

**From:** Khan, Cheryl  
**Sent:** Thursday, March 19, 2015 4:03 PM  
**To:** Diane Turco  
**Cc:** McKinley, Raymond  
**Subject:** Pilgrim - Response

Cape Downwinders  
Pilgrim Coalition  
Cape Code Bay Watch  
Concerned Neighbors of Plymouth

Dear Ms. Turco:

I am responding to your February 2, 2015, e-mailed letter to Mr. Stephen Burns, NRC Chairman, Mr. Raymond McKinley, Branch Chief in the Region I Division of Reactor Projects and Mr. Neil Sheehan, Public Affairs Officer in Region I, requesting that Pilgrim be kept shut down based on issues discussed in your letter. This letter was sent on behalf of the four named groups above.

Your letter discussed, in part, a January 26, 2015, NRC inspection report as well as the events surrounding the January 27, 2015, Pilgrim shutdown during a severe winter storm.

The NRC's decision-making process for our oversight of licensee performance is in accordance with the Reactor Oversight Process (ROP) as described in NRC Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program." <http://pbadupws.nrc.gov/docs/ML1419/ML14198A117.pdf> Prior to issuance of the January 26, 2015, inspection report, Pilgrim was in the Degraded Cornerstone of the IMC 0305 Action Matrix due to two White performance indicators (PIs) in the Initiating Events cornerstone. As a result, a supplemental inspection was performed in late 2014 and the results of this inspection were documented in the January 26 inspection report. The inspectors determined that, in general, Entergy's problem identification, cause evaluation, and corrective action plans for the White PIs were adequate. However, they identified deficiencies regarding Entergy's execution of corrective actions as well as Entergy's understanding of some of the causes of the issues. As a result, the inspectors determined that Entergy's actions did not provide the assurance level required to meet all the inspection objectives and the NRC assigned two parallel White PI inspection findings. In addition, two findings of very low safety significance (Green) were identified during this inspection. The two parallel White PI inspection findings led to Pilgrim remaining in the Degraded Cornerstone of the Action Matrix as documented in the January 26 inspection report. This condition (i.e., two White inspection findings in the same cornerstone) warrants continued increased NRC oversight since licensee performance is outside the normal performance range, but still represents an acceptable level of performance. Cornerstone objectives are still met with minimal reduction in safety margin. This condition does not lead to an indicated need for the plant to remain shut down. The NRC will resume the supplemental inspection at Pilgrim when the licensee notifies the NRC of their readiness. In addition, the NRC will continue to assess the effectiveness and sustainability of the licensee's efforts to address challenges in corrective action program (CAP) implementation during the next NRC biennial problem identification and resolution inspection, scheduled for August 2015.

Your February 2, 2015, letter also discussed the January 27, 2015, plant shutdown and equipment issues experienced during the shutdown, including the partial loss of off-site power. As a result of this shutdown and related equipment issues, the NRC launched a special inspection on February 2. The event and related issues are being evaluated and the results of the NRC inspection will be made publicly available within 45 days of the inspection's completion. In accordance with the ROP, the inspection results will be factored into the NRC's assessment of Pilgrim and their position in the Action Matrix. Appropriate follow-up actions will be determined at that time. Please keep in mind that although equipment issues were experienced during the shutdown, the reactor was safely shut down.

Your letter also identified concerns with the licensee's decision not to shut down prior to the severe winter storm. All nuclear power plants have procedures that dictate how they have to respond to a significant storm. For example, limits on wind speed are defined in the plants' Emergency Action Levels and the Updated Final Safety Analysis Report. The plants' Technical Specifications do not contain explicit limits with respect to wind speed, but the operability of the associated systems can be impacted by external events which may require a plant shutdown. Prior to the winter storm, the licensee evaluated a number of options including a pre-emptive shutdown. There was potential for reduced grid reliability associated with shutting down pre-emptively, and there was a plant trip risk associated with operating during the storm. The licensee evaluated their options and made an informed decision. The decision to continue to operate was within the conditions of their license. We were aware of their considerations.

During a subsequent storm, in February 2015, the licensee factored in additional considerations based on lessons learned from the earlier winter storm. In this case, they voluntarily decided to shut down before the storm. It was not an action sought or required by the NRC. With that said, given the forecast intensity of this particular storm, and in light of other challenges Pilgrim has experienced during the prior severe winter storm, this planned and orderly shutdown in advance of the approaching blizzard was a prudent precautionary action.

You identified a concern with the ability to implement the emergency response plans, if needed, during the January winter storm. The NRC works in partnership with the Federal Emergency Management Agency (FEMA) for ensuring the onsite and offsite emergency plans are adequate. The regulation of onsite emergency response falls within the NRC's purview, while the offsite oversight responsibility rests with FEMA. The Commonwealth of Massachusetts has the overall authority for making protective action decisions (sheltering, evacuation, etc.) for ensuring the safety of their public during a radiological event. Should at any time there be a potential challenge to the offsite infrastructure within the 10 mile emergency planning zone (EPZ), whether in a radiological or natural disaster (e.g. severe weather event), the NRC relies on FEMA in agreement with the State to provide a reasonable assurance finding that the State's plan, including the availability of evacuation routes, is adequate for protecting the public health and safety. During the recent Massachusetts snow storms, the NRC was in continuous contact with FEMA and the Massachusetts Emergency Management Agency (MEMA). In consultation with town emergency management agencies within the 10 mile EPZ, the State and FEMA provided the NRC a reasonable assurance finding that the State was capable of implementing their emergency plan, including evacuation. For additional information regarding the State's process for determining the adequacy of the EPZ, you may contact the Massachusetts Emergency Management Agency at (508) 820-2000.

With respect to the Jones River Watershed Association's (JRWA) Elevation Analysis which was recently submitted to the NRC, the NRC intends to continue with the established process and

not delay the licensee's submittal of the flood hazard reevaluation report for Pilgrim. The information available to the NRC indicates Entergy has been responding appropriately to the NRC's March 12, 2012, Request for Information and associated guidance regarding its flooding reanalysis. The JWRA information that was submitted to the NRC was forwarded to the technical and project management staff who will be reviewing the licensee's submittal. If the NRC staff identifies any technical inadequacies or regulatory concerns in its review of Pilgrim's submitted flood hazard reevaluation report, then the NRC will address them through appropriate regulatory processes. Also, in response to one of your questions, during the winter storm in January, there was no impact to the site from storm surge and wave action.

Lastly, with respect to your questions associated with the FLEX plan, the NRC review and evaluation of Entergy's plan is still ongoing. The questions you raised in your letter will be forwarded to the technical and project management staff who are reviewing Entergy's submittal.

Thank you for making us aware of your concerns. If you have any additional questions, please contact Ray McKinley ([Raymond.McKinley@nrc.gov](mailto:Raymond.McKinley@nrc.gov), 610-337-5150).

Cheryl Khan

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