



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
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May 7, 2008

Kevin H. Bronson
Site Vice President

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

Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

REFERENCE: 1. NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated January 11, 2008
2. Three-Month Response Extension Request to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated April 10, 2008

LETTER NUMBER: 2.08.025

Dear Sir or Madam:

The Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01 dated January 11, 2008 (Reference 1). This GL requested that each licensee evaluate the licensing basis, design, testing, and corrective action programs for the Emergency Core Cooling Systems (ECCS), Decay Heat Removal system, and Containment Spray system, to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

In GL 2008-01, the NRC requested each licensee to submit a written response pursuant to 10 CFR 50.54(f) within nine months of the date of the GL to providing the following (summarized) information:

- (a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL;
- (b) a description of all corrective actions that were determined necessary; and
- (c) the schedule for completion of the corrective actions, and the basis for that schedule.

Additionally, the NRC requested that if a licensee could not meet the requested nine-month response date, the licensee "shall provide a response within 3 months of the date of this GL."

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In the three-month response, the licensee was requested to describe "the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action". Entergy requested and received a one-month extension to this three-month response (Reference 2).

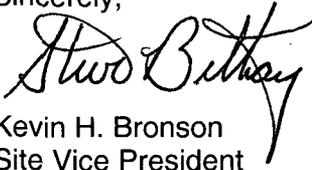
The attachments to this letter contain Entergy's Pilgrim Nuclear Power Station (PNPS) Three-Month response to NRC GL 2008-01.

Attachment 2 contains the commitments made in this letter.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 7, 2008.

Sincerely,


for Kevin H. Bronson
Site Vice President

MJG/dal

Attachments: 1. PNPS Three-Month Response to NRC Generic Letter 2008-01
2. Summary of Commitments

cc: Mr. James S. Kim, Project Manager
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Attachment 1 to ENO Letter 2.08.025

**PNPS Three-Month Response to NRC Generic Letter 2008-01
(2 pages)**

PNPS Three-Month Response to NRC Generic Letter 2008-01

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the PNPS three-month response as requested in NRC GL 2008-01, dated January 11, 2008. This response discusses:

1. the required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
2. the alternative course of action planned, and
3. the basis for the acceptability of the alternative course of action

Scope of Effort

The scope of evaluations required to support the response to GL 2008-01 include the following systems:

- **Residual Heat Removal System (RHR) – Various modes of operation**
- **High Pressure Coolant Injection System (HPCI)**
- **Core Spray System (CS)**

These evaluations will include a review of the four principle areas addressed in the GL 2008-01 to ensure that gas accumulation is maintained less than the amount that challenges the operability of these systems. The evaluations entail a thorough review of licensing basis documents, operating and programmatic procedures, the site technical specifications, design drawings, and our Corrective Action Program database. Piping system walkdowns will be performed to confirm items such as adequate vent capability for system high points and verification of design drawings. Previous drawing reviews and design basis verifications will be used as part of this process.

The evaluations of these systems will be performed as requested in GL 2008-01; however, not all evaluations will be completed within the schedule provided for in the Generic Letter.

Evaluations that will not be complete by October 11, 2008

The requested information in GL 2008-01 includes "A description of the results of evaluations that were performed." The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems. Portions of the affected systems are located inside of Primary Containment and are thus inaccessible during normal operations. It will not be possible to perform the walkdowns on all portions of these systems before October 11, 2008 because of the need for a refueling outage (RFO) to perform the walkdowns.

Therefore, due to the inability to conduct these walkdowns, the requested evaluations for the systems will not be complete by October 11, 2008. The need to wait for the next RFO to complete the walkdowns of inaccessible portions of the systems is based on the following:

- The walkdowns of these systems require entry into areas of high radiation or inerted atmosphere (less than 4% oxygen inside the drywell) during power operations.
- Restrictions on removal of insulation from piping during power operations prevent removal of sections of insulation from piping needed to perform proper evaluations of the piping systems.

PNPS Three-Month Response to NRC Generic Letter 2008-01

- Erection of scaffolding may be prohibitive during power operations for locations over safety related equipment or if high radiation levels exist in the area of interest preclude installing scaffolding.

Alternative Course of Actions Planned

The next available refueling outage, RFO 17, is currently scheduled for April 2009. Therefore, PNPS will perform these walkdowns during this outage and evaluate the findings upon completion. All other system walkdowns will be performed during the nine-month timeframe prescribed by GL 2008-01.

Acceptability of Alternative Course of Action:

The alternative course of action is acceptable based on the operational experience and previous actions taken to resolve identified issues.

- Previous surveillance testing performed on GL 2008-01 subject systems and interviews with operations personnel indicate that there are currently no gas voiding issues.
- Operating procedures include monthly venting of the GL 2008-01 subject systems to ensure systems are maintained sufficiently filled. No current issues have been identified in the performance of these procedures.
- In-service testing of the GL 2008-01 subject systems are routinely performed and no known issues impacting pump operability have been identified during this testing. PNPS has improved venting procedures to ensure adequate system venting and filling.

Entergy PNPS, has confidence that the GL 2008-01 subject systems can perform their required design functions based on the above-described operating experience, surveillances, performance testing, and past corrective actions which included procedural changes to better facilitate venting the affected piping systems, that have been performed to manage gas intrusion issues.

For these reasons, Entergy concludes that completing performance of detailed walkdowns on a portion of subject piping systems that require a refueling outage and subsequent evaluations outside the requested nine-month period is an acceptable alternative course of action for PNPS.

Summary of Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

List of Regulatory Commitments			
COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outage.		X	End of RFO 17
Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outage.		X	90 days from the completion of RFO 17