



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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Jeffery A. Hardy
Director, Regulatory Assurance and
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PNP 2016-042

June 16, 2016

EA-14-013

Mr. Kenneth O'Brien
U. S. Nuclear Regulatory Commission
Director, Division of Reactor Safety
2443 Warrenville Road
Lisle, IL 60532

Subject: Entergy Nuclear Operations, Inc. Annual Status Notification in Response to
Confirmatory Order, EA-14-013
Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Reference: *Confirmatory Order Related to NRC Report No. 05000255/2014406 and OI
Report 3-2013-018; Palisades Nuclear Plant, dated July 21, 2014
(ML14203A082)*

Dear Mr. O'Brien:

On July 21, 2014, the Nuclear Regulatory Commission (NRC) issued the referenced Confirmatory Order to Entergy Nuclear Operations, Inc (ENO). The Confirmatory Order requires ENO to submit written notifications to the NRC on the status of each item in the Confirmatory Order at intervals of six months, one year and annually thereafter until the terms of the Confirmatory Order are completed.

The purpose of this letter is to provide an annual status notification pursuant to Section V, Item F.1, of the Confirmatory Order. The attachment delineates progress made in implementing the requirements of the Confirmatory Order.

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

Sincerely,

A handwritten signature in black ink, appearing to read "JAH".

JAH/tad

Attachment: Entergy Nuclear Operations, Inc. Annual Status Notification in Response to
Confirmatory Order, EA-14-013

cc: Document Control Desk, USNRC
Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

Entergy Nuclear Operations, Inc. Annual Status Notification in Response to Confirmatory Order, EA-14-013

Confirmatory Order Item	Status	Comments
A. Verification of Training Credentials for both Staff and Management:		
A.1: Conduct fleet-wide review of qualifications of each duty position in security to ensure that the qualifications for each position are clear and verifiable by all parties (security officers, security supervisors, and security manager). The initial review and applicable procedure revisions shall be completed by November 30, 2014.	Complete	Each Entergy site Security Manager validated the qualifications for each position are clear and verifiable by all parties
A.2: Verify and modify, if necessary, the applicable security procedure to ensure that both assignor and assignee validate qualifications before the assignee performs a duty position. This shall be completed by November 30, 2014.	Complete	Revised EN-NS-221, "Security Department Standards and Expectations" revision 6
A.3: Following completion of A.1 and A.2, training will be conducted on the changes. This shall be completed by June 30, 2015.	Complete	Training has been conducted for all active security personnel. For inactive personnel, e.g., medical leave, etc., training will be conducted upon resumption of active duty.
B. Strengthen Safety Culture:		
B.1: Through June 30, 2016, the Palisades Security Manager shall meet quarterly (during the calendar quarter, allowing for one month grace period) with each security team: (a) to reinforce the importance of a healthy SCWE and management's intolerance for retaliation, and (b) to discuss security concerns and issue resolution.	In-progress	Quarterly meetings have been held with each security team.
B.2: Through June 30, 2016, Palisades' security management shall maintain and update a "Security Top 10 Issues" board to reflect, among other things, the expected issues resolution dates.	In-progress	Security Top 10 issues and resolutions are maintained and communicated on a routine basis.

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Confirmatory Order Item	Status	Comments
<p>B.3: Discuss the safety culture aspects of the event with Palisades Nuclear Plant staff, including long-term contract staff, in three monthly tailgate meetings. The tailgate meetings shall include employee rights, licensee expectations with respect to raising issues, methods to raise issues, and the right to contact the NRC. The tailgate meetings will be completed by December 31, 2014.</p>	Complete	The third and final monthly tailgate meeting material was distributed on November 6, 2014.
<p>B.4: Revise procedure EN-LI-102 to ensure that the Condition Review Group (CRG) chair considers whether the person assigned is sufficiently independent. This applies to condition reports that have challenges to a decision or a resolution that is highly dependent on a single individual. A “read and sign” will be provided to each Entergy (fleet-wide) CRG chair to inform them of the procedure revision. The procedure will be revised by November 30, 2014, and the “read and sign” training will be completed by January 31, 2015.</p>	Complete	<p>EN-LI-102 Revision 24, Section 5.4[6](d)(1)</p> <p>The “read and sign” training to CRG chairs is completed.</p>
<p>B.5: Conduct a case study for supervisors and above throughout the Entergy fleet that highlights safety culture aspects of the event: questioning attitude, proceeding in the face of uncertainty, procedure compliance, and responsiveness to employee concerns. The case study will be developed and conducted by June 30, 2015.</p>	Complete	Case study sessions were conducted by June 30, 2015.
C. Recognition by the Reactor Community:		
<p>C.1: Entergy Fleet Director of Nuclear Security shall make a presentation to an industry security working group on this event. The licensee will provide the NRC an opportunity to review the presentation. The presentation shall be accomplished by December 31, 2014.</p>	Complete	NRC reviewed presentation prior to presentation at NEI Security Working Group meeting on November 5, 2014
<p>C.2: Entergy shall make a related presentation at a broad industry meeting aimed at an audience beyond the security organizations and covering all four NRC regions. It is acceptable to make the presentation at multiple meetings, if deemed necessary to reach the desired audience. The presentations shall be accomplished by June 30, 2015.</p>	Complete	Presented at the winter meeting of the National Association of Employee Concerns Professionals (ECP), February 24-25, 2015

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Confirmatory Order Item	Status	Comments
D. Setting Standards for Security Senior Management:		
Entergy shall revise procedure EN-FAP-HR-006 to include specific requirements for Security Manager selection and development. This shall be accomplished by December 31, 2014.	Complete	EN-FAP-HR-006 revision 1 issued on December 23, 2014
E. Effectiveness Review:		
Entergy shall arrange for an independent effectiveness review of the actions discussed in sections A and B. The review will be conducted no earlier than one year, but less than two years, from the issuance date of the Confirmatory Order.	In-progress	Independent effectiveness review started June 13, 2016
F. Notification of NRC When Actions Are Completed:		
F.1: Unless otherwise specified, Entergy will submit written notification by letter to the NRC staff, specifically, the Director, Division of Reactor Safety, 2443 Warrenville Road, Lisle, IL, 60532, at intervals of six months, one year, and annually thereafter until the terms of the Confirmatory Order are completed, providing a status of each item in the Confirmatory Order.	On target	The one year status notification was completed on June 19, 2015
F.2: Upon completion of all terms of the Confirmatory Order, Entergy will provide the NRC with a letter discussing its basis for concluding that the Order has been satisfied.	On target	