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Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, N.Y. 10511-0249
Tel (914) 734-6700

J.E. Pollock
Site Vice President

March 30, 2008

Re: Indian Point Units 2 and 3
Docket Nos. 50-247 and 50-286
NL-08-058

Mr. Samuel J. Collins
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

SUBJECT: **Assessment of Safety Culture**

REFERENCE: 1. NRC letter to Entergy, "Annual Assessment Letter – Indian Point Nuclear Generating Units 2 and 3 (Reports 05000247/2008001 & 05000286/2008001), dated March 3, 2008.

Dear Mr. Collins:

The purpose of this letter is to respond to your letter of March 3, 2008, (Reference 1) and provide the details of the safety culture assessment that Entergy Nuclear Operations, Inc. (Entergy) will conduct at the Indian Point Energy Center (IPEC).

Background

In the NRC's Annual Assessment letter of March 3, 2008, which noted that this was the third consecutive assessment identifying a substantive cross-cutting issue associated with procedural adequacy, the NRC requested that Entergy conduct an assessment of the safety culture at Indian Point Entergy Center. The NRC requested that this assessment be conducted by individuals who are independent from the corporate and site organizations being assessed. The NRC further requested that Entergy provide a detailed description of Entergy's plans for the conduct of this assessment, including, as a minimum, the assessment scope and methodology, the assessment team composition and qualifications, and a detailed schedule with milestone dates.

Assessment Scope and Methodology

Entergy will use a two-step approach to address the NRC's request to assess the safety culture at IPEC. First, Entergy has formed a Root Cause team to determine the reason(s) why Entergy has not been fully successful in resolving the issues associated with procedural adequacy. As part of this evaluation, the team will also initially identify any of the thirteen components of safety culture identified in RIS 2006-13 that may have caused or contributed to the continuing cross-cutting issue in this area.

Second, Entergy will commission an assessment team, composed of individuals independent of the corporate and site organization being assessed, to conduct a safety culture assessment by determining whether any of the RIS 2006-13 safety culture components caused or contributed to this continuing cross-cutting issue.

Entergy has taken this two-step approach to enable the Company to focus on the identification and correction of the specific reasons for the noted procedural adequacy issues at IPEC. By concentrating on these issues, and any related weaknesses in safety culture, Entergy will be in a position to develop specific corrective actions to address the problem. If the root cause analysis or the independent safety culture assessment uncovers information that identifies issues beyond the issue of procedural adequacy, or if the information developed has broader safety culture implications, the independent team will expand its review to include the components or issues identified.

Standard

As noted above, the Root Cause team and the independent safety culture assessment team will assess the safety culture components identified in RIS 2006-13. Additionally, these teams will use Entergy Policy, EN-PL-190, "Maintaining a Strong Safety Culture", which provides guidance for Entergy nuclear plants in ensuring the maintenance of strong safety cultures, and for assessing the safety culture at these facilities.

Root Cause Analysis Team

To identify the reason(s) why Entergy was not fully successful in its earlier efforts to resolve the substantive cross-cutting issue associated with procedural adequacy, IPEC has initiated a Condition Report (CR-IP2-2008-01056), consistent with its Corrective Action Program, and commissioned the performance of a root cause analysis by a Root Cause team. This multidisciplinary team includes members of the Procedures group, Operations, Licensing, Maintenance, Human Performance, Engineering, and Corrective Action departments. This team began its work on March 10, 2008 and expects to complete its analysis by April 7, 2008. The Root Cause team will identify the root cause(s) and contributing cause(s) for this problem, as well as the extent of cause and extent of condition. As noted earlier, the team will use the results of the root cause analysis to initially identify any of the thirteen components of a safety culture identified in RIS 2006-13 that may have caused or contributed to the continuing cross-cutting issue in this area.

Independent Safety Culture Assessment Team

The independent safety culture assessment team will conduct a safety culture assessment to determine whether any of the safety culture components caused or contributed to the continuing substantive cross cutting issue associated with procedural adequacy. To perform this review, the team will, among other things, examine the factual basis and conclusions reached by the Root Cause team concerning the root cause(s) and contributing causes(s) for Entergy not fully succeeding in resolving the substantive cross-cutting issue associated with procedural adequacy and the role that safety culture played.

In performing this assessment, the team will have the authority to conduct its independent assessment using whatever methods the team in its discretion believes will lead to an accurate and timely assessment. Preliminarily, Entergy expects that the assessment team will review the Root Cause report and the underlying data and information relied upon by the Root Cause team in reaching its conclusions. Additionally, Entergy expects that the assessment team will review relevant INPO reports, internal site assessments, corporate assessments, Quality Assurance audits and assessments, relevant Condition Reports, NRC Inspection Reports, and any other documents or information germane to the safety culture components being assessed. Additionally, it is anticipated that the assessment team will conduct interviews of employees and management personnel, as necessary and appropriate. Entergy will provide a supplement to this letter once the scope and methodology is finalized by the independent safety culture assessment team.

Assessment Team Composition and Qualifications

The assessment team will be composed of three individuals. The team will be lead by the President of an independent company that provides consulting expertise in this area, and will be supported by the Entergy Nuclear Operations, Inc., Director of Oversight. An attorney with Morgan, Lewis & Bockius, LLP, will provide legal and regulatory support to the team. Each of these individuals is independent of the corporate and site organizations being assessed.

The team lead is a seasoned root cause investigator and team leader with 36 years experience in engineering, heavy construction, environmental protection, and nuclear power. His professional responsibilities have included independent nuclear safety reviews, event response team leadership, and total quality management. He has been trained in Department of Energy and Institute of Nuclear Power Operations root cause methods as well as specialized techniques developed by Kepner-Tregoe, Performance Improvement International, and System Improvements, Inc. (TapRoot[®]). This individual supports executives, corrective action program managers, and performance improvement personnel across the nation.

The Director of Oversight is based in Jackson, Mississippi and has over 29 years of commercial nuclear power experience with assignments as site vice president, director of new plant integration, plant general manager, operations manager, administrative and planning manager, system engineering manager, plant projects superintendent, and senior engineer. This individual successfully managed four nuclear plants, including

pressurized water reactors and boiling water reactors, single and dual unit sites. For the past six years, this individual has been at the Nuclear Management Company. Most recently he served as Site Vice President at Prairie Island Nuclear Generating Station, until his retirement in 2007.

The legal counsel for the team is a partner in Morgan Lewis's Energy Practice. For the past seventeen years, he has provided legal and regulatory guidance to officers and senior managers at many commercial nuclear power companies, DOE nuclear facilities, and other companies in the energy industry in assessing and enhancing the safety culture and work environment at those facilities.

Schedule

The following are the expected completion dates for the major milestones for this project.

- Establish Safety culture assessment team members - complete
- Root Cause report investigation complete – April 7, 2008
- Initial identification of safety culture elements which may have caused or contributed to the continuing cross-cutting issue – April 24, 2008
- Safety culture assessment team begins work – June 2, 2008
- Supplemental response providing final scope and methodology – June 15, 2008
- Safety culture assessment team – issue report – July 15, 2008

Entergy will commence the assessment in June to ensure the highest quality outcome. The factors affecting the decision to begin the assessment in June include: 1) Unit 2 is currently in a refueling outage, and will be in this outage until the latter half of April; 2) IPEC is undergoing a significant external performance assessment currently anticipated to be performed in the May timeframe. Performing two significant assessments, coupled with a NRC problem identification and resolution inspection on Unit 2, would significantly impact the station's ability to properly support the independent safety culture assessment during the same time period; and 3) availability of personnel selected to perform the independent assessment.

There are no new commitments identified in this letter.

Should you have any questions regarding this submittal, please contact Mr. Robert Walpole, Manager, Licensing at (914) 734-6710.

Sincerely yours,

A handwritten signature in black ink, appearing to read "J. E. Pollock". The signature is stylized with a large initial "J" and "P".

J. E. Pollock
Site Vice President
Indian Point Energy Center

cc: Mr. John Boska, NRR Senior Project Manager
Resident Inspector's Office, Indian Point Energy Center
US NRC, Document Control Desk
Mr. Paul Eddy, New York State Dept. of Public Service