



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

August 23, 2018

EA-17-086

Mr. Brian Sullivan
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

**SUBJECT: REVISION TO CONFIRMATORY ACTION LETTER – PILGRIM NUCLEAR
POWER STATION**

Dear Mr. Sullivan:

In a letter dated August 9, 2018 (ML18226A085¹), Entergy Nuclear Operations, Inc. (Entergy) notified the U.S. Nuclear Regulatory Commission (NRC) of its intent to change and/or clarify 14 of 156 actions in the Pilgrim Nuclear Power Station (PNPS) Recovery Plan that were included within the scope of the Confirmatory Action Letter (CAL) (ML17214A088).

The NRC staff has completed its review of the proposed changes for the five items associated with the Corrective Action Program and Procedure Use and Adherence Area Action Plans, and determined that these five changes do not affect our conclusions on the effectiveness of implementation of the Recovery Plan. Specifically, the proposed changes address expectations for coaching and mentoring provided to Pilgrim staff by industry corrective action program subject matter experts, methods used to communicate management expectations for procedure use and adherence, and the process used to assess Pilgrim staff in procedure use and adherence. The NRC staff determined that these changes were not substantive. The changes added detail to more accurately describe the Recovery Plan actions, updated the Recovery Plan to reflect changes made to internal site processes, or made minor clarification adjustments intended to improve the effectiveness of the Recovery Plan. The staff concluded that these revisions would not adversely affect Entergy's recovery in these fundamental problem areas and are acceptable.

For the remaining nine proposed changes or clarifications affecting five other Area Action Plans, our preliminary review did not identify any concerns; however, we expect to complete our review during the next CAL inspection which is scheduled for September 10, 2018. We will provide the results of our assessment of these changes in future correspondence.

¹ Designation in parentheses refers to an Agencywide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly available using the accession number in ADAMS.

After consulting with the Director of the Office of Nuclear Reactor Regulation, the NRC staff agrees with five of your revised commitments as described in this letter. The original PNPS CAL, EA-17-086, issued on August 2, 2017, as modified in the Enclosure to the June 7, 2018, letter from the NRC to Entergy, remains in effect, except as modified in the Enclosure to this letter.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and the NRC's Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

If you have any questions, please contact Anthony Dimitriadis at (610) 337-6953 or e-mail at Anthony.Dimitriadis@nrc.gov.

Sincerely,

/RA/

David C. Lew
Regional Administrator

Docket No. 50-293
License No. DPR-35

Enclosure:
Revised Confirmatory Action Letter Commitments

cc: Distribution via ListServ

SUBJECT: REVISION TO CONFIRMATORY ACTION LETTER – PILGRIM NUCLEAR
POWER STATION DATED AUGUST 23, 2018

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CAL Revision Request No 2 Response ltr no 1_final.docx
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Revised Confirmatory Action Letter Commitments

1. CAL Item CAP-1.2:

The original CAL item stated: "When interim actions EOC-3/CA-15 and 4/CA-16 are closed, assign a part-time (two weeks per month) SME to coach and mentor DPIC and CAP performance and independently review RCEs and ACEs to acquire the data for populating the CAP Performance Indicators." Entergy revised this item to read: "When interim actions EOC-3/CA-15 and 4/CA-16 are closed, assign a part-time (two weeks per month minimum) SME to coach and mentor DPIC and CAP performance and independently review RCEs and ACEs to acquire the data for populating the CAP Performance Indicators. Mentoring and coaching may be performed by contracted consultants designated as SMEs or Mentors." The NRC staff reviewed the change and determined it was administrative because it clearly identifies which contracted consultants perform the directed coaching and mentoring, but does not change the action to be taken. The NRC staff concluded this change is acceptable.

2. CAL Item CAP-1.5:

The original CAL item stated: "Generate the CAP SME monthly status report for July 2016 (performed by the CAP SME required in CA 74). Also generate a new CA to require each additional monthly report in the same fashion. These monthly status reports must continue until end of plant operating life." Entergy revised this item to read: "Generate the CAP SME status report for July 2016 (performed by the CAP SME required in CA 74). Also generate a new CA to require each additional report in the same fashion. These status reports must continue until end of plant operating life on a frequency not to exceed quarterly." The NRC staff reviewed the change and determined it was administrative. Entergy made this change because it determined that quarterly status reports provided more effective trending of the results of CAP SME activities. The NRC reviewed a sample of monthly and quarterly status report results and determined that the quarterly reports provided adequate data for identifying performance trends and taking timely action to address significant trends. The NRC staff concluded this change is acceptable.

3. CAL Items PUA-1.6/5.9:

The original wording for this item was: "Site department managers communicate senior management's procedure use and adherence expectations once per quarter for a year." Entergy revised this item to read: "Site department managers communicate senior management's procedure use and adherence expectations utilizing a different quarter's data not less than 4 times." The NRC reviewed the change and determined it provides additional flexibility regarding the timing of the action and clarifies that different data will be used each time, but it does not change the action to be taken for the item. The NRC staff concluded this change is acceptable.

4. CAL Item PUA-2.3:

The original wording for this item was: "Perform Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet concurrently with performance of HU observations for the assessment period of one year, June 1, 2016 through June 1, 2017, or until closure of Procedure Use and Adherence effectiveness review." Entergy revised this item to read: "Perform Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet criteria concurrently with performance of HU observations for the assessment period of not less than one year. The Procedure Use and Adherence observations using the 95003 Recovery

Enclosure

Human Performance WILL Sheet criteria will continue until closure of Procedure Use and Adherence effectiveness review." The NRC staff determined that this change added detail that clarified the requirements for the minimum expected duration of this action, but does not change the action to be taken. The NRC staff concluded the change is acceptable.

5. CAL Item PUA-3.4:

The original wording for this item was: "Communicate the PU&A Lessons Learned/Results from the PU&A 95003 Recovery WILL sheet as analyzed in Monthly Snap Shot Assessments quarterly via L&A meetings." Entergy revised this item to read:

"Communicate the PU&A Lessons Learned/Results from the PU&A 95003 Recovery WILL sheet attribute ratings quarterly via L&A meetings." The NRC staff reviewed this item and determined it was administratively needed because, as of 2016, Snap Shot Self Assessments are no longer performed or directed by Entergy procedures. The NRC staff concluded this change is acceptable.