It is important to note that wrongdoing allegations encompass subcategories such as falsification and counterfeit, fraudulent, and suspect items (CFSI). When these subcategories are combined, the total volume of wrongdoing-related concerns surpasses that of any other category, making wrongdoing the most prevalent issue overall.

The total volume of discrimination concerns received in 2024 was comparable to the volume received in 2023, but the volume declined throughout the year. Workers at Region II facilities submitted a greater proportion of concerns (45 percent); however, these concerns were distributed relatively evenly across the various sites. Only 41 percent of the reactor discrimination concerns met prima facie criteria,⁴ which is an increase from 2023 when only 39 percent met these criteria.

³ The agency received a few allegations about concerns in areas not shown in figure 4; these represent the remaining 20 percent of the issues received. These areas include engineering, chemistry, environmental, other, emergency preparedness, fire protection, instrumentation/control, civil/structural, fatigue/overtime, licensing, cybersecurity, electrical, employee concerns program, maintenance, nondestructive examination, and procurement.

⁴ The allegation manual defines a "prima facie" showing of discrimination to mean that the facts provided by an alleege create a reasonable inference that an employer took an adverse action against the alleege for

As of April 30, 2025, the NRC had not substantiated any of the discrimination concerns raised in 2024; however, most of those warranting investigation were still open and were either being investigated (investigations can take up to a year to complete) or were in the NRC's preinvestigation ADR process. Of the discrimination allegations that met prima facie criteria, 26 percent have already been closed. Of those closed cases, 83 percent involved allegeders who were offered either ADR or an investigation but chose to withdraw their complaint before the agency reached a conclusion. For calendar year (CY) 2024, eight of the preinvestigation ADR offers the NRC made in association with discrimination allegations resulted in agreements to mediate. One of the mediated cases concluded with a mutually agreeable settlement; however, that case stemmed from an allegation received before CY 2024. Two ADR cases are still in progress.⁵

Wrongdoing

"Wrongdoing" is defined as a willful violation of regulatory requirements through deliberate action or a violation resulting from careless disregard of regulatory requirements. Such concerns are unique in two ways. First, unlike other concerns in the program raised by individuals outside the NRC, potential wrongdoing concerns are sometimes identified by NRC inspectors and are tracked within the Allegation Program. Second, usually when an issue is raised to the NRC by licensee management acting in its official capacity, such as a licensee manager discussing operational issues with the NRC resident inspector, the concern is not considered an allegation. An exception is made for potential wrongdoing concerns.

Wrongdoing concerns include those related to falsification and CFSI. These types of wrongdoing allegations are categorized separately in the NRC's database but, for the purpose of this trend analysis, are included as wrongdoing. Of the wrongdoing concerns raised or identified in 2024, most were submitted to the Allegation Program by licensees acting in their official capacity, accounting for 48 percent of the total wrongdoing concerns (i.e., licensee-identified concerns). Total wrongdoing-related concerns decreased by 25 percent, but unlike during the previous year, the number of concerns increased in the last two quarters.

Chilling Effect

The NRC uses the term "chilling effect" to describe a condition that occurs when an event, interaction, decision, or policy change results in a perception that the raising of safety concerns to the employer or the NRC is being suppressed or is discouraged. A chilled work environment is a condition in which the chilling effect is not isolated (e.g., multiple individuals, functional groups, shift crews, or levels of workers within the organization are affected). A chilled work environment is often referred to as a condition that is the opposite of an SCWE.

Chilling effect concerns were received throughout the year at a slightly consistent pace, and the total volume was 40 percent lower than the number received in 2023 and more consistent with the 2022 values. The trends observed in the data show that a higher concentration of chilling effect concerns originated from Region II facilities, accounting for 79 percent of the total concerns reported. Notably, 30 percent of these concerns were specifically associated with STL.

having engaged in protected activity. Specifically, the allegeder must provide facts indicating that (1) the allegeder engaged in protected activity, (2) an adverse action was taken against the allegeder, (3) persons responsible for the adverse action had knowledge of the allegeder's protected activity, and (4) the protected activity was, at least in part, a reason for the adverse action. In such circumstances, further investigation, development of evidence, or both are needed to establish whether discrimination occurred.

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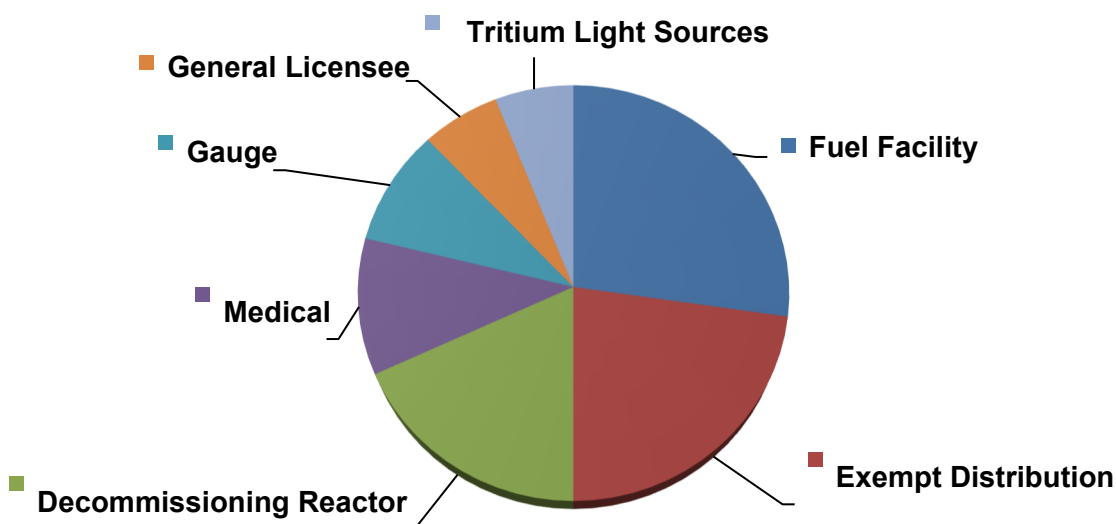
<https://www.nrc.gov/about-nrc/regulatory/enforcement/adr/trending-data.html>

The allegations indicating a chilled work environment within the STL Operations Department were substantiated. Additional information pertaining to the SCWE at STL is provided later in this report.

Materials Licensee Trends

A comparison of the types of materials issues identified in received allegations did not yield meaningful results because of the wide variety of materials licensees and the significant differences in the activities they perform. Figure 5 presents the seven types of materials licensees that accounted for about 90 percent of allegation concerns that the NRC received nationwide.⁶

Figure 5 Allegations by Type of Materials Licensee Nationwide, 2024



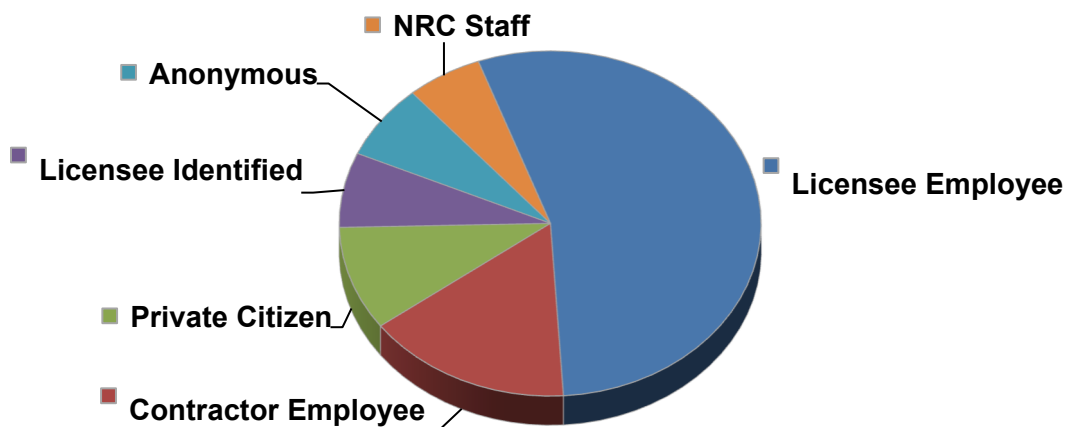
In 2024, the NRC received approximately 9 percent fewer materials-related allegations compared to 2023. For several years, allegations associated with fuel cycle facilities have represented the largest share of materials-related allegations. This trend is expected, as fuel cycle facilities are the largest type of materials licensee and most closely resemble reactor facilities in terms of organizational size and complexity. In the past several years, however, the NRC received more allegations concerning exempt distribution products. Such products include silicon chips, self-luminous products, gunsights, and smoke detectors. These products are required to be distributed by persons who have a specific license from the Commission authorizing such distribution to persons exempt from the requirements for an NRC license. One reason more exempt distribution concerns were received continues to be consumers' increased focus on the sale of radioactive products on the internet. This is the first time in 5 years that the trend reversed back to fuel facilities receiving the highest number of allegations.

⁶ The agency received a few concerns about the materials licensee types not shown in figure 5, which represent the remaining 10 percent of the issues raised. These licensee types include decommissioning materials, research and development, general licensee, irradiators, nuclear pharmacies, waste disposal, and others.

Source Trends

Figure 6 shows a breakdown of 95 percent⁷ of the sources for reactors and materials allegations received in 2024. In considering allegation sources with the potential to offer insights into the SCWE at a given facility (i.e., allegations submitted by current or former licensee or contractor employees or anonymous sources), their percentage increased slightly in 2024, although the number of allegations from contractor workers and those wishing to remain anonymous did not increase.

Figure 6 Allegations by Source Category Nationwide, 2024



Licensee-identified concerns, which are shared with the NRC by licensee employee representatives acting in their official capacity, decreased by 33 percent. These representatives often notify the NRC of internal investigations into potential wrongdoing involving their staff or management. The agency staff assigns an allegation process number to track the evaluation of the alleged wrongdoing issue. Similarly, the source category “NRC Staff” indicates an NRC staff member who suspects that a regulatory requirement has been willfully violated, thus prompting the NRC Office of Investigations to investigate. The volume of NRC staff concerns increased slightly by 17 percent compared to the previous year.

Allegation Trends for Selected Reactor Sites

Trending the number and nature of allegations for specific reactor sites, individually and in the aggregate, is one method the NRC staff uses to monitor the SCWE at reactor sites. The appendix to this report offers statistics on allegations for all operating and nonoperating reactor sites during the 5-year period from January 2020 through December 2024 from onsite sources (i.e., those that might indicate the health of the SCWE). Onsite sources include current or former licensee employees, current or former contractor employees, and anonymous allegers. For this analysis, the NRC assumed that anonymous allegations were from onsite personnel.

Because a large volume of allegations from onsite sources might indicate that an SCWE is at risk, the staff conducts a more in-depth SCWE review of any site with larger numbers of onsite

⁷ The other 5 percent of the sources for reactors and materials allegations received in 2024 are Federal agency; Federal, State, or local government employees; municipal government; and other.

allegations. Because sites with a larger population of employees and contractors (such as three-unit reactor sites or sites performing significant engineering projects) typically generate more allegations, the data must be normalized to ensure that the NRC does not disproportionately choose such sites for further analysis. The NRC used the following algorithm, which is based on the median number of allegations received at operating reactor sites over the CY, considers the varying workforce size at different sites, and then determines what sites warrant additional review:

- one-unit reactor sites (or any site with fewer than 800 persons) with an onsite allegation volume greater than 2.25 times the median
- two-unit reactor sites (or any site with 800 to 1,000 persons) with an onsite allegation volume greater than 3 times the median
- three-unit reactor sites (or any site with more than 1,000 persons) with an onsite allegation volume greater than 4.5 times the median

The staff recognizes, and takes into consideration when applying the above criteria, that during times of significant site activity, the site population might increase substantially.

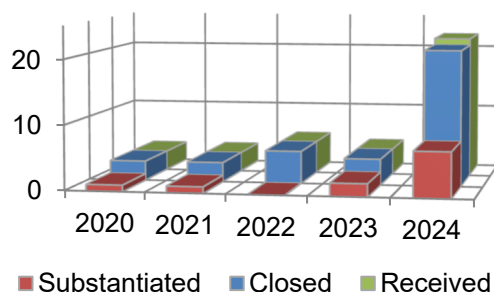
For 2024, the median number of allegations per operating reactor site was three. Two sites met the above thresholds for further review: STL and Quad Cities.

Saint Lucie Plant

As figure 7 shows, the number of allegations received by the NRC from onsite sources regarding STL in CY 2024 significantly increased from the number received in CY 2023 (400 percent). The rate of receipt increased each quarter until dropping in the fourth quarter. Most of the allegations came from licensee employees, accounting for 75 percent of the total. Contractors submitted 21 percent of the allegations, while 4 percent were anonymous. Of the contractor-related allegations, 80 percent coincided with outage periods. Since CY 2022, the NRC has received an anonymous allegation originating from STL each year. Anonymous allegations remain among the least common sources of allegations received by the agency;

therefore, the continued annual anonymous submission from STL is considered atypical. More concerns were received involving chilling effect, discrimination, and the corrective action program (CAP) than other disciplines. There were 10 concerns for chilling effect, 6 for discrimination, and 5 for CAP. Most of the chilling effect concerns were received in Quarter 1 and Quarter 3, while most of the discrimination concerns were received in Quarter 2. The CAP concerns were distributed almost equally throughout the year. All but one chilling effect concern came from licensee employees. Most of the concerns were related to the Operations Department and 20 percent to the Chemistry Department. The chilled work environment allegation in Operations was substantiated through an NRC inspection. Subsequent follow-up inspections were completed in 2025, and the agency will continue to monitor the work

Figure 7 STL Allegations



environment.

As with the general allegation activity, the site's subset of discrimination allegation concerns also increased in CY 2024. In CY 2024, the NRC received three times more discrimination concerns compared to 2023 and 2021, and twice as many as it received in 2020. All were from licensee employees. For 2024, half of the discrimination concerns involved the Operations Department. All the discrimination concerns were closed and unsubstantiated. Of the alleged, 33 percent decided not to pursue their discrimination concerns.

On June 28, 2024, the NRC completed a problem identification and resolution (PI&R) inspection at STL (Agencywide Documents Access and Management System Accession No. ML24262A044). The inspection included an assessment of the effectiveness of the station's programs to establish and maintain an SCWE. The team interviewed 12 individuals from the Engineering, Maintenance, Chemistry, and Radiation Protection Departments and determined that the licensee had an SCWE where individuals felt free to raise concerns without fear of retaliation. However, the team noted that most of those interviewed were hesitant to use the Employee Concerns Program (ECP) as an avenue to raise nuclear safety concerns.

Additionally, an NRC-qualified safety culture assessor led a focused evaluation of SCWE within the operations organization. After interviewing about 75 individuals within the operations organization, the team determined that senior management behaviors had created a chilled work environment such that the majority of operators would not use their chain of command to raise nuclear safety concerns.

As part of the annual follow-up PI&R inspection conducted during the week of December 11, 2024, NRC inspectors reviewed the licensee's corrective actions taken in response to previously identified SCWE concerns within the STL Operations Department (ML25029A238). In a separate follow-up, NRC inspectors conducted an additional SCWE inspection during the week of March 17, 2025. As part of this review, inspectors evaluated the results of independent safety culture assessments conducted in November 2024 and February 2025, and performed 23 interviews involving 29 personnel, most of whom were from the Operations Department. This inspection identified no new safety culture issues (ML25114A129).

Based on discussions with the licensee's ECP representatives conducted as part of the SCWE assessment, both the NRC and the licensee observed an increase in concerns within the Operations Department. The NRC also noted additional concerns from other departments; some of these were shared with the licensee with a request for a response as part of the allegation review process. While the licensee did not observe any discrimination concerns, the NRC identified a significant increase in discrimination-related concerns.

In summary, allegations at STL increased significantly in CY 2024, despite the site historically maintaining an average volume of allegations. One of the potential contributing factors to this increase was the substantiated chilled work environment within the Operations Department. No additional trends were identified across other departments or disciplines. The NRC will continue monitoring the SCWE and the corrective actions at STL through inspections scheduled through CY 2025.

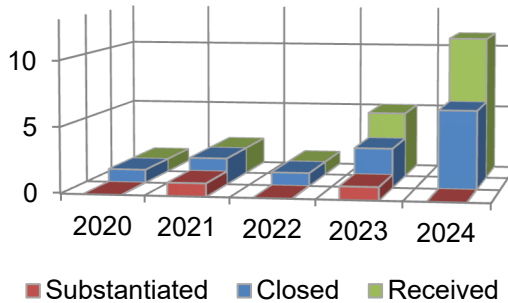
Quad Cities Nuclear Power Station

As figure 8 shows, the number of allegations received by the NRC from onsite sources at Quad

Cities in CY 2024 increased significantly from the number received in CY 2023 (267 percent). The allegations were received at a steady rate throughout the year. Allegations came primarily from licensee employees (73 percent), with only 18 percent from contractor employees raising their concerns to the NRC. One alerger came to the NRC anonymously. There was not a strong trend in the concerns received, but more involved security during the first and fourth quarters of the year.

The NRC received only one allegation asserting a chilled work environment at the Quad Cities site. The concern was raised anonymously in the third quarter and was not specific enough to allow evaluation.

Figure 8 Quad Cities Allegations



As with the general allegation activity, the site's subset of discrimination allegation concerns also increased significantly. The NRC received four discrimination concerns in CY 2024; two are still open and under investigation, and the other two did not make a prima facie showing. One discrimination concern was received in each of CYs 2020, 2021, and 2023. Of those received in CY 2024, one was investigated but not substantiated, one was settled in preinvestigation ADR, and one is still open.

Based on NRC allegations staff discussions with licensee ECP representatives in January 2025, it appears that both the NRC and the licensee's ECP saw a trend in the health physics department. In general, the ECP received more concerns related to nuclear safety for investigation in 2024 than in the previous year.

The NRC performed a PI&R inspection in late 2024 (ML24317A237). The inspectors conducted focus groups and interviews with 179 individuals, including first-line supervisors, from the departments handling operations, engineering, radiation protection, maintenance, and security, as well as interviews with the managers of those departments and the ECP manager. The inspectors also reviewed actions taken by the station following the inspection in August 2023 (ML23262B441) under Inspection Procedure (IP) 93100, "Safety Conscious Work Environment Issue of Concern Followup," dated August 18, 2011 (ML11231A651). The inspectors determined that there was an adequate SCWE at Quad Cities and observed that the licensee had addressed findings from the IP 93100 inspection.

In summary, there was a significant increase in allegations at the Quad Cities site in CY 2024 and more concerns involving the security organization than other departments. The NRC conducted a comprehensive assessment of that department's SCWE and concluded that the environment was adequate, and workers were comfortable raising concerns without fear of retaliation. The agency will continue to monitor the SCWE through normal oversight activities.

Allegation Trends for Selected Materials Licensees

The NRC posts allegation statistics for certain fuel cycle facilities on its public website (see the appendix to this report). Because of the small number of allegations and the smaller workforce sizes associated with most materials licensees, a licensee or contractor has a higher chance of

identifying an alleged than at larger sites. Therefore, this report does not include statistics on allegations about materials licensees other than fuel cycle facilities. None of the fuel cycle facilities received enough allegations to discern a trend or pattern to provide insights into the SCWE.

Allegation Trends for Selected Vendors

Neither this report nor the NRC website offers statistics by contractor or vendor for reasons similar to those outlined above for selected materials licensees. None of the vendors received enough allegations to discern a trend or pattern or to provide insights into the SCWE.

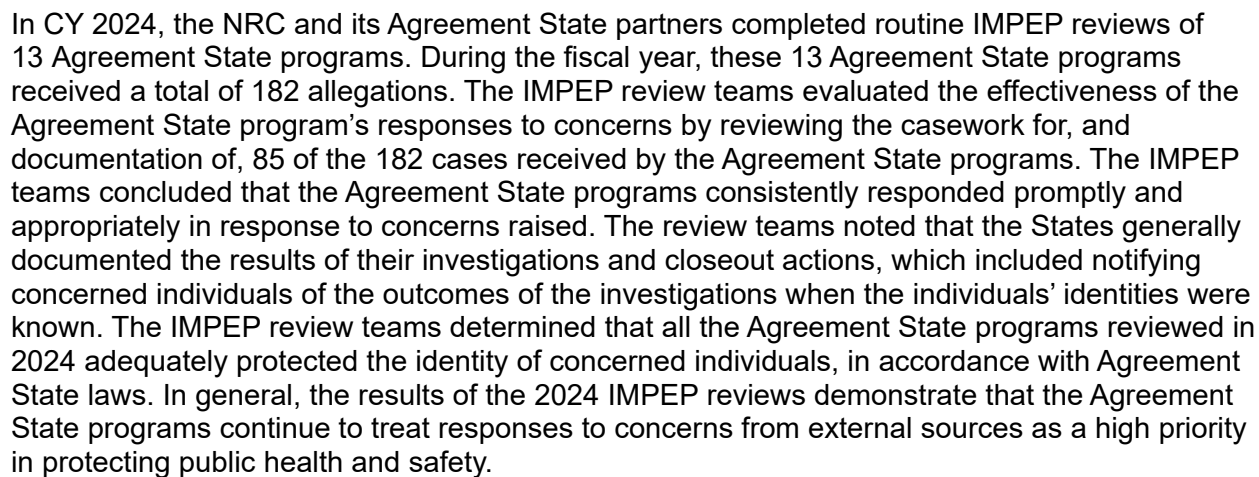
Trends in the Agreement States

Under the authority granted in section 274b of the Atomic Energy Act of 1954, as amended, the NRC may relinquish its authority to regulate certain byproduct material, source material, and limited quantities of special nuclear material to a State government through a mutual agreement. A State that has entered into this agreement with the NRC is called an "Agreement State." When individuals contact the NRC with concerns about Agreement State licensees, the NRC staff explains the Agreement State program to the individual. Most of these individuals are willing to contact, and be contacted directly by, Agreement State personnel about their concerns. The NRC staff does not process the concern as an allegation but rather provides the concern to the Regional State Agreements Officer for referral to the Agreement State. If an individual wishes to remain anonymous to the Agreement State, the NRC staff still refers the concern to the Agreement State in accordance with the agreement, but without divulging the concerned individual's identity. The NRC Office of Nuclear Material Safety and Safeguards addresses concerns about the Agreement State program oversight outside of the Allegation Program.

Before becoming Agreement States, States must first demonstrate that their regulatory programs are adequate to protect public health and safety and are compatible with the NRC's program, and the NRC has a statutory responsibility to periodically review the actions of the Agreement States to ensure that they adequately maintain their programs. The NRC uses the Integrated Materials Performance Evaluation Program (IMPEP) to satisfy this statutory responsibility, to include the processing of concerns from individuals. More information on the NRC's Agreement State program and IMPEP is available on the website for the NRC's Office of Nuclear Material Safety and Safeguards at <https://scp.nrc.gov>.

Figure 9 shows the 39 Agreement States.

NRC and Agreement States



OVERVIEW OF PROGRAM ACTIVITIES

The sections below discuss CY 2024 activities in areas closely related to the Allegation Program and SCWE policy, including statistics associated with the agency-sponsored preinvestigation ADR program. The staff gathers insights into the SCWE at a particular site in several ways (e.g., by reviewing the number and nature of allegations concerning a particular site, through documented observations based on interviews with the licensees' workers, and considering pertinent documents during the baseline PI&R inspections). If the staff discerns that a work environment is chilled (i.e., not conducive to raising safety concerns) or there is a finding of discrimination that has the potential to chill the work environment, the NRC may request information about the licensee's SCWE.

Requests for Information about Discrimination Findings

The U.S. Department of Labor or a Federal authority other than the NRC (e.g., U.S. Circuit Court) sometimes substantiates a discrimination concern under section 211 of the Energy Reorganization Act of 1974, on which the NRC's employee protection regulations are based. In such cases, while the NRC is considering enforcement action, the staff may issue a request for additional information to the regulated entity. Such requests inform the licensee or contractor of the NRC's knowledge of the finding and interest in understanding the licensee's or contractor's position, including any actions that have been taken or are planned to assess and mitigate the potential chilling effect that the finding might cause. If the finding is widely known (e.g., it was discussed in press publications), a public letter requesting such information from the licensee also informs the workforce of the NRC's interest in the state of the environment for raising concerns at the site. At the time that the NRC issues such requests, the agency normally has neither confirmed that enforcement is necessary nor that the work environment is chilled. Rather, information is acknowledged or, if necessary, sought to help inform the NRC's potential evaluation efforts going forward. The NRC issued no such letters in 2024.

Chilling Effect Letters

When the NRC concludes that a licensee's or contractor's work environment is chilled and corrective actions are warranted, the agency will typically issue a chilling effect letter (CEL). A CEL is intended to ensure that the licensee is taking appropriate actions to foster a workplace environment that encourages employees and contractors to raise safety concerns and to feel free to do so without fear of retaliation. The NRC issued no CELs in 2024.

Preinvestigation Alternative Dispute Resolution Process

The NRC's ADR program includes the opportunity to use voluntary dispute resolution early in the allegation process for cases of alleged discrimination before the NRC investigates the allegation. Preinvestigation ADR gives parties extra opportunities to resolve their differences outside the normal regulatory framework, and it uses a neutral third party to facilitate discussions and the timely settlement of the discrimination concern. The NRC believes that voluntary dispute resolution by the parties, using the communication opportunities that the preinvestigation ADR process supplies, can stem the inherent damage such disputes can inflict on the SCWE more quickly than an investigation. At any time, either party can exit the ADR process, at which point an NRC investigation remains an option if the alleged is still interested in pursuing the discrimination matter.

Should such an investigation and resulting enforcement panel conclude that enforcement is warranted, the NRC and licensee may engage in what the agency refers to as “enforcement ADR,” formally referred to as postinvestigation ADR. If, however, the parties reach a settlement during ADR, the staff will not pursue an investigation of or subsequent enforcement for a discrimination finding. The NRC also considers settlements resulting from licensee-initiated mediation as equivalent to settlements reached under the preinvestigation ADR program.

For CY 2024, the NRC extended 18 preinvestigation ADR offers associated with discrimination allegations. Of those offers, eight resulted in agreements to proceed with mediation. One of the mediated cases concluded with a mutually agreeable settlement; however, that case stemmed from an allegation received before CY 2024. As of April 17, 2025, only one case mediated in 2024 has reached settlement, and two remain open. Historically, the agency’s preinvestigation ADR process has allowed several discrimination allegations to be resolved between the parties before the start of an NRC investigation, with approximately 50 percent of mediated cases reaching settlement.⁸ The staff continues to believe that voluntary dispute resolution using preinvestigation ADR provides a valuable communication opportunity for the parties and can help address SCWE concerns more efficiently than a formal investigation.⁹

⁸ <https://www.nrc.gov/docs/ML0611/ML061110262.pdf>

⁹ <https://www.nrc.gov/about-nrc/regulatory/enforcement/adr/trending-data.html>

CONCLUSIONS

The Allegation Program continues to serve as an effective tool for monitoring the SCWE at NRC-licensed facilities. While the long-term downward trend in allegations began reversing in 2021, with increases continuing through 2024, this shift has provided valuable insight into emerging organizational and cultural issues. STL and Quad Cities stood out in 2024 because of elevated allegation activity, prompting further SCWE reviews. Allegation trends and inspection findings suggest that, overall, workers are willing to raise safety concerns and, when challenges were identified, licensees are taking and planning corrective actions to improve and sustain a healthy SCWE. The agency and licensee focus on the SCWE continues to support the industry's environment for raising concerns and should continue.

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APPENDIX**ALLEGATION STATISTICS FOR
OPERATING REACTORS, NONOPERATING REACTORS, AND FUEL CYCLE FACILITIES****OPERATING REACTOR ALLEGATIONS RECEIVED FROM ONSITE SOURCES**

Site	2020	2021	2022	2023	2024
Arkansas Nuclear One	2	4	5	5	4
Beaver Valley		2	2	2	4
Braidwood	1	2	2	2	5
Browns Ferry	4	3	1		3
Brunswick	4			4	
Byron	1		1	1	4
Callaway	1	1	2	2	
Calvert Cliffs		2			1
Catawba	5	2		3	2
Clinton	2	1	2	2	3
Columbia Generating Station		3	11	13	5
Comanche Peak		2	1	2	
Cooper			2	2	
Crane Clean Energy Center				1	
D.C. Cook		1	3		4
Davis-Besse	2		3	2	5
Diablo Canyon		2	3	6	1
Dresden	1	1	1		
Farley	2	3	1	5	3
Fermi	3	1	2	5	4
FitzPatrick		1	1	3	1
Ginna	1		3		3
Grand Gulf	1	2	3	4	1
Harris	1		1	5	6
Hatch	4	3	2	2	1
LaSalle	1	1			3
Limerick		1		4	2
McGuire		1		4	1
Millstone	3	4	3	1	2
Monticello	2	1		2	
Nine Mile Point	1		1	2	3
North Anna	1		1		2
Oconee	5	1	3	3	1
Palisades	2		1		2
Palo Verde	1	3	7	4	1
Peach Bottom	1			2	

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Site	2020	2021	2022	2023	2024
Perry		1	1	2	1
Point Beach			1	1	5
Prairie Island			1		1
Quad Cities	1	2	1	3	11
River Bend	2	2	1	10	3
Robinson	3			1	1
Saint Lucie	3	2	5	4	20
Salem/Hope Creek	1	9	4	5	2
Seabrook		1			
Sequoyah	1		3	4	8
South Texas Project		6	15	3	1
Summer		2	3	2	1
Surry		2	1	3	1
Susquehanna	1	3	4	3	3
Turkey Point	5	5	3	9	5
Vogtle	1	1	7		1
Vogtle AP1000	24	38	28	5	4
Waterford	2	1	3	4	4
Watts Bar	6	7	6	11	4
Wolf Creek	3	1	3	2	2

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NONOPERATING REACTOR ALLEGATIONS RECEIVED FROM ONSITE SOURCES

Site	2020	2021	2022	2023	2024
Crystal River		2	1	4	2
Fermi					1
Fort Calhoun			1	2	
Indian Point	5			3	4
Oyster Creek	4	3			3
Pilgrim	2		1	2	2
San Onofre			1	1	
Three Mile Island				1	
Three Mile Island 2				2	
Yankee-Rowe			1		

FUEL CYCLE FACILITY ALLEGATIONS RECEIVED FROM ONSITE SOURCES

Site	2020	2021	2022	2023	2024
BWXT Nuclear Operations Group, Inc.	1	1		2	1
Framatome, Inc.	2			1	2
Global Nuclear Fuel—Americas, LLC	1	1		3	3
Honeywell International, Inc.			1	2	3
Louisiana Energy Services, LLC		2	2	3	1
Nuclear Fuel Services, Inc.	1	4	4	4	5