



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

Richard L. Anderson
ANO Site Vice President

OCAN021801

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

SUBJECT: Notification of Confirmatory Action Letter Focus Area Inspection Readiness
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, NRC Supplemental Inspection Report 05000313/2016007 and 05000368/2016007, dated June 9, 2016 (OCNA061602) (ML16161B279)
3. NRC Letter to Entergy, Confirmatory Action Letter, dated June 17, 2016 (OCNA061604) (ML16169A193)
4. NRC Letter to Entergy, NRC Problem Identification and Resolution Inspection Report 05000313/2017015 and 05000368/2017015, dated January 9, 2018 (OCNA011804) (ML18009A878)

Dear Mr. Kennedy:

On May 17, 2016, Entergy Operations, Inc. (Entergy) transmitted a Comprehensive Recovery Plan (CRP) to address the issues that led to the decline in performance at Arkansas Nuclear One (ANO), Units 1 and 2 (Reference 1). The CRP, comprised of 14 Area Action Plans, was based upon a thorough evaluation of related weaknesses, causes, and associated safety culture aspects, as well as insights gained from the NRC 95003 Inspection (Reference 2). The CRP included measures to ensure rigorous implementation and close monitoring of effectiveness and also contains elements designed to achieve sustainable improvement over the long term.

On June 17, 2016, NRC issued a Confirmatory Action Letter (CAL) for ANO (Reference 3). The CAL specified CRP actions needed to resolve the problems identified within the following six inspection focus areas in order to improve safety performance:

1. Significant Performance Deficiencies (SPD)
2. Identification, Assessment, and Correction of Performance Deficiencies (IACPD)
3. Human Performance
4. Equipment Reliability and Engineering Programs
5. Safety Culture
6. Service Water System Self-Assessment

As outlined in Reference 3, the CAL remains in effect until Entergy notifies the NRC that the lists of CRP actions are complete, and NRC follow-up inspections are likewise completed.

The purpose of this correspondence is to notify the NRC of Entergy's readiness for NRC inspection and possible closure of the SPD and IACPD focus areas. Entergy has successfully completed actions outlined in Reference 3 for these two areas and determined that they have been completed with quality and were effective in correcting the identified performance issues. The actions have been reviewed by Action Closure Review Boards to confirm that the steps implemented met the intent and purpose of the associated actions. Metrics and/or other effectiveness measures have been used to verify that the actions have achieved intended results. Effectiveness Review Challenge Boards, comprised of senior station leaders, Entergy fleet representatives, and external representatives, have also determined that intended results have been achieved and are sustainable. For the remaining focus areas, actions remain open or are in review for area closure; Entergy anticipates reporting inspection readiness and requesting NRC inspection for these areas in separate correspondence.

An overall effectiveness review was recently conducted by a team of Entergy fleet and external representatives to determine whether the actions taken have been effective to ensure sustained performance improvement. The emphasis of the assessment was on the inspection focus areas identified by the NRC which encompass the 14 Area Action Plans developed by the site.

Overall, the assessment verified that 1) actions contained in the inspection focus areas and Area Action Plans were substantially complete or are following the established work-off plan; 2) performance improvement occurred in the areas addressed by the Area Action Plans; and 3) progress achieved and steps to ensure continuous improvement are sustainable. The measure of success was determined based on the effectiveness and sustainability of actions directly related to the CAL and Area Action Plans recognizing that, in some cases, there may still be gaps to industry-leading performance.

The independent effectiveness review concluded that the focus areas of SPD and IACPD were ready for inspection. The focus area of SPD was rated as effective and concluded that the desired behaviors and outcomes associated with the key actions were addressed. This assessment in conjunction with the site's Closure Readiness Evaluation for SPD confirmed:

- Sustained improvements in vendor oversight are being demonstrated as station leaders continue to reinforce correct behaviors, and the knowledge of individuals responsible for vendor oversight is being demonstrated in the metrics.
- Degraded or non-conforming flooding design features have been corrected and sustained improvements in flood protection is being demonstrated through the establishment of a thorough, documented design basis for the ANO Flood Protection Program such that personnel understand the significance of properly maintaining flood protection features.

- Leaders are now consistently reinforcing expectations that nuclear safety is the overriding priority in making decisions and use decision making tools that emphasize prudent choices.
- Workers are preventing errors and identify problems by not proceeding in the face of uncertainty as demonstrated by declining error rates.

The focus area of IACPD was rated as effective with comment and confirmed that overall:

- As supported by improving metrics, apparent and root cause evaluations are now identifying underlying causes, are correctly scoped for extent-of-condition and extent-of-cause and are defining specific, measurable, achievable, realistic, and timely corrective actions.
- Effectiveness reviews and performance indicators have shown that ANO personnel are now consistently using operating experience to improve performance with a bias for sustainable actions.
- Leaders are now supporting continuous improvement and driving excellence in processes and procedures through Department Performance Review Meetings (DPRMs) and Aggregate Performance Review Meetings (APRMs).
- ANO performance indicator data is available and used to consistently compare to top industry performance.
- Corrective action and continuous training processes effectively verify that training is used as appropriate to address performance issues.
- Operability determinations and functionality assessments are performed using a consistent process.

The assessment team also recommended areas in which adjustment or supplemental action is warranted regarding specific desired behaviors and outcomes. These recommendations are considered gaps to industry standards and have been entered into the Corrective Action Program (CAP), and prompt action has been taken to address the concerns.

Additionally, on September 28, 2017, the NRC completed a Problem Identification and Resolution inspection at ANO (Reference 4). The NRC inspection team reviewed the station's CAP and the station's implementation of the program to evaluate its effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards for CAP. Based upon the inspection sample, the team determined that the CAP, and ANO's implementation of the CAP, supports nuclear safety. Similar to the recent conclusion by the effectiveness review team, the NRC inspection team concluded that ANO maintained a CAP in which individuals identified issues at an appropriately low threshold, evaluated and addressed these issues appropriately, timely, and in a matter commensurate with their safety significance, and that the corrective actions were effective in addressing the causes and extent-of-conditions of problems.

In conclusion, Entergy has determined that committed actions have been completed to address performance issues in the focus areas of SPD and IACPD. The actions were also determined to be effective in improving safety performance issues in these areas. Entergy requests that the NRC inspect these two focus areas for closure.

This letter contains no new regulatory commitments. Should you have any questions or require additional information, please contact Stephenie Pyle at 479-858-4704.

Sincerely,

ORIGINAL SIGNED BY RICHARD L. ANDERSON

RLA/nbm

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