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John F. McCann
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ENOC-10-00015
April 22, 2009

Mr. Mark A. Satorius
Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

SUBJECT: **Completion of Action 4 for Confirmatory Order EA-09-060**

Palisades Nuclear Plant
Docket No. 50-255
License No. DPR-20

Reference: NRC letter dated November 10, 2009; Mark A. Satorius to Entergy Nuclear Operations, Inc; regarding Confirmatory Order EA-09-060.

Dear Sir:

Entergy is providing this notification as required by Action 4 of the referenced Confirmatory Order, which states:

“Entergy will assess its succession planning process with respect to how that process addresses unanticipated, short-term personnel losses in key positions. Entergy will complete this assessment, and will develop corrective actions, as appropriate, within six months of the date of the issuance of the Confirmatory Order. Entergy will provide the results of this assessment to the Regional Administrator, Region III, within one month of its completion.”

Entergy has completed an assessment of the Entergy Nuclear succession planning process as part of the 2010 strategic initiative for Workforce Planning and Development. A summary of the assessment results is provided in this letter. Entergy considers the existing succession planning process to be effective, however two of the assessment recommendations are being treated as corrective actions related to the subject Order.

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Summary of Assessment:

Entergy corporate has an established succession planning process, identified as the Management Depth Process, which provides the framework for the succession planning process implemented by the Entergy Nuclear business unit.

Entergy Nuclear maintains a succession plan for director positions and above and for designated key managers. The nuclear sites owned and operated by Entergy implement plans at the site level and the site plans roll up to regional and fleet plans. Candidates are identified for each required position and are categorized as “ready now,” “ready in 1 to 2 years,” or “ready in 3 to 5 years.” The Vice President, Nuclear Human Resources is the overall governance owner of the Entergy Nuclear succession planning process.

The assessment of the Entergy Nuclear succession planning process was performed by the Senior Manager, Nuclear Workforce Planning and the Senior Manager, Talent Management & Inclusion. The assessment involved the benchmarking of succession planning practices at seven other nuclear utilities using face-to-face interviews or telephone / email communications. The assessment also included a review of the Entergy corporate Management Depth Process for potential attributes that could be applied to the Entergy Nuclear succession planning process.

The succession planning elements covered by the benchmarking included:

- Range of positions covered
- Involvement of succession candidates
- Written guidance for the process
- Use and types of succession planning tools

The assessment identified eight recommendations to be considered for implementation or for further evaluation. Entergy has determined that two of the recommendations will be implemented as corrective actions pursuant to action 4 of the subject NRC Order.

1. Regarding ‘range of positions covered’, Entergy is implementing a corrective action to add the site Security Manager to the list of key managers covered by the succession plan at each of the nuclear sites owned and operated by Entergy. This position was not identified as a designated key manager for succession plans during the 2007 – 2008 timeframe of interest for the subject NRC Order.
2. Regarding ‘written guidance for the process’, Entergy is implementing a corrective action to develop specific written guidance for the Entergy Nuclear succession planning process to expand on the guidance available for the Entergy corporate Management Depth Process.

The remaining six recommendations are not considered to be corrective actions pertaining to the Order. Two of the recommendations require additional evaluation of Entergy’s policy regarding notification and involvement of succession candidates. The other four recommendations require additional evaluation of possible new tools for identifying and tracking succession candidates.

The commitment to implement the two corrective actions described in this letter is stated in Attachment I. If you have questions regarding this matter please contact Charlene Faison, Manager, Licensing Programs at 914-272-3378.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 4/22/2010

Sincerely,



JFM / cdf / krk

Attachment I: Entergy Commitments Regarding NRC Order EA-09-060; Action 4

cc:

Document Control Desk, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC
Site Vice President, Palisades, Entergy
NSA Director, Palisades, Entergy
Licensing Manager, Palisades, Entergy

ENTERGY COMMITMENTS REGARDING NRC ORDER EA-09-060: ACTION 4

COMMITMENT DESCRIPTION	SCHEDULED COMPLETION DATE
Add 'Security Manager' to the list of key managers covered by the succession plan at each of the nuclear sites owned and operated by Entergy.	October 1, 2010
Develop written guidance regarding the Entergy Nuclear succession planning process used at each of the nuclear sites owned and operated by Entergy.	December 14, 2010