



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
269.764.2000

Otto W. Gustafson
Licensing Manager

PNP 2012-015

February 27, 2012

10 CFR 26.717(e)
10 CFR 26.203(e)

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Fitness for Duty Program Performance Report

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Dear Sir or Madam:

In accordance with 10 CFR 26.717(e), Entergy Nuclear Operations, Inc. is submitting the Fitness for Duty Program Performance Report for the Palisades Nuclear Plant (PNP) for the period of January 1, through December 31, 2011. The report is provided in Attachment 1, and contains the annual report form, as well as eight single positive test forms.

In accordance with 10 CFR 26.203(e), the Fatigue Management Program Performance Report for the period of January 1, through December 31, 2011, is provided in Attachment 2.

This letter contains no new commitments and no revisions to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "OWG/JA", written over a circular stamp or mark.

OWG/bed

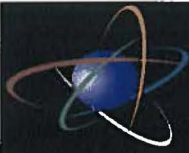
Attachments: 1. Annual Report Form and Single Positive Test Forms
2. Fatigue Management Program Performance Report

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ATTACHMENT 1

PALISADES NUCLEAR PLANT

**ANNUAL REPORT FORM AND
SINGLE POSITIVE TEST FORMS**



Electronic Information Exchange

NRC FFD Program Performance Data Reporting System

Annual Reporting Form for Drug and Alcohol Tests for the EIE General Submission Portal

Please explain the change(s) to the form

Submission Update

This is not a submission update; the form auto-populated "Submission Update" in error. This is our original submission for CY 2011. The NRC is aware of this problem.

Note:

- 1) All fields required except those marked 'optional'.
- 2) Use Adobe Reader 8 or later for this form to work properly.
- 3) Hold your mouse over a form field to view additional information.

Select Facility

Palisades [50-255]

Period of Report

2011

Tests Conducted in the Calendar Year

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	40	263	6
Random	406	95	2
For Cause	2	0	0
Post-Event	2	0	0
Followup	56	29	0
Total (Calculated)	506	387	8

FFD Program Random Testing Population and Rate

Average number of licensee employees

687

Average number of contractors/vendors

262

Total size of the random testing pool throughout the period (Calculated)

949

Annual random testing percentage achieved for the testing pool

52.8

Laboratory Testing

Does your program use a Licensee Testing Facility? (Yes / No)

Identify your HHS-Certified Laboratory(ies)

Identify your Blind Performance Test Sample supplier(s)

Substances Tested

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)

Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

Substance	Use Only NRC Cutoff Levels? (Yes / No)	Initial Cutoff	Confirmatory Cutoff	LOD Testing? (Yes / No)	Comment (Optional)
Alcohol	<input type="text" value="Yes"/>			<input type="text" value="Not Applicable"/>	
Cocaine	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Marijuana	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Amphetamines	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Opiates	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
PCP	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	

Substances Tested - continued

Summary of Management Actions - 26.717(b)(8)

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Program and System Management

Topic 1 Description

An analysis of the data for 2011 was conducted and did not identify any program weaknesses.

Add an additional Topic

Person(s) Responsible for Information Provided

Person 1 (required):

Brian	Rabideau	Supervisor Access Authorization FFD	brabide@entergy.com
First Name	Last Name	Position Title	Company Email Address

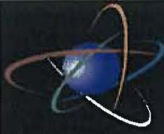
Person 2 (optional):

Barb	Dotson	Licensing Specialist IV	bdotson@entergy.com
First Name	Last Name	Position Title	Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked Form Locked On: Jan 31, 2012 at 3:29:23 PM

Save to Local PC **Print this Report**



Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-001

Select Facility

Palisades [50-255]

Note:

- 1) All fields are required except those marked "optional".
- 2) Entries in some form fields may result in information being auto-populated into other form fields.
- 3) Use Adobe Reader 8 or later for this form to work properly.
- 4) Hold your mouse over a form field to view additional information.

Date of Collection (mm/dd/yyyy) 02/14/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Reinstatement (Between 31 and 365 days)

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

Yes

Test Results - 26.717(b)(4)

Test Validity

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Alcohol Testing

Drug Testing

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

Substance - 26.717(b)(2) & (b)(6)

Additional Substance (as applicable)

Additional Substance (as applicable)

Use NRC Cutoff (Yes / No)?

Use NRC Cutoff (Yes / No)?

Use NRC Cutoff (Yes / No)?

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)?

Yes

Please elaborate on the choice(s) selected:

This is a shy bladder. The MRO determined it was a refusal to test.

Refused to provide initial specimen

Specimen characteristics (e.g., color, odor, precipitant)

Refused to provide second specimen

Invalid test result (initial specimen collected) - 26.185(f)

Specimen temperature (out of range)

Refused to follow directions

Specimen paraphernalia identified

Other

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

Subversion attempt

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

Permanent Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

First Name

Rabideau

Last Name

Supervisor Access Authorization FFD

Position Title

brabide@entergy.com

Company Email Address

Person 2 (optional):

Barb

First Name

Dotson

Last Name

Licensing Specialist IV

Position Title

bdotson@entergy.com

Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked

Form Locked On: Jan 31, 2012 at 8:39:52 AM

Save to Local PC

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Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-002

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 04/11/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)? No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75 No

Substance - 26.717(b)(2) & (b)(6)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b) No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)? No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied (NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

3- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian	Rabideau	Supervisor Access Authorization FFD	brabide@entergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Barb	Dotson	Licensing Specialist IV	bdotson@entergy.com
First Name	Last Name	Position Title	Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked Form Locked On: Jan 26, 2012 at 8:46:01 AM

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Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-003

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 04/20/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Other

Please elaborate

Contractor to issue material from warehouse.

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)? No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75 No

Substance - 26.717(b)(2) & (b)(6)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b) No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)? No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied
(NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

3- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian	Rabideau	Supervisor Access Authorization FFD	brabide@entergy.com
First Name	Last Name	Position Title	Company Email Address

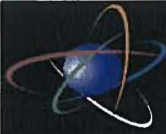
Person 2 (optional):

Barb	Dotson	Licensing Specialist IV	bdotson@entergy.com
First Name	Last Name	Position Title	Company Email Address

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Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-004

Note:
1) All fields are required except those marked 'optional'.
2) Entries in some form fields may result in information being auto-populated into other form fields.
3) Use Adobe Reader 8 or later for this form to work properly.
4) Hold your mouse over a form field to view additional information.

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 05/11/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Reinstatement (Between 31 and 365 days)

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Please elaborate

Labor Category - 26.717(b)(3)

Other

Cafeteria worker.

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

No

Substance - 26.717(b)(2) & (b)(6)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Use NRC Cutoff (Yes / No)? Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)?

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

3- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

First Name

Rabideau

Last Name

Supervisor Access Authorization FFD

Position Title

brabide@entergy.com

Company Email Address

Person 2 (optional):

Barb

First Name

Dotson

Last Name

Licensing Specialist IV

Position Title

bdotson@entergy.com

Company Email Address

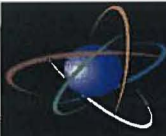
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Locked

Form Locked On: Jan 26, 2012 at 8:50:19 AM

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Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-005

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 08/16/2011

Reason for Testing - 26.717(b)(5)

Random

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug and Alcohol

Alcohol Testing

Breath

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

No

Substance - 26.717(b)(2) & (b)(6)

Alcohol

Additional Substance (as applicable)

Other

Additional Substance (as applicable)

Please Select

Please identify the substance

No drug identified by the lab. This is

What 26.103 BAC level was exceeded?

0.02 and in work status at least 2 hrs

Use NRC Cutoff (Yes / No)?

No

Use NRC Cutoff (Yes / No)?

Yes

Initial Cutoff

1

Confirmatory Cutoff

1

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)?

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

1- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

First Name

Rabideau

Last Name

Supervisor Access Authorization FFD

Position Title

brabide@entergy.com

Company Email Address

Person 2 (optional):

Barb

First Name

Dotson

Last Name

Licensing Specialist IV

Position Title

bdotson@entergy.com

Company Email Address

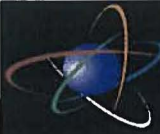
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Locked

Form Locked On: Feb 9, 2012 at 7:11:26 AM

Save to Local PC

Print this Report



Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-006

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 09/01/2011

Reason for Testing - 26.717(b)(5)

Random

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug and Alcohol

Alcohol Testing

Breath

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

No

Substance - 26.717(b)(2) & (b)(6)

Alcohol

Additional Substance (as applicable)

Other

Additional Substance (as applicable)

Please Select

Please identify the substance

No drug identified by the lab. This is

What 26.103 BAC level was exceeded?

0.04 or greater

Use NRC Cutoff (Yes / No)?

No

Use NRC Cutoff (Yes / No)?

Yes

Initial Cutoff

1

Confirmatory Cutoff

1

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)?

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

1- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

First Name

Rabideau

Last Name

Supervisor Access Authorization FFD

Position Title

brabide@entergy.com

Company Email Address

Person 2 (optional):

Barb

First Name

Dotson

Last Name

Licensing Specialist IV

Position Title

bdotson@entergy.com

Company Email Address

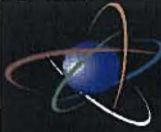
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Locked

Form Locked On: Feb 9, 2012 at 7:15:05 AM

Save to Local PC

Print this Report



Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-007

Select Facility

Palisades [50-255]

Date of Collection (mm/dd/yyyy) 09/19/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)? Yes

Test Results - 26.717(b)(4)

Test Validity

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Alcohol Testing

Drug Testing

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

Substance - 26.717(b)(2) & (b)(6)

Additional Substance (as applicable)

Additional Substance (as applicable)

Use NRC Cutoff (Yes / No)?

Use NRC Cutoff (Yes / No)?

Use NRC Cutoff (Yes / No)?

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b) No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)? Yes

- Refused to provide initial specimen
- Refused to provide second specimen
- Specimen temperature (out of range)
- Specimen paraphernalia identified
- Specimen characteristics (e.g., color, odor, precipitant)
- Invalid test result (initial specimen collected) - 26.185(f)
- Refused to follow directions
- Other

Please elaborate on the choice(s) selected:

This is a shy bladder. The MRO determined it was a refusal to test.

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

Subversion attempt

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

Permanent Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

Rabideau

Supervisor Access Authorization FFD

brabide@entergy.com

First Name

Last Name

Position Title

Company Email Address

Person 2 (optional):

Barb

Dotson

Licensing Specialist IV

bdotson@entergy.com

First Name

Last Name

Position Title

Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked

Form Locked On: Jan 26, 2012 at 10:09:22 AM

Save to Local PC

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Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Single Positive Test Form for the EIE General Submission Portal

Submission Update

Unique Reference Number (Licensee Supplied)

2011-PAL-008

Select Facility

Palisades [50-255]

Note:
1) All fields are required except those marked 'optional'.
2) Entries in some form fields may result in information being auto-populated into other form fields.
3) Use Adobe Reader 8 or later for this form to work properly.
4) Hold your mouse over a form field to view additional information.

Date of Collection (mm/dd/yyyy) 10/19/2011

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Update Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Maintenance (Craft)

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.75

No

Substance - 26.717(b)(2) & (b)(6)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)?

Yes

Use NRC Cutoff (Yes / No)?

Yes

Use NRC Cutoff (Yes / No)?

Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)?

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

Licensee Administrated

Specific Sanction Applied

3- Year Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Brian

First Name

Rabideau

Last Name

Supervisor Access Authorization FFD

Position Title

brabide@entergy.com

Company Email Address

Person 2 (optional):

Barb

First Name

Dotson

Last Name

Licensing Specialist IV

Position Title

bdotson@entergy.com

Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

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Form Locked On: Jan 31, 2012 at 8:36:43 AM

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ATTACHMENT 2

PALISADES NUCLEAR PLANT

FATIGUE MANAGEMENT PROGRAM PERFORMANCE REPORT



U.S. NRC
United States Nuclear Regulatory Commission

Protecting People and the Environment

Electronic Information Exchange

NRC FFD Program Performance Data Reporting System 10 CFR Part 26, Subpart I - Managing Fatigue Annual Fatigue Reporting Form for the EIE General Submission Portal

Select Facility: Period of Report:

Note:
1) Use Adobe Reader 8 or later for this form to work properly.
2) Hold your mouse over a form field to view additional information.

Submission Update - check this box only if this is an update to a previous submission.

Did your facility have any waivers in the reporting period? (Yes / No)

Was this facility in an outage for any part of the reporting period? (Yes / No)

Did any single site outage last more than 60 days in total? (Yes / No)

Yes No

Summary of Waiver Issuance - 26.203(e)(1)(i-ii)

Work Hour Controls	Number of Waivers Issued														
	Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)			Performing health physics or chemistry duties, as described in 26.4(a)(2)		Performing duties of a fire brigade member, as described in 26.4(a)(3)		Performing maintenance or on-site direction of maintenance, as described in 26.4(a)(4)			Performing security duties, as described in 26.4(a)(5)		Operating Total (days 1-60)	Outage Total (after day 60)	Combined Total
	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (after day 60)	Operating	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (after day 60)			
Daily Work Hours 26.205(d)(1)	Exceeded 16 work hrs in any 24 hr period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Exceeded 36 work hrs in any 48 hr period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Exceeded 72 work hrs in any 7 day period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Rest Breaks 26.205(d)(2)	Less than 10 hr break bet successive work periods (or 8 hr break accommodating scheduled transition bet shifts)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 34 hr break in any 8 day period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Minimum Days Off Per Shift Cycle 26.205(d)(3)	Average of less than 1 day off per week for 8-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 2 days off per week for 10-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 2.5 days off per week for 12-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 3 days off per week for 12-hour maintenance shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 3 days off per week for 12-hour security shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Minimum Days Off for Outage Activities (during first 60 days of outage) 26.205(d)(4) and 26.205(d)(5)	Less than 3 days off per successive 15-day period 26.205(d)(4)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 1 day off per 7-day period for maintenance personnel 26.205(d)(5)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 4 days off per successive 15-day period for security personnel 26.205(d)(5)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Alternate to Minimum Days Off 26.205(d)(7)	54 hour maximum average	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Total	<input type="text" value="2"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="40"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="48"/>	<input type="text" value="98"/>	<input type="text"/>	<input type="text" value="98"/>	<input type="text"/>

*NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

Distribution of Waivers for Individuals in Each Category - 26.203(e)(1)(iii)

Number of Employees Issued Waivers
(Note: Even if no waivers were issued for a given column, please enter a value (e.g., 0) in at least one of the cells in the column)

Number of Waivers	Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)	Performing health physics or chemistry duties as described in 26.4(a)(2)	Performing duties of a fire brigade member as described in 26.4(a)(3)	Performing maintenance or on-site directing of maintenance as described in 26.4(a)(4)	Performing security duties as described in 26.4(a)(5)
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
7	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
8	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
9	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
10	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
11 - 20	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
More than 20	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total Employees Issued Waivers (Calculate)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Most Waivers Provided to a Single Individual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

*NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

Summary of Corrective Action - 26.203(e)(2) (as applicable)

Analysis of Waiver Assessment Data: (Limit 10,000 characters)

There was a total of 62 waivers initiated during 2011. The majority of 2011 waivers were initiated during 3rd quarter for security, 39 total, and 4th quarter during the Dry Fuel Storage loading project, 18 total. The 49 waivers initiated during 3rd and 4th quarter by security and dry fuel storage accounted for 74 of the year-end total of 98 instances when a covered worker violated a Work Hour Limit (WHL). The 19 waivers initiated for the Fuel Storage loading project accounted for 35 instances of WHL violations.

The 39 Security waivers for 3rd quarter were due to the security departments being understaffed. Once staffing levels were increased, waiver initiation rate returned to the previous average seen in 2010 and early 2011. Security processed 4 waivers in the 4th quarter 2011. If security staffing levels are maintained at the current level count, there should be no future issues.

The 18 waivers, and associated 35 instances of WHL violations, during the Dry Fuel Storage Project were during a 3 month period. Underneath schedule delays accounted for the initiation of waivers. There were no instances of fatigue related issues identified during this time.

Analysis of Fatigue Assessment Data: (Limit 10,000 characters)

The majority of fatigue assessments performed in 2011 were required due to the approval of waivers for exceeding work hour limits. Fatigue assessments performed for other than approved fatigue rate waivers including include:

- Violation of WHL who waiver - 6 (coaching provided)
- Per case/Post event - 2 (post fatigue - no action taken)
- Self-declaration - 1 (post of duty - sent home)

No further actions were recommended.

Conclusions: (Limit 10,000 characters)

Overall the Fatigue Management Program is effective. The majority of documented conditions indicate lack of compliance with procedural requirements. Compliance with procedural requirements has been previously identified as a site focus area and corrective actions are in progress to mitigate the issues.

Summary and Status of Corrective Actions: (Limit 10,000 characters)

CR-PLP-2012-584: During 2011 Dry Fuel Storage Loading activities, CR-PLP-2011-5743 was written to document work hour limitations per EN-OM-123 being exceeded. The CR documented what work hour limitations were to be exceeded as well as the fact that waivers and fatigue assessments had been completed as required. The required focus in EN-OM-123 was not, however, forwarded to Security and a Fatigue Tracking Record was not developed in PQ 5 as required. Also, per EN-OM-123, the periodic review requirements for exceeding 54 hrs per week average were not documented via a Fatigue Tracking Record in PQ 5. The cause, and subsequent corrective actions, for the identified condition have not yet been determined.

CR-PLP-2012-406: During 2011, in the mechanical maintenance department, there were 5 instances where a covered worker exceeded the 54-hour per week average as defined in EN-OM-123. 4 of the 5 instances were attributed to 1 covered worker. Per EN-OM-123, exceeding the 54-hour per week average is not a set limit, but is treated as a performance indicator to assess whether the workforce in general or specific individuals are consistently working more than a reasonable amount of overtime. Assess the circumstances that lead to 1 worker accounting for the majority of the instances when the 54-hour per week average was exceeded. Determine if the cause was reasonable and if additional actions are required to prevent future instances.

General Comments (optional): (Limit 10,000 characters)

Person(s) Responsible for Information Provided

Person 1 (Required):
 Terry Davis Sr. Working Specialist terry.davis@nrc.gov
 First Name Last Name Position Title Company Email Address

Person 2 (Optional)

Person 2 (Optional):

 First Name Last Name Position Title Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Form Locked On: Feb 22, 2012 at 4:07:03 PM

Analysis of Waiver Assessment Data:

There was a total of 62 waivers initiated during 2011. The majority of 2011 waivers were initiated during 3rd quarter for security, 39 total, and 4th quarter during the Dry Fuel Storage loading project, 10 total. The 49 waivers initiated during 3rd and 4th quarter by security and dry fuel storage accounted for 74 of the year-end total of 98 instances when a covered worker violated a Work Hour Limit (WHL). The 10 waivers initiated for the Fuel Storage loading project accounted for 35 instances of WHL violations.

The 39 Security waivers for 3rd quarter were due to the security department being understaffed. Once staffing levels were increased, waiver initiation rate returned to the previous average seen in 2010 and early 2011. Security processed 4 waivers in the 4th quarter 2011. If security staffing levels are maintained at the current head count, there should be no future issues.

The 10 waivers, and associated 35 instances of WHL violations, during the Dry Fuel Storage Project were during a 3 month period. Unforeseen schedule delays accounted for the initiation of waivers. There were no instances of fatigue related issues identified during that time frame. For the next scheduled Dry Fuel Storage loading project campaign, the project manager should consider additional workers or a modification to the work schedule.

The review of circumstances, i.e., condition adverse to safety or security, associated with the initiation and authorization of waivers, did NOT identify any issues, and seems reasonable.

Analysis of Fatigue Assessment Data:

The majority of fatigue assessments performed in 2011 were required due to the approval of waivers for exceeding work hour limits. Fatigue assessments performed for other than approved fatigue rule waivers initiation include:

Violation of WHL w/o waiver - 6 (coaching provided)

For cause/Post event - 2 (not fatigued - no action taken)

Self-declaration - 1 - (start of shift - sent home)

No further actions were recommended.

Conclusions:

Overall the Fatigue Management Program is effective. The majority of documented conditions indicate lack of compliance with procedural requirements. Compliance with procedural requirements has been previously identified as a site focus area and corrective actions are in-progress to mitigate the issue.

Summary and Status of Corrective Actions:

CR-PLP-2012-584: During 2011 Dry Fuel Storage Loading activities, CR-PLP-2011-5745 was written to document work hour limitations per EN-OM-123 being exceeded. The CR documented what work hour limitations were to be exceeded as well as the fact that waivers and fatigue assessments had been completed as required. The required forms in EN-OM-123 were not, however, forwarded to Security and a Fatigue Tracking Record was not developed in PQ&S as required. Also, per EN-OM-123, the periodic review requirements for exceeding 54-hrs per week average were not documented via a Fatigue Tracking Record in PQ&S. The cause, and subsequent corrective actions, for the identified condition have not yet been determined.

CR-PLP-2012-606: During 2011, in the mechanical maintenance department, there were 5 instances where a covered worker exceeded the 54-hour per week average as defined in EN-OM-123. 4 of the 5 instances were attributed to 1 covered worker. Per EN-OM-123; exceeding the 54-hour per week average is not a set limit, but is treated as a performance indicator to assess whether the workforce in general or specific individuals are consistently working more than a reasonable amount of overtime. Assess the circumstances that lead to 1 worker accounting for the majority of the instances when the 54-hour per week average was exceeded. Determine if the causes was reasonable and if additional actions are required to prevent future instances.

The cause, and subsequent corrective actions, for the identified condition have not yet been determined.

CR-PLP-2012-607: This CR identified 2 discrepancies related to EN-OM-123 guidance: CR-PLP-2011-4802 and CR-PLP-2011-6848 documented conditions where an electrical maintenance worker required a waiver in accordance with the Fatigue rule Program. However, for both occurrences, a Fatigue Tracking Record (FTR) was not documented in the PQ&S software as required for the initiation of waivers per EN-OM-123. The cause, and subsequent corrective actions, for the identified condition have not yet been determined.

CR-PLP-2012-621: During annual report validation, it was identified that in the operations department, there are some people that show up in the violation report, but they do not appear in the weekly schedule manager. The operations department watch bill coordinator requested fleet help, and this problem was resolved. However, the violation report indicates a MDO violation based on incorrect shift cycle dates. When the shift cycle start manager is opened and a search performed for these two individuals at the appropriate dates, the two people and their data were not included. Therefore the incorrect data cannot be changed to clear the violations from the report. The cause, and subsequent corrective actions, for the identified condition have not yet been determined.

The majority of documented conditions indicate lack of compliance with the requirements of EN-OM-123. Compliance with procedural requirements has been previously identified as a site focus area and corrective actions are in-progress to mitigate the issue.