



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

Mike Bellamy
Site Vice President

March 25, 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,
Deletion of Requirement from LCO 3/4.10.D, Multiple Control Rod
Removal

REFERENCE: 1. Entergy Letter, 2.02.064, Request for Amendment to the
Technical Specifications, Deletion of Requirement from LCO
3/4.10.D, "Multiple Control Rod Removal" dated, August 16, 2002

LETTER NUMBER: 2.03.035

Dear Sir or Madam:

Discussions with the NRC indicated that additional information was needed to complete their review of Entergy's Request for Amendment to Technical Specifications 3/4.10.D, "Multiple Control Rod Removal" (Reference 1). Attachments to this letter provide the requested additional information.

The inclusion of the NRC staff requested change provides additional conservatism during multiple control rod removal and reload operations. This response does not invalidate the no significant hazard conclusions previously submitted in the original submittal (Reference 1).

If you have any questions or require additional information, please contact Mr. Bryan Ford, Licensing Manager, at (508) 830-8403.

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station

Letter Number: 2.03.035
Page 2

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th
of March 2003.

Sincerely,



Robert M. Bellamy

Attachments: 1. Response to Request for Additional Information -1 page
2. Proposed Technical Specification (mark-up) - 1 page

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Senior Resident Inspector
Pilgrim Nuclear Power Station

ATTACHMENT 1

LETTER NUMBER 2.03.035

Response to Request for Additional Information
Proposed Changes to TS 3/4.10.D, "Multiple Control Rod Removal" Requirements

Response to Request for Additional Information

NRC Request:

Please include a condition in TS 3.10.D.1.d stating that no fuel is loaded into the reactor core during multiple control rod removal operations.

Response:

Pilgrim has proposed Specification 3.10.D.1.d, stating, "No fuel is loaded into the reactor core." to minimize the possibility of fuel loading errors during multiple control rod removal operations. Attachment 2 provides this proposed specification change.

The proposed specification prevents fuel load during multiple control rod removal operations to prevent inadvertent criticality. This additional restriction adds conservatism and is consistent with the current Technical Specification Bases.

ATTACHMENT 2

LETTER NUMBER 2.03.035

Proposed Technical Specification (Mark up)

TS Page 3/4.10-3

LIMITING CONDITIONS FOR OPERATION

3.10 CORE ALTERATIONS (Cont)

D. Multiple Control Rod Removal
(Cont)

b. The source range monitors (SRM) are operable per Specification 3.3.B.4.3

c. The Reactivity Margin requirements of Specification 3.3.A.1 are satisfied.

d. All control rods in a 3x3 array centered on each of the control rods being removed are fully inserted and electrically or hydraulically disarmed, or have the surrounding four fuel assemblies removed from the core cell.

e. All other control rods are fully inserted.

f. The four fuel assemblies are removed from the core cell surrounding each control rod or control rod drive mechanism to be removed from the core and/or reactor vessel.

No fuel is loaded into the reactor core.

SURVEILLANCE REQUIREMENTS

4.10 CORE ALTERATIONS (Cont)

D. Multiple Control Rod Removal
(Cont)

b. The SRM channels are operable per Specification 3.3.B.4.3

c. The Reactivity Margin requirements of Specification 3.3.A.1 are satisfied.

d. All control rods in 3x3 array centered on each of the control rods removed or being removed are fully inserted and electrically or hydraulically disarmed, or have the surrounding four fuel assemblies removed.

e. All other control rods are fully inserted.

f. The four fuel assemblies surrounding each control rod and/or control rod drive mechanism that is to be removed from the reactor vessel at the same time are removed from the core and/or reactor vessel.