



River Bend Pre-Decisional Enforcement Conference

August 16, 2021

Agenda



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Kent Scott

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Jeff Reynolds

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Tim Schenk

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Kent Scott

Management Overview

Kent Scott
Site Vice President
River Bend Station

Nuclear Excellence Model



NUCLEAR EXCELLENCE MODEL

Committed to Excellence

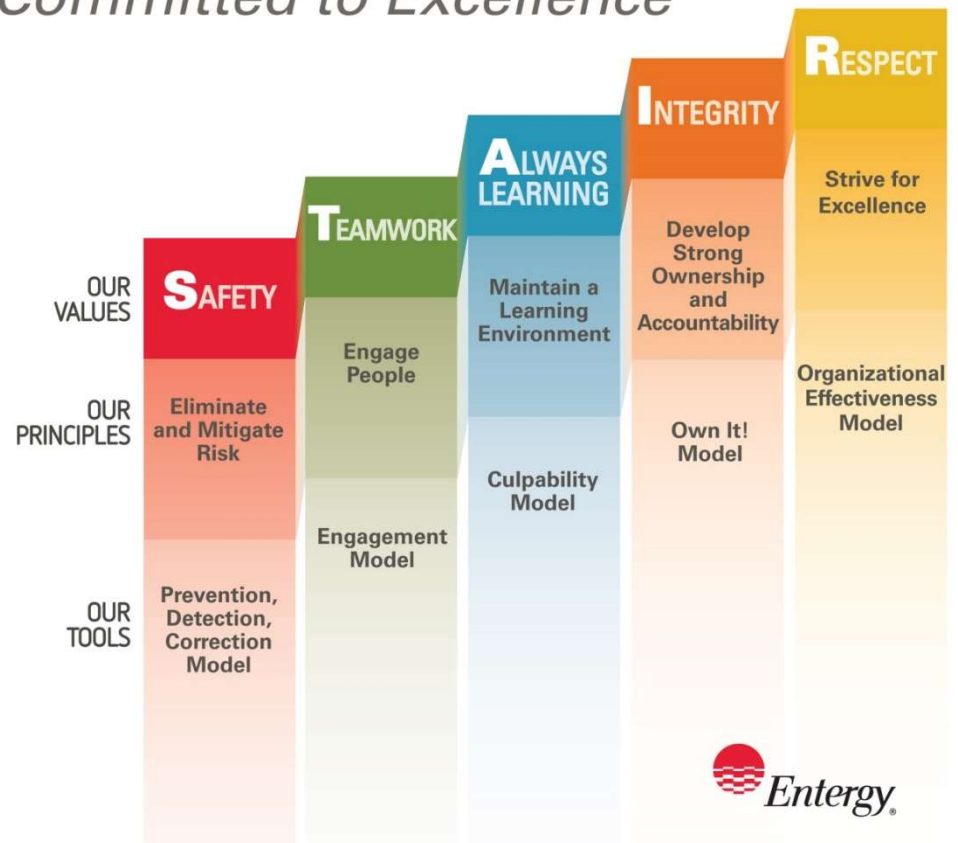
OUR VISION
We Power Life

OUR MISSION

We exist to operate a world-class energy business that creates sustainable value for our four stakeholders: owners, customers, employees and communities.

In support of the company's mission, we will safely and efficiently provide clean, reliable and sustainable nuclear power.

FLEET FOCUS AREAS



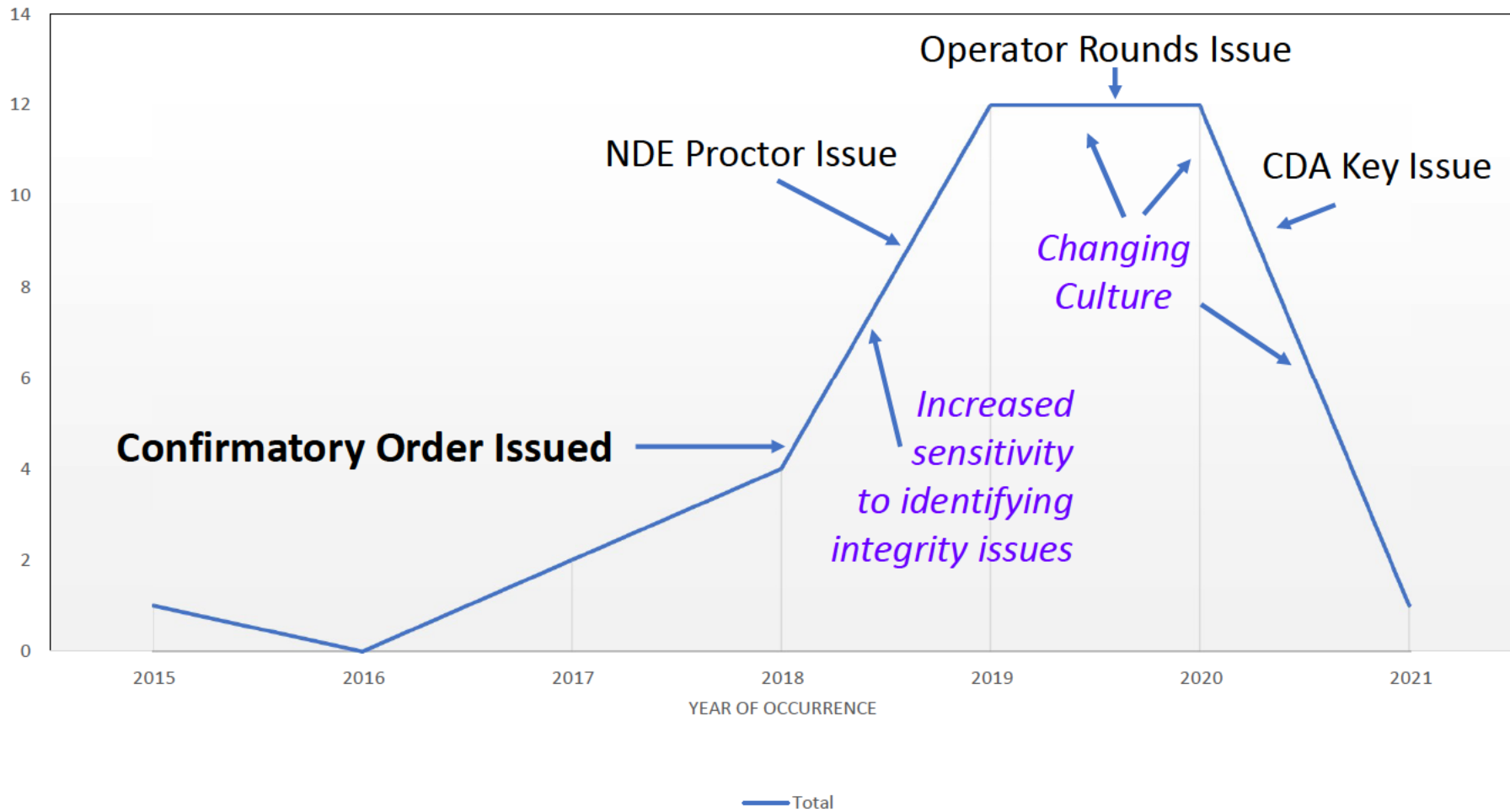
Confirmatory Order Perspective

Jeff Reynolds
Director, Regulatory Assurance &
Performance Improvement
River Bend Station

Confirmatory Order Perspective



Entergy Substantiated Integrity Issues Since Confirmatory Order Action Implementation



Identification of Issues

Tim Schenk
Manager, Regulatory Assurance
River Bend Station

Entergy identified three issues where individuals violated internal policies and procedures:

- In September 2018, an NDE exam proctor chose to deliberately circumvent the exam process by recreating a completed NDE exam
- In September 2019, two non-licensed operators did not conduct all required inspections during Control Building rounds
- In March 2020, an operator issued a CDA key and provided it to a supervisor not part of the critical group

Issue Overview & Enforcement Perspective

NDE Exam Proctor Falsification

Tiffany Baban
Senior Manager, Fleet Inspection Services
Nuclear Headquarters

- In September 2018, Entergy identified that an NDE exam proctor falsified a Magnetic Particle General Exam
- NDE Principal Level III identified and promptly reported receiving two exams for one test-taker
- Entergy investigation determined the proctor circumvented the exam process

Prompt Corrective Actions:

- Entergy placed the proctor on leave and removed access
- Entergy withheld all certifications for the NDE test-taker
- Entergy initiated a comprehensive investigation

Cause Evaluation Results:

- NDE exam proctor chose to deliberately circumvent the exam process
- NDE exam proctor maintained low standards of integrity related to the NDE qualification process

Entergy completed a fleet extent of condition:

- Review of examinations by the proctor
- Verified no other integrity lapses by the proctor
- Review of examinations by other NDE proctors
- Verified no indications of a more widespread NDE proctor issue
- Review of overall fleet proctoring issues

Investigation Results:

- Entergy identified there were no other exam falsification, willful misconduct or systemic integrity issues
- Issue was isolated to the NDE exam proctor decision to circumvent the exam process

NDE Proctor: Corrective Actions



- ✓ Entergy terminated the NDE proctor's employment and denied unescorted access
- ✓ Entergy completed a root cause evaluation
- ✓ Entergy issued fleet-wide communication
- ✓ Entergy successfully retested and later qualified the test-taker
- ✓ Entergy completed a gap analysis of the NDE qualification program
- ✓ Entergy revised the implementing guidance for administration and control of NDE

Assessing Significance



- Were there actual or potential safety consequences?
- Was the NRC's ability to perform its regulatory function affected?
- Were the issues isolated and not recurring?
- Were the responsible individuals at a low level in the organization and acting without management involvement?
- Were the issues the result of individual action and not caused by a lack of management oversight?
- Did Entergy identify and promptly report the issues?
- Did Entergy take prompt corrective actions to restore compliance?
- Did Entergy take effective corrective actions to prevent recurrence?

NRC Enforcement Policy Sections 2.2.1, 2.3.2;
NRC Enforcement Manual Section 2.2.2

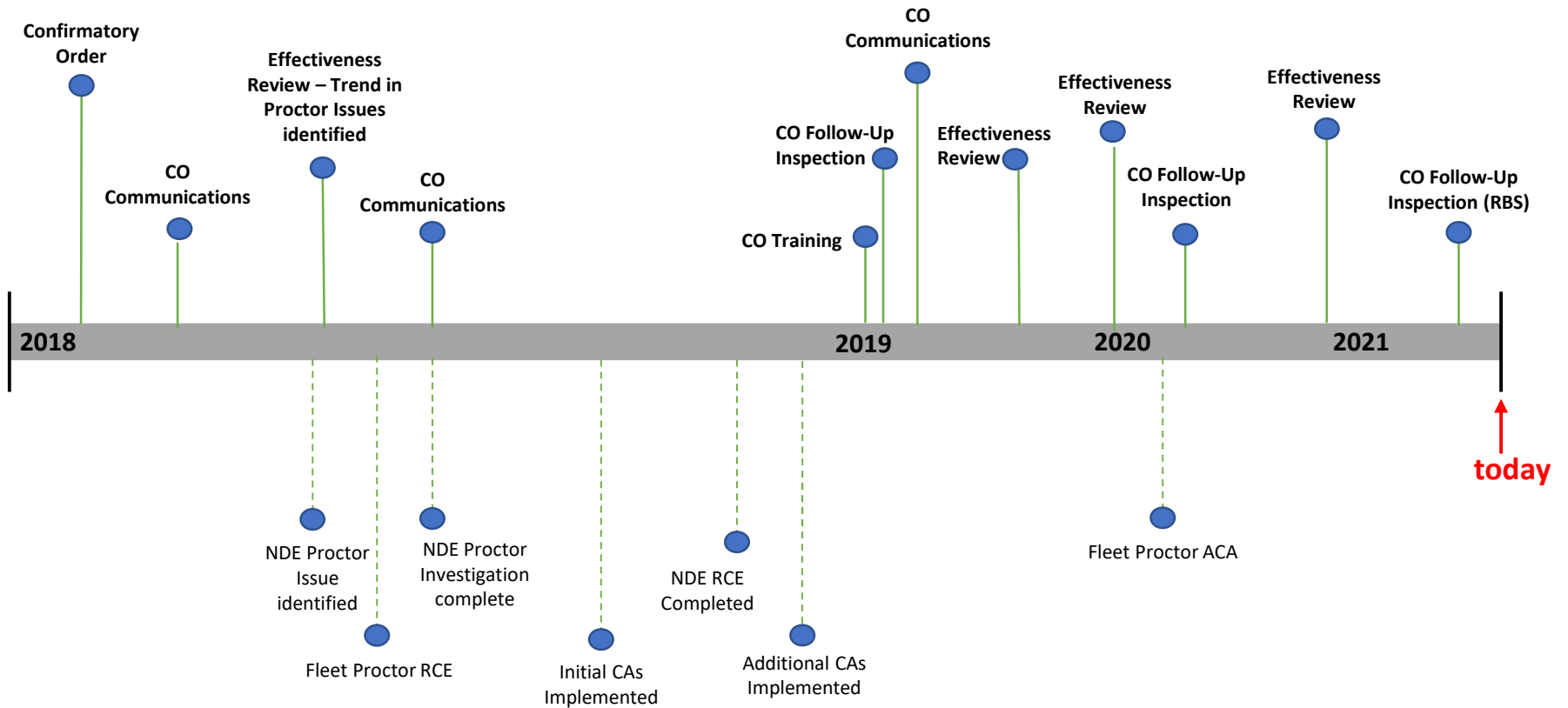
Apparent Violation

Failure to accomplish activities affecting quality in accordance with procedure CEP-NDE-0100, "Administration and Control of NDE," when an exam proctor deliberately made an unauthorized copy of a Magnetic Particle General Exam with the same control number and falsified the answers.

Entergy Assessment

Entergy concurs that the exam proctor violated written procedures. We discovered this during the exam verification process and promptly took several corrective actions to restore compliance and prevent recurrence. Entergy contends that this issue has a very low safety significance.

NDE Proctor: Timeline



Very Low Safety Significance

- There were no actual or potential safety consequences
- No work was performed by an unqualified individual
- There was no impact to the NRC's ability to perform its regulatory function
- The proctor's misconduct was not recurring
- The proctor acted without management involvement
- The proctor's misconduct was not caused by a lack of management oversight
- The proctor's misconduct did not afford him any specific advantage

Operator Rounds

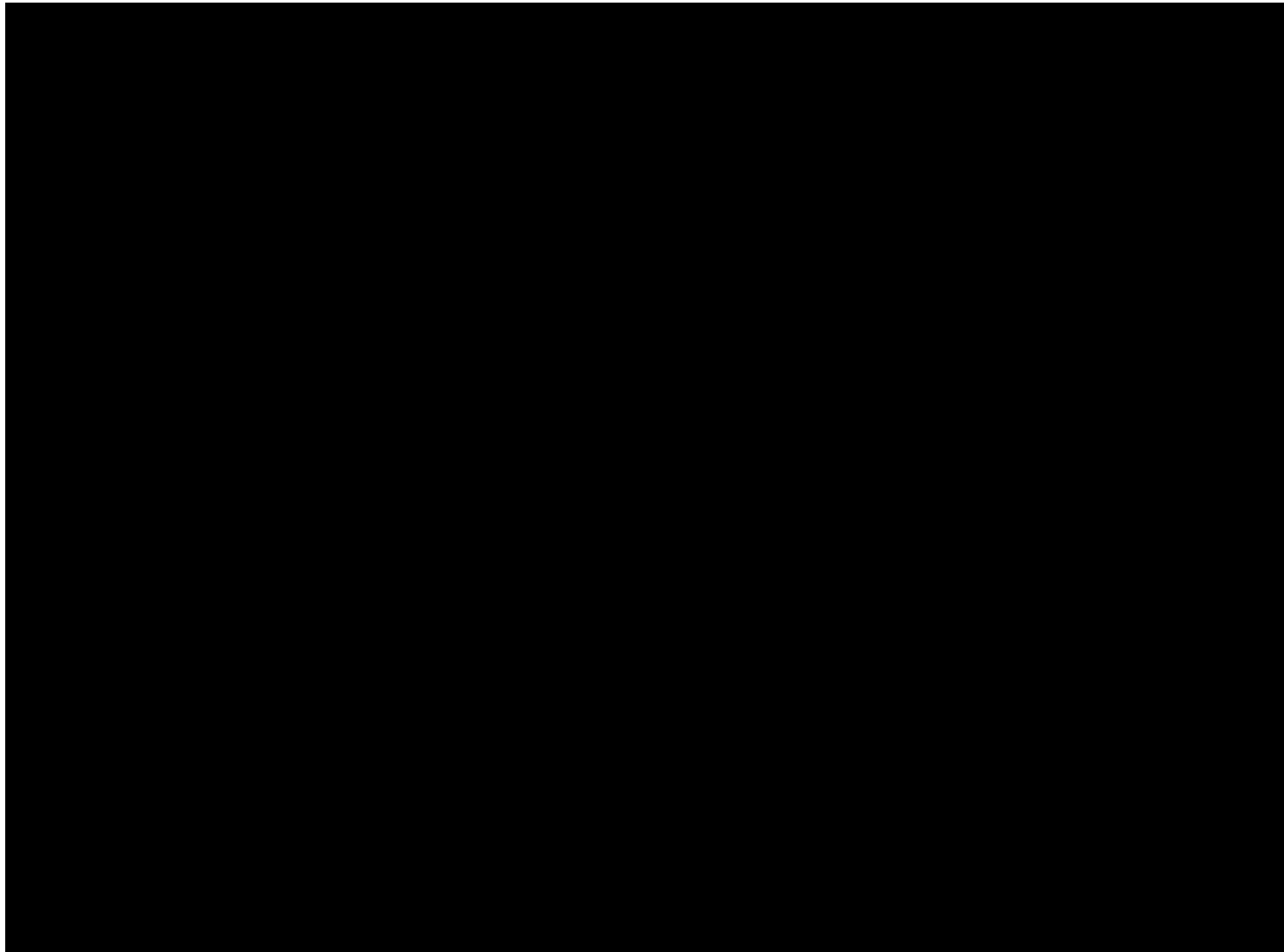
Danny James
Senior Manager, Operations
River Bend Station

Operator Rounds: Identification

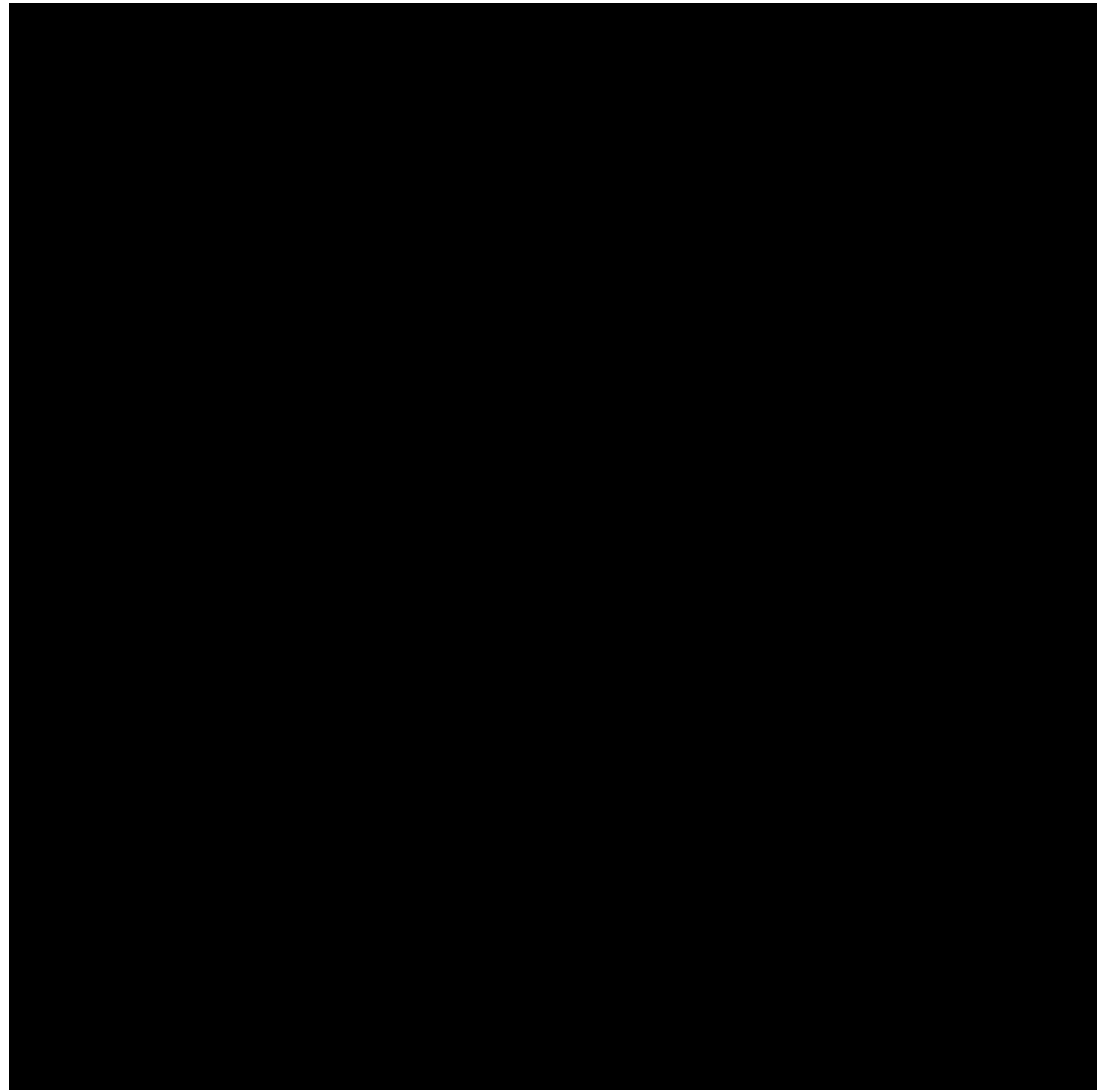


- In September 2019, an Entergy audit determined two non-licensed operators failed to inspect certain panels during their rounds
- Entergy investigation concluded each operator mistakenly thought the other inspected the panels

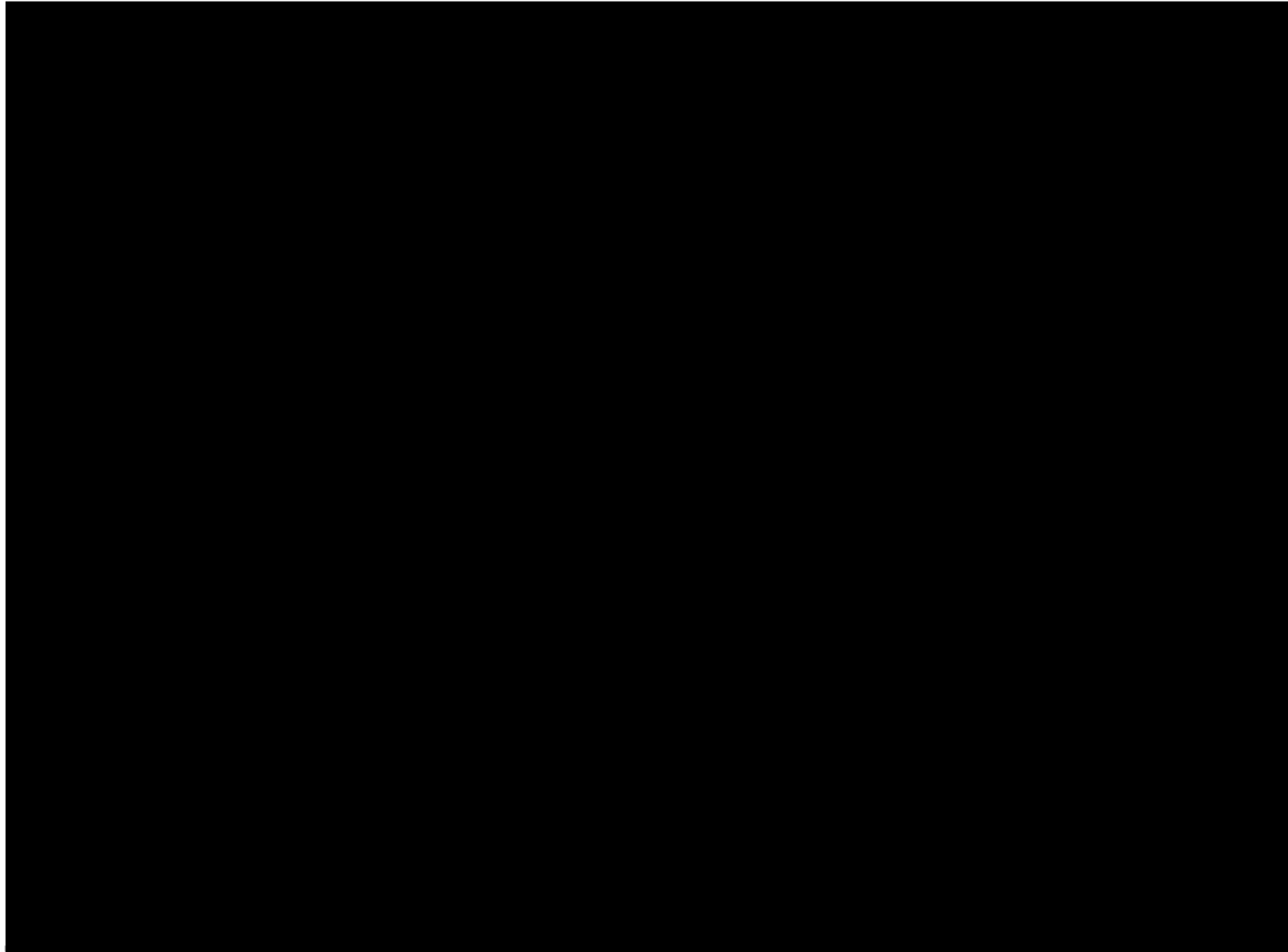
Operator Rounds: Identification



Operator Rounds: Identification



Operator Rounds: Identification



Investigation Results:

- The O/I operator did not maintain continuous control of the U/I operator
- Breakdown in communication
- Operators believed faulty assumptions that the other performed the inspection without validation
- Operators exhibited poor attention to detail
- Neither operator deliberately violated requirements nor acted with careless disregard

Operator Rounds: Corrective Actions



- ✓ Entergy removed the NLO qualifications pending investigation
- ✓ Entergy formally disciplined each operator via a written warning for violation Entergy procedures
- ✓ Entergy updated non-licensed qualification cards with specific guidance for rounds responsibilities
- ✓ River Bend held a stand down with each Operations crew to brief O/I and U/I responsibilities and integrity standards
- ✓ Additional corrective actions developed this month based on continuing to evaluate the issue in response to this apparent violation

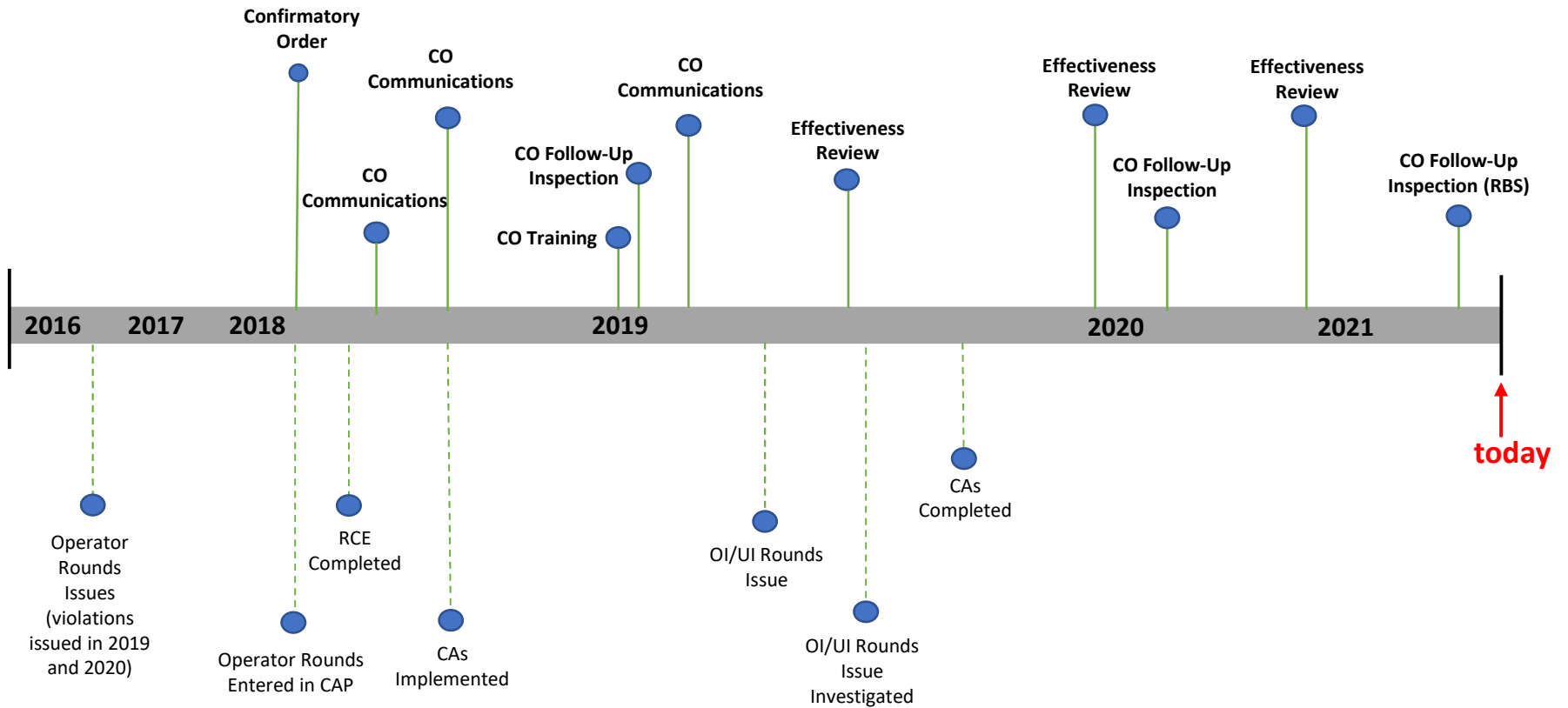
Apparent Violation

Failure to complete operator rounds when a non-licensed operator assigned to the Control Building as over-instruction failed to properly observe the under-instruction complete all panel checks and failed to ensure a complete tour of all required areas of their watch station.

Entergy Assessment

Entergy recognizes that the operators made a mistake that resulted in an unrecognized non-compliance of procedures. Neither operator intentionally failed to complete the round. Entergy discovered the non-compliance as a result of a self-auditing process implemented by River Bend Operations Management and promptly took several corrective actions to restore compliance and prevent recurrence. Entergy contends that this issue was not willful and had very low safety significance.

Operator Rounds: Timeline



Very Low Safety Significance and Not Willful

- There is no evidence the operators acted willfully
- There were no actual or potential safety consequences; the equipment remained fully operational and actively monitored
- There was no impact to the NRC's ability to perform its regulatory function
- The missed panel check was an isolated issue
- The missed inspection was not caused by a lack of management oversight

Critical Digital Asset Key

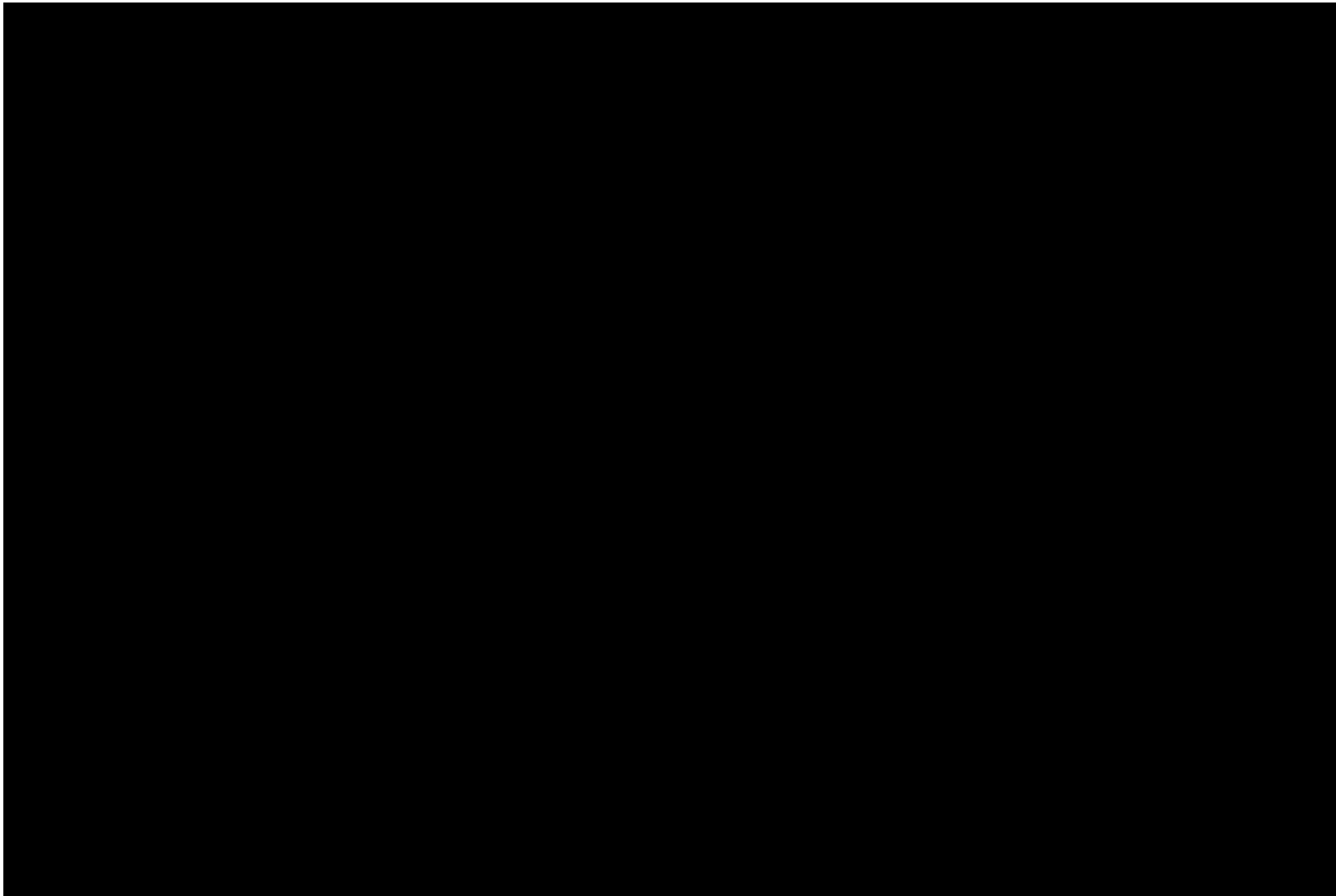
Mark Feltner
Assistant Manager, Operations
River Bend Station

CDA Key: Identification



- In April 2020, an Entergy Cyber Security audit determined a work week SRO provided a critical digital asset (CDA) key for the Met Tower Control Building to a supervisor who was not in the critical group
- The auditor promptly reported this discovery to the Cyber Security Manager, who initiated a causal evaluation to understand the CDA breach

CDA Key: Identification



Cause Evaluation Results:

- The SRO knowingly violated CDA key control requirements due to self-imposed schedule pressure
- The SRO worked under assumptions and failed to maintain a questioning attitude

CDA Key: Identification



- Entergy conducted a fleet extent of condition focusing on similar instances of CDA keys or media being issued to non-critical group members
- Entergy identified that there were no other instances identified, since October 2019, where cyber security keys were possessed inappropriately
- None of the issues resulted in cyber security issues or tampering

CDA Key: Corrective Actions



- ✓ River Bend disciplined both individuals issuing time off without pay and a written warning for violation of Entergy procedures
- ✓ River Bend Operations Management reinforced with SROs the importance of verifying critical group status prior to issuing CDA keys
- ✓ Robust changes were made to the software requiring verification of critical group status before issuing CDA keys
- ✓ River Bend updated signage on doors which require a CDA key to alert individuals of the procedural requirements before opening
- ✓ River Bend installed a new Key Control System with fingerprint identification protocol

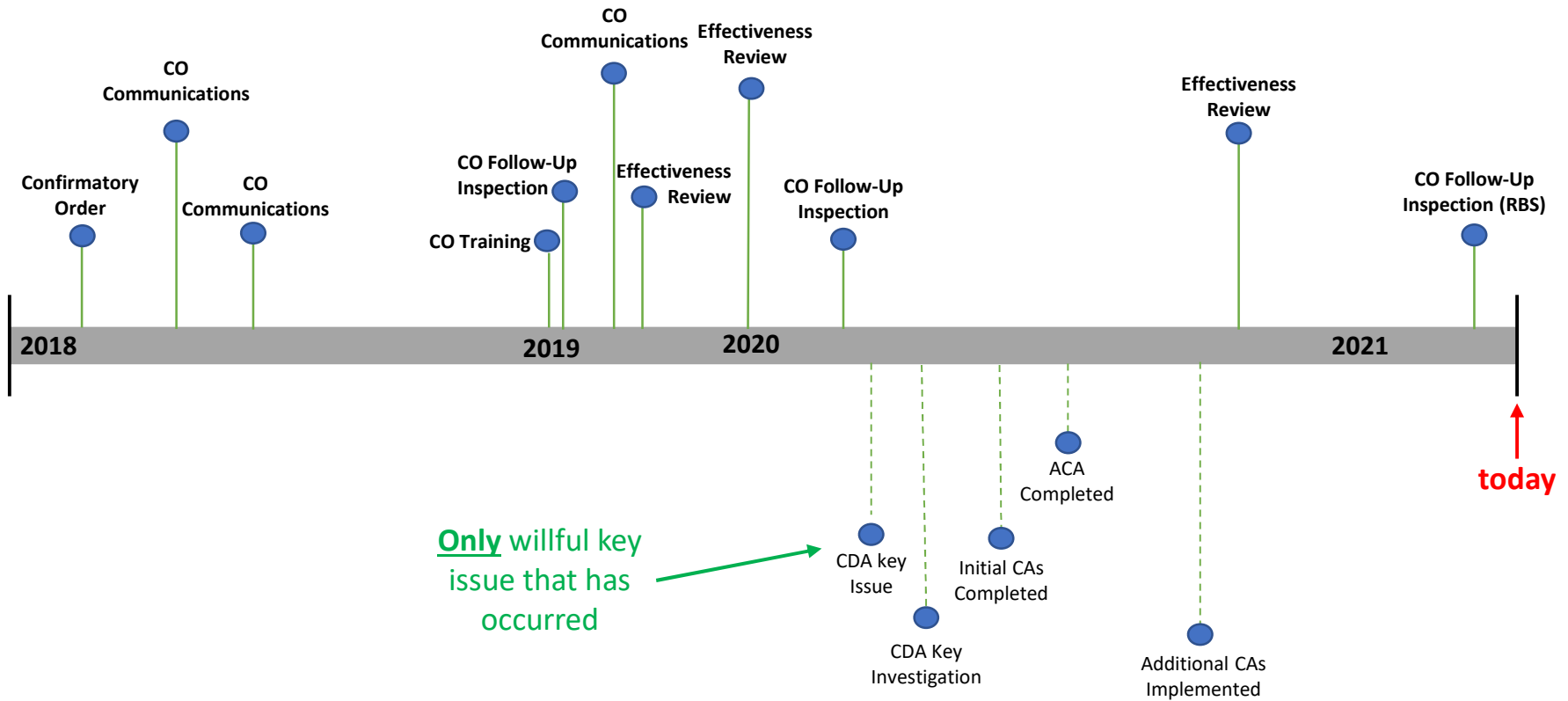
Apparent Violation

Failure to comply with the River Bend Cyber Security Plan when a work week senior reactor operator failed to follow key control procedures, resulting in an unauthorized individual opening a door to an area containing critical digital assets.

Entergy Assessment

Entergy concurs that the work week SRO's actions violated written procedures. We identified this during a Cyber Security Audit and found no evidence that resulted in equipment or cyber security controls being manipulated or altered. Entergy promptly took several corrective actions to restore compliance and prevent recurrence. Entergy contends that this violation has very low safety significance.

CDA Key: Timeline



Very Low Safety Significance

- There were no actual safety consequences
- The incident did not impact the NRC's ability to perform its regulatory function
- The issue was isolated and not recurring
- The work week SRO acted unilaterally and without management involvement
- The issue was not caused by a lack of management oversight

Civil Penalty Assessment

Tim Schenk
Manager, Regulatory Assurance
River Bend Station

No Civil Penalty

- No similar issues identified
- Entergy identified the issues
- Entergy took prompt and effective corrective actions in response to the issues
- Issues are of very low safety significance
- No previous escalated enforcement at River Bend attributed to events occurring within the last 2 years

Summary: Entergy's Enforcement Perspective

NDE Proctor:

- SL IV Non-Cited Violation
- No Civil Penalty

Operator Rounds:

- Previously Issued SL IV Non-Cited Violation
- No Traditional Enforcement
- No Civil Penalty

CDA Key:

- SL III Violation
- Prompt and Comprehensive Corrective Actions
- No Civil Penalty

Closing Comments

Kent Scott
Site Vice President
River Bend Station