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Michael R. Chisum
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W3F1-2017-0071

October 2, 2017

Mr. Anton Vegel
U.S. Nuclear Regulatory Commission - Region IV
Director, Division of Reactor Safety
1600 East Lamar Blvd.,
Arlington, Texas 76011-4511

SUBJECT: Entergy Operations, Inc. Third and Final Six Month Status Notification in Response to Confirmatory Order EA-15-100
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCE: Confirmatory Order Related to NRC Report No. 05000382/2016007 and NRC Investigative Report 4-2014-017; Waterford Steam Electric Station, Unit 3, dated April 6, 2016 (ML16098A302)

Dear Mr. Vegel:

On April 6, 2016, the Nuclear Regulatory Commission (NRC) issued the referenced Confirmatory Order to Entergy Operations, Inc. (EOI). The Confirmatory Order requires EOI to submit written notifications to the NRC on the status of each item in the Confirmatory Order at intervals of six months, until the terms of the Confirmatory Order are completed.

The purpose of this letter is to provide the Waterford 3 basis for concluding that the Confirmatory Order has been satisfied. Waterford 3 entered the Confirmatory Order actions into its corrective action program and has completed all required actions. Based on the completion of these activities, Waterford 3 has determined that the Confirmatory Order has been satisfied. A summary of the actions taken is provided in the Attachment of this letter.

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

If you have any questions, please contact John P. Jarrell, Regulatory Assurance Manager, at 504.739.6685.

I declare under penalty of perjury that the foregoing is true and correct; executed on April 6, 2017.

Sincerely,

A handwritten signature in black ink that reads "MR Chisum".

Michael R. Chisum
MRC/JPJ/SWM

ATTACHMENT: Waterford 3 Steam Electric Station (WF3) Third and Final Six Month Status Report for the Implementation of Order EA-15-100

cc: Mr. Kriss Kenndy
Regional Administrator
U. S. NRC, Region IV
RidsRgn4MailCenter@nrc.gov

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Attachment to

W3F1-2017-0071

**Waterford Steam Electric Station, Unit 3 (WF3) Third and Final Six Month Status
Report for the Implementation of Confirmatory Order EA-15-100
(7 pages)**

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 1 of 7**

Action	Target Completion Date	Activity Status
Accordingly, pursuant to Sections 104b, 161b, 161i, 161o, 182, and 186 of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR 2.202 and 10 CFR Part 50, IT IS HEREBY ORDERED, THAT:		
A.1	Entergy will retain an industrial psychologist, or similarly qualified person, and within 9 months of the issuance date of the Confirmatory Order, will complete a review of those integrity events within the Entergy Nuclear Fleet over the past 5 years to look for common themes or causes associated with the events and to recommend actions that Entergy can take to prevent similar events in the future.	January 6, 2017 COMPLETE
A.1.1	This review will also include an evaluation of previous fleet-wide training effectiveness.	January 6, 2017 COMPLETE
A.1.2	Entergy will share the results of this review and any contemplated actions with the NRC.	January 6, 2017 COMPLETE
A.2	Within 18 months of the issuance date of the Confirmatory Order, if the review reveals general industry insights/lessons learned, Entergy will share those insights with the industry in an appropriate industry forum to be determined based on consultation with the NRC.	October 6, 2017 COMPLETE

Status of Actions:

- A.1 Entergy contracted Aubrey Daniels International (ADI) that assembled a team of experts which included two psychologists to perform a review of integrity events within the Entergy Nuclear Fleet. This review went back to January 2011 and included, but was not limited to: all NRC issued Traditional Violations that were classified as "willful"; Employee Concerns Cases; Ethics Cases; Access Authorization denied access files; Safety Conscience Work Environment survey results; Organization Health survey results; and Root or Apparent Causes where integrity was a potential contributor. This review was completed by ADI on January 5, 2017, and included information as described above. This action is COMPLETE.
- A.1.1 The review of fleet wide training effectiveness was included as part of the evaluation and report as described in action A.1. This action is COMPLETE.
- A.1.2 An overview of the results and contemplated generic actions from the ADI report was provided to Region IV on January 6, 2017. This action is COMPLETE.
- A.2 A review of the report from ADI determined that there were no general industry insights or lessons learned that would require sharing with the Nuclear Industry. This action is COMPLETE

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 2 of 7**

	Action	Target Completion Date	Activity Status
B.1	In December 2014, Entergy issued Procedure EN-OM-126, "Management and Oversight of Supplemental Personnel", to enhance Entergy's management and oversight of supplemental workers. Within 9 months of the issuance date of the Confirmatory Order, Entergy will conduct an effectiveness review of implementation of Procedure EN-OM-126 at all Entergy Nuclear Fleet sites.	January 6, 2017	COMPLETE
B.1.1	Entergy will share the results of this review and its proposed actions to address any identified performance gaps with the NRC.	January 6, 2017	COMPLETE

Status of Actions:

- B.1 Entergy contracted Talisman International (Talisman) to perform an effectiveness review of the implementation of EN-OM-126 (Management and Oversight of Supplemental Personnel) at all Entergy Nuclear Fleet sites. Talisman reviewed Entergy's procedures for oversight of supplemental personnel and reviewed the performance of supplemental personnel as documented in approximately 3 ½ years of significant corrective action documents. Subsequently, two-person teams conducted onsite visits at each one of the eight Entergy reactor sites. This review was completed on September 26, 2016. This action is COMPLETE
- B.1.1 An overview of the results of the assessment was provided to Region IV on January 6, 2017. This overview summarized the full report issued by Talisman and recommended corrective actions. This action is COMPLETE.

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 3 of 7**

	Action	Target Completion Date	Activity Status
C.1	Within 6 months of the issuance date of the Confirmatory Order, Entergy will assign a corporate lead for governance and oversight of the Entergy Nuclear Fleet fire watch program.	October 6, 2016	COMPLETE
C.1.1	In conjunction with this assignment, Entergy will issue an Entergy Nuclear Fleet procedure or revise an existing procedure, as appropriate, to provide the common requirements for Entergy Nuclear Fleet fire watch programs.	October 6, 2016	COMPLETE
C.1.2	The responsibilities of the lead will include ensuring the consistent application of the subject procedure across the Entergy Nuclear Fleet.	October 6, 2016	COMPLETE

Status of Actions:

- C.1 Corporate lead for Governance and Oversight of the Entergy Nuclear Fleet Fire Watch program has been established as the “General Manager Plant Operations, Fleet Operations”. This guidance has been established in a new fleet procedure EN-OP-139 (Fire Watch Program) which was issued with an effective date of September 8, 2016. This action is COMPLETE.
- C.1.1 New Fleet Procedure EN-OP-139 provides the common requirements for Entergy Nuclear Fleet fire watch programs. This action is COMPLETE.
- C.1.2 New Fleet Procedure EN-OP-139 establishes the responsibilities of the fleet fire watch lead, which will ensure the consistent application of the subject procedure across the Entergy Nuclear Fleet. This action is COMPLETE.

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 4 of 7**

Action	Target Completion Date	Activity Status
D. Within 3 months of the issuance date of the Confirmatory Order, Entergy will revise the appropriate Entergy Nuclear Fleet procedure to provide a process to address requests for the reinstatement of unescorted access authorization for a worker whose unescorted access has been temporarily placed "on hold" or assigned some other comparable interim status. The revision must ensure that the Access Authorization Reviewing Official has the relevant information and appropriate approvals before deciding whether to reinstate the worker's unescorted access.	July 6, 2016	Complete

Status of Actions:

- D. Corporate procedure EN-NS-101-04 (Processing Potentially Disqualifying Information [PDI]) has been revised with an effective date of July 6, 2016, to provide guidance to address requests for the reinstatement of unescorted access authorization for a worker whose unescorted access has been temporarily placed "on hold". This procedure requires that the Reviewing Official be provided all relevant information regarding the investigation and justification for reinstatement of plant access. This action is COMPLETE.

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 5 of 7**

	Action	Target Completion Date	Activity Status
E.1	Within 6 months of the issuance date of the Confirmatory Order, Entergy will review and revise, as necessary, Entergy Nuclear Fleet supervisor training to ensure that it addresses the responsibilities and actions of supervisors who become aware of facts and circumstances potentially impacting a person's trustworthiness and reliability.	October 6, 2016	COMPLETE
E.2	If Entergy determines revisions to the supervisory training are necessary; the training will be delivered within 12 months of the issuance date of the Confirmatory Order.	April 6, 2017	COMPLETE
E.3	Additionally, within 2 months of the issuance date of the Confirmatory Order, Entergy will develop and publish a communication to all supervisors at its Entergy Nuclear Fleet sites reminding them of their responsibility to report issues impacting workers' trustworthiness and reliability to access authorization personnel.	June 6, 2016	COMPLETE

Status of Actions:

- E.1 Entergy Nuclear Fleet Training developed and incorporated into the supervisor training curricula a requirement to complete a familiarization guide specifically requiring a review of, and a discussion of, EN-NS-101 (Unescorted Access Authorization Program). This familiarization guide also requires a discussion with the AA/FFD supervisor regarding the responsibilities and actions of supervisors who become aware of facts and circumstances potentially impacting a person's trustworthiness and reliability. This action is COMPLETE.
- E.2 It was determined that no changes to the current model of supervisor initial training were required as a result of this Confirmatory Order. No gap training is necessary as no revisions were made to the current model of supervisor initial training. This action is COMPLETE.
- E.3 Entergy Nuclear Fleet Training developed a Computer Based Training course that was required to be completed by all Supervisors and above. The computer based training course specifically covers the supervisor's responsibility to report issues impacting workers trustworthiness and reliability to access authorization personnel. This action is COMPLETE.

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 6 of 7**

	Action	Target Completion Date	Activity Status
F.1	Within 3 months of the issuance date of the Confirmatory Order, Entergy will have conducted a briefing of all fire watch personnel, at each of its Entergy Nuclear Fleet sites, on the importance of the fire watch activity to the nuclear safety of the facility.	July 6, 2016	COMPLETE
F.1.2	In addition, within 3 months of the issuance date of the Confirmatory Order, this briefing will be incorporated as part of new fire watch personnel training.	July 6, 2016	COMPLETE
F.2	Within 9 months of the issuance date of the Confirmatory Order, Entergy will perform a review of other tasks where the importance of the task to reactor safety may not be apparent to the personnel performing the task and conduct similar training.	January 6, 2017	COMPLETE

Status of Actions:

- F.1 A briefing was conducted for all qualified fire watch personnel at each of the Entergy Nuclear sites on the importance of fire watch activities at their site. Briefing included the importance to nuclear safety and the reasons as to why their tours were being conducted. This action is COMPLETE.
- F.1.2 The computer based training that is required for all hot work and fire watch personnel was updated to include the briefing conducted in Action F.1 for all newly qualifying fire watches. This requirement has been incorporated into all future fire watch qualifications. This action is COMPLETE.
- F.2 A review of other tasks where the importance of the task to reactor safety may not be apparent to the personnel performing the task has been completed. Based on the review of individual program training requirements and qualifications, only two groups did not have training already established prior to the confirmatory order being issued. The two groups, Supervisors and Hot work/Fire Watch personnel received the training after the issuance of confirmatory order. Hot Work / Fire Watch personnel were briefed on the requirements and reactor safety significance of their job and all newly hired individuals are required to complete the revised fire watch CBT. This action is COMPLETE.
- F.3 An additional corrective action was added to CR-WF3-2016-0201 based on issues found with Non-Licensed Operator round. Based on the investigation results of this issue, Waterford 3 will review the Confirmatory Order and the actions associated with it to assess if those actions could have prevented the issue with Operator Rounds identified in February 2017. Additional actions will be issued as necessary and these will be provided to the NRC. This action is COMPLETE.

**Waterford 3 Steam Electric Station (WF3) Third and final Six Month Status Report for the
Implementation of Order EA-15-100
Attachment to W3F1-2017-0071
Page 7 of 7**

Action	Target Completion Date	Activity Status
G.1 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (6 month)	October 6, 2016	COMPLETE
G.1.1 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (12 Month)	April 6, 2017	COMPLETE
G.1.2 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (18 Months)	October 6, 2017	COMPLETE
G.2 Entergy will provide its basis for concluding that the terms of the Confirmatory Order have been satisfied, to the NRC, in writing.	October 6, 2017	COMPLETE

- G.1 Written notification was submitted to the Director, Division of Reactor Safety, USNRC Region IV on October 6, 2016, per Waterford 3 letter W3F1-2016-0062. This action is COMPLETE.
- G.1.1 Written notification was submitted to the Director, Division of Reactor Safety, USNRC Region IV on April 6, 2017, per Waterford 3 letter W3F1-2017-0031. This action is COMPLETE.
- G.1.2 This submittal satisfies this action. This action is COMPLETE.
- G.2 The confirmatory order was entered into Waterford 3's Paperless Condition Report System (PCRS) and all actions assigned to that Condition report have been completed. A review of all Entergy Nuclear PCRS indicates a marked reduction in the number of condition reports associated with Fire Watch and integrity issues. Prior to the implementation of corrective actions associated with this Confirmatory order the Entergy system had 240 condition reports (CRs) generated against the fire watch position. Of those 240 CR's 18 addressed NRC issued violations. Since June 2016, which is when the first corrective action was completed, there have been a total of 35 CR's associated with the fire watch program for fire tours and no NRC Violations. Based on this information and the completion of all corrective actions Waterford 3 and Entergy Nuclear are meeting the terms of the confirmatory order.