



May 18, 2011

Stephen J. Bethay
Director, Nuclear Safety Assurance

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Pilgrim Nuclear Power Station (PNPS) License Renewal Application
(LRA) List of Commitments

- REFERENCES:
1. Entergy Letter No. 2.06.003, to USNRC, "Entergy Nuclear Operations Inc., License No. DPR-35, License Renewal Application," dated January 25, 2006.
 2. Entergy Letter No. 2.11.001 to USNRC, "Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Supplemental Information," dated January 7, 2011
 3. Entergy Letter No. 2.11.008 to USNRC, "Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Additional Supplemental Information," dated January 31, 2011
 4. Entergy Letter No. 2.11.017 to USNRC, "Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Supplemental Information," dated March 16, 2011
 5. Entergy Letter No. 2.11.027 to USNRC, "Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Supplemental Information," dated April 21, 2011
 6. Entergy Letter No. 2.11.031 to USNRC, "Pilgrim Nuclear Power Station (PNPS) License Renewal Application (LRA) Supplemental Information," dated April 22, 2011

LETTER NUMBER: 2.11.034

Dear Sir or Madam:

On January 25, 2006, Entergy Nuclear Operations, Inc. (Entergy) submitted the License Renewal Application (LRA) for the Pilgrim Nuclear Power Station (PNPS) as indicated by Reference 1.

A119
NRC



On January 7, 2011, January 31, 2011, March 16, 2011, April 21, 2011, and April 22, 2011 (References 2 - 6), Entergy provided additional information that supplemented the LRA as a result of operating experience (OE) and industry activities potentially relevant to aging management in several specific areas.

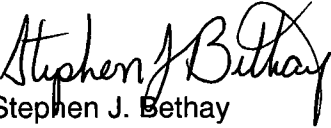
Attachment 1 to this letter provides a revision to Commitment 15 to address clarifying questions discussed with the NRC staff on a teleconference held on April 26, 2011.

Attachment 2 provides a complete listing of all current regulatory commitments.

Should you have any questions or require additional information concerning this submittal, please contact Mr. Joseph R. Lynch at 508-830-8403.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 18, 2011.

Sincerely,


Stephen J. Bethay
Director Nuclear Safety Assessment

JRL/jl

Attachments: 1. Revised License Renewal Commitment No. 15 (2 Pages)
2. License Renewal Commitment List (11 Pages)

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Attachment 1 to Letter No. 2.11.034

Pilgrim Nuclear Power Station
License No. DPR-35 (Docket No. 50-293)

License Renewal Application

Revised License Renewal Commitment No. 15

(2 pages)

Attachment 1
Pilgrim Nuclear Power Station
License Renewal Application - Supplemental Information

Entergy provides the following clarifying information to address questions discussed with the NRC staff on a teleconference held on April 26, 2011 regarding the following areas at Pilgrim Nuclear Power Station (PNPS).

- Aging Management of Low and Medium-Voltage Cables

Commitment No. 15 is being revised to be consistent with the Pilgrim License Renewal Application (LRA) Updated Final Safety Analysis Report (UFSAR) Section A.2.1.21, Non-EQ Inaccessible Medium-Voltage Cable Program revised in Entergy Letter 2.11.031, dated April 22, 2011 [Reference (6)].

License Renewal Commitment #15 is revised to read as follows;

Commitment No. 15

Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.19.

Inspections for water accumulation in manholes containing in-scope inaccessible low-voltage and medium-voltage cables with a license renewal intended function will be performed at least annually. Additional condition-based inspections of these manholes will be performed based upon natural events for a coastal site. The inspection results will be reviewed to determine the need for more frequent inspections.

Inaccessible medium and low-voltage (400 V to 2 kV) cables with a license renewal intended function are included in this program. Inaccessible medium and low-voltage cables will be tested for cable insulation degradation prior to the period of extended operation (PEO) and at least once every six years after entering the PEO. A proven, commercially available test will be used for detecting deterioration of the insulation system of low and medium-voltage inaccessible cables with a license renewal function. Review test results to determine the need for more frequent testing.

Attachment 2 to Letter No. 2.11.034

Pilgrim Nuclear Power Station
License No. DPR-35 (Docket No. 50-293)

License Renewal Application

Complete List of License Renewal Commitments

(11 Pages)

Revised List of Regulatory 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.

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
1	Implement the Buried Piping and Tanks Inspection Program as described in LRA Section B.1.2.	June 8, 2012	Letters 2.06.003 2.06.057
2	Enhance the implementing procedure for ASME Section XI Inservice Inspection and testing to specify that the guidelines in Generic Letter 88-01 or approved BWRVIP-75 shall be considered in determining sample expansion if indications are found in Generic Letter 88-01 welds.	June 8, 2012	Letters 2.06.003 2.06.057
3	Inspect fifteen (15) percent of the top guide locations using enhanced visual inspection technique, EVT-1, within the first 18 years of the period of extended operation, with at least one-third of the inspections to be completed within the first six (6) years and at least two-thirds within the first 12 years of the period of extended operations. Locations selected for examination will be areas that have exceeded the neutron fluence threshold.	As stated in the commitment.	Letters 2.06.003 2.06.057 2.06.064 2.06.081
4	Enhance the Diesel Fuel Monitoring Program to include quarterly sampling of the security diesel generator fuel storage tank. Particulates (filterable solids), water and sediment checks will be performed on the samples. Filterable solids acceptance criteria will be = 10 mg/l. Water and sediment acceptance criteria will be = 0.05%.	June 8, 2012	Letters 2.06.003 2.06.057 2.06.089
5	Enhance the Diesel Fuel Monitoring Program to install instrumentation to monitor for leakage between the two walls of the security diesel generator fuel storage tank to ensure that significant degradation is not occurring.	June 8, 2012	Letters 2.06.003 2.06.057
6	Enhance the Diesel Fuel Monitoring Program to specify acceptance criterion for UT measurements of emergency diesel generator fuel storage tanks (T-126A&B).	June 8, 2012	Letters 2.06.003 2.06.057

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
7	<p>Enhance Fire Protection Program procedures to state that the diesel engine sub-systems (including the fuel supply line) shall be observed while the pump is running. Acceptance criteria will be enhanced to verify that the diesel engine did not exhibit signs of degradation while it was running; such as fuel oil, lube oil, coolant, or exhaust gas leakage. Also, enhance procedures to clarify that the diesel-driven fire pump engine is inspected for evidence of corrosion in the intake air, turbocharger, and jacket water system components as well as lube oil cooler. The jacket water heat exchanger is inspected for evidence of corrosion or buildup to manage loss of material and fouling on the tubes. Also, the engine exhaust piping and silencer are inspected for evidence of internal corrosion or cracking.</p>	June 8, 2012	<p>Letters 2.06.003 2.06.057 2.06.064</p>
8	<p>Enhance the Fire Protection Program procedure for Halon system functional testing to state that the Halon 1301 flex hoses shall be replaced if leakage occurs during the system functional test.</p>	June 8, 2012	<p>Letters 2.06.003 2.06.057</p>
9	<p>Enhance Fire Water System Program procedures to include inspection of hose reels for corrosion. Acceptance criteria will be enhanced to verify no significant corrosion.</p>	June 8, 2012	<p>Letters 2.06.003 2.06.057</p>
10	<p>Enhance the Fire Water System Program to state that a sample of sprinkler heads will be inspected using guidance of NFPA 25 (2002 Edition) Section 5.3.1.1.1. NFPA 25 also contains guidance to repeat this sampling every 10 years after initial field service testing.</p>	June 8, 2012	<p>Letters 2.06.003 2.06.057</p>
11	<p>Enhance the Fire Water System Program to state that wall thickness evaluations of fire protection piping will be performed on system components using non-intrusive techniques (e.g., volumetric testing) to identify evidence of loss of material due to corrosion. These inspections will be performed before the end of the current operating term and at intervals thereafter during the period of extended operation. Results of the initial evaluations will be used to determine the appropriate inspection interval to ensure aging effects are identified prior to loss of intended function.</p>	June 8, 2012	<p>Letters 2.06.003 2.06.057</p>

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
12	Implement the Heat Exchanger Monitoring Program as described in LRA Section B.1.15.	June 8, 2012	Letters 2.06.003 2.06.057
13	Enhance the Instrument Air Quality Program to include a sample point in the standby gas treatment and torus vacuum breaker instrument air subsystem in addition to the instrument air header sample points.	June 8, 2012	Letters 2.06.003 2.06.057
14	Implement the Metal-Enclosed Bus Inspection Program as described in LRA Section B.1.18.	June 8, 2012	Letters 2.06.003 2.06.057
15	<p>Implement the Non-EQ Inaccessible Medium-Voltage Cable Program as described in LRA Section B.1.19.</p> <p>Inspections for water accumulation in manholes containing in-scope inaccessible low-voltage and medium-voltage cables with a license renewal intended function will be performed at least annually. Additional condition-based inspections of these manholes will be performed based upon natural events for a coastal site. The inspection results will be reviewed to determine the need for more frequent inspections.</p> <p>Inaccessible medium and low-voltage (400 V to 2 kV) cables with a license renewal intended function are included in this program. Inaccessible medium and low-voltage cables will be tested for cable insulation degradation prior to the period of extended operation (PEO) and at least once every six years after entering the PEO. A proven, commercially available test will be used for detecting deterioration of the insulation system of low and medium voltage inaccessible cables with a license renewal function. Review test results to determine the need for more frequent testing.</p>	June 8, 2012	Letters 2.06.003 2.06.057 2.11.001 2.11.031 2.11.034
16	Implement the Non-EQ Instrumentation Circuits Test Review Program as described in LRA Section B.1.20.	June 8, 2012	Letters 2.06.003 2.06.057
17	Implement the Non-EQ Insulated Cables and Connections Program as described in LRA Section B.1.21.	June 8, 2012	Letters 2.06.003 2.06.057

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
18	Enhance the Oil Analysis Program to periodically change CRD pump lubricating oil. A particle count and check for water will be performed on the drained oil to detect evidence of abnormal wear rates, contamination by moisture, or excessive corrosion.	June 8, 2012	Letters 2.06.003 2.06.057
19	Enhance Oil Analysis Program procedures for security diesel and reactor water cleanup pump oil changes to obtain oil samples from the drained oil. Procedures for lubricating oil analysis will be enhanced to specify that a particle count and check for water are performed on oil samples from the fire water pump diesel, security diesel, and reactor water cleanup pumps.	June 8, 2012	Letters 2.06.003 2.06.057
20	<p>Implement the One-Time Inspection program as described in LRA Section B.1.23</p> <p>Entergy will perform volumetric examination of 10% of the population of Class 1 ISI small-bore socket welds at PNPS. In lieu of volumetric examinations, destructive examinations may be performed. The total welds inspected will be any combination of volumetric and destructive examinations, where one destructive examination may be substituted for two volumetric examinations. In addition to the destructive examination performed in 2005, Entergy will schedule four volumetric examinations for 2013. The remaining inspections will be completed no later than 2017.</p> <p>As a further enhancement, Entergy will inspect three small-bore butt welds in 2011 and another one in 2015.</p>	June 8, 2012	Letters 2.06.003 2.06.057 2.07.023 2.11.001
21	Enhance the Periodic Surveillance and Preventive Maintenance Program as necessary to assure that the effects of aging will be managed as described in LRA Section B.1.24.	June 8, 2012	Letters 2.06.003 2.06.057
22	Enhance the Reactor Vessel Surveillance Program to proceduralize the data analysis, acceptance criteria, and corrective actions described in LRA Section B.1.26.	June 8, 2012	Letters 2.06.003 2.06.057

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
23	Implement the Selective Leaching Program in accordance with the program as described in LRA Section B.1.27.	June 8, 2012	Letters 2.06.003 2.06.057
24	Enhance the Service Water Integrity Program procedure to clarify that heat transfer test results are trended.	June 8, 2012	Letters 2.06.003 2.06.057
25	Enhance the Structures Monitoring Program procedure to clarify that the discharge structure, security diesel generator building, trenches, valve pits, manholes, duct banks, underground fuel oil tank foundations, manway seals and gaskets, hatch seals and gaskets, underwater concrete in the intake structure, and crane rails and girders are included in the program. In addition, the Structures Monitoring Program will be revised to require opportunistic inspections of inaccessible concrete areas when they become accessible.	June 8, 2012	Letters 2.06.003 2.06.057
26	Enhance Structures Monitoring Program guidance for performing structural examinations of elastomers (seals, gaskets, seismic joint filler, and roof elastomers) to identify cracking and change in material properties.	June 8, 2012	Letters 2.06.003 2.06.057
27	Enhance the Water Control Structures Monitoring Program scope to include the east breakwater, jetties, and onshore revetments in addition to the main breakwater.	June 8, 2012	Letters 2.06.003 2.06.057
28	Enhance System Walkdown Program guidance documents to perform periodic system engineer inspections of systems in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4(a)(1) and (a)(3). Inspections shall include areas surrounding the subject systems to identify hazards to those systems. Inspections of nearby systems that could impact the subject systems will include SSCs that are in scope and subject to aging management review for license renewal in accordance with 10 CFR 54.4(a)(2).	June 8, 2012	Letters 2.06.003 2.06.057
29	Implement the Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Program as described in LRA Section B.1.31.	June 8, 2012	Letters 2.06.003 2.06.057

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
30	Perform a code repair of the CRD return line nozzle to cap weld if the installed weld repair is not approved via accepted code cases, revised codes, or an approved relief request for subsequent inspection intervals.	June 30, 2015	Letter 2.06.057
31	<p>At least 2 years prior to entering the period of extended operation, for the locations identified in NUREG/CR-6260 for BWRs of the PNPS vintage, PNPS will refine our current fatigue analyses to include the effects of reactor water environment and verify that the cumulative usage factors (CUFs) are less than 1. This includes applying the appropriate Fen factors to valid CUFs determined in accordance with one of the following:</p> <ol style="list-style-type: none"> 1. For locations, including NUREG/CR-6260 locations, with existing fatigue analysis valid for the period of extended operation, use the existing CUF to determine the environmentally adjusted CUF. 2. More limiting PNPS-specific locations with a valid CUF may be added in addition to the NUREG/CR-6260 locations. 3. Representative CUF values from other plants, adjusted to or enveloping the PNPS plant specific external loads may be used if demonstrated applicable to PNPS. 4. An analysis using an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case) may be performed to determine a valid CUF. <p>During the period of extended operation, PNPS may also use one of the following options for fatigue management if ongoing monitoring indicates a potential for a condition outside the analysis bounds noted above:</p> <ol style="list-style-type: none"> 1) Update and/or refine the affected analyses described above. 2) Implement an inspection program that has been reviewed and approved by the NRC (e.g., periodic nondestructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC). 3) Repair or replace the affected locations before exceeding a CUF of 1.0. 	<p>June 8, 2012</p> <p>June 8, 2010 for submitting the aging management program if PNPS selects the option of managing the affects of aging due to environmentally assisted fatigue.</p>	<p>Letters 2.06.057 2.06.064 2.06.081 2.07.005 2.07.064</p>
32	Implement the enhanced Bolting Integrity Program described in Attachment C of Pilgrim License Renewal Application Amendment 5 (Letter 2.06.064).	June 8, 2012	Letters 2.06.057 2.06.064 2.06.081

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
33	PNPS will inspect the inaccessible jet pump thermal sleeve and core spray thermal sleeve welds if and when the necessary technique and equipment become available and the technique is demonstrated by the vendor, including delivery system.	As stated in the commitment.	Letter 2.06.057
34	Within the first 6 years of the period of extended operation and every 12 years thereafter, PNPS will inspect the access hole covers with UT methods. Alternatively, PNPS will inspect the access hole covers in accordance with BWRVIP guidelines should such guidance become available.	June 8, 2018	Letters 2.06.057 2.06.089
35	<p>At least 2 years prior to entering the period of extended operation, for reactor vessel components, including the feedwater nozzles, PNPS will implement one or more of the following:</p> <ul style="list-style-type: none"> (1) Refine the fatigue analyses to determine valid CUFs less than 1. Determine valid CUFs based on numbers of transient cycles projected to be valid for the period of extended operation. Determine CUFs in accordance with an NRC-approved version of the ASME code or NRC-approved alternative (e.g., NRC-approved code case). (2) Manage the effects of aging due to fatigue at the affected locations by an inspection program that has been reviewed and approved by the NRC (e.g., periodic non-destructive examination of the affected locations at inspection intervals to be determined by a method acceptable to the NRC). (3) Repair or replace the affected locations before exceeding a CUF of 1.0. <p>Should PNPS select the option to manage the aging effects due to fatigue during the period of extended operation, details of the aging management program such as scope, qualification, method, and frequency will be submitted to the NRC at least 2 years prior to the period of extended operation.</p>	June 8, 2012 June 8, 2010 for submitting the aging management program if PNPS selects the option of managing the affects of aging.	Letters 2.06.057 2.06.064 2.06.081
36	To ensure that significant degradation on the bottom of the condensate storage tank is not occurring, a one-time ultrasonic thickness examination in accessible areas of the bottom of the condensate storage tank will be performed. Standard examination and sampling techniques will be utilized.	June 8, 2012	Letter 2.06.057

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
37	The BWR Vessel Internals Program includes inspections of the steam dryer. Inspections of the steam dryer will follow the guidelines of BWRVIP-139 and General Electric SIL 644 Rev. 1.	June 8, 2012	Letter 2.06.089
38	Enhance the Diesel Fuel Monitoring Program to include periodic ultrasonic thickness measurement of the bottom surface of the diesel fire pump day tank. The first ultrasonic inspection of the bottom surface of the diesel fire pump day tank will occur prior to the period of extended operation, following engineering analysis to determine acceptance criteria and test locations. Subsequent test intervals will be determined based on the first inspection results.	June 8, 2012	Letter 2.06.089
39	Perform a one-time inspection of the Main Stack foundation prior to the period of extended operation.	June 8, 2012	Letter 2.06.094
40	Enhance the Oil Analysis Program by documenting program elements 1 through 7 in controlled documents. The program elements will include enhancements identified in the PNPS license renewal application and subsequent amendments to the application. The program will include periodic sampling for the parameters specified under the Parameters Monitored/Inspected attribute of NUREG-1801 Section XI.M39, Lubricating Oil Analysis. The controlled documents will specify appropriate acceptance criteria and corrective actions in the event acceptance criteria are not met. The basis for acceptance criteria will be defined.	June 8, 2012	Letter 2.06.094
41	Enhance the Containment Inservice Inspection (CII) Program to require augmented inspection in accordance with ASME Section XI IWE-1240, of the drywell shell adjacent to the sand cushion following indications of water leakage into the annulus air gap.	June 8, 2012	Letter 2.06.094
42	Implement the Bolted Cable Connections Program, described in Attachment C of Pilgrim License Renewal Application 11 (Letter 2.07.003), prior to the period of extended operation.	June 8, 2012	Letter 2.07.003

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
43	Include within the Structures Monitoring Program provisions to ensure groundwater samples are evaluated periodically to assess the aggressiveness of groundwater to concrete, as described in Attachment E of LRA Amendment 12 (Letter 2.07.005), prior to the period of extended operation.	June 8, 2012	Letter 2.07.005
44	Perform another set of the UT measurements just above and adjacent to the sand cushion region prior to the period of extended operation and once within the first 10 years of the period of extended operation.	As stated in the commitment.	Letter 2.07.010
45	If groundwater continues to collect on the torus room floor, obtain samples and test such water to determine its pH and verify the water is non-aggressive as defined in NUREG-1801 Section III.A1 item III.A.1-4 once prior to the period of extended operation and once every five years during the period of extended operation.	As stated in the commitment.	Letters 2.07.010 2.07.027 2.07.029
46	Inspect the condition of a sample of the torus hold-down bolts and associated grout and determine appropriate actions based on the findings prior to the period of extended operation.	June 8, 2012	Letter 2.07.027
47	Submit to the NRC an action plan to improve benchmarking data to support approval of new P-T curves for Pilgrim.	Sept.15, 2007	Letter 2.07.027
48	On or before June 8, 2010, Entergy will submit to the NRC calculations consistent with Regulatory Guide 1.190 that will demonstrate limiting fluence values will not be reached during the period of extended operation.	June 8, 2010	Letter 2.07.027
49	Perform periodic inspection and neutron absorber testing of Boral and Metamic in accordance with the Neutron Absorber Monitoring Program as described in LRA Section B.1.35. One test on each material will be performed within the five years preceding the PEO, with additional testing performed on each material at least once every 10 years during the PEO.	As stated in the commitment	Letters 2.11.001 2.11.027

#	COMMITMENT	IMPLEMENTATION SCHEDULE	SOURCE
50	<p>Buried carbon steel (CS) piping in all in-scope systems except fire protection will be inspected by 12/31/2013, using a direct visual inspection of the entire circumference of at least ten linear feet of exposed pipe. Results not meeting the inspection acceptance criteria will be entered into the PNPS corrective action program for evaluation and corrective actions.</p> <p>Prior to the period of extended operation, Entergy will implement the corporate Buried Piping and Tanks Inspection and Monitoring Program which defines the requirements for continuing inspection of buried and underground piping and tanks.</p>	As stated in the commitment	Letter 2.11.001 2.11.031
51	<p>Enhance the Structures Monitoring Program to invoke quantitative acceptance criteria for inspections of concrete structures in accordance with ACI 349.3R, "Evaluation of Existing Nuclear Safety-Related Concrete Structures" prior to the period of extended operation (PEO).</p>	As stated in the commitment	Letter 2.11.008
52	<p>Entergy will review design basis ASME Code Class 1 fatigue evaluations to determine whether the NUREG/CR-6260 locations that have been evaluated for the effects of the reactor coolant environment on fatigue usage are the limiting locations for the Pilgrim plant configuration. If more limiting locations are identified, the most limiting location will be evaluated for the effects of the reactor coolant environment on fatigue usage.</p> <p>PNPS will use the NUREG/CR-6909 methodology in evaluation of the limiting locations consisting of nickel alloy, if any. This evaluation will be completed prior to period of extended operation.</p>	June 8, 2012	Letter 2.11.017
53	<p>Enhance safety-related coatings programs and procedures to be consistent with the recommendations of NUREG-1801, Section XI.S8, Protective Coating Monitoring and Maintenance Program.</p>	June 8, 2012	Letter 2.11.027