



Entergy Operations, Inc.  
Entergy Nuclear Operations, Inc.  
1340 Echelon Parkway  
Jackson, MS 39213  
Tel 601-368-5138

**Ron Gaston**  
Director, Nuclear Licensing

10 CFR 2.202

CNRO-2021-00023

October 6, 2021  
NRC Region IV Administrator  
U.S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Subject: Supplement to CNRO-2021-00002, Basis for Concluding the Terms of  
Confirmatory Order EA-17-132/EA-17-153 are Complete, Element L

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

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

Reference: 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," (ADAMS Accession No. ML18072A191) dated March 12, 2018.

Confirmatory Order EA-17-132/EA-17-153 modified the above operating licenses to include specific elements to address willful violations. The Enclosure to this letter provides a supplement to Entergy's basis for concluding the terms of this Confirmatory Order are complete. The NRC Region III Regional Administrator is copied on this notification. This letter contains no new regulatory commitments.

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 October 6, 2021

Respectfully,

Ron Gaston  
RWG/jjn/jas

Enclosure: Supplement to Entergy Response to Confirmatory Order EA-17-132/EA-17-153,  
Element L

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

NRC Region IV Administrator - addressee  
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)

NRC Document Control Desk

John Dinelli (ANO)  
Riley Keele (ANO)  
Robert Franssen (GGN)  
Jeff Hardy (GGN)  
Darrell Corbin (PLP)  
Barbara Dotson (PLP)  
Kent Scott (RBS)  
Timothy Schenk (RBS)  
John Ferrick (WF3)  
Paul Wood (WF3)

**Enclosure**

**CNRO-2021-00023**

**Supplement to Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element L**

## **Supplement to Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element L**

The Nuclear Regulatory Commission (NRC) issued Confirmatory Order EA-17-132/EA-17-153 to Entergy (Entergy Nuclear Operations, Inc., and Entergy Operations, Inc.) as a result of a successful alternate dispute resolution (Reference 1). 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 enclosure provides a supplement to Entergy's response to Section V, Element L for License Nos. DRP-51, NPF-6, NPF-29, DPR-20, NPF-47, and NPF-38.<sup>1</sup>

### **Notifications to the NRC when Actions Are Completed, Element L**

Upon completion, Entergy will submit in writing to the Region IV Administrator, its basis for concluding that the terms of the Confirmatory Order have been completed.

Entergy's response to Element L in Reference 2, which included the following basis was included for Element D:

#### **Causal Evaluation of Previous Corrective Actions to Deter Willful Violations, Element D**

*Entergy will identify specific criteria necessary to perform annual effectiveness reviews of the corrective actions. The annual effectiveness reviews will include insights from fleet and individual site performance. Entergy will perform annual effectiveness reviews for three years. Entergy will modify its corrective actions, as needed, based on the results of the annual effectiveness reviews.*

*Entergy identified the specific criteria necessary to perform the annual effectiveness reviews of the corrective actions. The first effectiveness review using these criteria to assess 2018 and first quarter 2019 data was conducted in May 2019. The second effectiveness review assessing 2019 data was conducted in December 2019. Both effectiveness reviews found gaps and actions were initiated to correct these gaps. Entergy assessed this element in both 2019 and 2020 and found implementation acceptable. . . . The NRC reviewed this information in January 2020 and found the effectiveness reviews completed at that time for the specified criteria to be acceptable (Reference 7) [Reference 3]. The NRC left Element D open pending NRC inspection of the completion of the remaining Confirmatory Order effectiveness review. The third effectiveness review assessing 2020 data was conducted in October 2020. This effectiveness review found the implementation of the actions to be effective.*

During the Confirmatory Order Follow-up Inspection at River Bend Station (RBS 05000458/2021011) in July of 2021, the NRC questioned if the effectiveness reviews which had been performed met the intent of the Confirmatory Order to do three annual effectiveness reviews. As discussed during the RBS inspection, Entergy had originally selected 2019, 2020 and 2021 as the years to conduct the annual effectiveness reviews. However, after discussions with the NRC inspectors during and following the January 2019 inspection at the Entergy

---

<sup>1</sup> This enclosure does not include a response for either DPR-35 based on the license transfer in August of 2019 or DPR-26 & DPR-64 based on the license transfer in May of 2021.

Nuclear Headquarters and after reviewing the terms of the Confirmatory Order (Reference 1) Entergy determined that it would be more appropriate to use data from 2018, 2019 and 2020 for the three annual effectiveness reviews. Also discussed during the RBS inspection was the fact that a fourth effectiveness review for 2021 was in progress, as had been originally planned. In further discussions following the inspection at RBS, the NRC informed Entergy that the 2021 effectiveness review should be completed as part of the terms of the Confirmatory Order.

The fourth effectiveness review, completed in September 2021, assessed data from the last two quarters of 2020 and first two quarters of 2021. This effectiveness review found the implementation of the actions to be effective. This fourth effectiveness review is available for inspection.

The criteria selected to satisfy Element D (annual effectiveness reviews) of the confirmatory order were related to evaluating effectiveness of the 1) integrity audits, 2) evaluation of integrity issues in the Corrective Action Program (CAP), and 3) integrity training. Similar review criteria are included in the 1) oversight of integrity audits in accordance with EN-FAP-LI-017, Integrity Audits; 2) oversight of integrity evaluations in accordance with EN-LI-102, Corrective Action Program, and 3) in individual, supervisor, and program administrator checks of training in accordance with EN-TQ-212, Conduct of Training and Qualifications. These reviews are conducted on a more frequent basis under the respective programs. The results of integrity audit aggregate reviews and integrity trends in CAP are provided to the Nuclear Safety Culture Monitoring Panels (NSCMP) and the Safety Culture Executive Team (SCET) in accordance with EN-QV-136, Nuclear Safety Culture Monitoring. The SCET provides oversight of the integrity trend from a fleet perspective.

Based on successful completion of the effectiveness reviews completed to date and the oversight criteria contained in Entergy processes, Entergy plans no further annual Confirmatory Order Effectiveness Reviews. The Entergy processes and results of the periodic oversight activities are available for inspection.

This letter provides Entergy's additional basis for concluding the terms of the Confirmatory Order have been met. This letter contains no new regulatory commitments.

- References:
- 1) NRC letter to Entergy, "Confirmatory Order, NRC Inspection Report 05000416/2017014, and NRC Investigation Reports 4-2016-004 and 4-2017-021," (ADAMS Accession No. ML18072A191) dated March 12, 2018.
  - 2) Entergy letter to NRC, "Basis for Concluding the Terms of Confirmatory Order EA-17-132/EA-17-153 are Complete, Element L," (ADAMS Accession No. ML21028A782) dated January 28, 2021.
  - 3) NRC letter to Entergy, "NRC Confirmatory Order (EA-17-132 and EA-17-153) Follow-up Inspection Report. NRC IR - ANO 05000313/2020010 and 05000368/2020010, NRC IR - GGN 05000416/2020011, NRC IR - RBS 05000458/2020010, and NRC IR - WF3 05000382/2020011," (ADAMS Accession No. ML20086J157) dated March 26, 2020.