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**To:** [Powers, Michael J](#); [Byrne, Robert M](#); [Miner, Peter](#)  
**Cc:** [Cline, Leonard](#)  
**Subject:** CAL 5 Document Request #2  
**Date:** Thursday, November 15, 2018 4:34:00 PM

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Mike, Bob, and Peter,

Below is my second request for information based on finishing my reviews of all of the available closure packages (only NSC 8.9 not reviewed because it is not available). I broke the request down by closure package. Please provide the information within the individual Certrec folders for the closure packages like you have been. There are a lot of requests that are associated with a procedures and I know that you placed procedures on Certrec. Based on feedback from Wednesday's call, the site offered to take the requests vs. me scrubbing the list with the procedures that were provided.

1. NSC 3.7
  - a. Is Pilgrim continuing to apply the culpability model on a monthly basis?
  - b. If not, what drives completion of these reviews?
  - c. If they are can we see the results for recent months? What are the metric that are being monitored?
  - d. Please provide monthly metrics monitoring culpability model since July 2018.
  - e. The CA (CA-10) for CR-PNP-2018-00595 to review calendar month [April] unsatisfactory (unsat) adverse (priority 1, 2, and 3) corrective action (CA) closures to determine if Culpability Model was appropriately applied. If the review indicates an incorrect outcome, a CR is to be initiated. Closure of this action includes generation of the action for the next month to be repeated for a period of 6 months. However, only 4 additional months were reviewed (May, June, July and August). Instead, March was reviewed and April was counted as a month. CA-24 documented that 6 monthly reviews were completed. This does not appear to meet the intent of CA-10. PNPS response?
  - f. The CA for the CAL item states that "Closure of this action includes generation of the action for the next month to be repeated for a period of 6 months. The CAL item review was done for April shouldn't the additional six months be to Oct 2017?"
2. NSC 3.8
  - a. Please provide access to CAL closure package CAP 1.1.
  - b. Please provide CAP SME Quarterly reports for 2018.
  - c. Please provide of list of CRs generated for 2018 as a result of CAP SME reports (related to CA-10 from CR-PNP-2017-3025) 3.
3. NSC 1.3, 1.4, 1.6, 1.7, 1.8
  - a. TPIPs were developed using EN-FAP-HR-006, 'Fleet Approach to Leadership Development & Organizational Effectiveness' and EN-PL-100, 'Nuclear Excellence Model'. Please provide electronic copies of documents on Certrec.
  - b. TPIPs are considered sensitive and are stored with HR for viewing. Please provide redacted TPIPs (Pilgrim agreed to provide redacted TPIPs 1 Director, 1-2 managers/superintendents, and 3 supervisors).

4. NSC 1.1 and 1.5
  - a. The CAL description states that Entergy will "Implement the Individual Performance Improvement Plans (TPIP) developed from CR PNP-2016-2052, CA-35, utilizing...". CAL closure notes " The reference to CA-35 contained in CAL description above is incorrect. The correct reference is CA-36." PNPS agreed that a CAL change was required.
  - b. Please provide CR-PNP-2017-00406 which addressed FIN 05000293/2016011-11, Failure to Adequately Develop and Implement Targeted Performance Improvement Plans. This CR was administratively closed to CR-PNP-2016-2052 CA-103 and 106.
  - c. Please provided EN-FAP-HR-006, Fleet Approach to Leadership Development and Organizational Effectiveness, which is the guidance used to develop TPIPs.
  - d. The corrective actions (CA-37, 75, 76, 77, 78) are designed to prevent repetition (CAPR) and are required to be sustainable. What actions are being taken going forward for current supervisors? What actions will be taken for new supervisors?
  - e. During the TPIP closure review board CR-PNP-2018-1145 identified that one Control Room Supervisor (CRS) was not assigned a TPIP as required under CAL item NSC-1.5. CR-PNP-2018-8020 identified that CR-PNP-2018-1145 was closed without adequately resolving this issue. To meet the requirements of CAL item NSC-1.5, CR-PNP-2018-8020 CA 2 has been assigned to Operations to ensure the CRS completes TPIP as required. No CR response is in the CR. What is the status of the TPIP for the CRS?
  - f. Please provide CR-PNP-2018-2020.
  - g. CA-36 sub-response discusses that 6 individuals in initial SRO training who currently have the title of supervisor are not acting as supervisors. CARB Chairman addressed the issue with a separate CA. What was the separate CA? Is it CR-PNP-2018-1123?
  - h. CA-37 discusses 3 work week managers, 5 security shift supervisors and 1 SRO on rotation that were on the CA-26 list did not require TPIPs based on their duties and responsibilities as of the date of closure of CA 36 (CR-PNP-2018-1123). Please provide CR-PNP-2018-1123.
  - i. CA-37 also discusses one SRO was not assigned a TPIP. Please provide CR-PNP-2018-1145.

I any of you have questions about the list, don't hesitate to call me. The individual team members will begin in-office prep next week. It's a holiday week so I don't anticipate many additional requests until the following week.

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