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Entergy

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J.E. Pollock
Site Vice President

May 30, 2008

Re: Indian Point Units 2 and 3
Docket Nos. 50-247 and 50-286
NL-08-080

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

SUBJECT: **Supplemental Information Associated with the 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.
2. Entergy Letter NL-08-058, "Assessment of Safety Culture", dated March 30, 2008.

Dear Mr. Collins:

The purpose of this letter is to provide additional information on the Independent Safety Culture Assessment (ISCA) that Entergy Nuclear Operations, Inc. (Entergy) will conduct at the Indian Point Energy Center (IPEC). In response to your letter of March 3, 2008 (Reference 1), Entergy provided the assessment scope, methodology, assessment team composition, qualifications and schedule (Reference 2). As indicated in Reference 2, supplemental information was to be provided once the scope and methodology were finalized. To that extent, the ISCA team has finalized its assessment plan. The finalized plan includes several assessment focus areas; in addition to procedural adequacy, the assessment will include the new siren project, the supplemental 95001 inspection on Unit 3, and on-site groundwater contamination as focus areas. The ISCA team has also been augmented by two additional team members bringing the total team composition to five members. This letter provides details of the finalized assessment plan and updated information related to team member qualifications and independence and schedule of activities.

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 for Unit 2, 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. The information below provides details of the finalized assessment plan and updated information related to member qualifications and independence and schedule of activities.

ISCA Scope

NRC inspection guidance recognizes the need to focus safety culture assessments. Inspection Procedure (IP) 95003 (02.08.a) advises: "select the requirements that relate to the performance deficiencies that prompted this inspection, and, to the extent possible, adapt the selected requirements to focus on those performance deficiencies. Ensure that the selected requirements include at least one requirement associated with each safety culture component."

The NRC concluded in the Annual Assessment letter that the performance of both units is currently within the Licensee Response column of the NRC Action Matrix for the assessment period. Therefore, based on this and the above IP 95003 guidance the assessment will maintain a deliberate focus. While all thirteen safety culture components will undergo review, the assessment will concentrate on individuals, functional groups, and managers associated with the selected focus areas.

The selected focus areas include the following:

1. Procedure adequacy
2. Progress in upgrading emergency sirens
3. Scram PI issue resolution and readiness for the associated 95001 inspection
4. Progress in characterizing groundwater contamination and planning remediation

Given the diversity of the areas, the assessment will be comprehensive and provide insights into the overall site and corporate safety culture.

Entergy is using a two-step approach to address the NRC's request to assess the safety culture at IPEC. Entergy has performed a root cause evaluation to determine the reason(s) why Entergy has not been fully successful in resolving the issues associated with procedural adequacy. As part of that evaluation, the team also identified those of the thirteen components of safety culture that may have caused or contributed to the continuing cross-cutting issue in this area. In addition, relevant documents associated with the other focus areas have been generated and include root cause, common cause, self assessments, or other related information and reports.

This step is complete. The results of the associated evaluations have been made available to the ISCA team. The ISCA team will review the evaluations performed, but will reach their own conclusions based on their independent assessment.

The second step is commissioning of 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 the issues associated with the focus area issues. 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.

Assessment Methodology

A five-person ISCA team will employ the following general methodology. Although there is a sequence to the activities, plant conditions, personnel availability, and other factors may affect the exact timing. Likewise, new information may require assessment plan adjustments.

A. Team Familiarization and Historical Document Review

Focus Areas

1. Review root cause and other evaluation reports and information associated with the identified focus areas
2. Review the following documents since January 1, 2005:
    a. Applicable NRC inspection reports, assessment letters, and other regulatory correspondence.
    b. Related INPO reports or assessments.
    c. Related internal audits and self assessments
3. Review annual performance evaluations for accountable managers and supervisors, including key line department managers. Such reviews will be on a confidential, need-to-know basis, in accordance with IPEC Human Resource protocols.
4. Review communications from management related to nuclear safety and/or the importance of the four focus areas.

Nuclear Safety Culture

1. Ensure team member familiarity with relevant NRC and INPO guidance documents such as RIS 2006-13, IP95003, and INPO's "Principles for a Strong Nuclear Safety Culture."
2. Review currently applicable corporate and site safety policy statements.
3. Review the following documents since January 1, 2005:

a. Safety culture and safety conscious work environment surveys and assessments, e.g. Synergy, corporate assessments, etc.

b. Summaries, indicators, or collective evaluations from the Corrective Action Program that contain information about the safety culture components.

c. Lesson plans used to train IPEC personnel on safety culture principles, safety conscious work environment, and human performance error prevention tools.

d. Meeting minutes (or agendas) from the senior site management team, nuclear oversight review, and corrective action review group, and from meetings to develop and amend the site's financial plans and budgets.

e. Documents describing the site's reward, bonus, or incentive programs.

f. Site-wide communications from management related to any significant organizational change, including fleet nuclear alignment.

g. Relevant employee concerns, referred NRC allegations, and documentation of their resolution. Such review will be on a confidential, need-to-know basis.

Station Readiness

1. Notify the workforce of the ISCA team's mission, planned assessment activities, and schedule. Publicize the ISCA team's availability for confidential meetings with anyone desiring to discuss any aspect of safety culture.

2. Provide a means for individuals (Entergy employees and supplemental personnel) seeking anonymity to provide written information to the ISCA team concerning safety culture.

B. Interview and Focus Group Planning and Conduct

Interview questions will be developed to understand the specific circumstances surrounding the four focus areas and nuclear safety culture. Additional information will be elicited about current and past challenges in the four areas and the role, if any, that safety culture components played.

The planned sample size is approximately 10% of the site population. This is consistent with available NRC guidance.

Potential interviewees and the approximate sequence of interviews are as follows:

- Root cause and common cause evaluation team members
- Procedure users, e.g., operators, technicians, and engineers

- Procedure writers
- Emergency preparedness and siren project personnel
- IPEC 95001 inspection response team members
- Groundwater remediation project personnel

Note: the interviewees and the areas identified as the focus group areas are intended to include a horizontal cut of all thirteen safety culture components with vertical cuts up and down the organization as determined by the results.

1. Conduct structured interviews and focus groups of representative management, individual contributor, and bargaining unit personnel (current Entergy employees, as well as supplemental personnel) including those who are working, or who have worked in the four focus areas, to determine their perceptions of expectations, resources, information quality, priorities, etc. that influenced their progress/success since January 1, 2005.

2. Include IPEC management personnel in these areas:

   - Corrective Action & Assessment
   - Licensing
   - Engineering
   - Operations
   - Maintenance
   - I&C
   - Training
   - Procedure Project
   - Groundwater Remediation Project
   - Radiation Protection/Chemistry
   - Emergency Preparedness
   - Siren Project
   - 95001 Response Team
   - Nuclear Safety Assurance
   - Quality Assurance
   - Finance and Budget
   - Change Management
   - Site Integration
   - Site Leadership
   - Fleet Leadership
   - Employee Concerns

3. Conduct informal interviews with any person requesting an opportunity to meet with the team.

4. As shown in the schedule below, the team will pursue indications of corporate (fleet) influence on IPEC safety culture after becoming well grounded in site data. ISCA then will conduct appropriate interviews or focus group sessions with corporate staff/management as deemed necessary.

C. Work and Meeting Observations

Behavioral observations of selected work activities and meetings, for the purpose of assessing applicable safety culture components will be conducted. The following elements will be included:

1. Pre-job briefings and associated work activities in the Maintenance Department (I&C, mechanical, and electrical), Engineering, and Planning, Scheduling, & Outages.

2. Pre-job briefings and associated work activities in the Operations Department (day and night shifts).

3. Work activities in the cross-cutting issue action plan.

4. Representative IPEC meetings at which dialogue relevant to safety culture is likely to occur. These include plan of the day, operational focus, senior vice president, budget, tailgates, "end-of-day," executive protocol, and siren project.

To ensure that representative work in progress is assessed, additional observations will be scheduled in parallel with the above activities as necessary.

D. Review and Analysis of Information and Data

The data and information gathered will be reviewed as follows:

1. Ensure that there is sufficient information to draw reliable conclusions regarding the influence of the thirteen safety culture components in the four areas of interest.

2. Following the completion of document review and field activities, analyze the information and reach findings and conclusions. If appropriate, apply analytic tools such as hazard-barrier-target analysis, analysis of differences (change analysis), Pareto analysis, and the why staircase tree in an effort to discern the safety culture components having the greatest influence. This assessment will not be a root cause analysis.

3. Based on Item 2 above, determine whether additional data or information is needed. If so, deploy team resources to acquire it.

E. Team Report

Prepare a report describing the team's findings, conclusions, and the factual basis for them. Present recommendations the team believes are warranted, including responses to actual or suspected extent of condition.

Assessment Team Composition and Qualifications

The assessment team will be composed of the following five individuals.

Team Lead

The team will be led by the President of an independent company that provides consulting expertise in the assessment of safety culture. 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.

Team Members

The first team member is an expert in the conduct and oversight of investigations and performance assessments involving nuclear power generation facilities and general and specific nuclear byproduct materials licensees. He has significant experience with the NRC Office of Investigations and, in particular, the Millstone Nuclear Power Station during its shutdown. He directed the numerous NRC investigations that directly impacted the restart of that facility. He also briefed the NRC Commission on a quarterly basis over a two year period on the status of all open investigations involving the site. Since leaving the NRC five years ago, he has provided consulting services to the nuclear industry, wherein he has conducted plant performance and safety culture / safety conscious work environment assessments. Some of those assessments were performed utilizing the guidance set forth in NRC inspection modules 95-002 and 95-003.

The second team member has over thirty five years of experience in the nuclear power industry, which includes senior executive management of an electric utility, responsibility for the operation of a nuclear power station, executive consulting and management of large consulting companies. For the past ten years, he has worked with clients in the government, utility and energy sectors to establish, maintain and improve the safety conscious work environment in their organizations. He serves on the Nuclear Safety Board of an electric utility, advising senior management on a broad range of issues involving nuclear safety, employee concerns and operation of a nuclear power station. He was also a principal in the third party oversight organization established by the NRC to monitor the recovery of the safety conscious work environment at Millstone.

The third team member is the Entergy Director of Oversight and is based in Jackson, Mississippi. This individual 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. He successfully managed four nuclear plants, including pressurized water reactors and boiling water reactors, single and dual unit sites. Most recently he served as Site Vice President at Prairie Island Nuclear Generating Station, until retirement in 2007. Due to

the recent employment of this individual with Entergy and having no past involvement with IPEC this individual is considered "independent" and coupled with his qualifications is acceptable to serve on the team. However, to avoid any perception of lack of independence, this individual will recuse himself from any review or interview activities associated with the oversight group.

The fourth team member is an attorney with Morgan, Lewis & Bockius, LLP, and will provide legal and regulatory support to the team. He 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.

The team's individual resumes will be available for review by NRC to confirm their qualifications and independence.

General Schedule of Assessment Activities

Changing plant conditions and information that emerges during the course of the assessment may require adjustment to the planned activities cited below.

Activity	Dates
TEAM PREPARATION - OFFSITE ISCA team data gathering.	In progress
IPEC management notifies site population of ISCA initiative and offers opportunities to meet with team or to submit written statements.	Complete
ISCA team leader and members prepare assessment plan and develop draft interview and focus group questions.	In progress
WEEK ONE - ONSITE ISCA members align, complete preparatory work, and finalize assessment activities, interview and focus group questions.	June 2-3
ISCA team conducts individual interviews. ISCA team schedules any requested confidential interviews.	June 4-6
ISCA team evaluates document review and interview data. ISCA team meets to check and adjust, debrief IPEC as necessary.	June 6

Activity	Dates
WEEK TWO - ONSITE ISCA team conducts work observations. ISCA team begins focus groups and continues individual interviews. ISCA team schedules any requested confidential interviews. ISCA team members assess corporate influences on IPEC safety culture and schedules telephone or in-person interviews with corporate personnel.	June 9-13
ISCA team evaluates interview, focus group, and observation data. ISCA team meets to check and adjust, debrief IPEC as necessary.	June 13
WEEK THREE - ONSITE ISCA team begins meeting observations and continues work observations, focus groups, and interviews. ISCA team schedules any requested confidential interviews. ISCA team members assess corporate influences on IPEC safety culture and schedules telephone or in-person interviews with corporate personnel.	June 16-18
ISCA team evaluates interview, focus group, and observation data. ISCA team caucuses to assess progress and makes decision to debrief Friday, June 20 or to pursue additional input.	June 19
Debrief with IPEC management as determined by ISCA team.	June 20
SUBSEQUENT TEAM ACTIVITIES ISCA team members perform supplemental field work, if required. Team develops report draft. Schedule and conduct debrief of IPEC management on results, if not debriefed on June 20.	June 23-July 11
ISCA team completes draft report.	July 14-25
Schedule and conduct ISCA team exit meeting with IPEC management.	July 28-31

Activity	Dates
ISCA team submits final report to IPEC.	August 8
IPEC evaluates final ISCA team report and identifies areas requiring corrective action. Condition reports to be generated as necessary.	August 11-29
IPEC provides results of ISCA to NRC	September 15
IPEC establishes corrective actions based on condition report evaluations, including any needed effectiveness reviews	September 30

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,

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