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Entergy Services, Inc.

July 13, 2015

**Via e filing**

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: *Entergy Services, Inc.* Docket No. AC15-115-000

Dear Secretary Bose:

Entergy Services, Inc., on behalf of Entergy Nuclear Vermont Yankee, LLC ("ENVY"), submits the attached response to the Additional Information Request dated July 2, 2015 in the above-referenced docket.

Should you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

*/s/ Megan E. Vetula*

Megan E. Vetula

*Attorney for Entergy Services, Inc.*

Enclosures

cc: Gerald Williams  
Paul DeChario

## ADDITIONAL INFORMATION REQUEST

1. *In its application, Entergy Services, Inc. (ESI) describes the events leading to the potential premature destruction or loss of certain records recently discovered by the Company. Please provide the following:*

*a. Please provide a copy of the record retention policy which was followed from 2002 through 2007.*

Copies of the applicable records management and retention policies and procedures from 2002 through 2007 are listed below and are enclosed as Attachments A through O to this response. As explained in ESI's April 21, 2015 notice and accompanying statement, subsequent to the time ENVY acquired Vermont Yankee in 2002, Vermont Yankee "legacy" employees – who had been employed by the previous owner of the plant and continued on as Entergy Nuclear employees after the purchase – followed the previous owner's records retention procedure (see Attachment A). This procedure was revised several times (see Attachments B – F).

On April 29, 2005, a new Document Control and Records Management Activities Procedure became effective at Vermont Yankee (see Attachment G). This procedure was also revised several times but remained in effect at Vermont Yankee through December 2007 (see Attachments H – L).

As noted in Attachment I, in April 2006, procedure EN-AD-103 was revised to incorporate by reference the requirements of the Entergy Records Management and Retention System Policy. The Entergy Records Management and Retention system policy in effect at that time is provided as Attachment M. This policy was revised several times during 2006 and 2007 (see Attachments N and O).

- Attachment A: Vermont Yankee Nuclear Power Station Administrative Procedure AP 0807, Rev. 7, Records & Information Management Services Quality Assurance Records Management System, issued on Oct. 18, 2001.
- Attachment B: Vermont Yankee Nuclear Power Station Administrative Procedure AP 0807, Rev. 7, Records & Information Management Services Quality Assurance Records Management System, effective June 4, 2002.
- Attachment C: Vermont Yankee Nuclear Power Station Administrative Procedure AP 0807, Rev. 7, Records & Information Management Services Quality Assurance Records Management System, effective Aug. 1, 2002.
- Attachment D: Vermont Yankee Nuclear Power Station Administrative Procedure AP 0807, Rev. 7, Records & Information Management Services Quality Assurance Records Management System, effective March 27, 2003.
- Attachment E: Vermont Yankee Nuclear Power Station Administrative Procedure AP 0807, Rev. 7, Records & Information Management Services Quality Assurance Records Management System, effective June 19, 2003.

- Attachment F: Duke Engineering & Services Master Record Type Index, effective July 1998 (referenced in Attachment A).
- Attachment G: Entergy Nuclear Procedure EN-AD-103, Rev. 2, Document Control and Records Management Activities, effective April 29, 2005.
- Attachment H: Entergy Nuclear Procedure EN-AD-103, Rev. 3, Document Control and Records Management Activities, effective April 29, 2005 (approved Aug. 12, 2005).
- Attachment I: Entergy Nuclear Procedure EN-AD-103, Rev. 4, Document Control and Records Management Activities, effective April 28, 2006.
- Attachment J: Entergy Nuclear Procedure EN-AD-103, Rev. 5, Document Control and Records Management Activities, effective Nov. 13, 2006.
- Attachment K: Entergy Nuclear Procedure EN-AD-103, Rev. 6, Document Control and Records Management Activities, effective Sept. 13, 2007.
- Attachment L: Entergy Nuclear Procedure EN-AD-103, Rev. 7, Document Control and Records Management Activities, effective Dec. 19, 2007.
- Attachment M: Entergy System Records Management and Retention Policy, approved June 14, 2005.
- Attachment N: Entergy System Records Management and Retention Policy, updated Aug. 18, 2006.
- Attachment O: Entergy System Records Management and Retention Policy, updated Feb. 5, 2007.

*b. Please provide a copy of the record retention policy of ENVY in place in 2002.*

As noted above in the response to 1.a., Administrative Procedure AP 0807, Rev. 7 (see Attachment A), as modified by Attachments B and C, was the records retention procedure used at Vermont Yankee in 2002. The versions of the Entergy System Records Management and Retention Policy that were in effect in 2002 are provided as Attachments P and Q.

*c. Please explain if legacy employees of Vermont Yankee Nuclear Power Station (Vermont Yankee) were advised of the record retention policies of ENVY upon its acquisition of Vermont Yankee in 2002. If not, please explain why not. If so, please explain why the policy was not enforced.*

Subsequent to the permanent cessation of operations and initiation of decommissioning activities at Vermont Yankee, few “legacy” employees within the Records Management and Supply Chain organizations remain. ESI has been unable

to determine whether legacy employees were advised of the Entergy System Records Management and Retention Policy upon its acquisition of Vermont Yankee in 2002. As explained in ESI's April 21, 2015 notice and accompanying statement, and as noted above in the response to 1.a., Vermont Yankee employees were aware of, and continued to follow, the former plant owner's records retention procedure after ENVY acquired the plant in 2002 (see Attachment A). Although minor modifications were made to the procedure subsequent to the acquisition (see Attachments B – E), Administrative Procedure AP 0807, Rev. 7 remained in effect at Vermont Yankee until late April 2005.

- d. Please describe any efforts to obtain the missing contracts from any of the vendors providing services during the period in question and the results of those efforts.*

As explained in ESI's April 21, 2015 notice and accompanying certified statement, ESI has been unable to identify any inventory listing or database containing a description of those contracts. Accordingly, ESI is unable to determine which vendors to contact in an effort to obtain any contracts that may have been prematurely destroyed or discarded. ESI notes again that it submitted the April 21, 2015 notice out of an abundance of caution because it has been unable to determine whether any of the contracts were destroyed or lost prior to a prescribed retention period under 18 C.F.R. § 125.3(22)(b).

- e. Please describe what mitigation steps ENVY is performing to prevent a reoccurrence of this event.*

A Paperless Condition Reporting System (PCRS) is utilized for the purpose of raising and tracking NERC compliance concerns. PCRS provides a standard process to document, track and trend conditions and corrective actions to prevent reoccurrence. The potentially premature destruction or loss of contracts subject to the retention requirements of 18 C.F.R. § 125.2 has been documented in a Condition Report and entered into the Entergy Nuclear corrective action program. Notifications were made to the relevant Entergy corporate organizations. In addition, consistent with the corrective action program process, Vermont Yankee site management is evaluating this issue and will establish an appropriate corrective action plan to prevent a future reoccurrence during and subsequent to the ongoing decommissioning activities.

Finally, the following programmatic elements are also in place to prevent a future reoccurrence:

- Entergy's System-wide Records Management and Retention Policy sets forth the procedures regarding the management and retention of company records, including:
  - Classification of Records
  - Retention Period for Records
  - Use of Office of Records Reports
  - Maintenance of Records during their Retention Period
  - Reporting of lost or prematurely destroyed Records

- Proper disposition of Records

- Annually, all Supply Chain employees complete Annual Records Maintenance activities in accordance with the requirements set forth in the Records Management and Retention Policy.
- Supply Chain employees are required to complete “Managing Records” training on a triennial basis, which reinforces Entergy’s records management requirements.