

NRC REGULATORY CONFERENCE SUMMARY

Licensee: Entergy Operations, Inc.

Facility: Grand Gulf Nuclear Station

License No.: NPF-29

Docket No.: 50-000416

Date of Conference: December 10, 2020

EA-20-094

NRC REGULATORY CONFERENCE SUMMARY

On December 10, 2020, representatives of Entergy Operations, Inc. and Grand Gulf Nuclear Station met with U.S. Nuclear Regulatory Commission (NRC) personnel on a teleconference to discuss the apparent violations identified in NRC Inspection Report Number 05000416/2020-015, dated October 29, 2020 (NRC's Agencywide Documents Access and Management System [ADAMS] Accession No. ML20303A214). The regulatory conference was held at the request of the licensee, and was characterized as a NRC Category 1 public meeting. The Category 1 public meeting indicated that there was a business portion to the meeting limited between NRC staff and licensee participants, and a public portion of the meeting that initiated post closure of the business portion. The telephonic and web-based conduct, via WebEx, of this regulatory conference was at the request of the NRC because of the COVID-19 situation and the social distancing posture of the agency. The bridge line used during the telephonic activity was moderated by an external party, Verizon. The list of attendees is provided as an enclosure to this summary (Enclosure 1).

The NRC representatives discussed the four apparent violations that were described in the subject inspection report and provided an overview of NRC's Reactor Oversight Process for significance determination, as shown in the attached NRC presentation (Enclosure 2). During the opening of the meeting, NRC staff also clarified changes to the NRC agenda from what was published in the public meeting notice on December 2, 2020.

The licensee's Regulatory Assurance Manager, Radiation Protection Manager, and Site Vice President for the Grand Gulf Nuclear Station facility, as well as Entergy's Corporate Senior Manager, led the presentation of Entergy's response to the apparent violations, as shown in their enclosed presentation (Enclosure 3). The Entergy Operations, Inc. participants stated that Entergy accepted the performance deficiency, as generally characterized in the apparent violations, but did not agree that the significance of the finding was of low to moderate safety significance (White) due to a perceived very low risk of any radiological consequences to members of the public because the non-low specific activity (LSA) shipment was transported in a Type B robust cask. They also purported that the robustness in the non-LSA transportation method, and "no significant differing directions to first responders" via the emergency response guidance information, maintained public confidence in their shipments. Therefore, they determined that the safety significance was of a very low classification, stating the safety significance of the finding should be Green versus White. The supporting facts and circumstances of the shipment timeline, as detailed in the NRC inspection report, were not disputed.

The discussion of the timeline, causal analyses, and corrective actions described by licensee representatives during the presentation provided enough information so there were minimal clarifying questions from the NRC staff. The licensee also provided their significance determination perspective and mitigating risk factors for the NRC to consider during its deliberation. One pertinent point clarified during the meeting, and via subsequent discussion with the licensee, was that although the licensee failed to provide the correct emergency response information to the carrier for transport, they did verify verbally with the carrier that the driver maintained a copy of the 2016 Emergency Response Guidebook, also known as the Emergency Response Orange Book (the 2020 version of this manual did not publish until August 2020 and the manual is updated on a four-year term by the Department of Transportation). The licensee maintains that this was verified prior to the shipment being transported into the public domain by direct communication.

During the business portion of the meeting, NRC staff clearly informed the licensee participants that the primary objectives of the regulatory conference was to get information from the licensee on the significance of findings evaluated through the Significance Determination Process (SDP), and gain their perspective on the apparent violations. NRC staff also maintained that no final decisions will be made during the meeting. All information presented during the meeting, and prior to the meeting, will be considered and assessed to make a final decision and that determination will be communicated to the licensee as soon as possible. NRC also informed the licensee that they had appeal rights in the event that they did not agree with any final determinations.

At the close of the business portion of the meeting, members of the public were allowed to ask any relevant questions and interact with NRC participants. Only one statement was made from a member of the public to the NRC staff. The statement generally provided comments on the time between the shipment and the licensee's discovery of the incorrect shipment information was significant, the public confidence factor was highly impacted, and that NRC should consider enforcement actions and civil penalties against the licensee in this event. There was no question posed during that public statement; thus, NRC thanked the public member for the comments and received no additional comments or questions from the public attendees. Post this interaction, the meeting was adjourned.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this conference summary and enclosures (Enclosure 1, 2, and 3) will be made available electronically for public inspection in the NRC Public Document room or in the NRC's Agency-wide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Enclosures:

1. Attendance List - Public
2. NRC Presentation - Public
3. Licensee Presentation - Public

NRC REGULATORY CONFERENCE SUMMARY, ENTERGY OPERATIONS, INC., GRAND GULF NUCLEAR STATION, – DATED DECEMBER 17, 2020

Distribution:

SMorris, ORA
 MMuessle, DNMS
 LHowell, DNMS
 AVegel, DRP
 MHay, DRP
 RLantz, DRS
 GMiller, DRS
 DCylkowski, ORA
 VDricks, ORA
 BMaier, RSLO
 AAgrawal, IPAT
 JKozal, DRP-C
 TSteadham, DRP
 MThomas, DRP
 JGroom, ACES
 JKramer, ACES
 BHughes, NRR
 KHsueh, NRR
 DGarmon, NRR

PUBLIC ADAMS ACCESSION NUMBER: ML20365A113

<input checked="" type="checkbox"/> SUNSI Review By: NAG	ADAMS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Sensitive <input checked="" type="checkbox"/> Non-Sensitive	<input type="checkbox"/> Non-Publicly Available <input checked="" type="checkbox"/> Publicly Available	Keyword NRC-002
OFFICE	DNMS:RxIB	DNMS:C:RxIB	RIV:ACES	D:DNMS
NAME	NAGreene	GGWarnick	JRGroom	MCMuessle
SIGNATURE	/RA/	/RA/	/RA/	/RA/
DATE	12/17/2020	12/17/2020	12/17/2020	12/17/2020

OFFICIAL RECORD COPY