

April 10, 2013

Eric J. Leeds  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Via Email [NRCExecSec@nrc.gov](mailto:NRCExecSec@nrc.gov)

**RE: PILGRIM WATCH REQUEST FOR EXTENSION TO REPLY TO PROPOSED  
DIRECTOR'S DECISION UNDER 10 CFR 2.206 [7590-01-P] - DOCKET No. 50-293**

On March 20, 2013, the Director of the Division of Operating Reactor Licensing provided Pilgrim Watch (hereinafter "PW") with the NRC staff's proposed Director's Decision and asked that Pilgrim Watch provide comments with respect to errors and issues not addressed in that proposed decision within thirty days.

On April 8, 2013, PW sent William Dean Region I Administrator a number of pertinent questions that were raised by the proposed decision, and to which PW needs answers properly to respond to the proposed decision. PW could not find answers to these questions in the proposed decision or on NRC's website, after many days of searching. It is not possible for PW to properly reply to the proposed decision, or for that matter for the Director to make a final decision, absent the information that these questions seek.

PW accordingly requests that the time allocated to respond to the proposed decision be extended for a reasonable period, e.g., 30 days, until after the questions sent to NRC are answered.

For your convenience, a copy of the questions as sent to William Dean on April 8, 2013 is attached.

Thank you for your consideration and I would appreciate a prompt reply for scheduling purposes.

Respectfully submitted,

Mary Lampert  
Pilgrim Watch, Director  
148 Washington Street, Duxbury MA 02332  
Tel. 781-934-0389/Email: [mary.lampert@comcast.net](mailto:mary.lampert@comcast.net)

## ATTACHMENT

### **Questions Regarding Pilgrim NPS' Non-EQ Inaccessible Cables & Wiring**

1. How many bunkers/manholes at Pilgrim contain non-EQ electric cables?
2. We understand that flood Protection Measures require inspection of underground bunkers/manholes subject to flooding that contain cables whose failure could result in a significant risk.
  - a. How many bunkers/manholes at Pilgrim require inspection pursuant to this guidance?
  - b. Provide documentation showing for each such bunker/manhole, the date, compliance and the results of each inspection.
  - c. Please list each monitoring technique and inspection method that Entergy has used to monitor and/or inspect to establish cable reliability, and identify any such technique or method that has not been used since January 2006.
3. Cable circuits can pass through several different operating environments over the length of their routing.
  - a. Are only manholes tested for submergence? If not, what areas are tested other than manholes, e.g., areas between manholes?
  - b. If only manholes are tested, please explain in detail and with specifics how this provides assurance that the areas between manholes are not and have not been submerged?
4. We understand that Entergy revised its cable-monitoring program to include condition-based (event-driven) inspections, e.g., as a result of heavy rain or flooding), including the verification of the dewatering system function. Please confirm that this is correct and when the revised program went into effect. Also please provide documentation including the date of each event-driven inspection, a description of the event that resulted in each inspection and for each event document and describe the inspection performed and any verification of dewatering system functions.
5. Please describe the dewatering system used at Pilgrim. What are its components and how does it work?
  - a. Do they now have water sensors in the manholes that trigger sump pumps and if they do not now have such a system, do they plan to in the future, and if so by what date will it be installed?

6. We understand that Entergy periodically performs surveillance testing of equipment to test the integrity of electric cables and identify degradation.
  - a) Please indicate how many surveillance tests were performed, and the date(s) on which each was performed;
  - b) Indicate which tests were on cable sections that were installed at Pilgrim (provide date that the section tested was installed at Pilgrim and its location); and which tests were on cable sections of the same type as those installed at Pilgrim.
  
7. In determining and/or reporting whether a cable is or has been submerged, what definition(s) does Entergy use for the term "submerged;" and identify all relevant NRC Regulations or other documents, of what definition(s) of "submerged" are or have been used by the NRC?
  
8. What methods described in Reg. Guide 1.218 (including each of the following) has Entergy used in its monitoring, and what such methods will it use or does it have any plan to use in the future? Please provide documentation, including dates, showing when each of the following tests were used with respect to any manhole, the results of each test, when each test was performed, and (for each manhole) when each such test is planned to be performed in the future.
  - a. Direct Current High-Potential Test
  - b. Step Voltage Test
  - c. Very Low Frequency Test
  - d. Illuminated Borescope Technique
  - e. Visual Inspection
  - f. Compressive Modulus Technique
  - g. Dielectric Loss Dissipation Factor Test
  - h. Insulation Resistance Test
  - i. Partial Discharge Test
  - j. Time Domain Refractory Test
  - k. Frequency Domain Refractory Test
  - l. Infrared Imaging Thermography Technique
  
9. To the best of your and the NRC's knowledge, do Entergy's operations at PNPS in any way differ from the methods and techniques described in Regulatory Guide 1.218? If so,
  - (a) please identify each and any way in which there is, or has been since January 2006, any difference between Entergy's operations and what is described in Regulatory Guide 1.218 and

(b) State the basis, if any, on which the NRC has determined that the methods and techniques used by Entergy are acceptable.

10. To the best of your and the NRC's knowledge, do Entergy's operations at PNPS meet the requirements of 10 CFR 50.49 and Appendix B Criterion XI? If not:
  - (a) Please identify each and any way in which there is, or has been since January 2006, any difference between Entergy's operations and what is described in 10 CFR 50.49 and Appendix B Criterion XI and
  - (b) State the basis, if any, on which the NRC has determined that the methods and techniques used by Entergy are acceptable.
11. To the best of your and the NRC's knowledge (a) which testing methods described in Entergy's Nuclear Management Manual EN-DC-346 have been used for condition monitoring and aging assessments for medium and low voltage cables; (b) when were they used; and (c) with respect to which cables? Please provide documentation for each of these tests, including results, reports and/or conclusions or recommendations.
12. Other than a letter from Entergy dated May 3, 2007 or December 9, 2007, what is the basis in NRC Integrated Inspection Reports 05000293/20112009 for the statement that failure of Cable A404CD, 4106 "appeared to be due to installation damage?"
13. With reference to Inspection Report 050000293/20111003, to your and the NRC's knowledge, what corrective actions has Entergy actually taken?
14. We have been informed that NRC inspectors will rotate through bunkers/manholes until all are inspected. What bunkers/manholes at PNPS have NRC inspectors inspected since 2007, and what bunkers/manholes at PNPS have not been inspected by NRC inspectors since 2007?
15. Specifically, what has the NRC done to verify statements in Entergy's letters of May 3, 2007 and December 9, 2007 that "the cause of the failure [of a cable] was due to installation damage, or in Entergy's letters of January 7, 2011 and May 16, 2011 that there have been no subsequent failures?
16. To the NRC's knowledge, since January 2007, how has Entergy in fact tested cables for degradation, and what were the results of each such test? Please provide any documentation relating to any such test.
17. We have been told that the NRC follows existing regulatory processes, policies and programs to verify that the Pilgrim PNPS properly implements approved programs. To the extent not specifically identified in response to one of the previous questions, please

specifically describe all actions that the NRC has undertaken since January 2007 to verify that the Pilgrim PNPS properly implements approved programs to ensure that the Licensees programs will adequately manage aging affects to give reasonable assurance that cables subject to moisture will be adequately managed during extended operation. Please also describe in detail exactly what the NRC means by "adequately manage."

18. To the extent not provided in response to one of the preceding questions, please specifically describe what actions the NRC has taken since January 2006, or will take during PNPS's "extended operation," to insure that all inaccessible cables at PNPS are, and throughout the expended period of operation, will be capable of performing all of their functions.

Thank you for your consideration and I would appreciate a prompt reply for scheduling purposes.

Respectfully submitted,

Mary Lampert  
Pilgrim Watch, Director  
148 Washington Street  
Duxbury MA 02332  
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Email:mary.lampert@comcast.net

**Remsburg, Kristy**

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**From:** Mary Lampert [mary.lampert@comcast.net]  
**Sent:** Wednesday, April 10, 2013 4:39 PM  
**To:** NRCExecSec Resource  
**Subject:** Pilgrim Watch Request for Extension Reply Proposed Director's Decision  
**Attachments:** 04.10.13 PW REQUEST EXTENSION REPLY PROPOSED DIRECTOR DECISION.pdf

Hello:

Please find attached : PILGRIM WATCH REQUEST FOR EXTENSION TO REPLY TO PROPOSED DIRECTOR'S DECISION UNDER 10 CFR 2.206 [7590-01-P] - DOCKET No. 50-293.

If you have difficulty downloading the attachment, please call Mary at 781-934-0389.

Thank you and enjoy the evening.

Mary