



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

John A. Dent Jr.
Site Vice President

June 30, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Pilgrim Nuclear Power Station's Second Six-Month Status Report in
Response to June 6, 2013 Commission Order Modifying Licenses with
Regard to Reliable Hardened Containment Vents Capable of Operation
Under Severe Accident Conditions (Order Number EA-13-109)

Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

REFERENCES:

1. NRC Order Number EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated June 6, 2013 (Accession No. ML13143A334).
2. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
3. NRC Endorsement of Industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
4. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013.
5. Entergy's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2014.

LETTER NUMBER 2.15.046

Dear Sir or Madam:

On June 6, 2013, the U. S. Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Entergy Nuclear Operations, Inc. (Entergy). Reference 1 was immediately effective and directs Entergy to install a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris. Specific requirements are outlined in Attachment 2 of Reference 1.

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Reference 1 required submission of a phase 1 overall integrated plan pursuant to Section IV, Condition D. Reference 3 endorses industry guidance document NEI 13-02, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 2. Reference 5 provided the Entergy overall integrated plan.

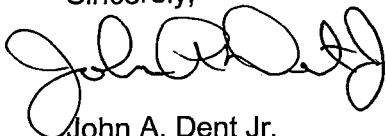
Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. References 2 and 4 provide direction regarding the content of the status reports. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition D, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

This letter contains no new regulatory commitments.

Should you have any questions concerning the content of this letter, please contact Mr. Everett (Chip) Perkins Jr. at (508) 830-8323.

I declare under penalty of perjury that the foregoing is true and correct; executed on June 30, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Dent Jr.', written over a horizontal line.

John A. Dent Jr.
Site Vice President

JAD/rmb

Attachment: Pilgrim Nuclear Power Station's Second Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

cc: Mr. Daniel H. Dorman
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NRC Resident Inspector
Pilgrim Nuclear Power Station

ATTACHMENT

To

PNPS Letter 2.15.046

**Pilgrim Nuclear Power Station's
Second Six-Month Status Report in Response to June 6, 2013 Commission Order
Modifying Licenses with Regard to Reliable Hardened Containment Vents
Capable of Operation Under Severe Accident Conditions
(Order Number EA-13-109)**

Attachment

PNPS Letter 2.15.046

Pilgrim Nuclear Power Station's Second Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

1 Introduction

Pilgrim Nuclear Power Station (PNPS) developed an Overall Integrated Plan (OIP) (Reference 1 in Section 8), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Phase 1 OIP and the First Six Month Status Report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of June 30, 2015.

- The Overall Integrated Plan was issued on June 30, 2014.
- The First Six Month Status Report was issued on December 16, 2014
- The Interim Staff Evaluation (ISE) was received on March 24, 2015

3 Milestone Schedule Status

The following provides an update to Part 5 of the OIP. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Comments
Complete HCVS Gap Analysis	June 2014	Complete	
Submit Overall Integrated Plan	June 2014	Complete	
Submit 6 Month Status Report	December 2014	Complete	
Submit 6 Month Status Report	June 2015	Complete	
Submit 6 Month Status Report	December 2015	Not Started	Simultaneous with Phase 2 OIP
Design Engineering On-site/Complete	December 2015	Started	
Submit 6 Month Status Report	June 2016	Not Started	
Operations Procedure Changes Developed	December 2016	Not Started	

Milestone	Target Completion Date	Activity Status	Comments
Site Specific Maintenance Procedure Developed	December 2016	Not Started	
Submit 6 Month Status Report	December 2016	Not Started	
Training Complete	December 2016	Not Started	
Implementation Outage	March 2017	Not Started	
Procedure Changes Active	March 2017	Not Started	
Walk Through Demonstration/Functional Test	March 2017	Not Started	
Submit Completion Report	June 2017	Not Started	

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Phase 1 OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

PNPS expects to comply with the order implementation date and design requirements and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

PNPS has received the Interim Staff Evaluation (ISE) with Open Items identified (Reference 7). Open Items will be addressed during completion of final design and provided in a future OIP update.

7 Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8 References

The following references support the updates to the Phase 1 OIP described in this enclosure.

1. Pilgrim's Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2014.
2. NRC Order Number EA-13-109, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions" dated June 6, 2013.
3. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013.
4. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
5. NRC Endorsement of Industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
6. Nuclear Regulatory Commission Audits of Licensee Responses to Phase 1 of Order EA-13-109 to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Accession No. ML14126A545).
7. Nuclear Regulatory Commission Interim Staff Evaluation dated March 24, 2015, "Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 1 of Order EA-13-109 (Severe Accident Capable Hardened Vents). (Accession No. ML15043A754) (PNPS Letter 1.15.016).