



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

Via Overnight Delivery

April 29, 2004

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

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

Supplemental Response to Issuance of Orders to Modify License for
Revised Design Basis Threat and Compensatory Measures Related to
Security Force Training and Fitness-For-Duty

REFERENCES: Letter 2.03.080, Response to Issuance of Orders to Modify License for
Revised Design Basis Threat and Compensatory Measures Related to
Security Force Training and Fitness-For-Duty, dated June 3, 2003

NRC Letters from Samuel J. Collins to Holders of Licenses for Operating
Power Reactors dated April 29, 2003 Regarding Issuance of Order
Requiring Compliance with Revised Design Basis Threat for Operating
Power Reactors (EA-03-086), Issuance of Order for Compensatory
Measures Related to Training Enhancements on Tactical and Firearms
Proficiency and Physical Fitness Applicable to Armed Nuclear Power
Plant Security Force Personnel (EA-03-039) and Issuance of Order for
Compensatory Measures Related to Fitness-For-Duty Enhancements
Applicable to Nuclear Facility Security Force Personnel (EA-03-038)
(ENO 1.03.042, ENO 1.03.043, ENO 1.03.040 respectively)

LETTER NUMBER: 2.04.030

Dear Sir or Madam:

The NRC issued an Order dated April 29, 2003, Requiring Compliance with Revised Design
Basis Threat ("Order EA-03-086" or "Order") and other security related Orders (collectively
"Orders") for the Pilgrim Nuclear Power Plant (PNPS). This Supplemental Response of PNPS to
Order EA-03-086 supplements the previous response dated June 3, 2003 that PNPS filed
pursuant to 10 CFR § 50.4 and Section III, Conditions A.1, B.1 and B.2.

Order EA-03-086 imposes license conditions on nuclear power plants licensed pursuant to the
Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the
Order requires licensees to revise their physical security plans and safeguards contingency plans
to provide protection against the revised design basis threat (DBT) set forth in Attachment 2 to
the Order. Section III.A also

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and must be protected accordingly. Upon separation of Attachments
A, C and E from this letter, this letter and Attachments B and D
become "DECONTROLLED"

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requires licensees to revise the security force training and qualification plan to implement the revised DBT. These revised plans, along with an implementation schedule, were required to be submitted to the Commission for review and approval no later than April 29, 2004.

In accordance with the Order and 10 CFR § 50.4, Entergy Nuclear Operations, Inc. (ENO) is submitting this Supplemental Response for the above-mentioned licensed facility. This submittal includes, as Attachment A, revisions to the PNPS's Physical Security Plan, the Contingency Plan, and the Training and Qualification Plan as required by Order EA-03-086. These plans contain the integrated commitments to comply with Order EA-03-086 and the other security related Orders issued on February 25, 2002, January 7, 2003, and April 29, 2003. As a result, these plans supersede previous submittals of ENO in these areas, including those related to the February 25, 2002, January 7, 2003, and April 29, 2003, Orders. PNPS will continue to implement the provisions of those previous submittals except to the extent that they are superseded by these plans. All changes that have been or will be made have been evaluated to ensure that they do not compromise plant safety.

PNPS has developed these plans to be consistent with NEI-03-01 (Revision 1), *Nuclear Power Plant Access Authorization Program* (April 2004); NEI-03-09 (Revision 2 (draft)), *Security Officer Training Program* (April 2004); and NEI-03-12 (Revision 2 (draft)), *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan* (April 2004). The schedule for completing those actions, which includes the identification of major transitional activities, is provided in Attachment B to this submittal. To facilitate the NRC's review, any provisions that are different from NEI-03-12 are identified and the justification provided in Attachment C, *Deviations from NEI-03-12*, to this submittal. Attachment D, *Previous Exemptions to 10 CFR Part 73*, is a listing of any exemptions to 10 CFR Part 73 previously granted to PNPS and an explanation of their status under the plans hereby submitted. Attachment E, *Justification for Alternatives*, includes the justification for any of the alternatives provided in NEI-03-12 or in "NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat" that PNPS has adopted.

When the final revision of NEI-03-12 is approved by the NRC, ENO will supplement this response, if necessary, to conform with NEI-03-12 as finally approved. However, with the filing of these plans, ENO will be implementing its revised protection strategy and completing plant modifications and security personnel training pursuant to these plans to ensure that implementation will be completed by October 29, 2004, as required by the Orders. Upon completion of the implementation of these plans, ENO will be in compliance with all applicable security requirements. For the purpose of complying with the requirements of 10 CFR Part 73 to conduct an annual audit, the date of the letter that will be submitted to the NRC pursuant to Order EA-03-086 certifying that implementation of the plans is complete will be the effective date for determining commencement of the annual audit requirement period.

Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirement of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003; and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the Orders, ENO requests that enforcement discretion be exercised during the transition period until full implementation of the plans is accomplished and the physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

NOTICE: Attachments A, C and E contain "Safeguards Information" and must be protected accordingly. Upon separation of Attachments A, C and E from this letter, this letter and Attachments B and D become "DECONTROLLED"

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As requested, the attachments to this letter are being transmitted on CD-ROM.

Contact Name: Bryan S. Ford

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Document Components:

- 001 Transmittal Letter.pdf 34,040 bytes
- 002 Attachment A, Security Plan.pdf 706,171 bytes
- 003 Attachment B, Action Completion Schedule.pdf 18,991 bytes
- 004 Attachment C, Deviations from NEI-93-012.pdf 23,273 bytes
- 005 Attachment D, Previous Exemptions to 10 CFR Part 73.pdf 15,091 bytes
- 006 Attachment E, Justification for Alternatives.pdf 79,708 bytes

If you have any problems with the CD ROM or require additional information, please contact Mr. Bryan Ford at (508) 830-8403.

This letter contains no new commitments.

In accordance with 10 CFR § 2.202(b), the following affirmation is provided:

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of April 2004.

Respectfully submitted,



Peter Dietrich
Acting Site Vice President, PNPS

Attachments One CD ROM containing the following file:
Supplemental Response to the April 29 2003 Orders to PNPS including
Signed copy of cover letter
Attachment A, Pilgrim Nuclear Power Station Security Plan, Training and
Qualification Plan, and Contingency Plan (Safeguards Information)
Attachment B, Major Milestone Implementation Schedule
Attachment C, Deviations from NEI-03-12 (Safeguards Information)
Attachment D, Previous Exemptions to 10 CFR Part 73
Attachment E, Justifications for Alternatives (Safeguards Information)

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cc: without attachments

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