

October 29, 2012

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

**SUBJECT:** Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) Pilgrim Nuclear Power Station  
Docket No. 50-293  
License No. DPR-35

- REFERENCES:**
1. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events", dated March 12, 2012 (PNPS Letter 1.12.013)
  2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events", Revision 0, dated August 29, 2012 (ML 12229A174)
  3. Nuclear Energy Institute (NEI) Letter to NRC, "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)", dated February 24, 2012
  4. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", Revision 0, dated August 2012

LETTER NUMBER 2.12.072

Dear Sir or Madam:

On March 12, 2012, the NRC issued an order (Reference 1) to Entergy Operations, Inc. (Entergy). Reference 1 was immediately effective and directs Entergy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

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Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms Entergy has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan
- Completion of a site specific evaluation to identify upgrades in plant hardware, procedures, and training to establish the coping capabilities as defined in NEI 12-06.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

- None at this time

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for Pilgrim Nuclear Power Station prior to startup from Refueling Outage (RFO) 20 (Spring 2015).

This letter contains no new regulatory commitments. Should you have any questions concerning the content of this letter, 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 October 29, 2012.

Sincerely,



Robert G. Smith  
Site Vice President  
RGS/rmb

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