



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

August 4, 2015

Ms. Mary Lampert
Pilgrim Watch
148 Washington Street
Duxbury, MA 02332

Dear Ms. Lampert:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your June 24, 2015, email which referred to NRC 95002 Supplemental Follow-up Inspection Report 05000293/2015009, dated June 18, 2015. Specifically, you requested that the report be withdrawn and a new report be issued for reasons detailed in your email attachment.

You raised concerns with regards to the clarity of the documentation in the 95002 Supplemental Follow-up Inspection Report related to the effectiveness reviews of the root cause evaluation for the 2013 winter storm scam. I would agree that the documentation is somewhat confusing, so I will clarify the conclusion of that portion (Section 4OA4.02.03.b, page 7) of the inspection report. During the first 95002 inspection, the team noted that two effectiveness reviews were identified by Entergy Nuclear Operations, Inc. (Entergy) for the root cause evaluation. At the time of the inspection, only one of the two effectiveness reviews had been completed which was not in accordance with Entergy's corrective action process requirements. The failure to perform the second effectiveness review was discussed in Section 4OA4.02.01.2.2 (page 36) of the 95002 Supplemental Inspection Report (05000293/2014008) and was cited as an example for the finding documented in Section 4OA4.02.03.f (page 39) related to the failure to implement corrective action program procedural requirements. The second 95002 (follow-up) inspection verified that the second effectiveness review was completed by Entergy with supportable conclusions.

You provided comments on the 95002 Supplemental Follow-up Inspection Report related to corrective action program observations discussed in Section 4OA4.02.01 (pages 5-6). For most NRC inspections, observations and issues determined to be minor are not normally documented. For inspections such as the biennial problem identification and resolution program inspection and the 95002 inspection, observations and minor issues are documented in order to provide insights into corrective action program effectiveness. These insights are used by the NRC in the assessment of licensee performance because of the importance of having an effective corrective action program. The observations made by the team were determined to not be violations of NRC regulatory requirements as discussed in that section of the report. The standard for satisfactorily completing a 95002 inspection is that no significant weaknesses are identified. The observations made by the 95002 follow-up inspection team were minor in nature.

You also provided comments on a number of switchyard related items including insulator preventive maintenance and testing and actions to address icing in the switchyard during winter storms. Entergy did make a number of reasonable changes to plant procedures to address switchyard and plant reliability during winter storms. Entergy used lessons learned from the

2013 and 2015 winter storms to implement actions before, during, and after blizzard conditions are experienced on site which should improve switchyard reliability. However, because the susceptibility of a loss of offsite power cannot be completely eliminated, Entergy revised Pilgrim Nuclear Power Station (Pilgrim) operating procedures to require the plant to be shut down if blizzard conditions are predicted on site. In addition, Entergy is evaluating design changes to further improve switchyard reliability. These actions have been entered into Entergy's correction action program. The NRC will continue to follow-up on these items through the inspection process and monitor their effectiveness at reducing the number of initiating events which are continuously tracked through Reactor Oversight Process performance indicators.

You also requested that the NRC Special Inspection Report 05000293/2015007, dated May 27, 2015, and NRC 95002 Supplemental Follow-up Inspection Report 05000293/2015009, dated June 18, 2015, be revised to explicitly state that during Winter Storm Juno there was no reasonable assurance that the State of Massachusetts was capable of implementing their emergency plan. There was no discussion of whether the emergency plan was capable of being implemented during the storm in those reports because assessing this capability was outside the scope of the two associated inspections. Your request was also included in your Title 10 of the *Code of Federal Regulations* (10 CFR) 2.206 petition to modify, suspend, or take any other action to the operating license of Pilgrim, dated June 11, 2015. Your petition is currently being processed in the petition review process. The resolution of your petition will address this request.

Thank you for your continued interest in these matters.

Sincerely,

/RA/

Raymond R. McKinley, Chief
Reactor Projects Branch 5
Division of Reactor Projects

2013 and 2015 winter storms to implement actions before, during, and after blizzard conditions are experienced on site which should improve switchyard reliability. However, because the susceptibility of a loss of offsite power cannot be completely eliminated, Entergy revised Pilgrim Nuclear Power Station (Pilgrim) operating procedures to require the plant to be shut down if blizzard conditions are predicted on site. In addition, Entergy is evaluating design changes to further improve switchyard reliability. These actions have been entered into Entergy's correction action program. The NRC will continue to follow-up on these items through the inspection process and monitor their effectiveness at reducing the number of initiating events which are continuously tracked through Reactor Oversight Process performance indicators.

You also requested that the NRC Special Inspection Report 05000293/2015007, dated May 27, 2015, and NRC 95002 Supplemental Follow-up Inspection Report 05000293/2015009, dated June 18, 2015, be revised to explicitly state that during Winter Storm Juno there was no reasonable assurance that the State of Massachusetts was capable of implementing their emergency plan. There was no discussion of whether the emergency plan was capable of being implemented during the storm in those reports because assessing this capability was outside the scope of the two associated inspections. Your request was also included in your Title 10 of the *Code of Federal Regulations* (10 CFR) 2.206 petition to modify, suspend, or take any other action to the operating license of Pilgrim, dated June 11, 2015. Your petition is currently being processed in the petition review process. The resolution of your petition will address this request.

Thank you for your continued interest in these matters.

Sincerely,

/RA/

Raymond R. McKinley, Chief
Reactor Projects Branch 5
Division of Reactor Projects

DOCUMENT NAME: \\nrc.gov\nrc\R1\Office\DRP\BRANCH5\Letters\Response Letter to Lampert 6-24-15.doc
ADAMS Accession No. **ML15217A270**

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRP	RI/DRP			
NAME	EDiPaolo/EMD	RMcKinley/RRM			
DATE	8/3/15	8/3/15			

OFFICIAL RECORD COPY