



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

October 30, 2015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

SUBJECT: Reply to a Notice of Violation

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

REFERENCE: NRC Letter to Entergy, "Pilgrim Nuclear Power Station – Problem Identification and Resolution Inspection Report 05000293/2015010 and Notices of Violation," dated October 1, 2015

LETTER NUMBER: 2.15.077

Dear Sir or Madam,

This letter provides the information requested in the Notice of Violation received at Pilgrim Nuclear Power Station in the above referenced letter. The requested information is provided in the Attachment to this letter.

This letter contains no commitments.

Should you have any questions concerning the content of this letter or require additional information, please contact me at (508) 830-8227.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna Calabrese".

Donna Calabrese,  
Manager, Emergency Preparedness

DC/mew

Attachment: Reply to a Notice of Violation (2 Pages)

IED1  
NRR



PNPS Letter 2.15.077

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cc:

Mr. Daniel H. Dorman  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-1415

NRC Senior Resident Inspector  
Pilgrim Nuclear Power Station

**Attachment**

**To**

**PNPS Letter 2.15.077**

**Reply to a Notice of Violation**

**(2 Pages)**

**Reply to Notice of Violation**

During an NRC inspection conducted from August 3 through 20, 2015, a violation of NRC requirements was identified. The violation is associated with the following requirement:

Violation No.	Description
2015010-02	<p>10 CFR 50.54(q)(2) requires, in part, that a holder of a nuclear power reactor operating license shall follow and maintain the effectiveness of an emergency plan that meets the requirements in Appendix E to this part, and the planning standards of 10 CFR 50.47(b).</p> <p>10 CFR 50.47(b) (8) requires, in part, that adequate equipment to support the emergency response are provided and maintained.</p> <p>Contrary to the above, since December 2011, Entergy did not follow and maintain the effectiveness of the Pilgrim Emergency Plan to meet the requirement that adequate equipment to support the emergency response was provided and maintained. Specifically, in December 2011, Entergy cancelled preventive maintenance of the 160' back-up meteorological tower, and that tower became non-functional. As a result, on eight occasions between March 18, 2012, and August 15, 2015, when the 220' primary meteorological tower was also non-functional for various reasons, Pilgrim did not have instrumentation available on either tower for continuous reading of the wind speed, wind direction, air temperature, and delta air temperature.</p>

**VIOLATION 2015010-02 – Failure to Maintain Station Meteorological Towers**

**Reason for the Violation**

During the 2015 NRC Problem Identification and Resolution (PI&R) Inspection a Green Notice of Violation (NOV) was issued for failure to follow and maintain the effectiveness of the Pilgrim Emergency Plan to meet the requirement that adequate equipment to support the emergency response was provided and maintained. The failure to properly maintain the 220' tower and restore or replace the 160' tower was previously identified in Non-Cited Violation (NCV) 2013008-02 issued for violation of 10 CFR 50.54(q)(2). The 2015 PI&R inspection determined Entergy did not address the adverse condition within a reasonable period of time after the NRC documented the initial Green NCV.

An organizational performance gap existed in that the meteorological towers performance monitoring and issue resolution did not have a single point of ownership, such that the priority to resolve issues was not properly evaluated to ensure timely resolution. As a consequence, previously identified corrective actions were untimely with inadequate organizational engagement to monitor performance or resolve issues.

**Corrective steps that have been taken and the results achieved**

The Emergency Preparedness Department (EPD) has taken ownership of the meteorological towers. The EPD obtained the necessary project funding, engineering design support, and installation support to install the replacement 160' tower. The tower structure is in place. The meteorological instruments have been installed. Post installation testing of the instruments and data communication system is in progress.

The Regulatory Assurance Weekly Report was modified to include a "deadline" date for completion of corrective actions associated with regulatory findings. Additionally, a Regulatory Assurance review has been incorporated as a required element for corrective actions associated with NRC Findings.

**Corrective steps that will be taken**

Post installation testing of the new 160' tower will be completed and the tower placed in service.

**Date when full compliance will be achieved**

The current schedule for resolution is on or before December 16, 2015, at which time full compliance to the NRC requirements will be achieved.