



Entergy Nuclear Operations, Inc.
Entergy Operations, Inc
440 Hamilton Avenue
White Plains, NY 10601
Tel 914 272 3370

John F. McCann
Vice President - Nuclear Safety,
Emergency Planning and Licensing

ENOC-12-00024
August 3, 2012

Mr. William Dean
Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

2012 AUG -7 AM 10:00
RECEIVED
REGION I

**SUBJECT: NRC Confirmatory Order EA-10-090, EA-10-248, EA-11-106
Section V.D; Review and Revision of EN-QV-136**

Arkansas Nuclear One – Units 1 & 2
Dockets 50-313 & 50-368
Licenses DPR-51 & NPF-6

Grand Gulf Nuclear Station
Docket 50-416
License NPF-29

Indian Point Nuclear Generating Units 2 & 3
Dockets 50-247 & 50-286
Licenses DPR-26 & DPR-64

James A. FitzPatrick Nuclear Power Plant
Docket 50-333
License DPR-59

Palisades Nuclear Plant
Docket 50-255
License DPR-20

Pilgrim Nuclear Power Station
Docket 50-293
License DPR-35

River Bend Station
Docket 50-458
License NPF-47

Vermont Yankee Nuclear Power Station
Docket 50-271
License DPR-28

Waterford 3 Steam Electric Station
Docket 50- 382
License NPF-38

- References:
1. NRC letter dated January 26, 2012; William Dean to John Herron; "Confirmatory Order (Effective Immediately) and Notice of Violation; Investigation Reports 1-2009-041, 1-2010-019, and 1-2010-031; Inspection Report 05000333/2011009".
 2. Entergy letter dated August 3, 2012; John F. McCann to Douglas J. Walters; "NEI 09-07, Fostering a Strong Nuclear Safety Culture".

Dear Mr. Dean:

Section V.D of the referenced NRC Confirmatory Order (CO) pertains to Entergy's review and revision of the nuclear safety culture monitoring procedure, EN-QV-136. Section V.D states:

"Within 90 days of the date of the CO, Entergy will review its procedure EN-QV-136, Nuclear Safety Culture Monitoring, which implements the safety culture monitoring

processes in NEI 09-07 "Fostering a Strong Nuclear Safety Culture," to determine whether the procedure (if that procedure had been in effect at the time of the violations) would have detected the safety culture weaknesses that led to the misconduct that formed the basis for the CO. If the review indicates that the implementation of that procedure may not have detected the weaknesses, Entergy will develop enhancements to the NEI process that would improve the ability to detect those weaknesses and revise the Entergy procedure accordingly. Entergy will complete this procedure revision, if needed, within 120 days of the completion of that review. Additionally, within 30 days after revising its procedure, Entergy will provide the results of its review to NEI for its consideration in revising NEI document 09-07 "Fostering a Strong Nuclear Safety Culture." Entergy will make the results of this review available for NRC review."

This letter is to inform you that Entergy completed the procedure review on April 13, 2012 and, based on the results of that review, completed the procedure revision on July 11, 2012. In addition, Entergy has provided information to NEI (Reference 2) for consideration in revising NEI 09-07. Documentation of the procedure review and revision is available for NRC review.

There are no new commitments identified in this letter. Please contact David Mannai, Senior Manager, Nuclear Safety and Licensing at 802-380-1175 with questions or comments and to make arrangements for your review of documentation pertaining to Section V.D of the Confirmatory Order.

Sincerely,



JFM / DM / KK

cc:

Document Control Desk, USNRC
NRC Resident Inspectors Offices – Entergy Sites



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ENOC-12-00023
August 3, 2012

Mr. Douglas J. Walters
Vice President Regulatory Affairs
Nuclear Energy Institute
1776 I Street NW, Suite 400
Washington, D.C. 20006-3708

2012 AUG - 7 AM 10:00
RECEIVED
REGION 1

SUBJECT: NEI 09-07, "Fostering a Strong Nuclear Safety Culture"

Reference: 1. NRC letter dated January 26, 2012; William Dean to John Herron; "Confirmatory Order (Effective Immediately) and Notice of Violation; Investigation Reports 1-2009-041, 1-2010-019, and 1-2010-031; Inspection Report 05000333/2011009".

Dear Mr. Walters:

Section V.D of the referenced NRC Confirmatory Order (CO) requires that Entergy provide information to NEI for consideration in revising NEI 09-07. The CO pertains to apparent violations at Entergy's James A. FitzPatrick Nuclear Power Plant involving willful falsification of documents on occasions between 2006 and 2009.

As required by the CO, Entergy performed a review of our procedure that implements the safety culture monitoring process based on NEI 09-07 Revision 0, November 2010. The initial version of our procedure was issued in 2011 and therefore was not in effect during the timeframe of concern for the apparent violations. The scope of our procedure review included an evaluation to assess whether the procedure would have detected the safety culture weakness that led to the misconduct, if that procedure had been in effect during the timeframe of concern. The CO also required that if the review resulted in proposed process / procedure enhancements, then Entergy would revise the procedure and determine if enhancements to NEI 09-07 may be warranted.

Entergy has completed the procedure review and revision required by the CO and has identified one recommendation for consideration in a future revision of NEI 09-07. Our review suggests that safety culture monitoring activities could benefit from an increased focus on the use of intuition and observation for 'faint signals' by station managers and a reduced emphasis on the collection of hard data and the binning of that data into the INPO Principles associated with nuclear safety culture. We believe that NEI 09-07 remains an effective guidance document for implementing a safety culture monitoring process.

We look forward to working with the NEI Safety Culture Task Force to share our lessons learned and to participate in efforts to further enhance NEI 09-07.

Please contact David Mannai, Senior Manager, Nuclear Safety and Licensing at 802-380-1175 with questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'JFM', written over a horizontal line.

JFM / DM / KK

cc:

J. Slider, NEI