



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

Mike Bellamy  
Site Vice President

February 24, 2003

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
Docket 50-293  
License No. DPR-35

Response to NRC Request for Additional Information Concerning  
Request for Amendment to the Technical Specifications Emergency Core  
Cooling System Requirements During Shutdown (MB7318)

LETTER NUMBER: 2.03.028

Dear Sir or Madam:

The NRC and Entergy conducted a teleconference on February 13, 2003 to discuss NRC questions related to the Entergy request for an amendment to the Technical Specifications Emergency Core Cooling System Requirements during shutdown (MB7318). Attachment 1 of this letter provides the responses to the requested information.

This response does not change the no significant hazard conclusions previously submitted in Entergy Letter 2.03.004, dated January 23, 2003.

Should you have any questions or comments concerning this submittal, please contact Bryan Ford at (508) 830-8403.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the  
24th day of February 2003.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert M. Bellamy".

Robert M. Bellamy

MJG/dd

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Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station

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Attachments: 1. Response to NRC Request for Additional Information (2 pages)

cc: Mr. Travis Tate, Project Manager  
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**ATTACHMENT 1**

LETTER NUMBER 2.03.028

**Response to NRC Request for Additional Information  
Request for Amendment to the Technical Specifications Emergency Core Cooling  
System Requirements During Shutdown (MB7318)**

Request for Additional Information

1. In your application dated January 23, 2003, water level at the 114 ft elevation is referred to in various places. On Page 5 of 10, first paragraph, you state "-----equal to elevation 114 foot in excess of 300,000 gallons of water is available to provide core cooling-----" The standard technical specification (STS), NUREG 1433, makes reference to water level at 23 feet over the top of the RPV vessel flange. Please explain the significance of the elevation 114 feet in relation to top of the active fuel (How many feet from TAF?) or top of the RPV vessel flange.

**Response:**

114' was chosen to be consistent with current TS 3.5.F.5.b requirements. This level also provides a significant water inventory and a viable reference elevation.

Top of Active Fuel: 67'6 1/4" elevation ( $114 - 67'6 \frac{1}{4}" = 46'5 \frac{3}{4}"$ )

Top of RPV flange: 93'3 3/4" elevation ( $114 - 93'3 \frac{3}{4}" = 20'8 \frac{1}{4}"$ )

2. The TS Page 3/4.2-17, proposed note 1 (Table 3.2.B) change in the January 23, 2003, application is not consistent with the completion time guidance specified in STS 3.3.5.1. Please provide a justification that addresses your proposed change in relation to guidance specified in the STS.

**Response:**

The requirements proposed are consistent with the current requirements. Please refer to letter 2.03.004 Enclosure page 6 of 10, item B. The proposed AOT (24 hours and then declare affected systems inoperable) is consistent with STS LCO 3.3.5.1 required actions—B.3, C.2, D.2.1. These are the STS Required Actions that apply to failures that do not result in a loss of function. Our Technical Specifications currently do not address loss of function separately. In addition, we do not have many of the allowances presently in STS e.g. Required Actions E.2, F.2, G.2. We tried to limit the scope of this change in order to ease NRC reviews. Therefore, we did not propose a complete upgrade of the instrumentation LCO.

3. The deleted portions in TS Page 3/4.5-10, of the January 23, 2003, application refer to containment cooling systems. The new replacement additions do not mention containment cooling systems. Please explain why the reference to the containment cooling systems is being deleted.

**Response:**

There are no requirements for containment cooling to be operable when in cold shutdown (reference TS 3.5.B.1. /2). This statement provided no real requirements and was probably included because the RHR system; which Low Pressure Coolant Injection (LPCI) is a mode of, also provides the containment cooling functions. When RHR is operating in the LPCI mode, it is considered one of the Core Standby Cooling Systems (CSCS).