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W3F1-2018-0049

August 16, 2018

Mr. Greg Werner, Chief, Engineering Branch 2
Division of Reactor Safety, Region IV
U.S. Nuclear Regulatory Commission
Greg.Werner@nrc.gov

Subject: Confirmatory Order EA-15-100
Fleetwide Integrity Events Action Plan
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

Reference: Electronic Mail from Mr. John Jarrell to Mr. Greg Werner dated January 06,
2017, titled Status of Waterford 3 Confirmatory Order EA-15-100

Dear Mr. Werner:

In the referenced correspondence, it was indicated that Entergy would review the recommended actions from the Aubrey Daniels Institute (ADI) review of integrity events within the Entergy Nuclear Fleet over the past 5 years, develop an action plan to implement those actions, and share the action plan with the NRC once developed.

Entergy has developed an action plan to implement those actions and that plan is attached to this letter.

By this written correspondence, Entergy is sharing the action plan with the NRC.

There are no new commitments contained in this submittal.

If you have any questions or require additional information, please contact the Regulatory Assurance Manager, John P. Jarrell, at 504-739-6685.

Sincerely,

A handwritten signature in black ink, appearing to be "JPJ/AJH", written over a large, stylized "J" that loops around the text.

JPJ/AJH

Attachment: Entergy Fleetwide Integrity Events Action Plan

cc: NRC Senior Resident Inspector, Waterford 3
Frances.Ramirez@nrc.gov
Chris.Speer@nrc.gov

Waterford 3 NRR Project Manager
April.Pulvirenti@nrc.gov

Reactor Inspector, Engineering Branch 2
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Enclosure to

W3F1-2018-0049

Waterford Steam Electric Station, Unit 3

Entergy Fleetwide Integrity Events Action Plan

(4 pages)

Aubrey Daniels International (ADI) was contracted to complete an assessment of the integrity events within the Entergy Nuclear Fleet over the past 5 years, evaluate the results for common themes and or causes, and develop recommended actions. The following are the recommended actions from ADI and Entergy's response to them:

- 1. Address staffing and experience gap through continued hiring and by improving the clarity of procedures for those with less experience. Continue hiring efforts begun in Operations and communicate these changes clearly so employees do not assume the worst.**

At the time of the issuance of the recommended actions from ADI, Entergy had already implemented the Nuclear Sustainability Plan (NSP) which included an initiative to increase the staffing levels throughout the Entergy Nuclear Fleet that had been minimized during Human Capital Management (HCM) from 2013. This plan specifically included Operations. Additionally, the staffing initiative from NSP was widely communicated throughout the fleet. Because the NSP would address staffing shortfalls throughout the fleet, it was decided that no further action for this recommendation was required.

It was determined by Entergy that, while improvement of the clarity of procedures for those with less experience was desirable, it was not an action that directly addressed the integrity issues of the fleet. As such, no action was taken for this specific recommendation.

- 2. Improve leadership efficiency by strengthening supervisors' coaching skill sets through improved training, observation and coach the coach models and practices. Ensure leaders understand how to apply the science of behavior to accelerate change and make it stick.**

Per NRC Confirmatory Order EA-15-100, Entergy was ordered "retain an industrial psychologist, or similarly qualified person....[to] 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." None of the common themes identified by ADI related to the cause(s) of integrity events involve the quality of leadership coaching. In fact, ADI noted in their report that Entergy has a strong coaching culture, encouraging leaders to spend time coaching direct reports on a regular basis. It was also noted that leaders believe the observation process is helpful and that spending time coaching direct reports is a critical part of their job. So, while ADI believes that "there are other training opportunities" related to the quality of coaching, Entergy determined that this was not a cause of the integrity events in the Entergy Nuclear Fleet. Because of this, Entergy did not issue an action to enhance leadership coaching skills.

It is important to note, however, that since the issuance of the Confirmatory Order, Entergy has developed required supervisory training that includes a "Dynamic Learning Activity" where quality coaching skills and practices are stressed.

3. Update systems to better align with desired culture, current leadership practices and to be more consistent with science of behavior:

a. Update scheduling/work order processes to build in time for Do-It-Right and Hu Tool usage.

After review of the ADI report Entergy determined that this recommended action would not directly address integrity issues within the fleet. As such, no actions were developed.

b. Focus observation processes on specific behavior(s) with strong follow-up elements (paired observations with frequent coaching debriefs).

Entergy reviewed the observation processes in place at the time of issuance of the Confirmatory Order. Subsequently, Entergy has strengthened its observation program by reverting to a database (Devonway) to track and trend observations.

c. Continue efforts to bring procedures up-to-date through craft input and management support.

Entergy has begun an initiative to both enhance fleet procedures as well as eliminate site specific procedures with redundant requirements and actions in fleet procedures. This initiative will bring the oversight and review of corporate procedures under fleet management. With regards to integrity events in the nuclear fleet, Entergy did not believe that a lack of up-to-date procedures contributed to the events reviewed by ADI.

d. Enhance Root Cause Evaluations with systematic analysis of desired and undesired behaviors, and limit volume of Corrective Actions.

Refer to the response to number 6 below.

Additionally, the Root Cause Evaluation for the Operator Round issue listed the following as the Root Cause:

“Entergy had the cultural perception that willful misconduct aspects of events should be addressed outside of CAP, which resulted in delayed and inadequate evaluation for EOC and identification/resolution of O&P factors.”

Corrective Actions from that Root Cause Evaluation will address this recommended action

e. Evaluate to ensure that scorecards/incentives are driving desired behaviors and not having unintended consequences.

Scorecards and incentives throughout the Entergy Nuclear fleet were reviewed. The performance indicators currently tracked are based on specific and measurable metrics. After this review, Entergy determined that no additional actions were required to address this recommended action.

- f. Value coaching skill alongside technical expertise; ensure the role and compensation attract good coaches into supervisory roles.**

The recommended action as stated is vague and non-specific. However, Entergy has developed required supervisory training that includes a “Dynamic Learning Activity” where quality coaching skills and practices are stressed.

- 4. Improve morale/OHI by proactive culture development & sustainability. Continue the recent practices and extend through first-line supervision by holding leaders accountable for demonstrating behaviors consistent with discretionary effort, and constructively addressing leaders who get results through practices inconsistent with your desired culture.**

This recommended action, by itself, does not directly address the integrity issues identified in the ADI report. After review of this action, Entergy has determined that this recommended action is an enhancement, and as such, no additional actions were determined to be warranted.

Additionally, Entergy develops action plans for each department to address issues identified from each OHI survey.

- 5. Develop a best-case model for implementing fire watches and an optimization of the other behavioral contingencies required to promote accurate and timely fire watches.**

On 9/8/2016, EN-OP-139, “Fire Watch Program,” was developed to address gaps in the fleet Fire Watch Programs. The purpose of this procedure is:

- a. To define the types of Fire Watches credited in the Fire Protection Program
- b. To identify the requirements for establishing a Fire Watch, the responsibilities of a Fire Watch, and the requirement for discontinuing a Fire Watch.
- c. To identify the minimum training requirements for Fire Watches.
- d. To adhere to the requirements outlined in WF3 NRC Confirmatory Order EA-15-100.

Any future revision of this procedure shall require a review of EA-15-100, specifically Section V, in order to ensure that all aspects of this commitment are not inadvertently deleted.

- 6. Establish an ongoing, corporate-level process for performing analyses on data from the employee concerns, ethics, access authorization denials (Security), and discipline cases (HR). Do the same for NRC and self-assessment findings and communicate the findings and any recommendations to the fleet.**

On March 3, 2018, EN-FAP-LI-001, "Performance Improvement Review Group (PRG) Process", and EN-LI-118, "Cause Evaluation Process," were revised to require a Fleet High Level Cause Review (FHLR) of all Root Cause Evaluations and selected Adverse Condition Analysis (ACA) and/or Non-Adverse Condition Analysis (NCA) be completed prior to PRG approval. Employee concerns, ethics, access authorization denials and discipline cases are reviewed each trimester by the individual sites' Nuclear Safety Culture Monitoring Panels. The results of this provide input into the Safety Culture Executive Team assessment of corporate level and fleet wide safety culture.

All NRC findings are shared with corporate Regulatory Assurance and these results are shared with the site Regulatory Assurance groups. Corporate condition reports are generated for site reviews if deemed necessary.

Because the above actions are already in Entergy processes no further actions are required.