



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, ILLINOIS 60532-4352

October 31, 2017

Mr. Charles Arnone
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

**SUBJECT: INFORMATION REQUEST TO SUPPORT UPCOMING PROBLEM
IDENTIFICATION AND RESOLUTION INSPECTION AT PALISADES
NUCLEAR PLANT**

Dear Mr. Arnone:

This letter requests information to support our scheduled Problem Identification and Resolution (PI&R) inspection beginning January 22, 2018, at your Palisades Nuclear Plant. This inspection will be performed in accordance with the NRC baseline Inspection Procedure 71152.

Experience has shown that these inspections are extremely resource intensive both for the NRC inspectors and the utility staff. In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a list of documents required for the inspection.

The documents requested are copies of condition reports and lists of information necessary to ensure the inspection team is adequately prepared for the inspection. The information requested prior to the inspection may be provided in electronic format by either a CD, DVD, or a website and should be provided for NRC review by December 15, 2017. Ms. April Nguyen, the Lead Inspector, will contact your staff to determine the best method of providing the requested information.

If there are any questions about the material requested or the inspection in general, please contact Ms. Nguyen at 269-764-8971 or April.Nguyen@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011.

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Eric Duncan, Chief
Branch 3
Division of Reactor Projects

Docket No. 50-255
License No. DPR-20

Enclosure:
Requested Info. to Support PI&R Inspection

cc: Distribution via LISTSERV®

Letter to Charles Arnone from Eric Duncan dated October 31, 2017

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IDENTIFICATION AND RESOLUTION INSPECTION AT PALISADES
NUCLEAR PLANT

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Requested Information to Support Problem Identification and Resolution Inspection

Please provide the information electronically, if possible. Unless otherwise specified, the time frame for requested information is for the period of April 9, 2016, through the time the data request is answered. Please label any electronic files with file content information. In the case of a list of items requested, the list should be sortable electronically.

In addition, inspectors will require computer access to the corrective action program (CAP) database while on site.

PROGRAM DOCUMENTS

1. Copies of current administrative procedures associated with the CAP. This should include procedures related to: (1) CAP (including procedures on how to perform cause evaluations, trending, etc.); (2) operating experience program; (3) self-assessment program; (4) maintenance rule program; (5) operability determination process; (6) system health process or equivalent equipment reliability improvement programs; and (7) operational decision making (ODMI) process. Also include prior revisions that would have been used since April 9, 2016.
2. A copy of the Quality Assurance Program Manual.
3. Description of any substantive changes made to the CAP since the last Problem Identification and Resolution (PI&R) inspection (April 2016). Please include the effective date with each listed change.

EFFECTIVENESS OF PROBLEM IDENTIFICATION

4. A list of all open condition reports (CRs) sorted by significance level. Include the number, the date initiated, a brief description/title, the system affected (if any), and significance level. Also include the open corrective actions associated with the CR, sorted by significance/priority level, with a brief description/title, due date, and a list of any due date extensions.
5. A list of CRs generated by the corporate office that involve or affect plant operation, sorted by significance level. Include the date initiated, a brief description/title, site(s) affected, system affected, assigned organization, and status (if closed include date closed; if open, include scheduled date to be closed).
6. A list of CRs generated in response to NRC documented violations and/or findings. Include the CR number, the date initiated, a brief description/title, significance level, and status (if closed include date closed; if open, include scheduled date to be closed). This list should include documented licensee-identified violations.
7. A list of CRs generated in response to findings/observations identified by safety review committees or other external oversight/assessment groups. Include the CR number, the date initiated, a brief description/title, significance level, and status (if closed include date closed; if open, include scheduled date to be closed).

8. A data table (or similar format) showing the total number of CRs generated per year since 2013 sortable by department (i.e. operations, engineering, security, etc.).
9. A data table showing the number of issues identified externally (NRC, INPO, etc.) per year as compared to internally since 2013.

EFFECTIVENESS OF PRIORITIZATION AND EVALUATION OF ISSUES

10. A copy of completed root cause evaluations generated since April 9, 2016. Provide the documents and/or CRs directing and tracking the actions developed as part of the evaluations.
11. A copy of completed adverse condition analyses generated since April 9, 2016. Provide the documents and/or CRs directing and tracking the actions developed as part of the analyses.
12. A copy of completed common cause analysis evaluations generated since April 9, 2016. Provide the documents and/or CRs directing and tracking the actions developed as part of the evaluations.

EFFECTIVENESS OF CORRECTIVE ACTIONS

13. A list of closed CRs sorted by significance level and then initiation date. Include the CR number, a brief description/title, the date initiated and closed, assigned organization, and system affected (if any).
14. A list of completed effectiveness reviews with a brief description of the results. Include a cross-reference to the CR for which the effectiveness review was conducted and, if applicable, CR numbers documenting any additional corrective actions.
15. A list of CRs initiated for inadequate or ineffective corrective actions. Include the date initiated, a brief description/title, significance/priority level, system affected (if any), and status (if closed include date closed; if open, include scheduled date to be closed). Include a cross-reference to the CR or evaluation that generated the original corrective action.
16. A copy of the CR, including the status of corrective actions (if closed include date closed; if open, include scheduled date to be closed), root cause evaluation, and effectiveness reviews for the EDEX White finding (reference NRC Inspection Reports 05000255/2014010, 05000255/2015007, and 05000255/2015011).
17. A copy of any performance reports or indicators used to track CAP effectiveness.

TRENDING

18. A list of CRs initiated for trends of conditions adverse to quality. Include the date initiated, a brief description/title, significance/priority level, and status (if closed include date closed; if open, include scheduled date to be closed).
19. Copies of the quarterly APRM reports issued since April 9, 2016.

20. Copies of the quarterly DPRM reports, sorted chronologically by department, issued since April 9, 2016.

21. Copies of all causal evaluations completed for adverse human performance trends.

OTHER ITEMS OF INTEREST FOR ASSESSMENT OF CAP

22. A list of CRs with operability evaluations that were completed since April 9, 2016. Include a brief description/title, date initiated, and the date closed or scheduled to be closed. Also include any open operability evaluations that were initiated prior to April 9, 2016.

23. A list of current control room deficiencies, operator burdens, and operator work-arounds, sortable by priority, with a brief description/title, corresponding CR(s), and work order number and status.

24. A copy of open ODMIs and ODMI precursors and the corresponding CR(s) and work order(s) (if assigned).

25. A list of degraded/non-conforming conditions. Include the CR number, brief description/title, date initiated and date closed or projected closeout date. Include open issues that were identified prior to April 9, 2016.

26. A list of the top ten risk significant systems and top ten risk significant components.

27. Condition analyses, corrective actions documents, health reports, and trend analyses for systems and/or components considered Maintenance Rule (a)(1) from 2016 to present. Provide this information starting one year earlier from when the system and/or component entered (a)(1) status. Include dates when system/components entered (a)(1) status and, if applicable, returned to (a)(2) status.

28. A list of temporary modifications that were installed since April 9, 2016, with a brief description/title, installation date, current status (open or closed), and corresponding engineering change number, CR(s), and work order. Include any in-place temporary modifications that were installed prior to April 9, 2016.

5-YEAR REVIEW

29. A list of CRs and work orders regarding the emergency diesel generators that have been generated since April 9, 2013. Include the CR number, brief description/title, significance level, date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).

30. A list of CRs and work orders regarding the instrument air system that have been generated since April 9, 2013. Include the CR number, brief description/title, significance level, date initiated, and the status (if closed include date closed; if open, include scheduled date to be closed).

ASSESSMENT OF THE USE OF OPERATING EXPERIENCE

31. A copy of the most recent operating experience program effectiveness review.

32. A list of CRs initiated to evaluate industry and/or NRC operating experience (e.g. 10 CFR, Part 21 reports, NRC generic communications, EPRI reports, etc.). Include the date initiated, a brief description/title, and the status (if closed include date closed; if open, include scheduled date to be closed).

ASSESSMENT OF AUDITS AND SELF-ASSESSMENTS

33. A copy of Quality Assurance (QA) audits of the corrective action program.
34. A chronological list of all other QA audits completed.
35. A copy of self-assessments and associated CRs generated in preparation for this PI&R inspection.
36. A copy of completed CAP self-assessments and any associated CRs. Also, include the plan/schedule for future CAP self-assessments.
37. A chronological list of department and site self-assessments completed (include date completed).
38. A list of CRs written for findings or concerns identified in self-assessments and audits. Include a cross-reference to the audit or self-assessment number.

ASSESSMENT OF SAFETY CONSCIOUS WORK ENVIRONMENT

39. Results of internally and/or externally completed safety culture/safety conscious work environment surveys or self-assessments. Include any associated CRs. Also include schedule/plans for future surveys.
40. A current copy of the Employee Concerns Program/Ombudsman administrative procedure and a copy of the procedure(s) used to assess and address safety culture concerns (e.g. governing procedure(s) for the Nuclear Safety Culture Monitoring Panel).

OTHER ADMINISTRATIVE INFORMATION

41. A copy of the latest plant organizational chart and phone listing.
42. A schedule (including dates, times, and locations) for all meetings associated with implementing the CAP (e.g. CR screening meetings, procedure review group (PRG) meetings). Include work order screening meetings.

DOCUMENTS REQUESTED TO BE AVAILABLE ON-SITE DURING THE INSPECTION:

- a. Updated Final Safety Analysis Report.
- b. Technical Specifications.
- c. CAP procedures and a procedure index.
- d. QA manual.

- e. Copies (2) of packages for the CAP-related meetings as they occur. Copies (4) of the daily Condition Report package, including any anonymous CRs.
- f. A list of issues brought to the ECP/ombudsman and the actions taken for resolution.
- g. A copy of the most recent independent/offsite organization review of safety culture/safety conscious work environment and internal equivalent assessments, if not provided as part of the requested data package.

On the first day of the inspection, or early on the second day, please provide the inspection team a briefing of your corrective action program. Include your expectations for personnel using the program and how the work order system fits into the overall scheme for addressing identified issues. Also, please demonstrate how to use a computer to access CAP data.