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Anthony J. Vitale
Site Vice President

PNP 2012-063

July 9, 2012

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Reply to Request for Information

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

Reference: Letter to Anthony Vitale, Entergy Nuclear Operations, Inc, from Gary L. Shear, Nuclear Regulatory Commission, dated June 26, 2012, "Request for Information on Safety Culture Issues at Palisades Nuclear Plant"

Dear Sir or Madam:

On June 26, 2012, the Nuclear Regulatory Commission (NRC) issued the referenced letter to Entergy Nuclear Operations, Inc (ENO) requesting certain information be provided within 20 days, to assist the NRC in understanding the breadth and depth of actions being taken by ENO and Palisades Nuclear Plant (PNP) to improve safety culture at the site and corporate office. Specifically, ENO understands the June 26 letter to request a copy of the summary of results of the safety culture assessment conducted by Conger & Elsea, Inc (CEI). The attachment to this letter provides the requested information.

ENO acknowledges the importance of a healthy safety culture and initiated significant action in the fall of 2011 at PNP to proactively address certain issues that had emerged at PNP. Those actions are documented in the Performance Recovery Plan.

The Performance Recovery Plan was designed to bring PNP back to operational excellence, and identifies five key areas where the PNP culture and/or processes need to be improved. Those five areas are:

1. Leadership Effectiveness
2. Safety Culture
3. Corrective Action Program
4. Equipment Reliability
5. Refueling Outage

For each plan area, the site leadership team identified the performance gaps that needed to be addressed and the required actions to close the gaps. In response, several hundred action items were written. One such action was the commissioning of the comprehensive third party nuclear safety culture assessment by CEI.

PNP management received the CEI safety culture assessment report in April 2012. Upon review, it became clear that the Areas for Improvement (AFIs) identified by CEI overlapped many of the issues already identified by station and corporate leadership in the Performance Recovery Plan. Because station and corporate management were implementing the Performance Recovery Plan in April 2012, many of the actions needed to address the nuclear safety culture assessment were already under way. A task was assigned to evaluate this conclusion, and to identify any additional actions required to ensure that all performance shortfalls and all AFIs were addressed. This evaluation will include sufficient information for the NRC to fully understand the breadth and depth of actions being taken by ENO and PNP to improve safety culture. The completed evaluation will be available for NRC review and ENO will be prepared to discuss our progress at the requested public meeting.

Gaps identified between the station Performance Recovery Plan and the safety culture assessment are being addressed in a Safety Culture Action Plan. This action plan involves, among other things, a series of focus meetings between station senior leaders and relatively small groups of plant staff for the purpose of providing the feedback needed to measure the effectiveness of steps taken to date, and to adjust the action plan going forward. Therefore, the Safety Culture Action Plan is a living document and a foundation for actively engaging station workers to identify, create and complete other actions deemed to be necessary to improve the nuclear safety culture at PNP.

This letter contains no new commitments and no revisions to existing commitments.

Sincerely,



AJV/bed

Attachment 1: Nuclear Safety Culture Assessment Executive Summary

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

Attachment 1

Nuclear Safety Culture Assessment Executive Summary

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