

TO: LEEDS, NRR
Ref. G20120327

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE EDO, U.S. NUCLEAR REGULATORY COMMISSION

June 20, 2012

R. William Borchardt
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Via Email hearingdocket@nrc.gov

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SUPPLEMENT TO 2.206 ENFORCEMENT PETITION REGARDING LABOR DISPUTE- PILGRIM NPS (SUBMITTED MAY 16, 2012) - MONTHLY COMMUNICATION TEST FAILURE

Pilgrim Watch ("PW") respectfully requests to supplement its 2.206 enforcement petition submitted originally on May 16 regarding the labor dispute at Pilgrim Station highlighting its public safety implications. We submit the following pertinent new information that supports PW's request for NRC to order Pilgrim closed for operations until the labor dispute is resolved with all 369 union workers reinstated in their original jobs onsite.

This morning we were informed that during the monthly scheduled radio test, no DNN Fax came through to any of the test participants in Pilgrim Station's EPZ. This is important because when EOC's get a notification of an event it comes through the BECONS radio and DNN fax and the system is supposedly redundant for obvious safety reasons. During this morning's test, no fax was received by any of the EPZ 24 hour answering points or the EPZ EOC's. This was out of the ordinary; usually one or two miss-fire due to issues on the receiving point end such as no toner or paper.

We naturally were curious if the lock-out had anything to do with it. Tom White, Pilgrim Emergency Planner, said the lock-out had no impact on the communication failure in an email to the Emergency Response Directors, dated Wed, 20 Jun 2012 16:43:32. He said that the test is normally performed from the Control Room and because there was another evolution there, the test was moved to the EOF as allowed by procedure.

It appears to be a remarkable coincidence that all EOC's reported the same problem and that it occurred for the first time during the lock-out. We request that NRC investigate.

Our original filing and each of our supplemental filings may appear not be such a "big deal" if looked at individually;" but when looked at collectively, they paint a clear picture that reasonable assurance is not adequately protected during this lock-out. Further, we believe that the filings provide valuable lessons learned for NRC to apply to subsequent lock-outs industry-wide.

Respectfully submitted on behalf of Petitioners,

(Electronically signed)

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