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10 CFR 2.201

GNRO2022-00005

January 25, 2022

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

SUBJECT: Reply to a Notice of Violation; EA-20-125, 21-096, 21-110

Grand Gulf Nuclear Station Unit 1  
Docket No. 50-416  
License No. NPF-29

REFERENCE: NRC letter to Entergy, "Grand Gulf Nuclear Station – Notice of Violation; Inspection Reports 05000416/2021091 and 05000416/2021092; and Investigation Reports 4-2019-021, 4-2020-025, and 4-2020-029," (ADAMS Accession No. ML21349B337) dated December 15, 2021.

Entergy Operations, Inc. (Entergy) hereby submits the Reply to a Notice of Violation; EA-20-125, 21-096 and 21-110 for Grand Gulf Nuclear Station. As requested, the Enclosure contains the following: (1) the reason for the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

This letter contains no new commitments and no revisions to existing commitments. If you have any questions, please contact Jeff Hardy at (802) 380-5124.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert Franssen".

RF/JAH

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cc: NRC Region IV - Regional Administrator  
NRC Senior Resident Inspector, Grand Gulf Nuclear Station  
State Health Officer, Mississippi Department of Health  
NRR Project Manager  
[R4Enforcement@nrc.gov](mailto:R4Enforcement@nrc.gov)

**Enclosure**

**GNRO2022-00005**

**Reply to a Notice of Violation;  
EA-21-096, 21-110**

**Entergy Operations, Inc.  
Response to Notice of Violation  
EA-21-096**

Inspection Reports 05000416/2021091 and 05000416/2021092 and Notice of Violation described a Severity Level IV violation by Entergy Operations, Inc. (Entergy) at the Grand Gulf Nuclear Station (GGNS) as restated below:

The inspectors identified a violation of 10 CFR 50.9 for the licensee's failure to maintain information required by the Commission's regulations that was complete and accurate in all material respects. Specifically, inaccurate information was entered in Condition Report CR-GGN-2020-05570, which documented an adverse condition regarding a safety-related component.

**Response by Entergy Operations, Inc.**

Entergy concurs that inaccurate information was entered in Condition Report CR-GGN-2020-05570, resulting in a violation of 10 CFR 50.9. Entergy also concurs with the Severity level as assigned. Upon identification of the issue in April of 2020, Entergy took appropriate action to investigate the cause and return GGNS to full compliance.

**A. Reason for the Violation**

The primary reason for the violation, as determined by a GGNS causal evaluation was the failure to follow maintenance fundamentals and the willful falsification of information in condition report CR-GGN-2020-05570. Specifically, maintenance technicians installed an incorrectly manufactured gasket into a set of flanges upstream of a main steam isolation valve air accumulator. When the component failed its post-maintenance test, the individuals fabricated the information entered into the condition report.

**B. Corrective Steps That Have Been Taken and the Results Achieved**

Entergy took appropriate action by identifying the inappropriate activity of the individuals, restoring the affected component to an acceptable condition, and ensuring long-term compliance. The event was evaluated by Entergy Ethics and in a GGNS causal evaluation. Specific actions included:

- Following completion of investigations, both individuals' access authorization was terminated;
- The proper gasket was installed and tested on April 30, 2020; and
- All maintenance shops were presented a learning memorandum which reinforced maintenance technical fundamentals and Human Performance error reduction tools.

**C. Corrective Steps That Will Be Taken**

Other than continued monitoring and oversight, no additional corrective actions are planned specific to this violation. Annual required integrity training will also continue.

**D. Date When Full Compliance Will Be Achieved**

Full compliance was achieved when the individuals' access authorization was terminated on September 24, 2020.

**Entergy Operations, Inc.  
Reply to a Notice of Violation  
EA-21-110**

Inspection Reports 05000416/2021091 and 05000416/2021092 and Notice of Violation described a Severity Level IV violation by Entergy Operations, Inc. (Entergy) at the Grand Gulf Nuclear Station (GGNS) as restated below:

The NRC identified a Severity Level IV violation of License Condition 2.E and Section 20 of the Physical Security Plan for the licensee's failure to accomplish activities affecting security in accordance with Procedure EN-WM-100, "Work Request Generation, Screening and Classification," Revision 16. Specifically, an individual deliberately made an unauthorized adjustment to the hand geometry unit's reject threshold operational setting without initiating a condition report and obtaining work authorization.

**Response by Entergy Operations, Inc.**

Entergy concurs that an individual engaged in an inappropriate activity that caused a violation of License Condition 2.E and Section 20 of the Physical Security Plan. Entergy also concurs with the Severity level as assigned. Upon identification of the issue in July of 2020, Entergy took appropriate action to investigate the cause and return GGNS to full compliance.

**A. Reason for the Violation**

The primary reason for the violation, as determined by a GGNS causal evaluation was the failure to follow procedural guidance related to the GGNS Work Control process. Specifically, the worker made a configuration change to the hand geometry unit (HGU) without initiating a Condition Report and without proper work authorization documentation.

**B. Corrective Steps That Have Been Taken and the Results Achieved**

Entergy took appropriate action by identifying the inappropriate activity of the individual, restoring the HGU to an acceptable condition, and ensuring long-term compliance. The event was evaluated by Entergy Ethics and in a GGNS causal evaluation. Specific actions included:

- The individual was placed on administrative leave while the condition was evaluated;
- Prior to the completion of investigations, the individual retired from Entergy;
- Following completion of investigations, the individual's access authorization was terminated;
- The HGU operational setting was properly restored; and
- The Work Control Process and the responsibilities of security personnel was reinforced with Security Force Members.

**C. Corrective Steps That Will Be Taken**

Other than continued monitoring and oversight, no additional corrective actions are planned specific to this violation. Annual required integrity training will also continue.

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**D. Date When Full Compliance Will Be Achieved**

Full compliance was achieved when the individual's access authorization was terminated on September 22, 2020.