



Entergy Operations, Inc.  
Entergy Nuclear Operations, Inc.  
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**John F. McCann**  
Vice President,  
Regulatory Assurance

CNRO-2015-00021

November 3, 2015

Mr. Marc L. Dapas  
Regional Administrator – Region IV  
U. S. Nuclear Regulatory Commission  
1600 East Lamar Blvd.  
Arlington, TX 76011-4511

SUBJECT: RBS Security Confirmatory Order – Action H

River Bend Station  
Docket No. 50-458  
License No. NPF-47

REFERENCE: NRC Letter Entergy Operations, Inc., *Confirmatory Order, Notice of Violation, and Civil Penalty – NRC Special Inspection Report 05000458/2014407 and NRC Investigation Report 4-2012-022 – River Bend Station*, dated December 3, 2014 (ADAMS Accession No. ML14339A167)

Dear Mr. Dapas:

The referenced letter documents the Confirmatory Order and actions resulting from the Alternate Dispute Resolution (ADR) between the NRC and Entergy Operations, Inc. pertaining to a security issue at River Bend Station (RBS). Actions to be taken by Entergy Operations, Inc. and Entergy Nuclear Operations, Inc. (collectively known as “Entergy”) are documented in Sections III and V of the referenced letter and further clarified in its attachment.

Action H of the Confirmatory Order states:

“Within 4 months from the date of this Confirmatory Order, Entergy will prepare a presentation describing the event that formed the basis for this violation. The presentation will be delivered to the Nuclear Security Working Group and the National Nuclear Security Conference (subject to acceptance of the conference-organizing committees). This presentation will include, among other subjects, the subjects covered by the non-public Attachment to this Confirmatory Order. Prior to making the presentation, Entergy will provide its proposed presentation to the NRC for its review. The NRC will communicate to Entergy any concerns regarding the presentation within 30 days of submittal. Entergy will deliver the presentation within 12 months of this Confirmatory Order.”

Entergy developed the presentation specified in Action H and delivered it to the Nuclear Security Working Group on September 16, 2015. However, Entergy did not deliver the presentation at the National Nuclear Security Conference (NNSC), which was held the week of June 9, 2015. In order to present at the conference, the organizers required all agenda

items to be submitted by May 22. However, Entergy failed to accomplish this action in time to be considered for the conference agenda.

A distraction that contributed to this failure was an organization change within the Corporate Security department. Specifically, during the timeframe for developing and submitting the presentation to the NRC (March – April 2015), Entergy Corporate Security was conducting turnover between the outgoing and incoming Security Directors. The change management plan associated with this action did not account for the tight timeline set on the Action H due dates in relation to scheduled timing of the NNSC. In addition, the persons involved failed to adequately review the upcoming activities to ensure they were being appropriately addressed. It wasn't until the time of the NNSC that Entergy recognized the activity to deliver the presentation to the NNSC would not be met.

Entergy is taking compensatory measures based on the inability to deliver the presentation at the NNSC. These measures involve presenting the information during the industry regional security groups' periodic conference calls. The lessons-learned presentation details were communicated to the Region III, I, and IV groups on September 23, 2015, October 14, 2015, and October 21, 2015, respectively. Entergy will deliver the presentation to the Region II group on or before the current Order due date of December 3, 2015.

Because Entergy did not deliver the lessons-learned presentation at the 2015 NNSC, we are proposing to deliver it during the 2016 conference. In order to support this effort, Entergy requests the current due date for this activity be extended to September 1, 2016.

If you have any questions pertaining to the presentation, please contact Mr. Guy Davant at (601) 368-5756.

This letter contains one new commitment, which is identified in the attachment to this letter.

Sincerely,



JFM/BSF/ghd

Attachment: List of Regulatory Commitments

cc: Mr. J. S. Forbes (ECH)  
Mr. T. G. Mitchell (ECH)  
Ms. D. Jacobs (ECH)  
Mr. J. A. Kowalewski (ECH)  
Mr. E. W. Olson (RBS)

Document Control Desk, USNRC

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bcc: Mr. J. A. Clark (RBS)  
Mr. B. S. Ford (ECH)  
Mr. J. Laplante (ECH)  
Mr. D. J. Berkanpas (ECH)  
Mr. T. Santy (ECH)

**ATTACHMENT**

**CNRO-2015-00021**

**LIST OF REGULATORY COMMITMENTS**

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This table identifies actions discussed in this letter for which Entergy commits to perform. Any other actions discussed in this submittal are described for the NRC's information and are not commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will deliver the lessons-learned presentation to the Region II security group on or before the current Order due date of December 3, 2015.	✓		12/3/2015