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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**

3 Pages Follow

EXECUTIVE SUMMARY

This report describes the results of an independent assessment of the existing Safety Culture and Safety Conscious Work Environment at the Palisades Nuclear Power Plant. The population addressed in the assessment included all Entergy Employees at the Palisades Nuclear Power Plant and long term contractors based at Palisades. The assessment was conducted during January and February, 2012. The primary objective of the assessment was to provide information regarding the status of the safety culture components at Palisades as recently described by the U.S. Nuclear Regulatory Commission (NRC). The assessment was conducted using the same methodology that aligns with the current U.S. NRC procedures for independent safety culture assessment. Positive observations and areas in need of attention with respect to the components are presented. Conclusions regarding the results of the information collected on the safety culture components are also presented to facilitate the identification of improvement strategies.

The safety culture components important for the existence of a healthy safety culture within a nuclear facility have been identified (INSAG-15, 2002; INPO Principles for a Strong Nuclear Safety Culture, 2004; U.S. NRC Inspection Manual 0305, 2006). The U.S. NRC has defined these components to include:

- **Human Performance**
 1. **Decision-Making**
 2. **Resources**
 3. **Work Control**
 4. **Work Practices**
- **Problem Identification and Resolution**
 1. **Corrective Action Program**
 2. **Operating Experience**
 3. **Self and Independent Assessments**
- **Safety Conscious Work Environment**
 1. **Environment for Raising Concerns**
 2. **Preventing, Detecting, Mitigating Perceptions of Retaliation**
- **Other Safety Culture Components**
 1. **Accountability**
 2. **Continuous Learning Environment**
 3. **Organizational Change Management**
 4. **Safety Policies**

Performance attributes are associated with each of the safety culture components. Particular behaviors and attitudes have been identified to evaluate the extent to which the organization has attained these attributes.

Most of the methodology used in this assessment was based upon work originally developed with the support of the U.S. NRC to assess the influence of organization and management on safety performance. The methodology entails collecting a variety of information that is largely based upon the perceptions of the individuals in an organization, as well as conducting structured

observations of individuals performing work activities. Perceptions are often reality when it comes to influencing behavior and understanding basic assumptions. Therefore, the data collected regarding individuals' perceptions are critical to this type of assessment.

The results of this assessment have been presented in the U.S. NRC framework for evaluating the components important to safety culture. In the context of that framework, the Assessment Team identified that there are positive observations and areas in need of attention within each of the 4 primary areas of safety culture and specific examples are presented for each component in each of the areas. In addition, areas for improvement are identified in the Conclusion Section of the report and are based upon the information collected for each component of the safety culture areas.

In general:

Human Performance

The Team noted that important decision making processes are governed by corporate procedures and appear to be consistent with industry practices. However, several events have occurred in recent Palisades history in which deviation from those processes contributed to the occurrence or severity of an event. Standards and expectations with respect to work practices and work control need to be more clearly communicated and reinforced. Formality and consistency in the implementation of human error prevention techniques needs to be implemented.

The Team believes that there is a lack of confidence and trust by the majority of employees (both staff and management) at the Plant in all levels of management to be open, to make the right decisions, and to really mean what they say. This is indicated by perceptions around the decisions that have been made, the mixed messages and lack of adherence to expectations by management and supervision, and in the repeated emphasis of production over safety exhibited through decisions around resources.

Problem Identification and Resolution

Individuals across the organization indicated their willingness to raise and escalate issues. The CR process is perceived by Plant personnel as easily accessible and well used by employees at all levels. However, the value of the process to create a learning organization is not being fully realized. Senior leadership provides weak oversight of the process and management engagement with the process is limited to high level issues, with no regular forum to assess the health of the program. Operating experience needs to be better integrated into a learning process and a stronger independent oversight organization that management will listen to is needed to help identify areas for performance improvement.

There is a lack in the belief that Palisades Management really wants problems or concerns reported or that the issues will be addressed. The way that CAP is currently being implemented is not perceived as a value added process for the Plant. The relationship of the CAP to performance improvement and the role it plays in the development of a learning organization is not understood or recognized by most individuals.

Safety Conscious Work Environment

The results of this assessment do indicate that the Palisades Plant has issues with respect to a safety conscious work environment. While the majority of employees believe that management says that retaliation would not be tolerated, there is also a widespread perception of fear and punishment across the Plant. The Team believes that an Area for Improvement must be identified for the perception that the majority of employees believe that they cannot challenge management decisions, that helpful criticism is not encouraged, and that they cannot approach management with concerns.

The absence of a dominant constructive cultural style at the Plant indicates that management has not been successful in communicating and reinforcing the values and attitudes that are important for enhancing safety culture. Further evaluation and understanding of why there is such pervasiveness and consistency across the Plant around these issues is critical in moving forward for effective progress to be made for ensuring a healthy safety culture.

Other Safety Culture Components

Examples of a lack of accountability at all levels at the Plant were evident. Many individuals in management and supervision do not consistently exhibit desired behaviors and are not challenged by their managers or peers. Inconsistent implementation of standards and expectations in work activities are common and may be facilitated by ineffective communication around the change management process. Significant management oversight and attention is needed to communicate the standards and expectations and implement the appropriate and consistent performance management to hold individuals accountable.

The Team believes that a contributing factor to the accountability issue is that there are too many expectations and standards identified without a clear prioritization of which ones are most important. Additionally, the negative perceptions around the communication process at the Plant must be improved in order for any messages to be heard, understood, and implemented to achieve the desired performance.