



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

July 6, 2012

Mr. David Lochbaum  
Director, Nuclear Safety Project  
P. O. Box 15316  
Chattanooga, TN 37415

Dear Mr. Lochbaum:

I am responding to your letter dated June 7, 2012, to the Region I Administrator, which asked about the U.S. Nuclear Regulatory Commission's review of Entergy's contingency plans for adequately staffing its emergency response organization in the event of a labor dispute. The NRC Inspection Manual and Region I internal policies provide specific guidance regarding preparations and actions to be taken by NRC staff in advance of a labor contract expiration date and upon notification of an impending strike that may affect staffing at any of the Region I nuclear power facilities.

If a strike appears imminent, NRC Region I Division of Reactor Projects and Safety Joint Policy No. 37/1030, "NRC Preparations for Potential Licensee Strike," directs NRC personnel to implement NRC Inspection Procedure (IP) 92709, "Licensee Strike Contingency Plans." The IP 92709 requires that inspectors "confirm that site staffing will be sufficient and qualified to implement the site emergency plan," and also to "verify that the emergency communication equipment and the Emergency Notification System, where applicable, are available and operable." The Pilgrim resident inspector staff and the regional senior emergency preparedness (EP) inspector conducted these reviews in advance of the labor action at Pilgrim. Entergy constructed a contingency emergency response organization (ERO) that maintained an adequate ERO shift rotation, composed of trained and qualified individuals capable of adequately implementing the Pilgrim Emergency Plan. While the primary focus of our review of the Pilgrim contingency ERO was on training and qualifications, the Region I senior EP inspector reviewed Pilgrim's contingency ERO against the criteria of the Reactor Oversight Process Performance Indicators (PIs). The ERO Drill Participation PI requires that 80 percent of the Key Positions of the ERO have participated in an EP drill within the previous 24 months to maintain the indicator above the green/white threshold. The inspector's review determined that all 11 positions tracked by the PI as a Key Position have been filled in the Pilgrim contingency ERO by an individual who has participated in a drill, in that specific position, within the past 24 months.

D. Lochbaum

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The NRC has concluded that the Pilgrim contingency ERO has been staffed with trained, qualified, and experienced individuals. Our inspectors' review and assessment activities provide me the reasonable assurance that the emergency response duties at Pilgrim will be conducted by adequately trained persons, and that the public health and safety would be adequately protected if a radiological emergency were to occur at the Pilgrim Nuclear Power Station.

If you have any further questions regarding this matter, please contact Steve Barr of my office, at (610) 337-5316.

Sincerely,

**/RA/**

Christopher G. Miller, Director  
Division of Reactor Safety

D. Lochbaum

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Christopher G. Miller, Director  
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OFFICE	RI/DRS	RI/DRP	RI/DRS	RI/DRS	
NAME	Barr/stb*	Bellamy/rrb*	Trapp/jmt*	Miller/cgm	
DATE	07/02/2012	07/02/2012	07/03/2012	07/05/2012 07/06/2012	

- Prior concurrence OFFICIAL RECORD COPY