



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

March 6, 2014

Mr. Anthony Vitale
Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT – PROBLEM IDENTIFICATION AND
RESOLUTION FOCUSED INSPECTION (REPORT 05000255/2014009)

Dear Mr. Vitale:

On February 26, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed a limited scope Problem Identification and Resolution (PI&R) inspection focused on assessment of your completion, and the effectiveness, of corrective actions to address NRC-identified deficiencies and Safety Conscious Work Environment (SCWE) aspects associated with two Greater-than-Green findings identified in 2011 at your Palisades Nuclear Plant. The enclosed report documents the results of this inspection, which the NRC discussed on February 26, 2014, with you and other members of your staff.

In September 2012, the NRC conducted a Supplemental Inspection in accordance with Inspection Procedure (IP) 95002 (NRC Inspection Report 05000255/2012011), for two Greater-than-Green findings identified in 2011. As documented in the inspection report, Safety Culture deficiencies, in part, contributed to these findings. In 2013, the NRC observed that although your efforts were generally on track with your Recovery Plan, the NRC received several concerns related to SCWE/Safety Culture. Collectively, these issues prompted questions into progress made in the plant's Recovery Plan regarding Safety Culture. Therefore, the NRC performed this limited scope PI&R inspection to continue assessment of Safety Culture at Palisades, focusing on SCWE. This inspection focused on departments where NRC observations indicated a potential negative trend in SCWE. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006. The NRC's Regulatory Issue Summary 2005-18, "Guidance for Establishing and Maintaining a Safety Conscious Work Environment," dated August 25, 2005, provides guidance for establishing and maintaining a SCWE at commercial nuclear plants.

The NRC inspectors observed that implementation of the SCWE program and overall performance related to identifying, evaluating, and resolving problems related to SCWE within the Mechanical Maintenance Work Group and Chemistry Department was acceptable.

The NRC identified a chilled work environment in the Security Department. The NRC concluded that staff within the Security Department perceived that: (1) recent actions to terminate the employment of two supervisors was in retaliation for their raised concerns; (2) the Corrective Action Program (CAP) was ineffective at addressing equipment and other concerns raised by Security staff; (3) the Security management was unresponsive to employees' concerns; and (4) the Employee Concerns Program (ECP) could not be relied upon to maintain employee confidentiality.

The NRC inspectors concluded that the Palisades management team did not recognize the extent of SCWE related concerns within the Security Department until they discussed the results of this inspection with you and your staff. In response to these issues, the NRC observed that actions have been developed and are being implemented to address these concerns. Specifically, you have instituted plans to improve communications and monitoring tools, as well as introduced an Ombudsman within the Security organization to address the identified weaknesses in the SCWE. Based on these actions, the NRC will maintain its oversight of the SCWE at Palisades through normal inspection activities. Through our baseline inspection effort, oversight will include a focus on the effective and timely completion of the corrective actions being implemented in response to the SCWE concerns identified in this report and continued improvement in the SCWE at Palisades. In addition, the NRC will review, as part of the May 2014 PI&R inspection, the effectiveness of actions taken to address the SCWE issues within the Security Department and in any additional Palisades identified groups with SCWE concerns; and any additional actions or changes in actions planned and taken to address the SCWE issues within the Security Department. Following the PI&R inspection, the NRC will determine if additional oversight with regards to Safety Culture is warranted.

The NRC will discuss the results of this inspection and the Safety Culture during the upcoming End-Of-Cycle assessment public meeting. The NRC requests that you be prepared to discuss: (1) the root cause of the chilled work environment within the Security Department, (2) your progress in addressing the SCWE concerns within the Security Department and (3) any additional actions planned and/or implemented to address the SCWE at Palisades. The NRC requested, and you agreed, to inform the employees of the Security Department, within 30 days of the date of your receipt of this inspection report, of: (1) the issuance, conclusions and content of this inspection report and (2) your planned actions to address the SCWE issues within the Security Department.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Anne T. Boland, Director
Division of Reactor Projects

Docket No. 50-255
License No. DPR-20

Enclosures:

Inspection Report 05000255/2014009

w/Attachments:

1. Supplemental Information
2. Palisades Security SCWE Action Plan

cc w/encl: Distribution via ListServ™

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-255
License No: DPR-20

Report No: 05000255/2014009

Licensee: Entergy Nuclear Operations, Inc.

Facility: Palisades Nuclear Plant

Location: Covert, MI

Dates: December 9, 2013 through February 26, 2014

Inspectors: G. Hansen, Physical Security Inspector, DRS
M. Keefe, Human Factors Specialist, NRR

Approved by: Anne T. Boland, Director
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

Inspection Report 05000255/2014009; 12/09/2013 – 02/26/2014; Palisades Nuclear Plant, Problem Identification and Resolution (PI&R) Focused Inspection.

The NRC conducted a limited scope PI&R inspection focused on an assessment of the SCWE at Palisades. This inspection was led by SCWE specialists from Region III and the Office of Nuclear Reactor Regulation (NRR) and focused on those departments in which previous observations and other information indicated a potential negative trend in the SCWE area.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006. The NRC's Regulatory Issue Summary 2005-18, "Guidance for Establishing and Maintaining a Safety Conscious Work Environment," dated August 25, 2005, provides guidance for establishing and maintaining a SCWE at commercial nuclear plants.

Safety Conscious Work Environment

On the basis of the samples selected for review, the inspectors concluded that although there were no significant SCWE related issues in the Mechanical Maintenance Work Group and Chemistry Department, a chilled work environment was present within the Security Department. In particular, the inspectors concluded that Security staff perceived that: (1) recent actions to terminate the employment of two supervisors was in retaliation for their raised concerns; (2) the Corrective Action Program (CAP) was ineffective at addressing equipment and other concerns raised by Security staff; (3) the Security management was unresponsive to employees' concerns; and (4) the Employee Concerns Program (ECP) could not be relied upon to maintain employee confidentiality.

To address the issues identified through this inspection, the licensee developed the Palisades Security SCWE Action Plan attached as Attachment 2 to this report.

A. NRC-Identified and Self-Revealed Findings

No items of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

.1 Assessment of Safety Conscious Work Environment (SCWE)

Background

In September 2012, the NRC conducted a Supplemental Inspection in accordance with IP 95002 (NRC Inspection Report 05000255/2012011) for two Greater-than-Green findings identified in 2011 at Palisades. As documented in the inspection report, Safety Culture deficiencies, in part, contributed to these findings. The licensee continued efforts in their Recovery Plan to address concerns stemming from the Yellow finding in 2011. While the licensee was generally on track with their plan, recent issues brought to the NRC's attention in 2013 had led to some questions on progress in addressing specific aspects of the site's Safety Culture, namely, the SCWE. In general, Safety Culture continued on a stable or improving trend for most departments, but staff concerns within the Mechanical Maintenance Work Group and Security Department had identified weaknesses that needed to be addressed. In Calendar Year (CY) 2013, the number of concerns raised to the NRC from onsite sources increased considerably over the number of concerns received in CY 2012. A majority of these concerns included at least some Safety Culture or SCWE aspects, and some directly alleged a chilled work environment.

As a result, a limited scope PI&R inspection was conducted that focused on an assessment of the SCWE at Palisades. This inspection was led by SCWE specialists from Region III and the Office of NRR and focused on those departments in which previous observations and other information indicated a potential negative trend in the SCWE area.

a. Inspection Scope

The inspectors assessed the licensee's SCWE through the review of the ECP implementing procedures, discussions with the manager of the ECP, interviews with personnel from various departments, and review of condition reports (CRs). The review was done to ensure there was a free flow of information and to determine if there was a reluctance to raise nuclear safety concerns.

The inspectors performed a focused inspection to independently evaluate the SCWE that existed within the Mechanical Maintenance Work Group, Chemistry Department, and Security Department at Palisades. The inspection included focus groups with personnel only assigned to the selected departments. In addition, the focus groups did not combine supervisors with craft personnel. The inspectors conducted focus groups with Non-Supervisory personnel from each of the identified groups/departments as follows: 10 participants from Mechanical Maintenance, 8 participants from Chemistry, and 29 participants from Security. The inspectors also conducted focus groups with a total of 4 first line supervisors from Mechanical Maintenance (3) and Chemistry (1) combined focus group; and 9 first line supervisors from Security. Additionally, the inspectors interviewed the ECP Manager, Maintenance Manager, Security Manager, Chemistry Manager, General Manager of Plant Operations (GMPO) and the Site Vice-President.

Other activities performed included a review of the licensee's ECP, including implementing procedures, and a sample of the ECP records (SCWE related concerns); the site's CAP, including implementing procedures and selected samples of CRs; and a review of site Safety Culture and SCWE surveys and assessments completed after the 2012 IP 95002 inspection conducted by the NRC during September 2012 (NRC Inspection Report 05000255/2012011).

b. Assessment

The inspectors concluded that the ECP was accessible to employees and effectively resolved employee issues. The site was performing periodic surveys in different organizations using anonymous computer questions to gauge staff attitudes. Managers took actions to address results that indicated a potential for improvement. The inspection activity verified that the licensee implemented programs designed to promote a SCWE in which individuals can raise issues or concerns without fear of retaliation. All participants in the focus groups conducted were aware of the definition of SCWE and the processes available for raising issues or concerns at Palisades, including verbally through supervisory or management staff, use of the CAP, use of the ECP, or through contact with the NRC. Results of the focus groups identified a positive SCWE in the Mechanical Maintenance Work Group and Chemistry Department; in that participants expressed a willingness to raise issues or concerns without fear of retaliation (specific details are provided in the observation section below). The results of the focus groups conducted for the Security Department revealed a chilled work environment in that all the Non-Supervisory Security Officer participants (29) stated they were not comfortable raising issues or concerns without fear of retaliation.

In summary, based on inspection interviews and insights obtained from Safety Culture and other relevant assessments, the conditions at the site were conducive to a SCWE within the Mechanical Maintenance Work Group and Chemistry Department. However, a chilled work environment was identified within the Security Department.

c. Observations

Mechanical Maintenance

The inspectors identified that the members of the Mechanical Maintenance Work Group (both Supervisors and Non-Supervisors) were familiar with the site's focus on promoting and encouraging a positive SCWE, and they expressed that the Site Vice-President specifically reinforced his commitment to a positive SCWE through his discussions at All Hands Meetings. Additionally, focus group participants stated this focus on promoting a positive SCWE was reinforced through discussions at daily briefs and through site training. The inspectors observed some improvements in Safety Culture within the Mechanical Maintenance Work Group as a result of the licensee's Recovery Plan. However, Non-Supervisors in Mechanical Maintenance stated this theme was not reinforced by the actions and communications of the Mechanical Maintenance Supervisors and the Maintenance Department Manager. Despite the disconnect in communications from senior management to the workers (an issue previously identified during the site's most recent IP 95002 inspection), the inspectors concluded that the workers were willing to raise issues and concerns without fear of retaliation either verbally to their supervisors; through the use of the CAP; or through the ECP.

A specific area of concern identified by Mechanical Maintenance Non-Supervisors was the perceived emphasis on production over safety demonstrated by the Outage Control Center (OCC) and Work Planning. Individuals identified instances where work orders did not always comply with site procedures, and when individuals questioned the work orders, they would receive feedback that they were wrong and they should follow the procedures in the work orders. Senior workers (more experienced) stated they were comfortable stopping work and questioning safety concerns, including the errors in work orders, and they would not continue work until the issue was resolved to ensure compliance with procedures. However, less experienced workers stated while they were comfortable raising issues and concerns, they may lack the knowledge required to identify work orders that failed to follow site procedures, which could result in performing maintenance activities that are not in compliance with site procedures.

Chemistry

The inspectors identified that both Supervisors and Non-Supervisors within the Chemistry Department were familiar with the site's focus on promoting and encouraging a positive SCWE through the Site Vice-President's discussions at All Hands Meetings; and they stated this message was reinforced by the Chemistry Department Manager and Supervisors during discussions at daily briefs and through site training. Non-Supervisors specifically identified the Department Manager and Supervisors as being actively engaged and communicating with the staff. Members of the department stated the site promoted raising issues and concerns without fear of retaliation either verbally, through the use of the CAP, or through the ECP. Additionally, members of the Chemistry Department stated that their use of the CAP was effective in resolving issues and concerns. The NRC inspectors observed improvement in Safety Culture within the Chemistry Department as a result of the licensee's Recovery Plan.

Security

Based on the feedback received during the initial Security Department focus group conducted with 12 Non-Supervisory Security force members, the NRC inspectors conducted an additional focus group to expand the number of participants and the response database in order to effectively formulate their assessment of the SCWE within the Palisades Security Department. The inclusion of the second focus group resulted in the participation of an additional 17 Non-Supervisory Security force members for a total of 29 Non-Supervisory Security force members representing a cross section of all four Security shifts at the Palisades Nuclear Plant. The inspectors noted that the focus group response to the inspectors' questions was not dominated by one or two individuals; it was the collective view of the focus group.

The inspectors identified that the Non-Supervisory members of the Security Department were familiar with the definition of SCWE and were aware of the programs available for raising issues or concerns, i.e., CAP, ECP, and notification of the NRC. However, the Security Non-Supervisors expressed reservations about raising issues or concerns to personnel in the position of Security Shift Supervisors (SSS) and above for fear that they would be the subject of retaliation. Additionally, they were not comfortable using the ECP in that they felt it did not maintain the confidentiality of the individual's identity upon raising an issue or concern through the ECP process.

Individuals stated that unless an issue or concern was associated with a significant nuclear safety issue or could result in a potential injury to personnel, they would not raise the issue or concern for fear of retaliation. Individuals highlighted the fact that in the past they would use the CAP to document issues or concerns, but had recently begun doing so anonymously and, in the future, would be hesitant to raise issues or concerns through the CAP.

Non-Supervisory personnel expressed a lack of trust, in department Supervisors and the Security Department Manager, specifically stating the Security Manager did not support them or advocate for them and was not receptive to their raising concerns. Additionally, the Security Officers stated when they raised issues or concerns with Security Operations Supervisors (SOSs) and above, they received responses that demonstrated a lack of support for identifying issues or concerns and created a hostile work environment. Individuals highlighted the fact that two supervisors, who they trusted and felt were proactive in raising issues and concerns on their behalf, recently had their employment terminated through the site's Human Capital Management (HCM) process. The termination of these two supervisors was perceived by Non-Supervisory Security personnel as retaliation against the supervisors for raising issues and concerns, and their termination had contributed to reluctance on the part of Security members (Non-Supervisory) to raise issues or concerns for fear of retaliation. Individuals specifically stated they feared retaliation if they raised issues or concerns and that there was a chilled work environment within the Security Department.

Non-Supervisors within the Security Department stated they had limited interaction with Security Management staff unless they were being disciplined. Individuals stated the Security Manager did conduct quarterly meetings with the Security staff which he stated he was required to do by Senior Site Management as a performance improvement requirement. However, despite having these meetings, individuals expressed there was a lack of information sharing by Security management staff and stated personnel within the Security Department in the positions of SOSs and above did not care about the issues or concerns identified by the Security Officers.

Participants in the SSS focus group were also familiar with the definition of SCWE, and were aware of the programs available for raising issues or concerns. They were comfortable raising issues or concerns without fear of retaliation and felt the site promoted and encouraged raising concerns.

The SSSs stated communication and interaction from the Security Manager and Security Superintendent was an area that needed improvement. One of the corrective actions implemented to address Safety Culture issues within the Security Department was a requirement for the Security Manager to have routine meetings with the Security crews. The NRC inspectors' interviews revealed that the meetings were started, but cancelled without an evaluation to determine if the meeting purpose had been accomplished. The Manager and Superintendent were not regular participants of shift briefings and the SSSs mentioned they hadn't had a meeting with the Security Manager since May 2013. However, the SSSs stated action was taken by management when the SSSs raised concerns. The SSSs also believed the recent termination of the two SSSs as part of the HCM process had an adverse impact on the Security Department. Specifically, management's failure to effectively communicate the intent of the HCM process and how it worked created concerns among Security Officers as to the uncertainty of their employment and who could be terminated in the future.

During 2013, the departmental “pulse” surveys conducted by the site indicated a positive work environment within the Security Department. However, when the inspectors reviewed the survey results, very low participation was noted. From the inspectors’ interviews, it appeared that Security Supervisors, who believed there was a positive work environment within the Security Department, were the primary participants in the surveys due to site management’s failure to encourage all members of the Security staff to participate in the survey. This lack of communication contributed to survey results that did not accurately reflect the collective view of the entire Security Department. Security Officers (Non-Supervisors) informed the inspectors that they were not notified of the surveys, not encouraged to take the surveys, and/or not provided the survey results.

Interviews with Palisades’ site senior management personnel revealed they believed the lack of trust and confidence in the Security management staff was limited to a few Security Officers. They were not aware that a significant number of the Security Officers were afraid to raise issues or concerns for fear of retaliation and that there was a chilled work environment within the Security Department at the Non-Supervisory employee level.

Senior management did acknowledge communication within the Security Department, specifically between Security management and Security Officers had been identified as an area for improvement. As part of the HCM process, a new Security Manager had been selected for Palisades and Site Senior Management intended to focus on improving communication and interaction between Security management and Security Officers.

In response to the NRC inspectors’ observations, the licensee developed the “Palisades Security SCWE Action Plan.” The licensee instituted plans to improve communications and monitoring tools, as well as introduced an Ombudsman within the Security organization to address the identified weaknesses in the SCWE. The Action Plan is provided as Attachment 2 to this report.

The Action Plan was designed to address the chilled work environment in the Security Department and was structured using four success criteria: (1) employees are free to raise concerns, (2) management effectively resolves issues and otherwise effectively responds to events that challenge the work environment, (3) the ECP remains effective, and (4) management effectively detects, prevents and manages concerns of retaliation. The Action Plan also contained multiple action items within each of the above performance success criteria. Each action item had an assigned owner and a specific completion due date.

Management Meetings

.1 Exit Meeting Summary

On February 26, 2014, the inspectors presented the inspection results to Mr. A. Vitale and other members of his staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

A. Vitale, Entergy/Site Vice-President
A. Williams, Entergy/General Manager Plant Operations
O. Gustafson, Entergy/Nuclear Safety Assurance Director
B. Dotson, Entergy/Licensing Specialist
T. Davis, Entergy/Licensing Specialist

Nuclear Regulatory Commission

A. Boland, Director, DRP Region III
E. Duncan, Chief, Branch 3, DRP Region III

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

PLANT PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
EN-EC-100	Guidelines for Implementation of the Employee Concerns	Rev. 7
EN-LI-102	Corrective Action Process	Rev. 17
EN-PL-187	Safety Conscious Work Environment (SCWE) Policy	Rev. 1
EN-PL-190	Maintaining a Strong Safety Culture	Rev. 2
EN-QV-136	Nuclear Safety Culture Monitoring	Rev. 1

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Condition Reports and Corrective Actions Associated with Safety Conscious Work Environment	June 2013 to December 2013

AUDITS, ASSESSMENTS AND SELF-ASSESSMENTS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Palisades Nuclear Safety Monitoring Panel Minutes and Report	October 17, 2013
	2012 Synergy Consulting Services Nuclear Safety Culture Survey Results	2012
LO-PLPLO-2013-05	2013 Nuclear Safety Culture Survey Action Plan	January 4, 2013
	Palisades Employee Concerns Program Chemistry Surveys	2013
	Palisades Employee Concerns Program Maintenance Department Surveys	2013
	Palisades Employee Concerns Program Security Department Surveys	2013

MISCELLANEOUS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Employee Concerns Files (12)	2013
	Entergy Employee Concerns Program Web Page	2013
	Entergy Ethics Live (Web Page); Reporting Violations and No Retaliation	2013

MISCELLANEOUS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Entergy PowerPoint Presentation; Nuclear Safety Culture Tailgate	December 2013
	Palisades Chemistry Department Organization Chart	December 2, 2013
	Palisades Mechanical Maintenance Work Group Organization Chart	December 2, 2013
	Palisades Safety Culture Timeline Review (PowerPoint Presentation)	Revision 0
	Palisades Security Department Organization Chart	December 2, 2013
	Varnum LLP PowerPoint Presentation; Discrimination, Retaliation and Harassment What Every Supervisor Needs to Know	October 22, 2013

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
CAP	Corrective Action Program
CR	Condition Report
CY	Calendar Year
DRS	Division of Reactor Safety
ECP	Employee Concerns Program
FSA	Focused Self-Assessment
GMPO	General Manager of Plant Operations
HCM	Human Capital Management
IP	Inspection Procedure
LO	Learning Organization
NCV	Non-Cited Violation
NRC	U.S. Nuclear Regulatory Commission
NRR	Nuclear Reactor Regulation
OCC	Outage Control Center
PI&R	Problem Identification and Resolution
SCWE	Safety Conscious Work Environment
SOS	Security Operations Supervisor
SSS	Security Shift Supervisor
WO	Work Order

Palisades Security SCWE Action Plan

1.0 Employees feel Free to Raise Concerns

Desired Outcome: An environment where Security department employees feel free to raise concerns without fear or harassment, intimidation, retaliation, or discrimination.

Current Status: NRC de-briefs noted focus groups of Non-Supervisory Security personnel (24 personnel) stated they feared retaliation for reporting security issues/concerns. The same focus groups reported they would report the condition in the Corrective Action Program (CAP) or through their management chain if it was significant to nuclear safety.

Gap: Non-Supervisory Security personnel believe two Supervisors were not selected during the Human Capital Management (HCM) initiative for raising concerns. This perception may create an environment where others in Security fear to raise concerns.

Performance Criteria: No statistically significant deviation in Condition Report generation rate.

Next Security Department SCWE survey indicates Security Department personnel feel free to raise concerns.

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
1.1.1	Communicate Senior Management expectation regarding fostering a SCWE and zero tolerance for harassment, retaliation, intimidation or discrimination.	12/31/2013
1.1.2	Communicate Senior Management expectation regarding fostering a SCWE and zero tolerance for harassment, retaliation, intimidation or discrimination.	3/31/2014
1.1.3	Communicate Senior Management expectation regarding fostering a SCWE and zero tolerance for harassment, retaliation, intimidation or discrimination.	6/30/2014

Palisades Security SCWE Action Plan

1.1.4	Communicate Senior Management expectation regarding fostering a SCWE and zero tolerance for harassment, retaliation, intimidation or discrimination.	9/30/2014
1.1.5	Communicate Senior Management expectation regarding fostering a SCWE and zero tolerance for harassment, retaliation, intimidation or discrimination.	12/31/2014
1.2.1	New Security Manager shall meet with each Security shift to reinforce the importance of maintaining a robust SCWE and Management's policy of Zero Tolerance for retaliation.	1/31/2014
1.2.2	New Security Manager shall meet with each Security shift to reinforce the importance of maintaining a robust SCWE and Management's policy of Zero Tolerance for retaliation.	5/30/2014
1.2.3	New Security Manager shall meet with each Security shift to reinforce the importance of maintaining a robust SCWE and Management's policy of Zero Tolerance for retaliation.	8/29/2014
1.2.4	New Security Manager shall meet with each Security shift to reinforce the importance of maintaining a robust SCWE and Management's policy of Zero Tolerance for retaliation.	12/31/2014
1.3.1	Each Security Supervisor and above to sign and post the annual SCWE Commitment letter. This commitment shall be affirmed by each supervisor and above to his/her direct reports.	2/28/2014
1.4.1	Develop presentation on Corrective Action Program (CAP) basics to refresh Security familiarity and comfort with raising issues via CAP. Include importance of raising concerns, how to generate Condition Reports (CRs) (including how to do so anonymously), characteristics of good CRs, and the importance of providing feedback to CR initiators.	2/28/2014
1.4.2	Provide CAP refresher presentation in face-to-face briefings with each Security team.	2/28/2014

Palisades Security SCWE Action Plan

1.4.3	Through interviews and direct observations, ensure Security Officers have easy access to computers for Paperless Condition Reporting System (PCRS). Document any potential barriers and initiate CRs to resolve, as appropriate.	2/28/2014
1.4.4	Address each Security Team at least annually on CAP / PI re: what we are doing at Palisades; how we manage CAP / PI; what our CAP / PI indicators “mean” or how we use them to manage the station.	12/31/2014
1.5.1	Request non-supervisory volunteer on each Security team to act as ombudsman (collateral duty) to provide Security staff with a trusted and familiar resource to raise their work environment issues.	3/31/2014
1.5.2	Develop & communicate responsibilities for ombudsman to include Security Management-ombudsman meeting frequency, alternative avenues for raising issues, and ombudsman responsibility to follow-up on issue resolution with teammates.	3/31/2014

2.0 Issue Resolution

Desired Outcome: Management effectively resolves issues and otherwise effectively responds to events that challenge the work environment.

Current Status: NRC de-briefs noted focus groups of Non-Supervisory Security personnel (24 personnel) did not believe CAP was effective in resolving their concerns, the majority of which were associated with fixing Security equipment.

Gap: Non-Supervisory Security personnel believe their concerns are not adequately resolved.

Performance Criteria: Next Security Department SCWE survey indicates Security Department personnel believe CAP is effective in resolving concerns.

Reduction in average age of Security CRs.

Palisades Security SCWE Action Plan

Improvement in resolution of Security equipment requiring compensatory actions as measured by throughput.

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
2.1.1	Security Manager to conduct 4th quarter meetings with each Security team to include discussions of Security concerns and issue resolution.	12/31/2013
2.1.2	Security Manager to conduct quarterly meetings with each Security team to include discussions of Security concerns and issue resolution.	3/31/2014
2.1.3	Security Manager to conduct quarterly meetings with each Security team to include discussions of Security concerns and issue resolution.	6/30/2014
2.1.4	Security Manager to conduct quarterly meetings with each Security team to include discussions of Security concerns and issue resolution.	9/30/2014
2.1.5	Security Manager to conduct quarterly meetings with each Security team to include discussions of Security concerns and issue resolution.	12/31/2014
2.2.1	Identify Security-initiated CRs from previous quarter (4Q13) that have been assigned Nuclear Safety Culture (NSC) trend codes as a result of passionate language or frustration AND assign an action for Security leadership to provide feedback to originator as to how and when issue will be resolved.	2/28/2014
2.3.1	Update Security Top 10 Issues board at least monthly to include current CR/WR/WO # and expected resolution date. Communicate updates to Security department. Closure of action must include initiation of new action to repeat due end of following month.	2/28/2014

Palisades Security SCWE Action Plan

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
2.4.1	Security Manager to conduct paired observations with Director, Regulatory & Performance Improvement of Security supervision advocacy for resolution of Security equipment issues at various T-week meetings (0630 P.O.D., T-2, T-6, etc.). Closure of action must include initiation of new action to repeat due end of following month.	3/31/2014

3.0 Employee Concerns Program (ECP)

Desired Outcome: The Employee Concerns Program remains effective.

Current Status: NRC de-briefs noted focus groups of Non-Supervisory Security personnel (24 personnel) stated they did not trust the ECP process.

Gap: Non-Supervisory Security personnel do not believe the ECP process will adequately resolve their concerns.

Performance Criteria: Next Security Department SCWE survey indicates Security Department personnel would use the ECP process.

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
3.1.1	ECP Coordinator to meet with individuals who raised concerns regarding HCM selection process to acknowledge receipt of concerns and discuss Senior Leadership actions taken through the ECP process.	12/13/2013
3.1.2	ECP Coordinator to meet with each Security team at least once per quarter to reinforce Employee Concerns options for raising issues.	3/31/2014
3.1.3	ECP Coordinator to meet with each Security team at least once per quarter to reinforce Employee Concerns options for raising issues.	6/30/2014

Palisades Security SCWE Action Plan

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
3.1.4	ECP Coordinator to meet with each Security team at least once per quarter to reinforce Employee Concerns options for raising issues.	9/30/2014
3.1.5	ECP Coordinator to meet with each Security team at least once per quarter to reinforce Employee Concerns options for raising issues.	12/31/2014

4.0 Performance Monitoring

Desired Outcome: Management effectively detects, prevents, and manages allegations of retaliation.

Current Status: Management has established site-wide Work Environment metrics and conducts Nuclear Safety Culture Monitoring in accordance with Entergy Fleet Procedure EN-QV-136.

Gap: NRC debrief noted there appears to be a chilled work environment in Security.

Performance Criteria: Improvement in metrics established by Performance Monitoring Action Plan.

Next Security Department SCWE survey demonstrates overall improvement in Security Department personnel responses.

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
4.1.1	Director, Regulatory & Performance Improvement to acknowledge concerns raised by individuals regarding HCM selection process.	12/2/2013
4.1.2	Ensure Executive Review Board (ERB) process (EN-HR-138) conducted for Security supervisors not selected during HCM Round 3.	12/6/2013

Palisades Security SCWE Action Plan

<i>Item</i>	<i>Action</i>	<i>Due Date</i>
4.1.3	Refer concerns regarding non-selection of two Security Supervisors during HCM Round 3 to external, independent investigator to determine whether retaliation was involved.	12/4/2013
4.2.1	Director, Regulatory & Performance Improvement to direct monthly backshift observations probe for and document positive or adverse examples of Security-related work environment issues.	1/19/2014
4.2.2	Director, Regulatory & Performance Improvement to develop Security department dashboard of SCWE-related indicators (e.g. CAP usage, anonymous CRs, CAP backlog, average age of CRs, ECP usage, NRC allegations from onsite sources, substantiated allegations, backlog &/or throughput measures for Security equipment issues, etc.).	2/28/2014
4.3.1	Director, Regulatory & Performance Improvement to meet with Site Vice-President monthly to discuss Palisades Security SCWE Action Plan status and metrics. Closure of action must include initiation of new action to repeat due end of following month.	2/28/2014
4.4.1	Ensure Senior Leadership and Security Management communicates importance of participation in next Security department SCWE survey (scheduled for June 2014)	6/6/2014

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Sincerely,

/RA/

Anne T. Boland, Director
Division of Reactor Projects

Docket No. 50-255
License No. DPR-20

Enclosure:

Inspection Report 05000255/2014009

w/Attachments:

1. Supplemental Information
2. Palisades Security SCWE Action Plan

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Letter to Anthony Vitale from Anne Boland dated March 6, 2014

SUBJECT: PALISADES NUCLEAR PLANT – PROBLEM IDENTIFICATION AND
RESOLUTION FOCUSED INSPECTION (REPORT 05000255/2014009)

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