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Michael R. Chisum
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W3F1-2016-0062

October 6, 2016

Mr. Anthony Vogel
U.S. Nuclear Regulatory Commission - Region IV
Director, Division of Reactor Safety
1600 East Lamar Blvd.,
Arlington, Texas 76011-4511

SUBJECT: Entergy Operations, Inc. First Six Month Status Notification in Response to
Confirmatory Order EA-15-100
Waterford Steam Electric Station, Unit 3
Docket No. 50-382
License No. NPF-38

REFERENCE: Confirmatory Order Related to NRC Report No. 05000382/2016007 and
NRC Investigative Report 4-2014-017; Waterford Steam Electric Station,
Unit 3, dated April 6, 2016 (ML16098A302)

Dear Mr. Vogel:

On April 6, 2016, the Nuclear Regulatory Commission (NRC) issued the referenced Confirmatory Order to Entergy Operations, Inc. (EOI). The Confirmatory Order requires EOI to submit written notifications to the NRC on the status of each item in the Confirmatory Order at intervals of six months, until the terms of the Confirmatory Order are completed.

The purpose of this letter is to provide the first six month status notification pursuant to Section V, Item G.1, of the Confirmatory Order. The attachment delineates progress made in implementing the requirements of the Confirmatory Order.

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

If you have any questions, please contact John P. Jarrell, Regulatory Assurance Manager, at 504.739.6685.

I declare under penalty of perjury that the foregoing is true and correct; executed on October 6, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read "MR Chisum", with a small dot at the end.

Michael R. Chisum
MRC/JPJ/SWM

ATTACHMENTS: Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for
the Implementation of Order EA-15-100

cc: Mr. Kriss Kenndy
Regional Administrator
U. S. NRC, Region IV
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Attachment 1 to

W3F1-2016-0062

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
Implementation of Order EA-15-100**

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
Implementation of Order EA-15-100**

Action	Target Completion Date	Activity Status
Accordingly, pursuant to Sections 104b, 161b, 161i, 161o, 182, and 186 of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR 2.202 and 10 CFR Part 50, IT IS HEREBY ORDERED, THAT:		
A.1 Entergy will retain an industrial psychologist, or similarly qualified person, and within 9 months of the issuance date of the Confirmatory Order, will complete a review of those integrity events within the Entergy Nuclear Fleet over the past 5 years to look for common themes or causes associated with the events and to recommend actions that Entergy can take to prevent similar events in the future.	January 06, 2017	In-progress
A.1.1 This review will also include an evaluation of previous fleet-wide training effectiveness.	January 06, 2017	In-progress
A.1.2 Entergy will share the results of this review and any contemplated actions with the NRC.	January 06, 2017	On-Track
A.2 Within 18 months of the issuance date of the Confirmatory Order, if the review reveals general industry insights/lessons learned, Entergy will share those insights with the industry in an appropriate industry forum to be determined based on consultation with the NRC.	October 6, 2017	On-Track

Status of Actions:

- A.1 Entergy has hired a private independent contract company that has created a team of experts that includes at least two psychologist to perform a review of integrity events within the Entergy Nuclear Fleet. This review of documents goes back to January 2011 and includes but is not limited to all NRC issued Traditional Violations that were classified as willfulness, Employee Concerns Cases, Ethics Cases, Access Authorization – denied access files, Safety Conscience Work Environment survey results, Organization Health survey results and Root or Apparent Causes where integrity was a potential contributor. This review is still in progress and expected to be completed in December 2016.
- A.1.1 The review of fleet wide training effectiveness will be included as part of the report being conducted by the independent contract company listed in A.1. This review is still in progress and expected to be completed in December 2016.
- A.1.2 This action is on track and is dependent on completion of A.1 and A.1.1.
- A.2 This action is dependent on completion of the above listed actions.

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
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Action	Target Completion Date	Activity Status
B.1 In December 2014, Entergy issued Procedure EN-OM-126, "Management and Oversight of Supplemental Personnel," to enhance Entergy's management and oversight of supplemental workers. Within 9 months of the issuance date of the Confirmatory Order, Entergy will conduct an effectiveness review of implementation of Procedure EN-OM-126 at all Entergy Nuclear Fleet sites.	January 06, 2017	In-progress
B.1.1 Entergy will share the results of this review and its proposed actions to address any identified performance gaps with the NRC.	January 06, 2017	On-Track

Status of Actions:

B.1 The Effectiveness review of EN-OM-126 data collections is completed at all Entergy Nuclear sites and is being evaluated for required actions to be issued. The final report and action plan is on track for completion and implementation of changes by January 6, 2017.

B.1.1 This action is on track and is dependent on Action B.1

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
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Action	Target Completion Date	Activity Status
C.1 Within 6 months of the issuance date of the Confirmatory Order, Entergy will assign a corporate lead for governance and oversight of the Entergy Nuclear Fleet fire watch program.	October 6, 2016	Complete
C.1.1 In conjunction with this assignment, Entergy will issue an Entergy Nuclear Fleet procedure or revise an existing procedure, as appropriate, to provide the common requirements for Entergy Nuclear Fleet fire watch programs.	October 6, 2016	Complete
C.1.2 The responsibilities of the lead will include ensuring the consistent application of the subject procedure across the Entergy Nuclear Fleet.	October 6, 2016	Complete

Status of Actions:

C.1 Corporate lead for Governance and Oversight of the Entergy Nuclear Fleet Fire Watch program is the GMPO Fleet Operations. This guidance has been established in a new fleet procedure EN-OP-139, Fire Watch Program. This action is complete.

C.1.1 and C.1.2 New Fleet Procedure EN-OP-139 issued with an effective date of September 8, 2016, establishes the consistent application the responsibilities of Fire Watch Personnel, minimum training requirements and responsibilities for the Entergy Nuclear Fleet. These actions are complete.

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
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Action	Target Completion Date	Activity Status
D. Within 3 months of the issuance date of the Confirmatory Order, Entergy will revise the appropriate Entergy Nuclear Fleet procedure to provide a process to address requests for the reinstatement of unescorted access authorization for a worker whose unescorted access has been temporarily placed "on hold" or assigned some other comparable interim status. The revision must ensure that the Access Authorization Reviewing Official has the relevant information and appropriate approvals before deciding whether to reinstate the worker's unescorted access.	July 6, 2016	Complete

Status of Actions:

D. Corporate procedure EN-NS-101-04, Processing Potentially Disqualifying Information (PDI) has been revised to provide guidance to address requests for the reinstatement of unescorted access authorization. Procedure requires that the Reviewing Official be provided all information regarding the investigation and justification for reinstatement. This action is complete.

Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the Implementation of Order EA-15-100

Action	Target Completion Date	Activity Status
E.1 Within 6 months of the issuance date of the Confirmatory Order, Entergy will review and revise, as necessary, Entergy Nuclear Fleet supervisor training to ensure that it addresses the responsibilities and actions of supervisors who become aware of facts and circumstances potentially impacting a person's trustworthiness and reliability.	October 6, 2016	Complete
E.2 If Entergy determines revisions to the supervisory training are necessary, the training will be delivered within 12 months of the issuance date of the Confirmatory Order.	April 6, 2017	On-Track
E.3 Additionally, within 2 months of the issuance date of the Confirmatory Order, Entergy will develop and publish a communication to all supervisors at its Entergy Nuclear Fleet sites reminding them of their responsibility to report issues impacting workers' trustworthiness and reliability to access authorization personnel.	June 6, 2016	Complete

Status of Actions:

E.1 Entergy Nuclear developed and incorporated into the supervisor training curricula a requirement to complete a familiarization guide specifically requiring a review of and a discussion of EN-NS-101, Unescorted Access Authorization Program. This Familiarization guide also requires a check out with the AA/FFD supervisor. This action is complete.

E.2 Action is in progress and being evaluated.

E.3 Entergy Nuclear Training department developed a Computer Based Training course that was required to be completed by all Supervisors and above. The computer based training course specifically covers the supervisor's responsibility to report issues impacting workers trustworthiness and reliability to access authorization personnel. This action is complete.

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
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Action	Target Completion Date	Activity Status
F.1 Within 3 months of the issuance date of the Confirmatory Order, Entergy will have conducted a briefing of all fire watch personnel, at each of its Entergy Nuclear Fleet sites, on the importance of the fire watch activity to the nuclear safety of the facility.	July 6, 2016	Complete
F.1.2 In addition, within 3 months of the issuance date of the Confirmatory Order, this briefing will be incorporated as part of new fire watch personnel training.	July 6, 2016	Complete
F.2 Within 9 months of the issuance date of the Confirmatory Order, Entergy will perform a review of other tasks where the importance of the task to reactor safety may not be apparent to the personnel performing the task and conduct similar training.	January 06, 2017	On-Track

Status of Actions:

- F.1 Briefing was conducted for all qualified fire watch personnel, at each of the nuclear sites on the importance of fire watch activities at their site. Briefing included the importance to nuclear safety and the reasons as to why their tours were being conducted. This briefing was completed within the required 3 months. This action is complete.
- F.1.2 The computer based training that is required for all hot work and fire watch personnel was updated to include the briefing conducted in F.1 for all newly qualifying fire watches. This requirement has been incorporated into all future qualifications. This action is complete.
- F.2 This task is in progress.

**Waterford 3 Steam Electric Station (WF3) First Six Month Status Report for the
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Action	Target Completion Date	Activity Status
G.1 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (6 month)	October 6, 2016	Complete
G.1.1 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (12 Month)	April 6, 2017	On-Track
G.1.2 Unless otherwise specified, Entergy will submit written notification to the Director, Division of Reactor Safety, USNRC Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, at intervals not to exceed 6 months until the terms of this Confirmatory Order are completed, providing a status of each item in the Order. (18 Months)	October 6, 2017	On-Track
G.2 Entergy will provide its basis for concluding that the terms of the Confirmatory Order have been satisfied, to the NRC, in writing.	October 6, 2017	On-Track