



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

November 20, 2017

EA-17-132
EA-17-153

Mr. Eric Larson
Site Vice President
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION – NRC INSPECTION
REPORT 05000416/2017014 AND NRC INVESTIGATION
REPORTS 4-2016-004 AND 4-2017-021

Dear Mr. Larson:

This letter refers to the investigations conducted at the Grand Gulf Nuclear Station by the U.S. Nuclear Regulatory Commission's (NRC's) Office of Investigations. The purpose of the investigations was to determine whether willful violations of NRC requirements occurred at the Grand Gulf Nuclear Station involving the administration of training examinations and the performance of operator rounds. The investigations were initiated on November 5, 2015, and March 6, 2017, and were completed on July 21 and August 25, 2017, respectively. The issues were discussed with you and other members of your staff during a telephone conversation on November 16, 2017. A factual summary (Enclosure 1) provides the details of the NRC's review of the case.

Based on the results of the investigations, three apparent violations were identified and are being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. The Enforcement Policy can be found on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The apparent violations being considered for escalated enforcement action involve the failure to ensure that training examinations were appropriately proctored, the failure of nonlicensed operators to perform required operator rounds, and the creation of falsified records of the performance of the operator rounds. The apparent violations are documented in Enclosure 2.

Before the NRC makes its enforcement decision, we are providing you an opportunity to: (1) request a predecisional enforcement conference (PEC), or (2) request alternative dispute resolution (ADR). If a PEC is held, the NRC may issue a press release to announce the time and date of the conference; however, the PEC will be closed to public observation since information related to an Office of Investigations report will be discussed, and the report has not been made public.

If you decide to participate in a PEC or pursue ADR, please contact Mr. Jason Kozal, Chief, Project Branch C, at 817-200-1144 within 10 days of the date of this letter. A PEC should be held within 30 days and an ADR session within 45 days of the date of this letter. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a PEC.

If you choose to request a PEC, the conference will afford you the opportunity to provide your perspective on these matters and any other information that you believe the NRC should take into consideration before making an enforcement decision. The decision to hold a PEC does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference would be conducted to obtain information to assist the NRC in making an enforcement decision. The topics discussed during the conference may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned. In presenting your corrective actions, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violations.

In lieu of a PEC, you may request ADR with the NRC in an attempt to resolve this issue. Alternative dispute resolution is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained neutral mediator works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues.

Based on notifications to the NRC by Entergy Operations, Inc., on November 5, 2015, January 31, April 19, and July 28, 2017, the NRC is aware of additional issues at the Grand Gulf Nuclear Station, as well as the River Bend Station and the Waterford Steam Electric Station, involving falsification of operator rounds and trainees receiving inappropriate assistance. If ADR is selected, we would anticipate the scope of the mediation to include a discussion of these additional issues. Additional information concerning the NRC's ADR program can be obtained at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr/post-investigation.html>. The Institute on Conflict Resolution at Cornell University has agreed to facilitate the NRC's program as a neutral third party. Please contact Cornell at 877-733-9415 within 10 days of the date of this letter if you are interested in pursuing resolution of this issue through ADR.

In addition, please be advised that the number and characterization of apparent violations described in Enclosure 2 may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

For administrative purposes, this letter is issued as NRC Inspection Report 05000416/2017014, and the apparent violations will be issued as AV 05000416/2017014-01, AV 05000416/2017014-02, and AV 05000416/2017014-03, as described in Enclosure 2.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC

Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

If you have any questions concerning this matter, please contact Mr. Jason Kozal of my staff at 817-200-1144.

Sincerely,

/RA/

Troy W. Pruett, Director
Division of Reactor Projects

Docket No. 50-416
License No. NPF-29

Enclosures:

1. Factual Summary
2. NRC Inspection Report 05000416/2017014

cc w/enclosures: Electronic Distribution

FACTUAL SUMMARY

Office of Investigations Report 4-2016-004

An investigation was initiated by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations on November 5, 2015, to determine whether a former examination proctor willfully failed to ensure that there was no examination misconduct and avoid compromise of the examination when the proctor provided workers with answers to the training examination questions. The NRC completed its investigation on July 21, 2017.

During an investigation interview, a trainee explained that the proctor would offer directions while standing behind the trainee and looking at the trainee's selected examination answers on the computer screen. The trainee stated, "Well, she might have come over and stood up and like say, you sure you want to do one like that? That's the answer right there." The trainee recalled that the proctor provided this direction for "about three" examination answers.

During an investigation interview, another trainee explained that he met the proctor offsite and told her that he needed some help to pass a test. The trainee stated that the proctor said that she would take care of it. The trainee stated that a friend later told him that the proctor had called to say that she had entered the trainee and his friend "in the computer . . . the only thing y'all got to do is go out there." The trainee indicated that a friend provided him with a printout showing that the trainee's required examinations were completed. Examination records for the trainee showed examinations with completion times under 180 seconds. The former examination proctor is recorded as the "proctor" for those examinations.

Based on the evidence, it appears that a former examination proctor deliberately compromised examinations by providing inappropriate assistance to trainees. This appears to have caused the licensee to be in violation of 10 CFR 50.120.

Office of Investigations Report 4-2017-021

An investigation was initiated by the NRC Office of Investigations on March 6, 2017, to determine if nonlicensed operators deliberately failed to perform the required operator rounds and if the nonlicensed operators subsequently falsified records to show that they had conducted the rounds. The NRC completed its investigation on August 25, 2017.

Security and badge access records showed that three nonlicensed operators failed to enter an area required as part of their rounds, even though the nonlicensed operators in question entered completed round logs into the electronic recordkeeping system. During the investigation interviews, two nonlicensed operators admitted that they completed the electronic logs without entering the assigned areas. For the dates in question, door access records do not show that the third nonlicensed operator entered the area recorded in the logs; in fact, the badge access records put him in another area of the plant on the date and time in question.

Based on the evidence, it appears that the nonlicensed operators deliberately failed to tour all required areas of their watch station and deliberately entered inaccurate information into the operator logs. This appears to have caused the licensee to be in violation of 10 CFR Part 50, Appendix B, Criterion V and 10 CFR 50.9.

SUMMARY OF APPARENT VIOLATIONS

- A. 10 CFR 50.120, requires, in part, that each holder of an operating license shall implement a training program derived from a systems approach to training (SAT) as defined in 10 CFR 55.4 that provides for the training and qualification of electrical maintenance, mechanical maintenance, and engineering support personnel.

10 CFR 55.4 defines a SAT program as including, in part, an evaluation of trainee mastery of the objectives during training.

Licensee Procedure EN-TQ-107, "General Employee Training," Revision 9, a quality related procedure, provides instructions for implementing the General Employee Training Program for Entergy Operations, Inc., including plant access training and radiation worker training for electrical maintenance, mechanical maintenance, and engineering support personnel. Step 5.5[2] requires, in part, that all general employee training examinations provided to non-utility personnel be proctored.

Licensee Procedure EN-TQ-201-04, "SAT - Implementation Phase," Revision 5, a quality related procedure, provides instructions for administering examinations in the training program. Step 5.12[7](h) requires that proctors answer trainees' questions carefully to avoid compromise of the examination. Step 5.12[7](i) requires that the proctor not modify a trainee's answer or direct a trainee to change an answer.

Licensee Procedure EN-TQ-217, "Examination Security," Revision 4, a quality related procedure, provides controls necessary for examination security. Step 3.0[3] defines "Exam Compromise" as any activity that could affect equitable and consistent administration of the examination in question regardless of whether the activity takes place, before, during, or after the examination administered. Step 4.0[5] states, in part, that instructors are responsible for establishing and maintaining examination security and immediately reporting to training management any potential or actual examination compromise.

Contrary to the above, from January through September 2015, the licensee failed to implement the SAT training program that provides for the training and qualification of electrical maintenance, mechanical maintenance, and engineering support personnel. Specifically, the licensee failed to ensure that general employee training examinations provided to non-utility (contractor) personnel were appropriately proctored. An examination proctor compromised examinations by providing inappropriate assistance (i.e., answers and/or information leading to answers) during trainee examinations.

This apparent violation is designated as AV 05000416/2017014-01, "Inappropriate Proctoring of Training Examinations."

- B. 10 CFR Part 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be accomplished in accordance with documented instructions or procedures of a type appropriate to the circumstances.

Procedure EN-OP-115-01, "Operator Rounds," Revision 1, a quality related procedure, provides instructions for operators to conduct watchstanding rounds. Subparagraph 5.1[7] requires, in part, that watchstanders tour all required areas of their watch station.

Contrary to the above, between February and December, 2016, three watchstanders failed to tour all required areas of their watchstation. Specifically, three non-licensed operators deliberately failed to tour the area of the standby service water pump houses, which is an area they were required to tour for that watch station.

This apparent violation is designated as AV 05000416/2017014-02, "Failure to Perform Operator Rounds."

- C. 10 CFR 50.9 requires, in part, that information required by the Commission's regulations, orders, or license conditions to be maintained by the licensee shall be complete and accurate in all material respects.

10 CFR Part 50, Appendix B, Criterion XVII, "Quality Assurance Records" requires, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following: operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and materials analyses.

Procedure EN-OP-115-01, "Operator Rounds," Revision 1, a quality related procedure, provides instructions for operators to conduct watchstanding rounds. It defines "operator rounds" as "electronic media or data sheets used by the operator to record parameters or conditions existing in his area of responsibility. Subparagraph 5.1[7] requires, in part, that operators tour all required areas of their watch station, and Subparagraph 5.2[3] requires operators assigned to an area to complete rounds applicable to that area.

Contrary to the above, between February and December 2016, the licensee failed to ensure that information required by the Commission's regulations, orders, or license conditions to be maintained by the licensee were complete and accurate in all material respects. Specifically, non-licensed operators did not tour all required areas of their watch station, and then deliberately completed falsified rounds for their assigned area. These operator rounds are material to the NRC because when performing inspections, the NRC uses the information contained in the rounds to ensure that the condition of safety-related equipment is being monitored as required by station procedures.

This apparent violation is designated as AV 05000416/2017014-03, "Falsification of Operator Rounds Records."

GRAND GULF NUCLEAR STATION – NRC INSPECTION REPORT 05000416/2017014 AND NRC INVESTIGATION REPORTS 4-2016-004 AND 4-2017-021 DATED NOVEMBER 20, 2017

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