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

Subject: Public Meeting Slides

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

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. (ENO) is providing the slides that will be presented during the public meeting for the Palisades Nuclear Plant. The meeting is scheduled for September 12, 2012.

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

Sincerely,

A handwritten signature in black ink, appearing to read "OWG", followed by a long horizontal line.

OWG/bed

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

Palisades Nuclear Safety Culture Assessment Briefing

September 12, 2012

Agenda

- Nuclear Safety Culture Assessment
 - Timeline
 - 3rd Party Assessment
 - Results
 - Results Analysis
 - Action Plans

Commitment

Entergy Corporation and Palisades Nuclear Plant is committed to establishing and maintaining a strong Nuclear Safety Culture.

Timeline

TIMELINE

- Oct 2011 - Station Recovery Plan implemented
- November 3, 2011 – NSCMP held
- December 2011 – contract proposal accepted from CEI
- Jan 16 -31, 2012 survey conducted
- Jan 25, 2012 ATC CO issued includes NSC assessment
- Feb 20, 2012 two week on site assessment period begins
- April 5, 2012 – CEI debriefs management and site on NSC assessment

TIMELINE

- April 18, 2012 – final NSC report issued to site
- April 8 to May 12, 2012 – refueling outage
- End of April – draft NSC action plan created
- June 3, 2012 - NSC assessment to Recovery Plan gap assessment completed by outside contractor
- July 2012 – Independent industry assessment complete
- Oct 15, 2012 – Synergy survey scheduled

3rd Party Assessment

3rd Party Assessment

- Conger & Elsea Inc. (CEI)
- Meets intent of USNRC 95003 & NEI 09-07 third party Safety Culture Assessment Team Criteria
- Two Members Involved in Development of Methodology for USNRC
- Team Leader Has 25 Years Experience, Including Davis-Besse Assessments
- Independent from Entergy and Palisades

3rd Party Assessment

- Depth and Scope
 - 100% Palisades Employees Invited
 - 76% Responded
 - > 50% Response Rate from all Groups
 - Total Site Population of 783
 - 123 or 15.7% Selected for Interviews or Focus Groups
 - Cross-Sectional Sample of Employees

3rd Party Assessment

- Info was Gathered from Multiple Data Points
 - > 10 % Interviews
 - 76% Survey Response Rate
 - 15 Plant Observations
- “...provide a strong basis from which conclusions related to the organizations safety culture can be drawn.”

Assessment Results

Results

- Relatively few “significant differences” between work groups
- Corrective action strategy equal across the station
 - Recovery plan actions address safety culture
 - NSC action plan address gaps
 - Actions captured in PCRS
- No regulatory compliance issues identified
 - One item of concern was referred to ECP
 - 3 enhancement actions
- Product was not intended to assess corporate safety culture

Results

- Three “key take aways” provided
- Five Areas for Improvement (AFI)
 - AFI’s binned under the three “key take aways”

“Key Take Away”

There is a significant loss of confidence in the Site Leadership Team. Management and supervision has not been able to engage the workforce, provide healthy avenues for reporting concerns, and beneficially challenge each other to make the right decision.

AFI's

- Leadership behavior that communicates clear expectations and standards, and exhibits the behaviors that are consistent with the message, needs to be demonstrated to regain the engagement and trust of the Plant.
- Palisades Management needs to evaluate what behaviors can be used to create an environment where beneficial challenging, a healthy questioning attitude, and the reporting of concerns can be accepted, supported and desired. Efforts to erase the perceptions of fear around potential punishment will have to be made to provide a better foundation from which the appropriate behaviors can be effectively achieved.
- A clear, consistent and unified vision, mission and values message needs to be reconstituted for the Plant. Processes around decision making, resource allocation, coordination of work and human performance need to be aligned with this message. These processes need to be communicated, understood and used such that work activities are performed safely.

“Key Take Away”

The processes to develop a learning organization and to understand how to improve performance are not valued or prioritized by the Plant.

AFI

Performance Improvement overall, and the CAP in particular, at the Palisades Plant needs to be reassessed and realigned to ensure that all employees understand its value and priority in enhancing Plant performance.

“Key Take Away”

Accountability is perceived to be only punitive and has created a pervasiveness of SCWE issues across the organization.

AFI

Palisades needs to ensure that any accountability model that is used is consistently implemented against clearly communicated and prioritized standards and expectations, which recognizes and reinforces desired behaviors and uses effective coaching, minimizing punitive actions, for undesirable behaviors.

Action Plan

Action Plan

- Recovery Plan gap assessment
 - Actions compared against NSC assessment results
- Safety Culture Action Plan
 - Addresses gaps in Recovery Plan actions vs. NSC assessment
- Vision/Strategy/Wildly Important Goals (WIG's)
- Entergy Corporation 4 platforms
- Metrics to Measure Improvement
- Safety culture attributes coding

Action Plan

Wildly Important Goals (WIGs)

- **EVENT FREE OPERATIONS DAY-TO-DAY**
- **R22 AND R23 SAFE AND ERROR FREE**
- **CORRECTIVE ACTION PROGRAM
IMPROVEMENTS**
- **IMPROVE EQUIPMENT RELIABILITY**

Action Plan

Entergy Nuclear Four Platforms:

- **Trust, Honesty, Fairness, Integrity**
- **Be deliberate – actions under control – follow the rules.**
- **Set and continuously reinforce high standards**
- **Do what you will say you will do**

Action Plan

AFI-1, AFI-2 and AFI-3 actions:

- Vision/Strategy/WIG's
- Development of written roles and responsibilities
- Leadership one-on-one meetings
- Case Study regarding Sept 25th event
- CBT regarding Accountability, Behaviors, Procedure Use
- Stand-down on procedure use and adherence
- Reinforcement of “What Good Looks Like”

Action Plan

AFI-1, AFI-2 and AFI-3 actions:

- Eliminating process implementation gaps
- Snapshot Assessment of risk assessment practices and behaviors
- Discussion of integrated risk at key meetings
- Communication of risk management principles
- Communications Advisory Group

Action Plan

AFI-4 actions:

- Increasing CAP understanding among all workers
- Improving CAP through CARB improvements
- Improving ACE and RCE's quality
- Actions to reduce CR backlogs
- Review POC's for each department
- Train POC's with regard to OE
- Trend ineffective use of OE
- Assess site OE program improvement

Action Plan

AFI-5 actions:

- CEI NSC Assessment results briefings conducted
- Site Vice President small group meetings
- Shop briefings on SCWE
- Communications Advisory Group created
- Devil's Advocate role is implemented
- CRG communication role on NSC issues
- Department specific surveys monthly

Actions

- **Human Performance**
 - *Decision-Making*
 - Work Management Discipline readiness
 - Communications improvements on key decision making
 - Devil's advocate program
 - “Stop when unsure”
 - Risk Management

Actions

- **Human Performance**
 - Resources
 - Key positions all filled
 - Most openings have approval to post
 - HR working to streamline process
 - Procedure quality reviews

Actions

- **Human Performance**
 - *Work Control*
 - Work Management action plan
 - Focus on preparations
 - Risk Management

Actions

- **Human Performance**
 - *Work Practices*
- Procedure Use and Adherence training.
- HU brief procedure streamlined
- Procedure improvement program

Actions

- **Problem Identification and Resolution**
 - *Corrective Action Program*
- CAP improvement plan instituted
 - Line ownership of processes
 - CAP Procedure use and adherence
 - Causal evaluation quality
 - Self-assessment program
 - Timely and quality action implementation

Actions

- **Problem Identification and Resolution**
 - *Operating Experience*
- CAP improvement plan instituted with actions to improve OE

Actions

- **Problem Identification and Resolution**
 - *Self & Independent Assessments*
- NOS meets with Site Leadership Team
- Use of elevation and escalation process
- Communications Advisory Group developed
- Corporate oversight

Actions

- **Other Safety Culture Components**
 - Accountability
- Entergy 4 platforms
- HU/IS Superintendent in position
- Accountability Model Training
- Small Group meetings
- Procedure improvement program

Actions

- **Other Safety Culture Components**
 - *Continuous Learning Environment*
- Training specific action created and being addressed NSC plan
- Enhancements to training forms related to qualification
- Corrective Action Program improvements

Actions

- **Other Safety Culture Components**
 - *Organizational Change Management*
- HOT TOPICS
- Communications Advisory Group

Actions

- **Other Safety Culture Components**
 - *Safety Policies*
- Wildly Important Goals
- Site strategy includes safety “focus on safe, error free operations while improving our ability to find and fix our own issues.”
- HU/IS Superintendent position filled
- Metrics on Leader Observations
- Top decile Total Industrial Safety Accident rate (TISA)

Actions

- **Safety Conscious Work Environment**
 - *Environment for Raising Concerns*
- ECP communication and outreach
- Small Group Meetings
- Accountability vs. discipline
- Devils advocate program
- Shop briefs on SCWE

Actions

- **Safety Conscious Work Environment**
 - *Preventing, Detecting, Mitigating Perceptions of Retaliation*
- Small Group meetings
- ERB process
- Shop briefs on SCWE
- Improved communications
- Corporate action for SCWE training periodicity
- Safety Culture fact & information sheet

Closing

- Palisades and Entergy recognized need to assess safety culture
- Prompt 3rd party assessment conducted
- Prompt and aggressive action plan implemented
- Results show improvement
- Focus on sustainability