

**Summary of the Root Cause Evaluation**  
***GGNS License Renewal Apparent Violation of 10CFR54.13 “Completeness and Accuracy of Information”***

**Corrective Action Program Tracking Number: CR-GGN-2013-04074**  
**Approved on: July 24, 2013**

Problem Statement

During the time period of May 2012 to October 2012, Grand Gulf site personnel and License Renewal Office failed to provide complete and accurate information in responses to Requests for Additional Information (RAIs) related to implementation of aging management activities for Grand Gulf's (GGNS) License Renewal Application (LRA). This resulted in a notice of apparent violation of 10CFR54.13 subject to escalated enforcement.

Root Cause

*Insufficient engagement and oversight by site personnel in the development and approval of responses to Requests for Additional Information resulted in incomplete and inaccurate information being submitted to the U.S. Nuclear Regulatory Commission (NRC) as part of the License Renewal Process.*

The organization of the license renewal project team for Grand Gulf differed from all previous Entergy license renewal applications in that it did not contain a dedicated team from the site responsible for developing and certifying responses to RAIs. An executive-level decision was made to deviate from our normal practice to ensure that Grand Gulf staff could devote their efforts to ensuring the success of an unprecedented Extended Power Uprate (EPU) outage, while relying on the corporate license renewal staff to develop and provide responses to LRA RAIs. The vulnerability of this decision was exposed when complex technical issues involving Grand Gulf specific procedures and historical actions arose. Team certification or peer reviews are suggested by EN-LI-106 “NRC Correspondence” (Revision 9, August 23, 2011) section 5.4 for technical or complex matters. These were not adequately obtained due to the unique organizational structure of the Grand Gulf license renewal project. This weakness came to fruition when incomplete and inaccurate information was provided on the docket to the NRC.

Contributing Causes

*#1) Weaknesses exist in the governing document(s) that provide guidance for responding to complex technical License Renewal Application RAIs.*

When technically complex issues arose involving Grand Gulf specific procedures and programs, the lack of clear guidance or definition of what a “technically complex” issue is resulted in responses being submitted to the NRC that were from a perspective focusing on License Renewal Program requirements (e.g. NUREG-1801) and not descriptive of the site-level programs/procedures actually being questioned by the NRC.

*#2) EN-DC-315 “Flow Accelerated Corrosion Program” (Revision 1, April 2, 2008) contained ambiguous guidance that was open to interpretation.*

In one section of the Entergy fleet procedure EN-DC-315, “significant wall thinning” was not identified as an initial screening criterion requiring initiation of a condition report, therefore condition reports were not written in some cases. EN-DC-315 did not state the requirement to document “significant wall thinning” in all sections of the procedure governing inspection results and evaluation of inspection data. Consequently, the manner in which the Grand Gulf site applied this criterion to its engineering practices may have differed from other sites’ interpretations of when a condition report is required to be written.

#### Extent of Condition

The condition being extended from the Root Cause Analysis report was the failure to provide complete and accurate information associated with the GGNS license renewal project RAIs. For the purposes of the extent of condition evaluation, the RAI Level was characterized as an initial RAI or a follow-up to a previous RAI. A Level 1 RAI is the initial RAI based on the LRA or Audit unresolved issues. A Level 2 RAI is a follow-up to a Level 1 RAI and so on.

In order to review the extent of condition all Level 3 (9) and 4 (3) RAIs responses were reexamined to determine if incorrect or inaccurate information was submitted to the NRC. Additionally, a representative sample of Level 1 (44) and Level 2 (6) RAIs were selected. The Level 1 and 2 RAIs were selected randomly. This sample was based on similar guidance provided in EN-QV-109, “Audit Process.” (Revision 24, June 27, 2013) For the purposes of performing an adequate and timely Root Cause Evaluation (RCE), a determination was made to review a total of 62 RAI responses related to the GGNS LRA.

Of the sixty two RAI responses that were reviewed, one additional example of miscommunication regarding the full details of the GGNS-MS-46 procedure was identified.

#### Extent of Cause

The root cause of this condition is isolated to the responses to RAIs associated with the GGNS license renewal project. A review of other license renewal projects performed in the Entergy fleet indicated that dedicated site teams were established to support answering technical questions relating to RAIs. Based on the change analysis performed in support of the evaluation, it appeared that the lack of a site team dedicated to the license renewal project at GGNS was unique. Not having a license renewal team onsite directly resulted in a lack of site engagement with the project, and it ultimately led to receiving the avoidable notice of violation.

Additionally, the untimely overlap of Grand Gulf’s EPU and Grand Gulf’s LRA was a unique factor that directly attributed to the root cause. Had the two major projects not been performed concurrently, there would have been no reason to deviate from the normal practice of having a dedicated site team assigned to the license renewal project. Therefore, the Root Cause Evaluation concluded that the extent of cause is limited to only the GGNS License Renewal Application.

## Safety Significance

The condition documented in this RCE deals with poor practices in the development of correspondence by the Grand Gulf site and corporate License Renewal Group. The conditions have no significant implication for public health and safety or common defense and security as described in Title 10 *Code of Federal Regulations* Part 54, and do not pose any increase in risk to nuclear, radiological, or industrial safety. The violation examples, if left uncorrected, would have no potential impact to the effectiveness of programs required for aging management review.

## Corrective Actions

### *Corrective Action to Prevent Recurrence*

Entergy will revise EN-LI-106 to drive engagement of multiple departments and/or sites in developing responses to RAIs when more than one response is referring to the same issue, the issue is \*technically complex, or when organizations external to a site (such as vendors, headquarters, license renewal, etc) are providing a response that involves site-specific programs or procedures.

\*NOTE: (This will include a clear definition, with examples, of "technically complex.")

### *Completed Actions*

Entergy revised procedure EN-FAP-LR-011 "License Renewal Application Maintenance" (Revision 4, December 29, 2012) and included the addition of a RAI response checklist as attachment 7.4 and requirements to use the checklist after preparing an RAI response. (Ref. CR-GGN-2012-8208)

Entergy revised EN-DC-315 (Revision 9, July 15, 2013) to clarify the process for determining "Significant Wall Thinning" that warrants an entry into the corrective action program. (Ref. CR-GGN-2013-2489 CA-3)

### *Interim Action*

Grand Gulf Licensing and Engineering departments are now reviewing and certifying, respectively, the responses to RAIs for the remainder of the Grand Gulf LRA.

### *Long Term Action*

Entergy License Renewal Director will share the lessons learned and operating experience from this event with the Nuclear Energy Institute License Renewal Task Force.

Entergy Licensing Programs Manager will share the lessons learned and operating experience from this event with the Entergy fleet.