

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352

April 2, 2010

EA-09-060

Mr. Christopher J. Schwarz Vice President, Operations Entergy Nuclear Operations, Inc. Palisades Nuclear Plant 27780 Blue Star Memorial Highway Covert, MI 49043-9530

SUBJECT: SUMMARY OF THE MARCH 29, 2010, PUBLIC MEETING TO DISCUSS

THE RESULTS OF THE PALISADES NUCLEAR PLANT SAFETY

CULTURE WORKPLACE SURVEY

Dear Mr. Schwarz:

On March 29, 2010, the Nuclear Regulatory Commission (NRC) held a Public Meeting at the Region III Office, located at 2443 Warrenville Road, Lisle, Illinois. The purpose of the meeting was for Entergy Nuclear Operations, Inc., to discuss the results of the Palisades Nuclear Plant safety culture workplace survey conducted in 2009 as specified in the NRC issued Confirmatory Order dated November 10, 2009.

Mr. Ken O'Brien, Deputy Director, Division of Reactor Safety, Region III, opened the meeting with an introduction of NRC officials and an overview of the purpose of the meeting.

Mr. Michael Balduzzi, Entergy Senior Vice President, Regional Operations, led a presentation which provided an overview of the results of the 2009 Palisades Nuclear Plant safety culture workplace survey. Additionally, Mr. Dave Hamilton, Palisades Nuclear Safety Assurance Director, provided an overview of specific action plan focus areas that were developed for implementation at Palisades Nuclear Plant in response to the survey results.

Prior to the conclusion of the conference, Mr. Ken O'Brien provided members of the NRC and public attendees an opportunity to ask questions.

Mr. Mark Satorius, Regional Administrator, Region III, concluded the conference by thanking the members of Entergy Nuclear Operations, Inc., for coming to the Regional Office and providing the information that was discussed at the meeting.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, the attendance listing, and the Entergy presentation will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Eric Duncan, Chief Plant Support Branch Division of Reactor Safety

Docket No. 50-255 License No. DPR-20

Enclosures:

- 1. Meeting Attendees
- 2. Entergy Presentation Palisades 2009 Nuclear Safety Cultural Assessment

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-2-

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DISTRIBUTION:

See next page

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Letter to Mr. Chris Schwarz from Mr. Eric Duncan dated April 2, 2010.

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CULTURE WORKPLACE SURVEY

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MEETING PRINCIPAL ATTENDEES

March 29, 2010

Licensee

- T. Dougherty, Entergy Nuclear Director
- M. Balduzzi, Entergy Senior Vice President, Northeast Regional Operations
- T. Mitchell, Entergy Vice President, Engineering and Technical Services
- D. Hamilton, Palisades Nuclear Safety Assurance Director

Nuclear Regulatory Commission

- M. Satorius, Deputy Regional Administrator, RIII
- S. West, Director, Division of Reactor Projects, RIII
- K. O'Brien, Deputy Director, Division of Reactor Safety, RIII
- S. Orth, Enforcement/Investigations Officer, RIII
- E. Duncan, Chief, Plant Support Branch, RIII
- J. Giessner, Chief, Branch 4, Division of Reactor Projects, RIII
- J. Heck, Regional Counsel, RIII

Palisades 2009 Nuclear Safety Cultural Assessment

Entergy Presentationto

NRC Region III

March 29, 2010

NRC ORDER EA-09-060

Task 5:

Entergy shall meet with the NRC Regional Administrators in the three regions in which Entergy owns and operates plants, to discuss the results of the safety culture workplace surveys conducted in 2009.

Scope & Methodology

Scope of 2009 NSCA

- Comprehensive, Psychometrically Validated Nuclear Safety Culture Survey with Write-In Comments Using:
 - > SYNERGY's Standard Cultural Models
 - Nuclear Safety Culture Model (NSC)
 - Nuclear Safety Values, Behaviors & Practices
 - Safety Conscious Work Environment
 - Employee Concerns Program
 - General Culture & Work Environment (GCWE)
 - Leadership, Management and Supervision (Abridged) (LMS)
 - > SYNERGY'S Model for INPO Principles
 - > SYNERGY'S Model for NRC RIS 2006-13

Scope & Methodology

Methodology Update – Rating Criteria

- Measuring site performance acceptability based on comparisons to the industry norms.
- Top Industry Quartile "Areas of Strength" (AOS)
- Middle Industry Quartiles "Areas of Adequacy / Competency" (AOA)
- Low 3rd Industry Quartile "Opportunities for Improvement" (OFI)
- Bottom Industry Quartile "Area in Need of Attention" (ANA)
- Bottom Industry Decile "Area for Improvement"(AFI)

Summary of Results

2009 Response Summary

- 96.5% Response Rate
- 95% Provided Organizational Affiliation

Summary of Results

Palisades – NSC & GCWE Metric Results & Rankings

Location	NSC	NS VB&P	SCWE	ECP	GCWE
	Metric / Trend				
Palisades	4.45	4.37	4.67	4.43	4.22
- Description	Strength	Strength	Strength	Strength	Strength
- Industry Rank (quartile)	1 st				
- Fleet Rank (position / 9)	1 st				
Entergy North Composite	4.11 +8.2%	4.00 +9.6%	4.47 +4.3%	3.89 +12.1%	3.76 +10.6%
Entergy Composite	4.08 +6.0%	3.96 +6.9%	4.46 +3.1%	3.87 +9.2%	3.71 +7.4%

[•]No trends for Palisades are shown as this is a baseline assessment for Palisades.

^{•2006} to 2009 Trends are shown for Entergy Composite results.

Summary of Conclusions

Palisades Specific

- Survey Ratings for all Nuclear Safety Culture Questions and Models were measured as "Areas of Strength."
- Survey Ratings for General Culture & Work Environment and Leadership, Management and Supervision Questions and Models were also measured as "Areas of Strength."
- SYNERGY detected systematic positive bias in the ratings and cautioned that the results should not be considered fully accurate.
 - Recommended further validation of results.
 - > Suggested addressing lower rated attributes.
 - Suggested addressing lower rated organizations as part of continuous improvement.

Summary of Conclusions

Palisades Specific

- NSC Weaknesses
 - No "Areas for Improvement," "Area in Need of Attention," or
 "Opportunities for Improvement" were identified.
- NSC Lower Rated Areas (< 4.15)
 - Contractor oversight
 - Sufficient staffing
 - Corrective Action Program feedback to those who identify issues.
 - Correcting deficient procedures in a timely manner.
 - Seeking new ideas and best practices from other sites and organizations.
 - Implementing Self-assessment recommendations in a timely manner.
 - Selected areas of SCWE receptiveness.

Summary of Conclusions

Palisades Specific

- GCWE / LMS Weaknesses
 - No "Areas for Improvement," "Area in Need of Attention," or
 "Opportunities for Improvement" were identified.
- GCWE / LMS Lower Rated Areas (< 4.15)
 - Change Management
 - Effective Technical Training.
 - General Communications
 - Sufficient Sr. Management / Management Communication
 - Sr. Management Visibility
 - Middle Management Trust

Summary of Actions Taken or Planned

Communications of Results

- Executive Management was briefed by Synergy on fleet wide results
- Site lead teams were briefed by Synergy on site specific results
- Site lead team members briefed all-hands on site results
- Department managers brief workers on department results

Action Planning

- Action Planning Guidelines and Action Plan Templates were developed and provided to the sites to ensure consistency and focus when developing action plans.
- The Corrective Action Program (CAP) is used to track each site's review of results and the development of action plans.
- Each site (NSA Director) reviews their site specific results to determine what will be addressed in their site action plan and for the need for specific department action plans.
- Fleet wide results were reviewed to determine common themes and areas appropriate for inclusion in the fleet wide action plan.

Summary of Actions Taken or Planned

- Action Planning (continued)
 - Action plans are submitted to the VP Oversight for Management review.
 - Periodic summary report of action plan status will be provided to Fleet Management.
- Palisades Specific Action Plan Focus Areas
 - Survey Results Validation
 - Corrective Action Feedback
 - General Communications
 - Reinforcement of Nuclear Safety Culture Principles
 - Procedure Quality
 - Supplemental Worker Oversight

Glossary of Terms

- CCI Composite Cultural Indicator
- ENT Entergy
- NSC Nuclear Safety Culture
- GCWE General Culture and Work Environment
- LMS Leadership, Management and Supervision
- SCWE Safety Conscious Work Environment
- NSVB&P Nuclear Safety Values, Behaviors and Practices
- ECP Employee Concerns Program