

**Pre-decisional Enforcement
Conference
in response to
NRC Inspection Report
05000416/2013201**

Agenda

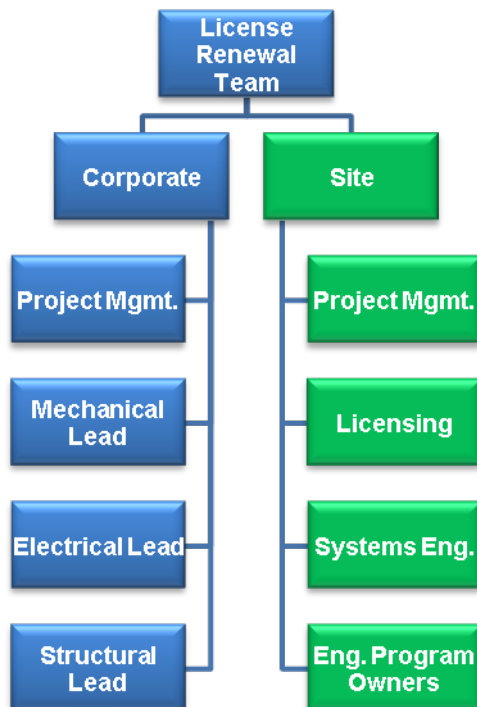
- Opening Remarks
- License Renewal Organization
- Performance Gaps
- Causes
- Corrective Actions
- Perspective on Significance
- Closing Remarks

Opening Remarks

- Acknowledge each example to be valid
- Implemented interim corrective actions
- Finalizing causal evaluation
- Planning additional corrective actions

License Renewal Organization

Entergy License Renewal Structure



- Corporate team focuses on:
 - Standardization of IPA, TLAA, and ER efforts.
 - Standardization of LRA; incorporating latest industry lessons learned and optimized practices.
- Site team focuses on:
 - Confirmation of CLB, OE, DB, AMP detail.
 - Review of all IPA, TLAA, ER, and LRA documents before submittal to NRC.

Performance Gaps

- Failure to address all attributes of the RAI
- Failure to adequately describe the use of Moderate Energy Piping Procedure
- Failure to differentiate FAC and non-FAC wall-thinning mechanisms
- Ambiguous FAC procedure
- Failure to initiate CRs for significant wall thinning

Causes

- Insufficient engagement, coordination, and oversight of Grand Gulf license renewal activities
- Inadequate and ambiguous guidance in FAC procedure
- Insufficient RAI response guidance in LRA Maintenance procedure

Corrective Actions

Completed Actions

- Returned to the normal LRA business practice
- Reinforced NRC communication guidance
- Revised procedures for FAC and LRA Maintenance
- Conducted department stand-downs

Corrective Actions

Planned Actions

- Establish an escalation process
- Present OE and lessons learned at NEI License Renewal Task Force meeting
- Present OE to licensees who utilize Entergy License Renewal services
- Finalize Root Cause Evaluation
- Complete extent of condition

Perspective on Significance

No impact during the period of extended operation

- Errors in LRA program descriptions
- No missing site aging management activities

Perspective on Significance

NRC Enforcement Policy guidance for SL III violation

- Our errors should not result in the NRC changing a regulatory position
- Substantial further inquiry should not be required

Conclusion

- Acknowledge each example to be valid
- Recognize that providing complete and accurate information is essential
- GGNS will ensure the fleet and industry learn from our mistakes