

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket # 50-293-LR

Entergy Corporation

Pilgrim Nuclear Power Station

License Renewal Application

April 11 2011

PILGRIM WATCH MEMORANDUM -ENTERGY'S INCORRECT AND MISLEADING INFORMATION REGARDING PROVEN TESTS TO DETECT CABLE INSULATION DEGRADATION

In this proceeding, Pilgrim Watch repeatedly said that there were no proven commercially available tests to detect cable insulation degradation.

At an April 6, 2011 Massachusetts General Court public hearing, Entergy said that there were no proven commercially available tests to detect cable insulation degradation, contradicting statements made in previous filings in this proceeding. The hearing was held by the Joint Committees of Environment, Natural Resources and Agriculture; Telecommunications, Utilities and Energy; Public Health; Public Safety and Homeland Security.

Specifically, the Joint Committees asked Entergy's panel if there were proven tests to assess submerged electric cable degradation at Pilgrim Station. Mr. S.J. Bethay,

Director Nuclear Safety Assurance Pilgrim Station, responded for Entergy's panel. He testified that there were no proven commercially available tests to detect cable insulation degradation; but when they became available, Pilgrim would use them. (Emphasis added) Mr. Bethay was accompanied at the table for presenting to the Joint Committees by Entergy's top leadership personnel including Michael Balduzzi, Rick Smith and Michael Slobodian. They did not contradict or qualify Mr. Bethay's statement

Entergy's Previous Claims To The Contrary

1. In the *Declaration Of Vincent Fallacara And Roger B. Rucker In Support Of Entergy's Answer Opposing Pilgrim Watch's Request For Hearing On A New Contention* (Feb 14, 2011) Vincent Fallacara, Director of Engineering at Pilgrim, said in regard to the adequacy of cable insulation test methods

12. Mr. Blanch challenges the adequacy of the cable insulation test methods called for by the AMP. He contends that there is no proven test that will provide assurance that cables and splices that have been submerged will function when called upon. He claims to rely on findings from the NRC, the Electric Power Research Institute ("EPRI"), Sandia National Laboratory ("Sandia"), and Brookhaven National Laboratory ("Brookhaven"). Blanch Affidavit ¶¶ 29, 32-35, 45-46. See also PW Request at 27.

13. These claims by Pilgrim Watch and Mr. Blanch are incorrect...**there are many proven tests to determine the degradation of cable insulation** from different aging mechanisms. Emphasis added.

2. In *Entergy's Answer Opposing Pilgrim Watch Request For Hearing On A New Contention* Feb 14, 2011, section (a) Proven Tests for Cable Insulation Degradation, Entergy again disputed the lack of proven tests.

3. At the March 9, 2011 Plymouth hearing, Mr. Lewis, representing Entergy, said in his description of what the NRC's December 2010 Information Notice said:

“(… licensees should **do these type of tests that are capable of detecting degradation**. (Transcript, pg., 881, lines 21-22, emphasis added). The clear implication was that there were tests capable of detecting degradation.

Conclusion

Both Entergy and Pilgrim Watch now agree that there are no proven tests to detect cable insulation degradation.

Respectfully signed,

Mary lampert

(Signed Electronically)

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ATTACHMENT

Declaration Rebecca J. Chin

(Please note that additional declarations may be provided, upon request)

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Declaration Rebecca J. Chin

I, Rebecca J. Chin, hereby declare under penalty of perjury that the following is true and correct.

I have been appointed by the Town of Duxbury Emergency Management Director to represent the town at the ASLB hearings regarding proceedings in Pilgrim's license renewal application. I was present at the April 6, 2011 Massachusetts General Court public hearing held by the Joint Committees of Environment, Natural Resources and Agriculture; Telecommunications, Utilities and Energy; Public Health; Public Safety and Homeland Security in response to the ongoing nuclear reactor tragedy in Fukushima.

At the hearing, I heard Mr. S.J. Bethay, Entergy spokesperson, respond to a question from the committee panel. He said that there were no proven commercially available tests to detect cable insulation degradation; but when they became available, Pilgrim would use them. Mr. Bethay was accompanied at Entergy's presentation table by other Entergy Pilgrim personnel including Michael Balduzzi, Rick Smith and Michael Slobodian. They did not contradict or qualify Mr. Bethay's statement.

Rebecca J. Chin

(Electronically signed)

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CERTIFICATE OF SERVICE

I hereby certify that *Pilgrim Watch Memorandum Regarding Entergy's Incorrect & Misleading Information Regarding Proven Tests To Detect Cable Insulation Degradation* and Certificate of Service were served April 11, 2011 in the above captioned proceeding to the following persons by the Electronic Information Exchange and complimentary copies sent via email to the service list

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