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CNRO-2018-00011

March 19, 2018

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

SUBJECT: NextEra Energy-Entergy Joint Plant Access Shared Information Table

Arkansas Nuclear One Units 1 & 2
Docket Nos. 50-313 & 50-368

Pilgrim Nuclear Power Station
Docket No. 50-293

Grand Gulf Nuclear Station
Docket No. 50-416

River Bend Station
Docket No. 50-458

Indian Point Nuclear Generating Units 2 & 3
Docket Nos. 50-247 & 50-286

Waterford 3 Steam Electric Station
Docket No. 50-382

Palisades Nuclear Power Plant
Docket No. 50-255

REFERENCE: NextEra Energy letter L-2018-067, dated March 19, 2018

Dear Sir or Madam:

Entergy Operations, Inc. and Entergy Nuclear Operations, Inc. (collectively referred to as "Entergy") hereby submits the enclosed information table which describes our compliance with all elements of licensee shared information as described in 10 CFR 73.56, 10 CFR 26, and NEI-03-01 (Nuclear Power Plant Access Authorization Program). This table shows how the Energy operating fleet is implementing the provisions of NEI 03-01 without having access to the industry system.

This letter contains no new regulatory commitments.

If you have any questions or require additional information, please contact me at (601) 368-5102.

Sincerely,

A handwritten signature in black ink, appearing to be "PC", written over a white background.

PC

Enclosure: NextEra/Entergy Alternative Process with no Personnel Access Database System (PADS) Access (5 pages)

cc: USNRC Director, Office of Nuclear Security and Incident Response

USNRC Regional Administrator, Region I
USNRC Regional Administrator, Region III
USNRC Regional Administrator, Region IV

USNRC Project Manager, ANO 1/2
USNRC Project Manager, Grand Gulf
USNRC Project Manager, Indian Point 2/3
USNRC Project Manager, Palisades
USNRC Project Manager, Pilgrim
USNRC Project Manager, River Bend
USNRC Project Manager, Waterford 3
Ms. Margaret O'Banion, Project Manager, NRC/NRR/DORL
Mr. Jason J. Drake, Project Manager, NRR

USNRC Senior Resident Inspector, ANO 1/2
USNRC Senior Resident Inspector, Grand Gulf
USNRC Senior Resident Inspector, Indian Point 2/3
USNRC Senior Resident Inspector, Palisades
USNRC Senior Resident Inspector, Pilgrim
USNRC Senior Resident Inspector, River Bend
USNRC Senior Resident Inspector, Waterford 3

Mr. A. Bakken III (ECH)
Mr. J. Ventosa (ECH)
Mr. C. Costanzo (ECH)
Mr. L. Coyle (ECH)
Mr. R. Anderson (ANO)
Mr. E. Larson (GGNS)
Mr. A. Vitale (IPEC)
Mr. C. Arnone (PAL)
Mr. B. Sullivan (PNPS)
Mr. W. Maguire (RBS)
Mr. J. Dinelli (WF3)
Mr. O. Limpas (ECH)
Mr. K. Jury (ECH)
Mr. R. Gaston (ECH)
Ms. M. Halter (ECH)

NextEra/Entergy Alternative Process with no Personnel Access Database System (PADS) Access

Background

10 CFR 73.56(h)(6) discusses information sharing and provides that licensees, applicants, and contractors or vendors may rely upon such shared information.

NEI 03-01, Nuclear Power Plant Access Authorization Program, Section 12 provides guidance on how the sharing of information is conducted via the information-sharing mechanism also known as the Personnel Access Data System (PADS) and, if the information-sharing mechanism is unavailable, the manual process available to licensees to ensure information is shared.

NextEra¹ and Entergy² are no longer members of the Nuclear Energy Institute and therefore, as of February 4th, 2018, both fleets are now utilizing manual processes in lieu of PADS to ensure all elements of licensee shared information as described in 10 CFR 73.56, 10 CFR 26, and NEI 03-01 are being maintained. The following table shows how both fleets are implementing the provisions of NEI 03-01 without having access to the PADS system.

NEI 03-01	Information	Mitigation
12(a)	The NRC requires that key access authorization and fitness-for-duty program information be accessible by other power reactor licensee. However, this requirement extends to other entities committed to 10 CFR 73.56, 10 CFR 26, and NEI 03-01 who agree to participate in the industry information-sharing program. The section defines the minimum elements that must be made available by licensees or other entities to me requirements. The industry database may require additional information to facilitate data management and audit requirements.	NextEra and Entergy provide a daily spreadsheet to industry counterparts via an e-mail identifying if an individual is still currently badged or has been terminated, along with a favorable or unfavorable flag. The receiving licensees are responsible for checking the spreadsheet and requesting further information or a transfer of an individual's record.
12(c)	If the shared information used for determining an individual's trustworthiness and reliability changes or new or additional information is developed about the individual, the licensees or Contractor/Vendors (C/Vs) that acquire this	On a daily basis, NextEra and Entergy transfer the name of those individuals who have been placed in a denial status or have a change in status in the follow-up drug testing program to NEI PADS Central. PADS Central then

¹ In this paper, NextEra refers to Florida Power & Light Company, NextEra Energy Seabrook, LLC, NextEra Energy Duane Arnold, LLC, and NextEra Energy Point Beach, LLC.

² In this paper, Entergy or Entergy Nuclear, refers to both Entergy Operations, Inc., the licensed operator for the Arkansas Nuclear One Units 1 & 2, Grand Gulf Nuclear Station, River Bend Station, and Waterford 3 Steam Electric Station, and to Entergy Nuclear Operations, Inc., the licensed operator for Indian Point Nuclear Generating Units 2 & 3, Palisades Nuclear Power Plant and Pilgrim Nuclear Power Station.

	<p>information shall correct or augment the data contained in the information sharing mechanism.</p>	<p>adds those individuals to the PADS database and provides NextEra and Entergy with a new daily list of those individuals currently denied or in a follow-up program.</p>
<p>12(d)</p>	<p>If the changed, additional or developed information has implications for adversely affecting and individual's trustworthiness and reliability, the licensee or C/V who discovered or obtained the new, additional or changed information, shall on the day of discovery, inform the reviewing official of any licensee access authorization program under which the individual is maintaining his or her UAA/UA status of the updated information.</p>	<p>In addition to the data provided to PADS Central for the daily update or the industry e-mailed spreadsheet, separate forms were developed for Potentially Disqualifying Information (PDI) and 10 CFR Part 26 Follow-up program requirements for providing the industry information of any change where a licensee could request a transfer of information.</p> <p>As some licensees make changes to individuals that may affect their access, those licensees are providing the individual's name to us as notice. Our internal systems are checked to determine whether the individual is or has ever been badged at any of the NextEra or Entergy fleet sites. If currently badged, a transfer of information is requested from the licensee that provided the information in order to obtain the relevant details to make an access determination. If never badged, the licensee supplying the information is informed of such. Other licensees are providing their derogatory information to both NextEra and Entergy to ensure compliance since there is no awareness if the individual is currently badged or not at our sites. Our response is a courtesy. If the individual was badged at some point but is not currently badged, our internal system is annotated with the appropriate flag for resolution upon their return to any fleet site.</p>
<p>12(f)</p>	<p>If the information-sharing mechanism is unavailable and a notification of change or updated information is required, licensees and C/Vs shall take manual actions to ensure that the information is shared and update the data in the information-sharing mechanism as soon as reasonably possible.</p>	<p>Because NextEra and Entergy no longer have access to PADS, this provision is critical to NextEra's and Entergy's regulatory compliance. Transfer of information forms were developed by NextEra and Entergy independently of NEI forms and automated for fast turnaround on a licensee request. Similarly, when NextEra or Entergy requires information from another licensee, a transfer request is</p>

		provided to a receiving licensee for their cooperation and response. If this information is not returned, Entergy and/or NextEra take alternate measures, such as; conducting a new initial investigation; going back to the last known licensee where information can be validated; and re-fingerprinting those individuals. The denial list and the follow-up lists are checked prior to the certifying of Unescorted Access Authorization (UAA) or the granting of Unescorted Access (UA)
12(g)	Records maintained in the database must be available for NRC review.	Records associated with this process are available for review by the NRC.
12.1(c)	<p>c. The most recent data that provides the basis for the current authorization needs to be provided. The information to be shared includes:</p> <ol style="list-style-type: none"> 1. date current UAA/UA granted; 2. employer; 3. date psychological evaluation completed; 4. date CHRI received (the date the CHRI is reviewed and approved); 5. date of FFD chemical sample collected and reason for test; 6. date BI and suitable inquiry completed; 7. licensee providing the information; 8. company holding the supporting records, if not the licensee; 9. whether additional information is held by the licensee; 10. follow-up information; begin date, estimated end date frequency of testing, and number of tests required; and 11. whether the individual is participating in a treatment plan. 	Key UAA/UA elements are made available to the industry via the daily spreadsheet identified in 12(a) above. Upon a licensee's identification of an individual on the spreadsheet where they would require a transfer of information, this information would be provided upon their request.
12.1(d)	<p>d. For individuals granted UAA/UA after July 7, 2003 , the information to be shared includes:</p> <ol style="list-style-type: none"> 1. date UA granted; 2. employer; 3. citizenship; 4. date psychological evaluation completed; 	Key UAA/UA elements are made available to the industry via the daily spreadsheet identified in 12(a) above. Upon a licensee's identification of an individual on the spreadsheet where they would require a transfer of information, this information would be provided upon their request.

	<p>5. date CHRI received, (the date the CHRI is reviewed and approved);</p> <p>6. date of FFD chemical sample collected and reason for test;</p> <p>7. date of completion of Plant Access Training and BOP training and other training as defined in NEI 03-04;</p> <p>8. date UAA completed;</p> <p>9. licensee providing the information;</p> <p>10. company holding the supporting records, if not the licensee;</p> <p>11. whether additional information is held by the licensee; and</p> <p>12. follow-up information; begin date, estimated end date frequency of testing, and number of tests required.</p>	
12.1(f)&(g)	<p>f. Licensees shall ensure the demographic information of any person formally applying for UAA/UA to a licensee facility, is added to or updated in the method.</p> <p>g. Demographic data for individuals granted UA after July 7, 2003 includes:</p> <ol style="list-style-type: none"> 1. current address; 2. height; 3. weight; 4. eye color; 5. hair color; 6. gender; and 7. Place of birth (city, US state or province, and country if not US). 	<p>Upon a licensee's identification of an individual on the spreadsheet where they would require a transfer of information, this information would be provided to the requesting licensee upon their request.</p>
12.4(a)	<p>Licensees shall ensure those persons denied UA since January 1, 1997, are identifiable by other licensees through the established methods.</p>	<p>See 12(a) above</p>
12.5(a)	<p>Licensees shall include the follow-up information regarding all persons in a UAA/UA status, including the date the follow-up commenced and the date the follow-up is expected to end.</p>	<p>See 12(c) above</p>
12.6(c)	<p>UAA/UA Denial Review Process</p> <p>(c) If the review finds in favor of the individual, the licensee</p>	<p>On a daily basis, NextEra and Entergy transfer to NEI PADS Central the names of those individuals who had</p>

	<p>shall update the relevant records to reflect the outcome of the review and delete or correct all information the review found to be inaccurate.</p>	<p>been placed in a denial status and subsequently have had their denial overturned through the UAA/UA Denial Review Process.</p>
12.7(a)	<p>Except for emergency conditions e.g., ambulance, fire, law enforcement response, etc., and NRC employees all visitors will be checked against the industry database to ensure that they are not currently denied access. The check for each visitor will be performed at least once daily (00:01-2400 hours) prior to the worker's first daily entry into the protected area.</p>	<p>See 12(c) above. In addition, the spreadsheet from PADS Central is uploaded to a security file share where it is accessed by those performing visitor checks prior to an individual's entry in to the PA.</p>