



Ron Gaston
Director,
Regulatory Compliance

10 CFR 2.202

CNRO-2018-00051

December 28, 2018

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

Subject: Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K

Arkansas Nuclear One, Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

Indian Point Energy Center,
Units 2 & 3
Docket Nos. 50- 247 & 50-286
License Nos. DPR- 26 & DPR-64

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416
License No. NPF-29

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

River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

Pilgrim Nuclear Power Station
Docket No. 50-293
Renewed License No. DPR-35

Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38

- References: 1) U.S Nuclear Regulatory Commission (NRC) letter to Entergy (Entergy Nuclear Operations, Inc. and Entergy Operations, Inc.), "Confirmatory Order, NRC Inspection Report 05000416/2017014, and NRC Investigation Reports 4-2016-004 and 4-2017-021," dated March 12, 2018
- 2) Entergy Nuclear Operations, Inc. and Entergy Operations, Inc. letter to the NRC, "Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element J," CNRO-2018-00039, dated September 27, 2018

Reference 1 modified the above operating licenses to include specific elements to address willful violations. As required by Section V, Element K, the attachment provides, in writing to the appropriate Regional Administrators, a summary of the actions implemented across the fleet as a result of this Confirmatory Order and the results of any effectiveness reviews performed.

Should you have any questions or require additional information, please contact John Giddens, Senior Manager, Fleet Regulatory Assurance, at (601) 368-5756.

I declare under penalty of perjury, the foregoing is true and correct.

Executed on the 28th day of December, 2018.

Respectfully,

A handwritten signature in black ink, appearing to read "Ron Gaston", with a long horizontal flourish extending to the right.

Ron Gaston
Director, Regulatory Compliance

RWG/jjn/gpn

Attachments:

Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K

cc: Rich Anderson (ANO)
Stephenie Pyle (ANO)
Eric Larson (GGN)
Douglas Neve (GGN)
Charlie Arnone (PLP)
Jeff Hardy (PLP)
Brian Sullivan (PNP)
Peter Miner (PNP)
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Timothy Schenk (RBS)
John Dinelli (WF3)
John Signorelli (WF3)

NRC Region I Administrator
NRC Project Manager (Pilgrim)
NRC Senior Resident Inspector (Pilgrim)
NRC Project Manager (Indian Point)
NRC Senior Resident Inspector (Indian Point)

NRC Region III Administrator
NRC Project Manager (Palisades)
NRC Senior Resident Inspector (Palisades)

NRC Region IV Administrator
NRC Project Manager (Arkansas Nuclear One)
NRC Senior Resident Inspector (Arkansas Nuclear One)
NRC Project Manager (Grand Gulf)
NRC Senior Resident Inspector (Grand Gulf)
NRC Project Manager (River Bend)
NRC Senior Resident Inspector (River Bend)
NRC Project Manager (Waterford)
NRC Senior Resident Inspector (Waterford)

ATTACHMENT TO CNRO-2018-00051

Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K

Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K

In Reference 1, the NRC issued a Confirmatory Order to Entergy (Entergy Nuclear Operations, Inc., and Entergy Operations, Inc.) as a result of a successful alternate dispute resolution. Section V of the Confirmatory Order modified Entergy License Nos. DRP-51, NPF-6, NPF-29, DPR-26, DPR-64, DPR-20, DPR-35, NPF-47 and NPF-38 to include Elements A through L. This attachment responds to Section V, Element K for calendar year 2018.

Notifications to the NRC when Actions Are Completed, Element K

By December 31 of each calendar year from 2018 through 2020, Entergy will provide in writing to the appropriate Regional Administrators a summary of the actions implemented across the fleet as a result of this Confirmatory Order and the results of any effectiveness reviews performed.

Entergy Response, Element K

The following is a summary of the actions implemented across the fleet as a result of this Confirmatory Order.

Communications with Site Workers

Between March 3, 2018 and April 11, 2018, communications about integrity were shared from the Chief Nuclear Officer (CNO) and senior site leaders with Entergy employees and contractors. The tool "Nuclear Talk" was used to share the message. A video with the CNO about integrity was also distributed across the fleet. These messages communicated with workers the circumstances leading to this Confirmatory Order, that willful violations will not be tolerated, and, as a result, Entergy will be undertaking efforts to confirm whether others are engaging in such conduct at any of its sites. The communications stressed the importance of procedural adherence, ensuring that documents are complete and accurate, and of potential consequences for engaging in willful violations. The messages were balanced with the recognition that people do make mistakes and when that happens, it is Entergy's expectation that its employees and contractors will identify and document issues accordingly.

Between September 21, 2018 and October 10, 2018, Entergy conducted the first semi-annual communications with workers in the Entergy fleet reemphasizing its intolerance of willful misconduct and updating the workforce on the status of compliance with this Confirmatory Order.

Causal Evaluation of Previous Corrective Actions to Deter Willful Violations

Between June 13, 2016 and August 28, 2018, Entergy performed five station root cause evaluations (RCEs) and two fleet level RCEs to accomplish the objectives set forth in the Confirmatory Order. This was previously communicated to the NRC via letter CNRO-2018-00039, Reference 2.

The following fleet wide actions were implemented in 2018 from the RCEs or Training Evaluations related to the Confirmatory Order.

- Implemented a periodic audit of operator rounds to detect and deter operator rounds issues
- Implemented a periodic assessment of proctoring activities to detect and deter proctoring issues
- Conducted Extent of Condition reviews fleet-wide based on the Grand Gulf, River Bend, Waterford, and fleet root causes conducted for this confirmatory order
- Implemented Extent of Cause actions in other departments which conduct periodic audits to detect and deter willful non-compliance
- Revised the Safety Culture Executive Team governance to improve monitoring of concerns and actions involving safety culture at a fleet level
- Established a Confidential Corrective Actions Process to apply the rigors of higher level causal investigation, to willful non-compliance
- Included 10CFR 50.5, 50.7, and 50.9, Deliberate Misconduct / Completeness and Accuracy of Information / Employee Protection” training in the 2018 Supervisor Continuing Training curricula

There were no Effectiveness Reviews conducted for the Confirmatory Order in 2018. The first scheduled Effectiveness Review is in 2019.

Organizational Health Survey

Entergy conducted the 2018 Organizational Health Index (OHI) Survey in July 2018. This survey was developed by a third party and designed, in part, to identify safety culture concerns that could contribute to willful misconduct. The results were received on August 3, 2018, and showed an overall improvement from 2017.