



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 11, 2011

Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

SUBJECT: PILGRIM NUCLEAR POWER STATION - CLOSEOUT OF GENERIC LETTER 2008-01, "MANAGING GAS ACCUMULATION IN EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND CONTAINMENT SPRAY SYSTEMS" (TAC NO. MD7863)

Dear Sir or Madam:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The stated purpose of GL 2008-01 was (a) to request addressees to submit information to demonstrate that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance; and, (b) to collect the requested information to determine if additional regulatory action is required.

GL 2008-01 requested that licensees provide the following information within 9 months of the date of the GL:

- (a) A description of the results of evaluations that were performed pursuant to requested actions specified in the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

In the letter dated October 14, 2008 (ADAMS Accession No. ML082970193), the licensee provided information in response to the GL.

Specifically, the licensee's response included evaluations for the following systems: high-pressure coolant injections, core spray, and residual heat removal (low-pressure coolant

injection mode, containment spray cooling mode, suppression pool cooling mode, and shutdown cooling mode).

The licensee identified a variety of gas intrusion sources and corrective actions taken or planned to minimize gas intrusion events. The licensee performs periodic venting of the subject systems and has a "zero-tolerance" for as-found gas accumulation during routine venting. The corrective action program will be entered when gas is found.

The licensee has committed to develop administrative controls to capture the results of the venting operations, evaluating operability, and trending the results. The licensee has also committed to evaluate the applicability of the Technical Specification Task force (TSTF) Traveler for unacceptable gas accumulations in emergency core cooling systems to Pilgrim within 90 days of NRC approval of the TSTF.

The licensee is actively participating in the Nuclear Energy Institute (NEI) Gas Accumulation Team (GAT) working to bring resolution to gas accumulation and management issues.

The NRC staff has reviewed the submitted information and finds that for Pilgrim Nuclear Power Station, the licensee has acceptably demonstrated "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" as stated in GL 2008-01. Therefore, the NRC staff has concluded that for Pilgrim Nuclear Power Station, the licensee's response to the GL is acceptable and the subject systems are currently operable. Consequently, the licensee's GL response is considered closed and no further information or action is requested from the licensee with the exception of any commitments the licensee has made with respect to the GL responses.

Notwithstanding, the NRC's Region I staff may decide to perform (and would contact the licensee to schedule) an inspection using Temporary Instruction (TI) 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (NRC Generic Letter 2008-01)" (ADAMS Accession No. ML082950666). The TI 2515/177 is confirmatory in nature in that it directs NRC inspectors to assess applicable information that is available at the plant, to selectively verify that the licensee has implemented or is in the process of acceptably implementing the commitments, modifications, and programmatically controlled actions described in the licensee's response to GL 2008-01. Additionally, the TI directs NRC inspectors to confirm the NRC staff conclusion, on the basis of plant-specific information, that subject systems' operability is reasonably ensured or, conversely, to identify items where additional follow-up is necessary.

The NRC staff is continuing to engage with stakeholders regarding the creation of durable guidance for Gas Management, which may require additional actions by the licensee.

If you have any questions regarding this letter, please feel free to contact me at (301) 415-1030.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Guzman", with a long horizontal flourish extending to the right.

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-293

cc: Distribution via Listserv

The NRC staff is continuing to engage with stakeholders regarding the creation of durable guidance for Gas Management, which may require additional actions by the licensee.

If you have any questions regarding this letter, please feel free to contact me at (301) 415-1030.

Sincerely,

/RA/

Richard V. Guzman, Senior Project Manager
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
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(* No substantial change in SE Input Memo

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DATE	5/11/11	5/11/11	4/6/2010 & 05/06/11	5/11/11	5/11/11

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