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April 6, 2011

Administrative Judge  
Ann Marshall Young, Esq., Chair  
Atomic Safety and Licensing Board  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Administrative Judge  
Dr. Richard F. Cole  
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Washington, DC 20555-0001

Administrative Judge  
Dr. Paul B. Abramson  
Atomic Safety and Licensing Board  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

In the Matter of  
Entergy Nuclear Generation Co. et al.  
Pilgrim Nuclear Power Station  
(Docket No. 50-293-LR; ASLBP No. 06-848-02-LR)

Dear Administrative Judges:

I am writing to inform the Board and parties of a change in Entergy's commitments related to the interior inspection of the Salt Service Water (SSW) discharge lines, which carry SSW that has served its cooling function from the auxiliary building to the bay. During the hearing on Pilgrim Watch Contention 1, Entergy testified that while the current In-Service Inspection (ISI) program for the SSW system requires a complete ultrasonic or visual examination of the Cured In-Place Piping (CIPP) after 20 years of service, Entergy intended to inspect the CIPP piping after ten years of service. The CIPP in Loop B of the SSW discharge line was placed in service in 2001, and the CIPP in Loop A of the discharge line was placed in service in 2003. Accordingly, as Entergy testified and as reflected in Judge Young's concurring opinion (LPB-08-22, 68 N.R.C. at 637), Entergy contemplated inspecting Loop B in 2011 and Loop A in 2013.

During planning for the 2011 refueling outage (RFO), Entergy determined that performing a complete inspection of the CIPP in Loop B would not be optimal in this outage. Pilgrim conducts its refueling outages, which occur every two years, on an alternating loop basis. That is, "A"

loop systems are taken out of service for major maintenance one outage and the “B” loop systems are taken out the next. Thus, in each refueling outage, one loop of the SSW system is kept in operation to support safety related equipment while the other is taken out of service for maintenance. The 2011 refueling outage is an “A” loop outage; therefore, performing a complete inspection of Loop B during the 2011 outage would require taking Loop B out of service out of sequence, and as consequence, would greatly complicate maintenance on Loop A equipment.

Entergy has therefore decided to align the 10-year, full-length loop inspections with the appropriate loop-specific RFO. Consequently, the full-length inspection of the CIPP in Loop B will occur in the 2013 RFO, and the full-length inspection of the CIPP in Loop A will occur in the 2015 RFO. During the RFO in 2011, Pilgrim plans to perform a visual inspection of approximately 20 feet of the CIPP liner in the “A” loop. This complements the partial visual inspection of approximately 20 feet of the CIPP liner in the “B” loop completed in the 2009 RFO, which detected no degradation of the liner.

The ten-year inspection of the CIPPs in the SSW discharge lines was not relied upon in the Initial Decision issued by the Licensing Board majority. LPB-08-22, 68 N.R.C. at 608-10. While the ten-year inspection was one of a number of aging management activities mentioned in Judge Young’s concurring decision, Entergy does not believe that this minor adjustment in schedule would materially affect the Board’s decision. As witness Spataro stated during the hearing, based on his professional experience with similar materials used under more aggressive conditions than at Pilgrim, he expects Pilgrim’s CIPP liners to last at least thirty-five years. LPB-08-22, 68 N.R.C. at 632, citing Tr. at 681. NRC witness Davis agreed “that the CIPP liners installed in loops A and B have an expected life of approximately thirty-five years.” Id., citing Tr. at 669. In light of the Spataro and Davis conclusions and the results of the 2009 inspection, the delay of one operating cycle to complete the full visual inspection of the “B” loop is not significant.

Sincerely yours,

[Signed electronically by]

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**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
Entergy Nuclear Generation Company and	)	Docket No. 50-293-LR
Entergy Nuclear Operations, Inc.	)	ASLBP No. 06-848-02-LR
	)	
(Pilgrim Nuclear Power Station)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the attached letter was provided to the Electronic Information Exchange for service on the persons listed below this 6<sup>th</sup> day of April, 2011.

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