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March 15, 2004

Chief, Rules and Directives Branch,
Office of Administration, MS-T6-D59
U. S. Nuclear Regulatory Commission
ATTN: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

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Rules and Directives
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SUBJECT: Entergy Operations, Inc., Entergy Nuclear Operations, Inc. - Comments Proposed "Best Practices to Establish and Maintain a Safety Conscious Work Environment"

REFERENCE: Best Practices to Establish and Maintain a Safety-Conscious Work Environment (69 FR 7025, February 12, 2004)

Dear Sir or Madam:

Entergy Nuclear supports efforts to improve the industry's understanding of the Safety Conscious Work Environment (SCWE). However, we are concerned that the proposed issuance of a "Best Practices" document will have some unintended consequences.

Given that the Nuclear Regulatory Commission's primary mission is to regulate, there is significant potential for a document containing best practices to evolve into a pseudo-regulation or inspection checklist, which might drive compliance to practices ill-suited to a particular site culture or circumstance. Nuclear operators with effective but diverse cultural environments could find their practices compared and challenged.

The nuclear operators, through such industry interest groups as INPO and NEI, have worked diligently to develop processes, policies and procedures to fulfill our SCWE commitment. The fact that these various products form the bases of the draft NRC best practices document is testament to their efficacy. It is our opinion that retaining this information within industry processes will allow for more effective and timely improvement and a sense of ownership by the nuclear operators.

If there must be some form of guidance on this matter, we would support a listing of some industry best practices on an industry website, as long as it was clearly communicated that the material was for information only and did not imply any regulatory requirements. If the NRC thinks they see a good practice, they should submit it for screening and addition to such an industry website.

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E-RIDS = ADM-03
Add = L. Jarnick (45)

Entergy Nuclear participated in and endorses the NEI comments contemporaneously submitted on this same subject.

Thank you for the opportunity to comment on this matter. If you have any questions or require additional information, please contact Mr. L. England at 601-368-5766.

This letter contains no new commitments.

Sincerely,



Gary J. Taylor
Chief Executive Officer
Entergy Operations, Inc., Entergy Nuclear Operations, Inc.

GJT/LAE/bal

cc:

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