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ENOC-11-00021
 November 14, 2011

Mr. Roy P. Zimmerman
 Director, Office of Enforcement
 U. S. Nuclear Regulatory Commission
 Washington, DC 20555

**SUBJECT: NRC Confirmatory Order EA-11-096;
Planned Reorganization of Quality Control Reporting Relationship**

Arkansas Nuclear One Unit One Unit Two Docket 05000313 Docket 05000368 DPR-51 NPF-6	Indian Point Nuclear Generating Station Unit 2 Unit 3 Docket 05000247 Docket 05000286 DPR-26 DPR-64
Grand Gulf Nuclear Station Docket 05000416 NPF-29	James A. FitzPatrick Nuclear Power Plant Docket 05000333 DPR-59
River Bend Station Docket 05000458 NPF-47	Palisades Nuclear Plant Docket 05000255 DPR-20
Waterford Steam Electric Station – Unit 3 Docket 05000382 NPF-38	Pilgrim Nuclear Power Station Docket 05000293 DPR-35
	Vermont Yankee Nuclear Power Station Docket 05000271 DPR-28

REFERENCE: NRC Confirmatory Order EA-11-096 dated August 24, 2011 (ML11224A255).

Dear Mr. Zimmerman:

Entergy Operations, Inc and Entergy Nuclear Operations, Inc (Entergy) hereby submit the plan for a reorganization of the Quality Control (QC) reporting relationship as required by Action 1 of the subject confirmatory order which states:

“Entergy will reorganize the Quality Control (QC) reporting relationship so that those persons whose primary function is to assign or perform QC inspections will report directly to a manager in the Quality Assurance (QA) organization. These same persons may have a dotted line reporting relationship to the site Maintenance

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department and may be tasked to perform maintenance activities other than QC inspections. Entergy will provide to the Director, Office of Enforcement, a plan to accomplish this reorganization within 90 days after the issuance of this CO and will complete the transition described above within 270 days after the issuance of this CO. If Entergy is unable to provide a plan or complete the transition as described above, this CO shall be null and void and the NRC reserves the right to reenter the enforcement process in the underlying matter.”

Entergy's planned reorganization, shown in Attachment I, includes the following key elements:

1. The existing position title “Manager, QA”, which currently is part of the nuclear oversight organization, changes to “Manager, Nuclear Oversight”, and remains in the oversight organization. This position is located at each of Entergy's nine nuclear power plant sites. The new title reflects the responsibilities of this position which include QA, QC, and performance improvement activities. Each Manager, Nuclear Oversight will report to the Director, Oversight, which is a corporate-level position.
2. The existing position “QA Senior Auditor”, which is currently part of the nuclear oversight organization, transitions to “Supervisor, QA”, and remains in the oversight organization. This position is located at each of Entergy's nine nuclear power plant sites. This new management position will have the responsibilities of the QA Manager as defined and described in the Quality Assurance Program Manual (QAPM). The qualifications required by ANSI/ANS-3.1 1978, Section 4.4.5, “*Quality Assurance*” for the group leader, will be held by the Supervisor, QA. The Supervisor, QA at each nuclear power plant site will report to the Manager, Nuclear Oversight for that site. In unusual situations (e.g., unanticipated retirement, disability, resignation, etc) the qualifications may be held temporarily by the Manager, Nuclear Oversight.
3. The existing reporting relationship for the site QA Auditors (reporting to the Manager, QA) will change to report to the new position described in item 2 (Supervisor, QA).
4. The existing reporting relationship for those individuals whose primary function is site Quality Specialist (QC) in the maintenance organization will be changed to report to the new position described in item 2 (Supervisor, QA) in the oversight organization.
5. The existing reporting relationship for the Corporate ANSI Level III in the fleet operations support organization will be changed to report to the Manager, QA-Corporate in the fleet oversight organization.

Entergy has reviewed the actions necessary to implement this reorganization and concludes that the transition can be completed by May 20, 2012 (within 270 days of the Confirmatory Order dated August 24, 2011).

In addition to Action 1 regarding the QC reorganization, Entergy has completed the following other actions described in the confirmatory order.

Actions 2 and 3:

“Entergy will review its existing general employee training (GET) to ensure adequate coverage of 10 CFR 50.7, including insights from the underlying matter. To that end, Entergy will create a document identifying the relevant “lessons-learned” from

the facts of this matter, and in reviewing its GET, Entergy will ensure that these lessons-learned are addressed in the training materials. Entergy will also document the results of its review of the GET within 60 days after the issuance of the CO. If this review reveals a need to revise the GET, Entergy will make the appropriate revisions within 180 days of the issuance of this CO.”

and

“Entergy will review its existing training provided to new supervisors to ensure adequate coverage of 10 CFR 50.7 including insights from the underlying matter. To that end, Entergy will create a document identifying the relevant "lessons-learned" from the facts of this matter, and in reviewing the training provided to new supervisors, Entergy will ensure that these lessons-learned are addressed in the training materials. Entergy will also document the results of its review of the training within 60 days after the issuance of the CO. If this review reveals a need to revise the supervisory training, Entergy will make the appropriate revisions within 180 days of the issuance of this CO.”

Entergy has completed preparation of the lessons-learned document. Entergy’s review of the existing general employee training (GET) and the existing training provided to new supervisors has identified the need for revisions to ensure adequate coverage of 10 CFR 50.7, including insights identified in the lessons-learned evaluation. The results of the training review are documented and actions are in progress to complete the required revisions to the training materials by February 20, 2012 (within 180 days of the Confirmatory Order dated August 24, 2011).

Action 4:

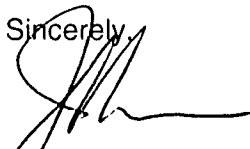
“Within 30 days after the issuance of this CO, a senior Entergy nuclear executive will issue a fleet-wide written communication reinforcing Entergy’s commitment to maintaining a safety conscious work environment and reaffirming Entergy’s insistence upon the protection of employees’ right and obligation to raise safety issues without fear of retaliation.”

Entergy issued a fleet-wide written communication on September 19, 2011 using the *InsideEntergy* communication tool for Entergy employees within the nuclear fleet. The requirements of Action 4 are complete.

There are no new commitments identified in this letter. If you have questions please contact Mr. Bryan Ford, Senior Manager, Licensing at 601-368-5516.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 11/14/2011

Sincerely,



JFM / bf / krk

cc: Document Control Desk, USNRC

ATTACHMENT I TO ENOC-11-00021

PLANNED QC REORGANIZATION
FOR ACTION 1 OF
NRC CONFIRMATORY ORDER EA-11-096

ENERGY OPERATIONS, INC
and
ENERGY NUCLEAR OPERATIONS, INC

