

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

John A Dent, Jr. Site Vice President

December 17, 2015

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

SUBJECT: Pilgrim Nuclear Power Station's Commitment to Maintain Severe Accident Management Guidelines

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

LETTER NUMBER 2.15.085

Dear Sir or Madam:

The Nuclear Energy Institute Nuclear Strategic Issues Advisory Committee recently approved an industry initiative to implement and maintain Severe Accident Management Guidelines (SAMGs). This letter establishes commitments related to SAMGs for Pilgrim Nuclear Power Station (PNPS). These guidelines would be used by emergency response personnel during accident conditions that progress beyond the mitigation capabilities described in Emergency Operating Procedures. SAMG strategies are intended to arrest the progression of fuel damage, maintain the capability of the containment as long as possible, and minimize radiological releases.

The new SAMG commitments are listed in the enclosed Attachment.

It is expected that NRC staff personnel will conduct periodic inspection of our SAMGs and performance deficiencies, if any, will be assessed using the Reactor Oversight Process. We also understand that inspection activities will not extend to NRC staff review and approval of SAMG strategies, or the use of equipment described in the SAMGs.

Please note that Pilgrim Nuclear Power Station submitted a notification of permanent cessation of power operations for no later than June 1, 2019 to the NRC staff on November 10, 2015 via PNPS Letter No. 2.15.080. The exact timing of the shutdown is expected to be decided in the first half of 2016 and could impact the commitment to maintain SAMGs. Once the official decision is made further communications with the NRC staff will take place.

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

HOOI

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I declare under penalty of perjury that the foregoing is true and correct. Executed on December 17, 2015.

Sincerely,

John A. Dent, Jr.

Site Vice President

JAD/rmb

Attachment: Entergy Pilgrim Nuclear Power Station List of Regulatory Commitments

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

U. S. Nuclear Regulatory Commission Director, Office of Nuclear Reactor Regulation Washington, DC 20555-0001

Ms. Booma Venkataraman, Project Manager Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Mail Stop O-8C2A Washington, DC 20555-0001

Mr. John Giarrusso, Jr. Planning, Nuclear & Preparedness Section Chief Mass. Emergency Management Agency 400 Worcester Road Framingham, MA 01702 Attachment to

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Entergy Pilgrim Nuclear Power Station List of Regulatory Commitments

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List of Regulatory Commitments

The following table identifies those actions committed to by PNPS in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check One)		SCHEDULED COMPLETION DATE
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
PNPS will consider the site SAMGs within plant configuration management processes in order to ensure that the SAMGs reflect changes to the facility over time.		Х	October 31, 2016
Commitment # A-16868			
PNPS will update the site SAMGs to revision 3 of the BWROG generic severe accident guidelines (published February, 2013). Commitment # A-16869	x		June 30, 2017
PNPS will update the site SAMGs to future revisions of the BWROG generic severe accident technical guidelines, and the SAMGs will be integrated with other emergency response guideline sets and symptom-based Emergency Operating Procedures, and validated, using the guidance in NEI 14-01, Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents. ¹ Commitment # A-16870		X	Within 2 refueling outages or 3 years of the publication date of the guidelines, whichever is greater

1 - Use of NEI 14-01 guidance for BWR sites begins with the update to revision 4 of the BWROG generic severe accident guidelines.