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

Subject: Arkansas Nuclear One – Units 1 and 2
Docket No. 50-313 and 50-368
License No. DPR-51 and NPF-6
Problem Identification and Resolution Update

Dear Sir or Madam:

The purpose of this correspondence is to provide the NRC Staff with a status of the corrective actions Entergy has taken in response to weaknesses the NRC identified regarding the Arkansas Nuclear One (ANO) Corrective Action Program (CAP).

On December 8, 2003, the NRC completed a team inspection of the ANO problem identification and resolution (PI&R) program as documented in NRC Inspection Report 0500313/2003-008; 0500368/2003-008. The inspection team concluded that, while, for the most part, problems were being properly identified, evaluated, and corrected, occasionally, problems were not identified or properly entered into the corrective action program. The team found several examples where station personnel dealt with issues independently of the corrective action program. The team also found that most priority and evaluation actions were conducted properly; however, problems were identified where some conditions adverse to quality, and at least one significant condition adverse to quality, were not effectively corrected. There were four findings identified, with multiple examples, which were determined to be violations of very low safety significance.

A corrective action plan to address the conditions identified by the PI&R inspection was promptly developed and entered into the ANO CAP. The plan is both comprehensive and aggressive, addressing each of the weaknesses identified in the inspection report.

The initial focus of the corrective action plan was to ensure consistent alignment within the plant management staff on the corrective actions that were to be taken to address the findings. This message was reinforced by senior ANO management in a series of meetings with ANO supervisors and above, who subsequently delivered this message to their direct reports. This message was reinforced with focused plant-wide communications which discussed the program changes and expectations. These communications were followed by a survey that confirmed the message was received and understood.

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The focus areas of the corrective action plan are problem identification and prompt entry of conditions into the CAP, ensuring effective corrective actions are taken, monitoring program performance and oversight of the CAP. Significant progress has been made in each of these areas.

In the area of problem identification and entry into the CAP, clear expectations have been established and communicated to each level in the organization with respect to their role in problem identification. Communication and reinforcement of the type of conditions required to be entered into the CAP have occurred. Clarification of the threshold for entering conditions into the CAP has been established and communicated. Reinforcement of these expectations is conducted through the identification and public recognition of good catches and through coaching feedback. Good catches are condition reports that demonstrate a questioning attitude that identify conditions in their incipient stage. Good catches are identified by plant management in the daily alignment meetings. There are clear indications the corrective actions taken in this area have been effective. The condition report initiation rate has increased from approximately 4,000 condition reports in calendar year 2003 to an estimated 6,000 in 2004. The number of condition reports that identify a failure to promptly report has diminished since the beginning of the campaign. A survey indicates that employees at ANO are aware of the reporting requirements and understand their responsibility to initiate condition reports for those conditions required by the station corrective action procedure.

Extensive steps have also been taken to improve the effectiveness of corrective actions. The root cause determination process, previously contained in a desk guide, has been enhanced and formalized in a new Entergy Nuclear procedure ENS-LI-118, *Root Cause Analysis Process*. Root cause reports are now graded by the Corrective Action Review Board as a measure of quality to provide insights into the effectiveness of this process. The corrective action program procedure EN-LI-102, *Corrective Action Process* has also been updated to require Category B, cause determination corrective actions to include: 1) a problem statement, 2) apparent cause, 3) immediate and interim corrective actions, 4) operating experience research, 5) extent of condition, and 6) necessary actions to correct the condition. Clear expectations have been established and managers are held accountable for the effectiveness of corrective actions assigned to their organization. Managers are required to personally review and approve the closure of all Category A (significant) and B (cause determination required) condition reports assigned to their organization. Effectiveness reviews are conducted on all Category A condition reports and on select Category B and C condition reports as identified by the Condition Review Group (CRG) in accordance with new guidance found in the station corrective action program. The Corrective Action and Assessment group has also increased the number of condition reports they independently review for closure. If, as a result of an effectiveness or closure review, the corrective action plan is identified as ineffective or deficient, a condition report is generated. Effectiveness reviews typically occur some time after the corrective actions have been implemented to ensure the corrective actions are lasting. Therefore, a definitive measure of the effectiveness of our corrective actions in this area is not yet available.

Oversight of the ANO CAP is provided by the members of the CRG, Safety Review Committee and the CAP Oversight Group. Members of the CAP Oversight Group include the ANO Vice President, Operations, General Manager, Plant Operations, and the Director, Nuclear Safety Assurance. To facilitate this oversight, a comprehensive overhaul of the program's performance indicators was performed. The program was divided into its fundamental elements and indicators were developed for each element. This has resulted

in a number of new indicators with others still under development. As these indicators trend changes in the program over time, their effectiveness continues to be evaluated. The CRG reviews the CAP performance indicators monthly to ensure proper oversight is provided.

In addition to the day-to-day oversight the Quality Assurance organization specifically reviews the organization's effective use of the CAP as mandatory scope elements in each of their audits. Results from corrective program audit activities in each program audit are used as input for the biennial CAP audit.

There are many indications demonstrating that improvements to strengthen the ANO CAP have been effective in bringing about needed changes. ANO management continues to emphasize the importance of the CAP and drives for continued improvement.

There are no new commitments contained in this submittal. Should you have any questions concerning this submittal, please contact Mr. Dale James at (479) 858-4619.

Sincerely,



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