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October 4, 1994

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555-0001

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to NRC Administrative Letter 94-11

GNRO-94/00123

Gentlemen:

We are pleased to respond to your request for comment on Administrative Letter 94-11.

Overall, we feel that the NRC's Pilot Program for Recognition of Good Performance is a positive validation of a plant's safety culture and brings needed balance to the more usual focus on deficient performance.

At Grand Gulf we have received significant benefit from our recognition as a good performer. The primary benefits are the sense of pride in accomplishment for our personnel, their motivation to maintain our standing on the good performers list and, surprisingly, the recognition of the difficulty in maintaining strong performance which is an effective weapon against complacency.

While we have also experienced additional demands on our resources as a result of the NRC's pilot program, they are small in comparison to the benefits. Consequently, we recommend continuation of the program.

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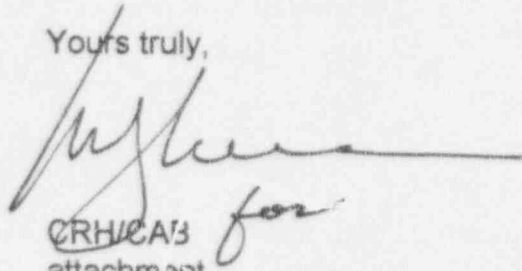
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We have also attached brief responses to the specific questions posed in AL 94-11. Please feel free to call Mike Meisner (601-437-6470) should you require additional information.

Yours truly,



CRH/CA/3
attachment

cc:

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(1) **Should the NRC continue the Good Performer Program?**

Yes Grand Gulf believes it is in the best interest of the nuclear industry to maintain the program. While the regulator, by necessity, must focus on the relatively poorer performers, the Good Performer Program affords a means to maintain balance and perspective.

(2) **What changes, if any, would enhance the current program?**

No significant changes are needed.

(3) **What attributes should the NRC consider in assessing licensees for good performer recognition?**

The present program attributes are acceptable. Within those attributes, emphasis should be placed on a strong safety culture and technical competence. The staff should also consider acknowledging the safety benefit associated with aggressive elimination of non-safety significant regulatory burden which allows licensee resources to be better focused on areas important to safety.

(4-5) **What other programs can the NRC use to provide positive reinforcement or recognize good performers? and; What other NRC programs should be modified to support the Good Performer Program?**

No new programs are needed. However, there could be more consistent emphasis on existing programs. For instance, strong SALP performance allows for reduced NRC oversight of the licensee's facility which translates into such benefits as reduced inspection hours and extended SALP periods. Recently this has been applied to Grand Gulf and has resulted in a reduction of approximately \$350,000 in inspection fees during 1993 and, we expect, a larger reduction in 1994. However, reduced inspection doesn't seem to be consistently applied in all NRC Regions.

(6) **Has the Good Performer Program selected the outstanding plants?**

No comment.

- (7) **Do licensees consider recognition by the Good Performer Program as an organizational goal?**

Grand Gulf's goals are focused on attaining top decile status in three performance areas - safety, availability and cost. The key measures in the safety arena are SALP and INPO ratings. Although attaining good performer status is not and was not an organizational goal, maintaining that status is a de facto goal.

- (8) **Are there any adverse effects, real or perceived, from being placed on the NRC Good Performer list?**

Although "adverse" may be too strong a word, there are additional demands put upon Grand Gulf as a result of being named to the Good Performer list. These demands fall into two main categories - information requests and individual regulator skepticism. We have noticed a marked increase in information requests from other licensees and the NRC, site visits from other licensees and the NRC, and requests for support to other licensee sites. It is our practice to support reasonable requests because we usually learn something in the process of assisting others. We have also noticed occasions where NRC personnel will visit Grand Gulf skeptical of our good performance, and somewhat intent on finding problems for the purpose of demonstrating that we still have a long way to go. This, by far, is the exception rather than the rule.

- (9) **Are there any indications of "rising standards" for Good Performer recognition since 1991?**

We are not aware of any clear indicators of "rising standards".

- (10) **Has the industry benefited or been penalized from the use of Good Performer Program results by external organizations?**

We don't believe there are any obvious indicators either way for the industry as a whole.

- 11) **What benefits, if any, have been realized by the licensees recognized for good performance?**

The major benefits accrue to the entire organization through a sense of validation and pride in accomplishment. Much of the accomplishment which merits Good Performer recognition is associated with intangibles such as a strong safety culture. NRC's recognition of these efforts reinforces and strengthens these positive cultural aspects which contributed to our good performance.

One of the unexpected benefits of being recognized as a good performer is a reduction in complacency. While we take satisfaction in our accomplishments, the satisfaction seldom lasts very long. As an organization, we've come to understand that it is much more difficult to remain on a good performers list than it is to get on the list in the first place. Continued strong safety performance requires continuous improvement and self-assessment - in fact, that critical self-assessment usually starts with the idea that we need to avoid complacency and self-satisfaction, and usually ends in a more critical review than we receive from the NRC.