



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

Kevin H. Bronson  
Site Vice President

December 9, 2007

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

Subject: Pilgrim Nuclear Power Station  
Docket No. 50-293  
License No. DPR-35

Clarification to Previous Response to NRC Generic Letter 2007-01

- References:
1. Entergy Letter No. 2.07.034, Response to NRC Generic Letter 2007-01, dated May 3, 2007
  2. NRC Generic Letter 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients", dated February 7, 2007
  3. NEI Letter from J. H. Riley to Administrative Points of Contact, "Guidance for Response to GL 2007-01", dated March 16, 2007
  4. NRC Letter to James H. Riley, "Response to Nuclear Entergy Institute (NEI) Letter dated March 26, 2007 – RE: Interpretation of Generic Letter (GL) 2007-01, Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients", dated April 13, 2007

LETTER NUMBER: 2.07.091

Dear Sir or Madam:

Entergy has reviewed the previously submitted GL 2007-01 Response (Reference 1) taking into consideration Reference 4 guidance and hereby confirms that the previous response remains valid for the guidance provided in Reference 4. Attachment 1 provides our previous response.

There are no regulatory commitments made in this submittal.

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

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NRR

The requested information is being provided pursuant the requirements of 10 CFR 50.54(f).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 9<sup>th</sup> of December, 2007.

Sincerely,



Kevin H. Bronson  
Site Vice President

WGL/dl

Attachment 1: Generic Letter 2007-01 Response

cc: Mr. James S. Kim, Project Manager  
Plant Licensing Branch I-1  
Division of Operator Reactor Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
One White Flint North 4D9A  
11555 Rockville Pike  
Rockville, MD 20852

Regional Administrator, Region 1  
U.S. Nuclear Regulator Commission  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
Pilgrim Nuclear Power Station

Attachment 1 to  
Entergy Letter No. 2.07.091

**Generic Letter 2007-01 Response**

**Request 1**

Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes for the failure.

**Response 1**

Pilgrim has experienced one cable failure within the scope of the GL. The requested information is provided below.

<b>Cable Type</b>	<b>Voltage Class</b>	<b>Manufacturer</b>	<b>Date of Failure / Service (Yrs.)</b>	<b>Type of Service</b>	<b>Root Cause</b>
1-1/C-1250 MCM, stranded coated copper conductor, non shielded. KERITE HT insulation (EPR) with KERITE FR jacket (Hypalon)	5KV	KERITE	Feb.21,1989/ 19 years  (Ref: LER 89-10, dated March 20, 1989)	Cable A404CD, 4160 volt feed from offsite power source to Bus A4 installed in duct bank and normally energized but not loaded.	Failed during service. Failure appeared to be due to installation damage.

**Request 2**

Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).

**Response 2**

Pilgrim inspection, testing, and monitoring practices presently include visual cable inspection during routine operations, periodic meggering of cables, connected equipment associated with maintenance activities, and periodic inspection of manholes for dewatering. The plant condition reporting system is used to determine root cause and extent of conditions where deemed necessary and determining the need for any increased cable monitoring.