



Entergy Operations, Inc.  
1448 S.R. 333  
Russellville, AR 72802  
Tel 479-858-3110

Richard L. Anderson  
ANO Site Vice President

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OCAN021702

February 24, 2017

Mr. Kriss M. Kennedy  
Regional Administrator  
U. S. Nuclear Regulatory Commission, Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Subject: Request to Modify a Prior Confirmatory Action Letter Commitment  
Arkansas Nuclear One – Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6

References: 1. Entergy letter to NRC, *ANO Comprehensive Recovery Plan*, dated  
May 17, 2016 (OCAN051602) (ML16139A059)  
2. NRC letter to Entergy, *Confirmatory Action Letter – Arkansas Nuclear  
One Units 1 and 2*, dated June 17, 2016 (OCNA061604) (ML16169A193)

Dear Mr. Kennedy:

On May 17, 2016, Entergy Operations, Inc (Entergy) transmitted the Arkansas Nuclear One (ANO) Comprehensive Recovery Plan (CRP) (Reference 1). The CRP contains the actions that Entergy is taking to address the decline in performance at ANO including actions to address the issues that led to ANO being placed in the Multiple/Repetitive Degraded Cornerstone Column (Column IV) of the NRC Action Matrix and issues identified during third-party assessments of ANO's safety culture.

In response, the NRC transmitted the ANO Confirmatory Action Letter (CAL) confirming the commitments made by Entergy on June 17, 2016 (Reference 2). As discussed in this correspondence, pursuant to Section 182 of the Atomic Energy Action, 42 U.S.C. 2232, Entergy is required to notify the NRC in advance, if for any reason, an action listed in the CAL cannot be completed within the specified schedule.

As part of the CRP, a corrective action was initiated to develop and implement required training on constructive conversation skills (e.g., crucial conversations). The intent of the training is to provide station leaders with communication skills to support engaging workers and reinforcing standards and behaviors.

This action is tied to the following CRP and CAL items:

LF-3 - Provide supervisory training on constructive conversation skills. (CAL due date June 2018)

SC-9 - Develop and provide training to ANO leaders, including supervisory training on Nuclear Safety Culture (NSC) and Safety Conscious Work Environment (SCWE), constructive conversation skills, and how to foster a strong NSC within their organizations. (CAL due date December 2016)

NF-7 - Develop and provide training to ANO leaders, including supervisory training on NSC and SCWE, constructive conversation skills, and how to foster a strong nuclear safety culture within their organizations. (CAL due date December 2016)

In the fall of 2016, a gap analysis of Leadership Fundamentals and NSC identified the need to expand this training beyond constructive conversation. Specifically, the gap analysis identified the need to include the following elements in the planned training:

- Building trust with employees
- Effective communication skills
- Professional development of leaders
- Successful critical/crucial conversations

Additional time was necessary for determination of training content, creation of lesson plans and presentations, and scheduling of the training. The extended ANO-1 refueling outage, the forced outage on ANO-2, and the need to align with new fleet leadership training initiatives delayed completion of this action. In an effort to gain alignment with the Entergy Nuclear Strategic Plan and Entergy's values and practices, the scope of the above listed actions was expanded to include additional elements beyond the original commitment scope. These elements involve training to allow participants to outline the practices of being an effective leader and how to positively impact organizational performance and health.

As a result, Entergy requests that the CAL commitment date to complete the final actions listed under the heading of Safety Culture be extended to December 2017. The due date for LF-3 is not affected. Currently the lesson plans and presentations have been approved, training is scheduled to start the first quarter of 2017, pause for the ANO-2 spring refueling outage, and resume this summer. The need for this request was communicated to NRC Region IV Branch Chief, Neil O'Keefe on December 8, 2016. It was agreed that Entergy would follow-up with docketed correspondence to provide the basis for why the CRP and CAL items could not be completed within the specified schedule.

Sincerely,

**ORIGINAL SIGNED BY RICHARD L. ANDERSON**

RLA/mkh

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

NRC Senior Resident Inspector  
Arkansas Nuclear One  
P. O. Box 310  
London, AR 72847

U. S. Nuclear Regulatory Commission  
Attn: Mr. Thomas Wengert  
MS O-8B1A  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852