

**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 24, 2011

**PILGRIM WATCH RESPONSE TO ENTERGY'S APRIL 22, 2011 FILING  
REGARDING PROVEN TESTS TO DETECT CABLE INSULATION DEGRADATION**

Pilgrim Watch responds to Entergy's Objection to Pilgrim Watch's Post-Hearing Memoranda filed April 22, 2011. Pilgrim Watch's memoranda referred to and provided a link to an archived video recording of Entergy's presentations to the Massachusetts Joint Committees on the safety of the nuclear reactors that directly impact the Commonwealth.

Pilgrim Watch correctly stated that Pilgrim's Director of Nuclear Safety Assurance, Mr. Bethay, statements "supports that there are no proven commercially available tests for cable insulation degradation currently available," contrary to what Entergy's experts said in testimony and at the March 9, 2001 hearing in Plymouth<sup>1</sup>. Contrary to Entergy's April 22, 2011 Response,

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<sup>1</sup> *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 sufficiency 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. 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.

At the March 9, 2011 hearing, Mr. Lewis said that "licensees should **do these type of tests that are capable of detecting degradation** (Transcript, pg., 881, lines 21-22, emphasis added), clearly implying that there were tests capable of detecting degradation.

the presentation by Mr. Bethay, Director Nuclear Safety Assurance, Pilgrim, does not “in fact support[] the existence of a test capable of detecting cable insulation degradation.” (Entergy Response, pg. 2)

The facts speak for themselves. Entergy’s panel presentation begins at 146.20 on the video<sup>2</sup>; the pertinent section on cable testing runs from 173-180. The following starts at 178 on the tape. Representative Anne Gobi asked what actual testing was there to make sure there was not cable degradation. Mr. Bethay responded:

We don’t think we have had a lot that have been submerged for an extended period of time in the first place. So we’re talking about medium, fairly high voltage cables, that stay in the water, not that rains on them occasionally or that it’s in the damp air. The concern is those medium voltage cables that are under water and they’re not designed to stay under water forever, so just to be clear on what the issue really is.

So, if we can see it, if we can verify that there is water or not, and we can remove it accordingly, that’s one aspect of the program.

There is another electrical test called the Megger test that tests the insulation capabilities, but that only kinda tells you what’s its condition right now, not necessarily a good predictor.

There’s a new testing comes out, and I may have to ask for some help on this, that is more predictive than being able to say what’s the condition of insulation of the cable and do you anticipate a future failure.

That’s a technology that is evolving, and there are new types of testing developed to be more predictive and identify what’s the longer term effects of this – so we’re active in the industry and trying to keep up with those efforts to develop better testing, figure out what, how we would implement that when it comes along, but right now we want to not let the cables stay under water.

There are no proven tests today. Mr. Bethay spoke of the future - “There’s a new testing comes out... [t]hat’s a technology that’s evolving.” As for the present, he concluded that “right now we want to not let the cables stay under water.”

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<sup>2</sup> <http://www.malegislature.gov/Events/EventDetail?eventId=733&eventDataSource=VideoService&videoSource=int>

The lead editorial in today's (April 24, 2011) Boston Globe was largely focused on Entergy's promises to Vermont, but its concluding sentence was directed to Pilgrim:

“Permission to run a nuclear plant is a public trust. Vowing to run Pilgrim safely, the company has applied for federal permission to keep it open for another 20 years. But as the Nuclear Regulatory Commission reviews the company's application, it should keep in mind what promises from Entergy are worth.”

Respectfully submitted,

Electronically signed

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**CERTIFICATE OF SERVICE**

I hereby certify that Pilgrim Watch Response To Entergy's April 22, 2011 Filing Regarding Proven Tests To Detect Cable Insulation Degradation was served April 24, 2011 in the above captioned proceeding to the following persons by the Electronic Information Exchange and that complimentary copies provided via email to the service list

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