



Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
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Otto W. Gustafson
Licensing Manager

PNP 2013-018

February 28, 2013

10 CFR 26.717(e)
10 CFR 26.203(e)

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

SUBJECT: Fitness for Duty Program Performance Report

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Dear Sir or Madam:

In accordance with 10 CFR 26.717(e), Entergy Nuclear Operations, Inc. is submitting the Fitness for Duty Program Performance Report for the Palisades Nuclear Plant (PNP) for the period of January 1, through December 31, 2012. The report is provided in Attachment 1.

In accordance with 10 CFR 26.203(e), the Fatigue Management Program Performance Report for the period of January 1, through December 31, 2012, is provided in Attachment 2.

This letter contains no new commitments and no revisions to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "OWG", followed by a long horizontal line.

OWG/bed

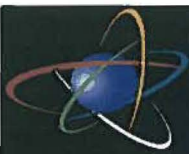
Attachments: 1. Annual Report Form
2. Fatigue Management Program Performance Report

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ATTACHMENT 1

PALISADES NUCLEAR PLANT

ANNUAL REPORT FORM



Electronic Information Exchange

NRC FFD Program Performance Data Reporting System Annual Reporting Form for Drug and Alcohol Tests for the EIE General Submission Portal

☐ Submission
Update

Note:

- 1) All fields required except those marked 'optional'.
- 2) Use Adobe Reader 8 or later for this form to work properly.
- 3) Hold your mouse over a form field to view additional information.

Select Facility

Palisades [50-255]

Period of Report

2012

Tests Conducted in the Calendar Year

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	72	1,093	19
Random	449	150	2
For Cause	1	0	0
Post-Event	3	2	0
Followup	45	40	1
Total (Calculated)	570	1,285	22

FFD Program Random Testing Population and Rate

Average number of
licensee employees

700

Average number of
contractors/vendors

428

Total size of the random testing pool
throughout the period (Calculated)

1,128

Annual random testing percentage
achieved for the testing pool

53.1

Laboratory Testing

Does your program use a
Licensee Testing Facility?
(Yes / No)

No

Identify your HHS-Certified Laboratory(ies)

Quest Diagnostics, Lenexa KS

Identify your Blind Performance Test Sample supplier(s)

El Sohly Laboratories

Substances Tested

Did your program only test for NRC-required substances
AND at the NRC-specified minimum cutoff levels? (Yes / No)

Yes

Does your program conduct LOD testing
permitted in 26.163(a)(2)? (Yes / No)

Yes

Substance	Use Only NRC Cutoff Levels? (Yes / No)	Initial Cutoff	Confirmatory Cutoff	LOD Testing? (Yes / No)	Comment (Optional)
Alcohol	Yes			Not Applicable	
Cocaine	Yes			Yes	
Marijuana	Yes			Yes	
Amphetamines	Yes			Yes	
Opiates	Yes			Yes	
PCP	Yes			Yes	

Substances Tested - continued

Summary of Management Actions - 26.717(b)(8)

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Program and System Management

Topic 1 Description

An analysis of the data for 2012 was conducted and did not identify any program weaknesses.

☐ Add an additional Topic

Person(s) Responsible for Information Provided

Person 1 (required):

Brian	Rabideau	Supervisor Access Authorization/FFD	brabide@entergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Barb	Dotson	Licensing Specialist IV	bdotson@entergy.com
First Name	Last Name	Position Title	Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked

Form Locked On: Jan 3, 2013 at 11:11:16 AM

Save to Local PC

Print this Report

ATTACHMENT 2
PALISADES NUCLEAR PLANT

FATIGUE MANAGEMENT PROGRAM PERFORMANCE REPORT



U.S. NRC
United States Nuclear Regulatory Commission

Protecting People and the Environment

Electronic Information Exchange

NRC FFD Program Performance Data Reporting System 10 CFR Part 26, Subpart I - Managing Fatigue Annual Fatigue Reporting Form for the EIE General Submission Portal

Select Facility: Period of Report:

Palisades (50-255) 2012

Submission Update - check this box only if this is an update to a previous submission.

Did your facility issue any waivers in the reporting period? (Yes / No)

Yes ☐ No ☐

Was this facility in an outage for any part of the reporting period? (Yes / No)

Yes ☐ No ☐

Did any single site outage last more than 60 days in total? (Yes / No)

Yes ☐ No ☐

NOTE:
1) Use Adobe Reader 8 or later for the form to work properly.
2) Hold your mouse over a form field to view additional information.

Summary of Waiver Issuance - 26.203(e)(1)(ii)-(iv)

Work Hour Controls		Number of Waivers Issued																		
		Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)			Performing health physics or chemistry duties, as described in 26.4(a)(2)			Performing duties of a fire brigade member, as described in 26.4(a)(3) *			Performing maintenance or on-site direction of maintenance, as described in 26.4(a)(4)			Performing security duties, as described in 26.4(a)(5)			Operating Total	Outage Total (days 1-60)	Outage Total (after day 60)	Combined Total
		Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	(Calculated)	(Calculated)	(Calculated)	(Calculated)
Daily Work Hours 26.205(a)(1)	Exceeded 16 work hrs in any 24 hr period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Exceeded 28 work hrs in any 48 hr period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Exceeded 72 work hrs in any 7 day period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Rest Breaks 26.205(a)(2)	Less than 10 hr break between successive work periods (or 8 hr break accommodating scheduled rotation shift shifts)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 34 hr break in any 7 day period	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 1 day off per week for 8-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Minimum Days Off Per Shift Cycle 26.205(a)(3)	Average of less than 2 days off per week for 10-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 2.5 days off per week for 12-hour shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Average of less than 2 days off per week for 12-hour maintenance shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Minimum Days Off for Outage Activities during first 60 days of outage(s) 26.205(a)(4) and 26.205(a)(5)	Average of less than 3 days off per week for 12-hour security shifts	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 3 days off per successive 15-day period 26.205(a)(4)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Less than 1 day off per 7-day period for maintenance personnel 26.205(a)(4)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Alternate to Minimum Days Off 26.205(a)(7)	Less than 4 days off per successive 15-day period for security personnel 26.205(a)(5)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	16 hour maximum average	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Total	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade columns. Do not double count these individuals.

Distribution of Waivers for Individuals in Each Category - 26.203(e)(1)(iii)

Number of Employees Issued Waivers		Number of Waivers Issued					
(Note: Even if no waivers were issued for a given column, please enter a value (e.g., 0) in at least one of the cells in the column)		Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)	Performing health physics or chemistry duties, as described in 26.4(a)(2)	Performing duties of a fire brigade member as described in 26.4(a)(3)	Performing maintenance or on-site directing of maintenance as described in 26.4(a)(4)	Performing security duties as described in 26.4(a)(5)	
1	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
2	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
4	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
5	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
7	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
8	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
9	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
10	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
11 - 20	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
More than 20	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total Employees Issued Waivers (if applicable)	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Most Waivers Provided to a Single Individual	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade columns. Do not double count these individuals.

Person(s) Responsible for Information Provided

Person 1 (required)

First Name: Last Name: Position Title: Company Email Address:

Person 2 (optional)

First Name: Last Name: Position Title: Company Email Address:

Final Step (Required): NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

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Summary of Corrective Action - 26.203(e)(2) (as applicable)

Analysis of Waiver Assessment Data (Limit 10,000 characters)

A total of 11 waivers were submitted during 2012.

- Security - 2 waivers: all initiated during the 1st and 4th quarters to support security training requirements.
- Operations - 1 waiver: submitted during April to reduce outage to support future on-depth and disturbance safety.
- Maintenance - 1 waiver: submitted during April to reduce outage to support future on-depth and disturbance safety.
- Construction - 1 waiver: submitted during April to reduce outage to support future on-depth and disturbance safety.
- Construction - 1 waiver: submitted during April to reduce outage to support future on-depth and disturbance safety.
- Construction - 1 waiver: submitted during April to reduce outage to support future on-depth and disturbance safety.

Analysis of Fatigue Assessment Data (Limit 10,000 characters)

Five current waivers and fatigue assessments were performed for post-outage, on-site, self-direction or follow-up. All fatigue assessments completed. Covered workers were performed as required of the waiver conditions prior to performing covered work. No claims or injuries were noted in the assessments. No management actions were required.

Seven Security-related waivers required approximately 115 fatigue assessments, all on-site related. The Maintenance and Operations-related waivers required 17 fatigue assessments, all on-site related.

Conclusions (Limit 10,000 characters)

Overall, the fatigue management program is effective.

Summary and Status of Corrective Actions (Limit 10,000 characters)

Corrective actions were initiated for the instances when the covered workers exceeded at least one work hour limit without a waiver. No safety concerns were identified.

General Comments (optional) (Limit 10,000 characters)

Analysis of Waiver Assessment Data:

A total of 11 waivers were initiated during 2012.

- Security - 7 waivers, all initiated during the 3rd and 4th quarter to support security manning requirements.
- Operations - 1 waiver, initiated during April refueling outage to support defense in-depth and shutdown safety.
- Maintenance
 - Contractor - 1 waiver - Steam Generator workers. Occurred in April refueling outage. Issues with S/G nozzle dam installation during reduced inventory.
 - Contractor - 1 waiver - Reactor Head Inspection workers. Occurred in April refueling outage. Required for safe operation of head lift.
 - Contractor - 1 waiver - SIRWT repairs. Occurred in June SIRWT outage. Required to expedite plant transition from high risk condition.

A security hiring initiative, implemented in the 2nd half of 2012, should alleviate the need for future waivers. Seventeen officers were hired. Per Security management, no waivers will be needed in 2013, if the current staffing level remains constant.

Analysis of Fatigue Assessment Data:

For covered workers, no fatigue assessments were performed for post-event, for-cause, self-declaration or follow-ups. All fatigue assessments completed for covered workers were performed as required for waiver initiation prior to performing covered work. No elements of fatigue were noted in the assessments. No management actions were required.

Seven Security-initiated waivers required approximately 310 fatigue assessments, all non-outage related. The Maintenance and Operations-initiated waivers required 17 fatigue assessments, all outage related.

Conclusions:

Overall, the fatigue management program is effective.

Summary and Status of Corrective Actions:

Condition reports were initiated for the instances when ten covered workers exceeded at least one work hour limit without a waiver. No safety concerns were identified.