



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

November 9, 2016

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

Dear Ms. Lampert:

As the designated manager for the upcoming team inspection at Pilgrim Station, I am responding to your October 4, 2016, and October 26, 2016, emails to Messrs. William Dean and Daniel Dorman regarding that inspection. The emails included the following requests: 1) that the inspection focus on some recent events that were cited in your letter in order to identify the underlying problems that led to these events and to ensure that inspection activities are not limited to a review of condition reports; 2) that the inspection team assess worker attitudes by asking specific questions regarding their coworkers' potential reactions to various situations; 3) that we provide assurance that the upcoming inspection takes a hard look at Pilgrim's safety culture with the results reflected in our final evaluation; and, 4) that an independent inspector, not bound by a confidentiality agreement, accompany the NRC team.

First, let me assure you that we are fully committed to performing this inspection with the highest standards and quality. To that end, we have assembled a capable, diverse, and independent team of NRC inspectors from across the agency and will ensure that they have all of the necessary tools and resources. The team is experienced, knowledgeable, and dedicated, and I am confident in their ability to successfully complete this inspection.

As you may be aware, our baseline inspection program examines the licensee's response to events on an ongoing basis including the events cited in your letter. The purpose of the upcoming inspection is to examine more deeply the licensee's programs to independently assess the root causes of the declining performance that resulted in Pilgrim being placed in Column 4 of the NRC Action Matrix for a Repetitive Degraded Cornerstone, to assess the adequacy of the licensee's recovery plan to achieve sustained performance improvement, and to determine what further regulatory actions may be warranted. Our sample selections are intended to provide a sound basis for in-depth assessment of past problems and the licensee's actions to improve future performance in diverse areas such as human performance, equipment reliability, and procedural adequacy. The team's activities may examine some of the events you listed, but will extend well beyond looking at condition reports and will include activities such as in-plant observations, personnel interviews, and document reviews.

With respect to assessing workers' attitudes and the site's safety culture, we have qualified experts on the team specifically dedicated to this task. They will be following the process outlined in NRC Inspection Procedure 95003.02, which can be found at <http://www.nrc.gov/docs/ML1409/ML14090A072.pdf>. As part of the review, they will examine other formal culture assessments, including assessments performed by experts external to and

independent from Entergy. In addition, our inspectors in this area will lead focus group discussions, observe activities, and interview plant workers. We will have full access to plant workers to ask questions or discuss items of interest.

Finally, we share your interest in ensuring the independence of this inspection team. In particular, a majority of the inspectors on this team are from outside of Region I and have not had any recent experience with the oversight of Pilgrim. We also have a memorandum of understanding with the Commonwealth of Massachusetts that allows the State to provide a representative to observe this effort. We will continue to frequently communicate throughout the inspection to ensure that the state observer is aware of our plans and activities. It's important to note that the state observer is welcome to communicate any insights or observations to the team leader throughout the inspection. However, prior to issuance of the final report, the information is pre-decisional and we ask that state observers, like our own inspectors, refrain from discussing inspection details. Once the final report is issued, the state observer is free to disclose any issue or insight developed during the inspection

I would like to reiterate that we share your goal that this inspection be of the highest quality and provide a thorough, independent examination of the licensee's performance and improvement plans. I trust that our plans and approach for conducting this inspection satisfies the overall objectives for the issues that you raised. However, if you have additional questions or concerns regarding this issue, please feel free to contact me at 610-337-5128.

Sincerely,

/RA/

Raymond K. Lorson, Director
Division of Reactor Safety

independent from Entergy. In addition, our inspectors in this area will lead focus group discussions, observe activities, and interview plant workers. We will have full access to plant workers to ask questions or discuss items of interest.

Finally, we share your interest in ensuring the independence of this inspection team. In particular, a majority of the inspectors on this team are from outside of Region I and have not had any recent experience with the oversight of Pilgrim. We also have a memorandum of understanding with the Commonwealth of Massachusetts that allows the State to provide a representative to observe this effort. We will continue to frequently communicate throughout the inspection to ensure that the state observer is aware of our plans and activities. It's important to note that the state observer is welcome to communicate any insights or observations to the team leader throughout the inspection. However, prior to issuance of the final report, the information is pre-decisional and we ask that state observers, like our own inspectors, refrain from discussing inspection details. Once the final report is issued, the state observer is free to disclose any issue or insight developed during the inspection

I would like to reiterate that we share your goal that this inspection be of the highest quality and provide a thorough, independent examination of the licensee's performance and improvement plans. I trust that our plans and approach for conducting this inspection satisfies the overall objectives for the issues that you raised. However, if you have additional questions or concerns regarding this issue, please feel free to contact me at 610-337-5128.

Sincerely,

/RA/

Raymond K. Lorson, Director
Division of Reactor Safety

Distribution w/encl:

DDorman, RA	ABurritt, DRP	ACass, DRP, AA
DLew, DRA	CBickett, DRP	DTifft, SLO
MScott, DRP	LCline, DRP	CCrisden, SLO
DPelton, DRP	ECarfang, DRP, SRI	DScrenci, PAO
RLorson, DRS	BPinson, DRP, RI	NSheehan, PAO
JYerokun, DRS	JVazquez, DRP, RI	JBowen, RI OEDO
RidsNrrPMPilgrim Resource		RidsNrrDorLPL1-1 Resource

DOCUMENT: G:\DRP\BRANCH5\External Stakeholder Letter Responses\2016 Letters\Response Letter to Lampert 10-04-16_final.docx
ADAMS Accession No. **ML16315A301**

<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	RI/DRS		
NAME	LCline	ABurritt	RLorson		
DATE	11/08/16	11/08/16	11/9/16		

OFFICIAL RECORD COPY