



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

February 26, 2007

EA-06-311

Mr. Fred R. Dacimo
Site Vice President
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
295 Broadway, Suite 1
P.O. Box 249
Buchanan, NY 10511-0249

SUBJECT: ENTERGY'S PLAN TO ADDRESS THE SAFETY CONSCIOUS WORK
ENVIRONMENT AT INDIAN POINT NUCLEAR GENERATING UNITS 2 AND 3

Dear Mr. Dacimo:

This refers to your letter dated January 22, 2007, responding to concerns expressed by the NRC in a letter dated December 21, 2006, regarding the safety conscious work environment at the Indian Point Nuclear Generating Units 2 and 3 (Indian Point). In the December 21, 2006, letter, the NRC requested that Entergy provide its plan for evaluating the potential chilling effect onsite and its plan of action for addressing this matter.

Our letter informed you that the NRC had become aware of incidents where workers perceived that individuals were treated negatively by management for raising issues and that, as a result, some workers expressed reluctance to raise issues under certain circumstances. Although most workers made a distinction between nuclear safety issues and other concerns, the NRC found that some of the other concerns could have nuclear safety implications. The NRC was also concerned that, as of the conclusion of the NRC problem and identification resolution inspections in October 2006, Entergy had not fully evaluated the negative responses and declining trends related to the safety conscious work environment which were identified by an independent safety culture assessment conducted at Indian Point in early 2006.

In your January 22, 2007, response, you stated that you had performed additional diagnostic activities which indicated that the safety conscious work environment at Indian Point is healthy, although you also noted that there are a number of circumstances and factors which create the potential for significant challenges to the overall work environment. Specifically, you reported that a perception exists within a segment of the Indian Point workforce that they may suffer in some way if they were to raise a safety concern, and you committed to taking actions to counter that perception. In your response, you provided a plan with actions intended to: 1) improve

communications; 2) identify and prevent retaliation, chilling effect, and the perception of retaliation; 3) enhance the corrective action program; 4) enhance the employee concerns program; and 5) improve the broader work environment at Indian Point.

The NRC has reviewed Entergy's evaluations and proposed actions to improve the safety conscious work environment at Indian Point. The NRC conducted an on-site review of the results of (1) an assessment of the employee concerns programs at the Entergy nuclear plants in the northeast conducted in late 2006, and (2) an independent assessment conducted in December 2006 and January 2007. The results of these recent assessments were consistent with the results of the independent safety culture assessment conducted in early 2006 and NRC observations during the problem identification and resolution inspections in 2006. We recognize that Entergy has considered insights from these assessments in developing actions to address the challenges to the safety conscious work environment, and plans to continue to monitor the work environment with metrics tied to the components of a safety conscious work environment. At the time of our on-site review, Entergy had not yet finalized these metrics, but had plans to perform several interim effectiveness reviews and conduct a broader assessment to confirm the effectiveness of your actions in early 2008. It will be important that these metrics and effectiveness reviews provide meaningful information on the health of the work environment, and that monitoring occur on an ongoing basis so that your corrective actions can be adjusted, if necessary.

Based on our review of your response and specific action plans, we found that Entergy's proposed actions appear to be reasonable to address the apparent causes of the work environment issues. In particular, your proposed actions to improve the effectiveness of communications will be important in addressing the issues that are challenging the health of the work environment at Indian Point. We will continue to monitor the results of your ongoing and proposed actions through our independent, baseline inspection activities.

Based on the NRC review of your response, we do not need additional information at this time regarding your approach and schedule to address these issues; therefore, we do not see the need to meet with you to discuss these matters. The NRC is considering Entergy's response in our assessment of plant performance in accordance with Inspection Manual Chapter 0305, "Operating Reactor Assessment Program." The results of this assessment will be documented in the annual assessment letter expected to be issued in early March. We expect to discuss these issues in conjunction with the results of our assessment during the public annual assessment meeting to be conducted within the next few months.

We request that you inform Mr. Eugene Cobey of my staff in writing if you make any substantive changes to your planned actions as you continue to evaluate and address the work environment issues. Please contact Mr. Cobey at (610) 337-5171 with any questions you may have regarding this letter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the

NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system, and is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

David C. Lew, Director
Division of Reactor Projects
Region I

Docket Nos. 50-247 and 50-286
License Nos. DPR-26 and DPR-64

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J. G. Testa, Mayor, City of Peekskill
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E. A. Diana, Orange County Executive
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D. Lochbaum, Nuclear Safety Engineer, Union of Concerned Scientists

Public Citizen's Critical Mass Energy Project
M. Mariotte, Nuclear Information & Resources Service
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