



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

January 14, 2022

EA-17-132
EA-17-153

Mr. Bill Maguire
Ms. Kimberly Cook-Nelson
Chief Operating Officers
Entergy Nuclear
1340 Echelon Parkway
Mailstop Code: M-ECH-66
Jackson, MS 39213

SUBJECT: GRAND GULF NUCLEAR STATION – NRC CONFIRMATORY ORDER
(EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION
REPORT 05000416/2021010

ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 – NRC CONFIRMATORY
ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION
REPORT 05000313/2021012 AND 05000368/2021012

RIVER BEND STATION – NRC CONFIRMATORY ORDER (EA-17-132 AND
EA-17-153) FOLLOW-UP INSPECTION REPORT 05000458/2021011

WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NRC CONFIRMATORY
ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION
REPORT 05000382/2021012

Dear Mr. Maguire and Ms. Cook-Nelson:

On December 6, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed a review of Entergy's implementation of the actions specified in a Confirmatory Order dated March 12, 2018 (NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML18072A191) (EA-17-132 and EA-17-153). The inspection team discussed the results of this inspection with you and other members of your staff on December 6, 2021. The team documented the results of this inspection in the enclosed inspection report.

This inspection was performed in response to Entergy's notification to the NRC submitted on January 28, 2021, (ADAMS Accession No. ML21028A782), in which Entergy documented that the implementation of the terms of the Confirmatory Order had been completed. This inspection was conducted in accordance with Inspection Procedure 92702, "Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders." The inspection included a review of fleet-wide communications, root cause evaluations, corrective actions, and effectiveness reviews to address willful violations that have occurred at facilities across the

Entergy fleet and to prevent similar willful violations in the future. Two prior inspections that followed up on Entergy's actions to comply with the Confirmatory Order were performed by the NRC in 2019 and 2020. The results of these inspections were documented in inspection reports issued on April 4, 2019, and March 26, 2020 (ADAMS Accession Nos. ML19094B867 and ML20086J157). Through these inspections, the NRC provided observations regarding the adequacy of Entergy's initial approaches taken to comply with the Confirmatory Order, as of the dates of the inspections. The inspection documented in the enclosed report represents the completion of the NRC's planned follow-up inspection for this Confirmatory Order.

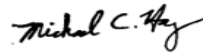
The inspection team reviewed the actions taken by Entergy to address the deficiencies identified in the previous inspections as well as the completion of the remaining actions necessary to comply with the requirements of the Confirmatory Order. No findings or violations of more than minor significance were identified in this inspection. Overall, the team assessed that the actions taken by Entergy to implement the requirements of the Confirmatory Order are adequate for compliance, and that measures implemented over the past three years throughout the Entergy fleet of operating reactor facilities have resulted in improved performance of preventing and detecting willful misconduct by employees.

The NRC has recently issued two groups of additional enforcement actions involving willful violations of NRC requirements at Entergy facilities. On September 30, 2021, the NRC issued Inspection Report 05000458/2021091 (ADAMS Accession No. ML21272A215), which included three Notices of Violation for issues involving willful violations of NRC requirements at the River Bend Station. The issues cited in these violations occurred in August 2018, September 2019, and March 2020. On December 15, 2021, the NRC issued Inspection Reports 05000416/2021091 and 05000416/2021092 (ADAMS Accession No. ML21349B337), which included three Notices of Violation for issues involving willful violations of NRC requirements at the Grand Gulf Nuclear Station. The issues cited in these violations occurred in July 2019, April 2020, and July 2020. These issues were identified through processes that Entergy established in response to the Confirmatory Order to identify and address such issues at reactor facilities in the Entergy fleet.

Based on the issues referenced above and the results of this follow-up inspection, the NRC has noted indications of significant progress toward raising sensitivity and awareness of requirements and expectations regarding willful misconduct among the workforce at Entergy facilities. Entergy has implemented processes to identify and address willful misconduct issues and to reduce the occurrence of such issues, resulting in a trend of fewer issues occurring in more recent periods since these measures have been in place. The NRC considers continued focused efforts in this area to be valuable to sustain a trend of improvement. While this report ends the formal direct inspection activities related to the order, the Confirmatory Order is a permanent modification to the operating licenses for the power reactor facilities owned and operated by Entergy Operations, Inc. and remains effective and in place. Specifically, the portion of Element B that requires "...Entergy will conduct annual training emphasizing its intolerance of willful misconduct" remains in effect.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,



Signed by Hay, Michael
on 01/14/22

Michael C. Hay, Deputy Director
Division of Reactor Projects

Docket Nos. 05000313, 05000368,
05000382, 05000416, and 05000458

License Nos. DPR-51, NPF-6, NPF-29,
NPF-47, and NPF-38

Enclosure:
Inspection Reports 05000313/2021012,
05000368/2021012, 05000382/2021012,
05000416/2021010, and 05000458/2021011

cc: Mr. Joe Sullivan, Site Vice President
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Mr. John Ferrick, Site Vice President
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Mr. Robert Franssen, Site Vice President
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Dockets: 05000313, 05000368, 05000382, 05000416, and 05000458

Licenses: DPR-51, NPF-6, NPF-29, NPF-47, and NPF-38

Report Nos.: 05000313/2021012, 05000368/2021012, 05000382/2021012,
05000416/2021010, and 05000458/2021011

Licensee: Entergy Operations, Inc.

Facility: Entergy Headquarters (Echelon)

Dates: July 19 through December 6, 2021

Team Lead: C. Young, Senior Project Engineer

Inspectors: A. Sanchez, Senior Project Engineer

Approved By: Jason W. Kozal, Chief
Reactor Project Branch C
Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the performance of Entergy Operations, Inc., by conducting a follow-up inspection at the Grand Gulf Nuclear Station, the Waterford Steam Electric Station, and the River Bend Station in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

The inspection team reviewed the actions taken by the licensee to comply with the requirements specified in the Confirmatory Order (EA-17-132 and EA-17-153) dated March 12, 2018. The team also reviewed the licensee's actions to address the Notices of Violation listed below.

List of Findings and Violations

No findings were identified.

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
NOV	05000382/2018010-01	Failure to Perform Operator Rounds	92702	Closed
NOV	05000382/2018010-02	Falsification of Operator Rounds Records	92702	Closed
NOV	05000458/2019014-01	Failure to Perform Operator Rounds	92702	Closed
NOV	05000458/2019014-02	Falsification of Operator Rounds Records	92702	Closed
NOV	05000458/2020012-01	Falsification of Operator Qualification Cards	92702	Closed

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

92702 – Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders

Confirmatory Order Follow-up (1 Sample)

In November 2017, the NRC proposed three traditional enforcement apparent violations involving willfulness, which were associated with general employee training examination proctoring and falsification of non-licensed operator rounds at Grand Gulf Nuclear Station. An alternative dispute resolution (ADR) mediation was conducted on February 6, 2018. A Confirmatory Order (CO) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18072A191) (EA-17-132 and EA-17-153) was issued on March 12, 2018, which contained actions to be implemented fleet-wide by Entergy as agreed upon during ADR. These actions included commitments to conduct fleet-wide communications to employees at all Entergy sites, training, causal evaluations, and organizational health surveys.

On January 7-10, 2019, the NRC conducted an initial inspection using Inspection Procedure 92702 to assess the licensee's actions to comply with the CO, with emphasis on actions due to be completed by December 31, 2018, and reviewing samples of actions implemented at Entergy South plants. The team had several observations with respect to Entergy's implementation of the CO, as documented in NRC Inspection Report Nos. 05000313/2019014, 05000368/2019014, 05000382/2019012, 5000416/2019012, and 05000458/2019013 (ADAMS Accession No. ML19094B867).

On January 27-31, 2020, the NRC conducted a second interim inspection using Inspection Procedure 92702 to assess the licensee's actions to comply with the CO, with emphasis on actions due to be completed by December 31, 2019, and reviewing samples of actions implemented at Entergy South plants. The team had several observations with respect to Entergy's implementation of the CO but noted that Entergy had made progress in completing the actions required by the CO, as documented in NRC Inspection Report Nos. 05000313/2020010, 05000368/2020010, 05000382/2020011, 5000416/2020011, and 05000458/2020010 (ADAMS Accession No. ML20086J157).

These two previous inspections were conducted at the Entergy Nuclear headquarters facility in Jackson, MS, and included reviews of documentation of actions that had been implemented to comply with the CO. Following Entergy's notification to the NRC in January 2021 that the

implementation of the terms of the CO had been completed (ADAMS Accession No. ML21028A782), the NRC conducted a final follow-up inspection to assess whether the cumulative actions taken were adequate to comply with the requirements of the CO. This inspection was performed in two stages, in July 2021 and October 2021, at River Bend Station and Grand Gulf Nuclear Station, respectively. The team reviewed the actions taken by Entergy to address the deficiencies identified in the previous inspections as well as the completion of the remaining actions necessary to comply with the requirements of the CO. The approach taken by the inspection team for this final CO follow-up inspection differed somewhat from that of the 2019 and 2020 inspections, in order to assess the extent the actions taken have penetrated the organizations at the sites. The inspectors interviewed station employees to assess awareness of the actions taken to implement the requirements of the CO, how the actions have been received and implemented, and what the impacts at the stations have been.

.1 Communications with Site Workers

a. Element A

Within 1 month of the issuance date of the Confirmatory Order, a licensee senior executive at each Entergy site and the corporate nuclear headquarters will communicate with workers the circumstances leading to this Confirmatory Order, that willful violations will not be tolerated, and, as a result, Entergy will be undertaking efforts to confirm whether others are engaging in such conduct at any of its sites. The communication will stress the importance of procedural adherence, ensuring that documents are complete and accurate, and of potential consequences for engaging in willful violations. This message will be balanced with the recognition that people do make mistakes and when that happens, it is Entergy's expectation that its employees and contractors will identify and document issues accordingly.

1. Observations

During the 2020 CO follow-up inspection referenced above, the NRC documented the basis for concluding that the requirements of this Element have been met. During the 2021 inspection, the inspectors further assessed, via feedback from station employees, the efficacy of the licensee's communications with site workers.

.2 Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

b. Element B

Within 6 months of the completion of Element A, Entergy will conduct semiannual communications with workers in the Entergy fleet reemphasizing its intolerance of willful misconduct and updating the workforce on the status of compliance with this Confirmatory Order until December 31, 2019. Starting in 2020, Entergy will conduct annual training emphasizing its intolerance of willful misconduct.

1. Observations

During the 2019 and 2020 follow-up inspections, the NRC documented several observations with respect to implementation, tracking, and verifying effectiveness of communications and training required by Element B of the CO. During the 2021 inspection, the team reviewed the licensee's actions to address the previously identified issues. Specifically, the team reviewed the licensee's implementation of annual training to emphasize its intolerance of willful misconduct. This training continued to be implemented via a computer-based training (CBT) module, which was assigned and tracked for completion annually by all Entergy employees and contractors. In the 2020 inspection, the NRC determined that Entergy had effectively implemented the semiannual communications, but the inspection team did identify some discrepancies regarding the content of the annual CBT. The team verified that the licensee took actions to address observations documented in the 2020 inspection regarding some of the content of this training material. The team also provided some additional feedback regarding some of the content of this training material. The licensee entered these observations into the corrective action program to evaluate further revisions to the training material.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO. The CO requirement for annual training remains effective.

.2 Causal Evaluations and Corrective Actions to Deter Willful Violations

a. Element C

Within 6 months of the issuance date of the Confirmatory Order, Entergy will perform a causal evaluation, informed by site evaluations, to determine why prior fleet-wide corrective actions from confirmatory orders and other willful violations issued after January 1, 2009, were not fully successful in preventing or minimizing instances of willful misconduct across the fleet. The causal evaluation will include the following elements:

- 1. Problem identification**
- 2. Root cause, extent of condition (including an assessment of work groups that perform NRC regulated activities to determine whether those workers are engaging in willful misconduct), and extent of cause evaluation**
- 3. Corrective actions, with timeframe for their completion**
- 4. Safety culture attributes**

1. Observations

During the 2020 inspection, the NRC reviewed root cause corrective actions and extent-of-condition reviews that had been revised and expanded by the licensee in

response to previous inspection results. The team concluded that Entergy appropriately implemented the comments of the previous CO inspection into the root cause evaluation. The 2020 inspection documented an additional observation regarding the extent-of-condition reviews included in the root cause evaluation. Specifically, it was noted that the evaluation did not include consideration of auditing on-the-job training or job performance measures in the plant to ensure that the credited items on qualification cards were in fact performed, in addition to evaluating proctoring of training exams. The team reviewed the licensee's actions to address this observation, which included expanding the scope of recurring departmental integrity audits to include reviews of completed qualification cards for on-the-job training.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

b. Element E

For the Grand Gulf Nuclear Station, the evaluation described in Element C will address the three violations that are the subject of this ADR mediation session (refer to the NRC's letter, dated November 20, 2017).

1. Observations

During the 2020 inspection, the NRC reviewed the licensee's actions to revise the Grand Gulf site-specific root cause analysis to address issues identified in the previous inspection. The NRC concluded that the actions completed were appropriate to implement the requirements of the CO.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

c. Element F

Corrective actions identified as a result of the above evaluations will be implemented within 18 months of completion of the evaluation unless they involve a plant modification.

1. Observations

Through previous inspections, the NRC observed that Entergy initiated several corrective actions to address the root and contributing causes of the fleet-wide failure to prevent repeat instances of willful misconduct. These included procedure revisions, recurring departmental integrity audits, training, communications, and the initiation of the confidential corrective action program (CAP). In the 2020 inspection, the NRC documented several observations regarding the implementation of these actions.

The team reviewed the licensee's actions to further enhance the implementation of these corrective actions to address the previous observations. The team also continued efforts to continue to assess the licensee's implementation of key corrective actions such as departmental integrity audits and continued integration of the confidential CAP into the overall CAP with processes to identify and evaluate issues having potential wrongdoing aspects.

In previous inspections, the NRC noted that the confidential CAP had challenges with timeliness and quality of evaluations, as well as the sharing of operational experience between fleet sites for the types of issues resulting in willful misconduct. It was also previously determined that the confidential CAP did not have a provision to evaluate the issues for any trends or the impact of the volume of issues of willful misconduct. The team reviewed actions taken by the licensee to improve the effectiveness of the CAP to process issues involving potential wrongdoing.

The team also reviewed the licensee's continued implementation of integrity audit activities being conducted within many key departments at each of the stations in the fleet. The team reviewed implementing procedures and several samples of completed audit activities. The team also interviewed groups of employees from applicable departments at the sites to assess how the audits were being implemented and the impact they were having.

Overall, the team determined that the licensee's implementation of these corrective actions has been appropriate and effective. The team provided some observations regarding some improvement that could be made in the implementation of the departmental audits, such as communication/awareness of audit results and the inclusion of employee interviews in audit activities in addition to documentation reviews. The licensee entered these issues into the corrective action program to evaluate further enhancements to these processes.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

d. Element D

Entergy will identify specific criteria necessary to perform annual effectiveness reviews of the corrective actions. The annual effectiveness reviews will include insights from fleet and individual site performance. Entergy will perform annual

effectiveness reviews for 3 years. Entergy will modify its corrective actions, as needed, based on the results of the annual effectiveness reviews.

.1 Observations

The team determined that the licensee performed effectiveness reviews of corrective actions associated with the causal evaluations after sufficient time had elapsed following the implementation of the corrective actions such that measurable information regarding effectiveness would be available. The initial effectiveness reviews were performed by the licensee in May 2019.

In the licensee's January 2021 notification to the NRC, the licensee credited effectiveness reviews that were performed in May 2019, December 2019, and October 2020, to meet the requirement to perform annual effectiveness reviews for three years. Because the initial effectiveness review was performed in 2019, the inspectors determined that subsequent annual reviews should have been performed in 2020 and 2021. This is consistent with the inspection results documented in the 2020 CO follow-up inspection report, issued in March 2020, which stated that two additional rounds of effectiveness reviews were scheduled to be completed in 2020 and 2021, and that the third required annual effectiveness review would be performed in 2021. In response to this observation, the licensee proceeded with the performance of an additional effectiveness review, which was already in progress at the time of the initial phase of this inspection in July 2021, and completed that review in September 2021. On October 6, 2021, the licensee submitted a supplement to the January 2021 notification to the NRC pursuant to the requirement of Element L of the CO to credit the effectiveness review completed in 2021 to meet the requirement of Element D.

In the 2020 inspection, the NRC noted that eight unique root and contributing causes had been identified from among the root cause evaluations performed at the affected sites and corporate headquarters, for which effectiveness measures and reviews would be applicable for the associated corrective actions. The inspection team in 2020 observed that Entergy did not have effectiveness review actions in place for two of these eight causes. The team in 2020 also observed that Entergy's effectiveness reviews did not consider the quantity or type of new instances of wrongdoing issues identified through the fleet's confidential CAP as part of the determination of whether the corrective actions in total have had the desired effect.

The team reviewed the licensee's actions to address these issues with the performance of the subsequent effectiveness reviews completed in 2020 and 2021. Overall, the inspectors determined that the licensee's effectiveness reviews were performed adequately to ensure the corrective actions are achieving the desired outcomes.

.2 Conclusions

The inspectors determined that the timing of the performance of the three reviews that the licensee initially credited to satisfy the requirements of this Element were not consistent with the requirement for annual reviews and therefore not adequate for compliance with the Order. However, with the subsequent completion of an appropriate effectiveness review later in 2021, the inspectors determined that the actions ultimately taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

.3 Organizational Health Survey

a. Element G

Within 12 months of the issuance date of the Confirmatory Order, the Grand Gulf Nuclear Station, as well as all Entergy fleet sites, will conduct an organizational health survey developed by a third-party and designed, in part, to identify safety culture concerns that could contribute to willful misconduct.

Conclusions

During the 2020 inspection, the inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

b. Element H

A second organizational health survey will be conducted within 18 months of the survey in Element G.

Conclusions

During the 2020 inspection, the inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

c. Element I

If safety culture concerns are identified through the survey, Entergy will document and initiate corrective actions within 2 months of the concern identification to mitigate the likelihood of willful misconduct occurring.

Conclusions

During the 2020 inspection, the inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

.4 Notifications to the NRC When Actions Are Completed

a. Element J

Within 1 month of completion of Element C, Entergy will submit written notification to the appropriate Regional Administrators.

1. Observations

Based on the completion date of Element C of August 28, 2018, the written notification to the Regional Administrators was due on September 28, 2018. On September 27, 2018, Entergy submitted letters to the regional administrators documenting completion of Element C of the CO. Entergy Operations, Inc., submitted a timely and complete letter to comply with Element J of the CO.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

b. Element K

By December 31 of each calendar year from 2018 through 2020, Entergy will provide in writing to the appropriate regional administrators a summary of the actions implemented across the fleet as a result of this Confirmatory Order and the results of any effectiveness reviews performed.

1. Observations

On December 28, 2018, Entergy submitted letters to the NRC regional administrators summarizing the actions taken across the fleet and results of any effectiveness reviews performed during calendar year 2018.

On December 30, 2019, Entergy submitted the second required letters to the NRC regional administrators with a summary of actions completed and the results of the effectiveness reviews. The team noted that the letters were complete, timely, and contained self-critical results in the effectiveness reviews.

On December 17, 2020, Entergy submitted the third and final required annual notification to the NRC with a summary of actions completed and the results of the effectiveness reviews. The team noted that the notification was comprehensive and timely to meet the requirement of the CO.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

c. Element L

Upon completion, Entergy will submit in writing to the Region IV Regional Administrator its basis for concluding that the terms of the Confirmatory Order have been completed.

1. Observations

On January 28, 2021, the licensee submitted a letter pursuant to the requirement of this Element to provide its basis for concluding that the terms of the CO have been completed. As discussed above in the observations under Element D, on October 6, 2021, the licensee submitted a supplement to this notification to provide additional basis for concluding that Element D has been completed. The inspection team reviewed these letters and determined that, with the supplemental letter provided in October 2021, the licensee has provided a satisfactory basis for concluding that the terms of the CO have been completed.

2. Conclusions

The inspectors determined that the actions taken by the licensee to implement the requirements of this Element were adequate to comply with the CO.

Traditional Enforcement Violation Follow-up (5 Samples)

Following the identification of the issues involving willful violations of NRC requirements that led to the issuance of the CO, additional examples of similar issues were identified as a result of continuing investigative efforts conducted by the licensee. On April 5, 2019, the NRC issued two Notices of Violation to Entergy Operations, Inc., for instances of violations of NRC requirements that occurred at the Waterford Steam Electric Station (see NRC Inspection Report 05000382/2018010, ADAMS Accession No. ML19095B573). On April 19, 2019, the NRC issued two Notices of Violation to Entergy Operations, Inc., for instances of violations of NRC requirements that occurred at the River Bend Station (see NRC Inspection Report 05000458/2019014, ADAMS Accession No. ML19112A197). These four violations involved non-licensed operators (NLOs) deliberately failing to tour all required areas of their watch station and deliberately entering inaccurate information into the operator logs associated with these rounds. On September 29, 2020, the NRC issued a Notice of Violation to Entergy Operations, Inc., for violations of NRC requirements that occurred at the River Bend Station (see NRC Inspection Report 05000458/2020012, ADAMS Accession No. ML20273A235). This violation involved examples of training program records (qualification cards for operator trainees) that were falsified by NLOs. Additional examples of one of the violations previously issued in April 2019, which involved NLOs deliberately failing to tour all areas of their watchstation, were also identified in this inspection report.

The violations referenced above are listed below. As in the case of the issues that led to the issuance of the CO, all the violations referenced above involved issues that occurred prior to the issuance of the Confirmatory Order. In conjunction with reviewing the licensee's actions to comply with the requirements of the CO to address and deter willful violations of NRC requirements, such as these examples, the NRC reviewed the licensee's actions to address these violations specifically. The inspectors determined that the actions taken by the licensee to

address these violations, including causal evaluations and corrective actions, were adequate to address these issues.

- NOV 05000382/2018010-01, Failure to Perform Operator Rounds
- NOV 05000382/2018010-02, Falsification of Operator Rounds Records
- NOV 05000458/2019014-01, Failure to Perform Operator Rounds
- NOV 05000458/2019014-02, Falsification of Operator Rounds Records
- NOV 05000458/2020012-01, Falsification of Operator Qualification Cards

EXIT MEETINGS AND DEBRIEFS

On December 6, 2021, the team presented the inspection results to Mr. Bill Maguire and Ms. Kimberly Cook-Nelson, Chief Operating Officers, and other members of the Entergy Operations, Inc., staff. The inspectors confirmed that no proprietary information was retained or documented in this report.

DOCUMENTS REVIEWED

Condition Reports

CR-HQN-

2020-00710	2020-00711	2020-00033	2020-00180	2020-00197
2020-00198	2020-00201	2020-00205	2020-00206	2020-00207
2020-00208	2020-00214	2020-00269	2019-02903	2018-02142
2019-00052	2018-02750	2019-02427	2019-02825	2019-02641
2019-02372	2019-02904			

CR-GGN-

2019-05198	2018-10278	2019-02899	2019-06074	2019-09618
2019-06440	2020-04805	2020-07758	2020-04645	2020-06156
2020-08221	2020-00366	2020-05564	2020-01460	2020-07776
2020-08268	2021-01079			

CR-RBS-

2020-03687	2020-03599	2018-01917	2019-06023	2020-03886
2021-00640	2019-07137	2020-01264	2020-01535	

CR-WF3-

2018-01693	2019-03961
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Condition Reports Initiated During Inspection

CR-HQN-2021-

01178	01179	01180	01181	01182
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CR-RBS-2021-

04936	04937
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Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
EN-RP-152	Conduct of Radiation Protection	6
EN-OP-100	Operating Experience Program	27, 25
EN-LI-102	Corrective Action Program	44
EN-OP-115	Conduct of Operations	25
EN-OP-115-01	Control Room and Field Operator Rounds	4
EN-OP-117	Operations Assessment Resources	16

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
EN-FAP-OM-011	Corporate Oversight Model	15
EN-FAP-LI-013	Communications with Nuclear Regulatory Commission	4
EN-LI-104	Self-Assessment and Benchmark Process	15
EN-LI-106	NRC Correspondence	16
EN-LI-118	Casual Evaluation Process	34
EN-FAP-QV-401	Nuclear Independent Oversight Supplier Quality Assurance and Quality Control Assessments	1
EN-MA-105	Control of Measuring and Test Equipment	18
EN-NS-221	Security Organization, Standards and Expectations	13
EN-OE-100	Operating Experience Program	27
EN-QV-109	Audit Process	39
EN-QV-136	Nuclear Safety Culture Monitoring	21
EN-FAP-LI-017	Integrity Audits	2
EN-TQ-217	Examination Security	11
EN-TQ-214	Accredited Training Program Assessment Process	21

Miscellaneous

<u>Number</u>	<u>Title</u>	<u>Revision Date</u>
CNRO 2020-00023	Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K 2020 Summary	December 17, 2020
CNRO 2021-00002	Basis for Concluding the Terms of Confirmatory Order EA-17-132/EA-17-153 are Complete, Element L	January 28, 2021
CNRO 2021-00023	Supplement to CNRO-2021-00002, Basis for Concluding the Terms of Confirmatory Order EA-17-132/EA-17-153 are Complete, Element L	October 6, 2021
LO-HQNLO-2019-00013 CA-2	2019 Annual Effectiveness Review	

Procedures

<u>Number</u>	<u>Title</u>	<u>Revision</u>
LO-HQNLO-2019-00013 CA-3	2020 Annual Effectiveness Review	
LO-HQNLO-2019-00013 CA-4	2021 Annual Effectiveness Review	
LO-HQNLO-2020-00007	Pre-NRC Inspection Assessment for Confirmatory Order EA-17-132/EA-17-153	
LO-HQNLO-2020-00028 CA-6	2020 Training Completion Statistics	
TQF-214-CBTPROCTOR	Training Integrity Assessment	4

GRAND GULF NUCLEAR STATION – NRC CONFIRMATORY ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION REPORT 05000416/2021010; ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 – NRC CONFIRMATORY ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION REPORT 05000313/2021012 AND 05000368/2021012; RIVER BEND STATION – NRC CONFIRMATORY ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION REPORT 05000458/2021011; WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NRC CONFIRMATORY ORDER (EA-17-132 AND EA-17-153) FOLLOW-UP INSPECTION REPORT 05000382/2021012 – DATED JANUARY 14, 2022

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