



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Robert G. Smith, P.E.
Site Vice President

January 29, 2013

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

SUBJECT: Response to March 12, 2012, Request for Information Enclosure 2,
Recommendation 2.1, Flooding, Required Response 1, *Integrated
Assessment Approach*

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

- REFERENCES:
1. NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, March 12, 2012 (ADAMS Accession No. ML12053A340)
 2. NRC Interim Staff Guidance JLD-ISG-2012-05, *Guidance for Performing the Integrated Assessment for External Flooding*, Revision 0 (ADAMS Accession No. ML12311A214)
 3. NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), *Trigger Conditions for Performing an Integrated Assessment and Due Date for Response*, December 3, 2012 (ADAMS Accession No. ML12326A912)

LETTER NUMBER 2.13.005

Dear Sir or Madam:

On March 12, 2012, the NRC staff issued Reference 1 to request information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for Flooding. Item 2 of Enclosure 2 to Reference 1 requests an Integrated Assessment Report from plant sites whose reevaluated flooding hazard is not bounded by their current design basis. Further, Required Response 1 states: "Within 60 days of the date of the NRC's issuance of guidance on implementation details of the Integrated Assessment Report, including criteria for identifying vulnerabilities, submit an approach for developing an Integrated Assessment Report including criteria for identifying vulnerabilities."

The following is Entergy Nuclear Operations, Inc (Entergy) 60-day response to Required Response 1.

On November 30, 2012, the NRC issued the Reference 2 Interim Staff Guidance. Entergy commits to use the Reference 2 guidance as the approach for developing the NTTF 2.1 flooding Integrated Assessment Report for Pilgrim Nuclear Power Station if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.

ADDI
NRR

Entergy also commits to use the guidance provided in Reference 3 regarding the trigger conditions and scope of any required Integrated Assessment.

This letter contains two new regulatory commitments, which are identified in the attachment.

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 January 29, 2013.

Sincerely,



Robert G. Smith
Site Vice President
RGS/rmb

Attachment: Pilgrim Nuclear Power Station (PNPS) List of Regulatory Commitments

cc: Mr. William M. Dean
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NRC Senior Resident Inspector
Pilgrim Nuclear Power Station

ATTACHMENT

PNPS Letter 2.13.005

Pilgrim Nuclear Power Station (PNPS)

LIST OF REGULATORY COMMITMENTS

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 | TYPE (Check One) | | SCHEDULED COMPLETION DATE (If Required) |
|---|------------------------|--------------------------|---|
| | ONE- TIME ACTION | CONTINUING COMPLIANCE | |
| Entergy commits to use Interim Staff Guidance JLD-ISG-2012-05, <i>Guidance for Performing the Integrated Assessment for External Flooding</i> , Revision 0 guidance as the approach for developing the NTTF 2.1 flooding Integrated Assessment Report for PNPS if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation. PNPS Commitment No. A16860 | ✓ | | March 12, 2017 [Upon submittal of the Integrated Assessment Report, if required, which is two years following submittal of the site's Hazard Reevaluation Report.] |
| Entergy commits to use the guidance provided in NRC Letter, D.L. Skeen (NRC) to J.E. Pollock (NEI), <i>Trigger Conditions for Performing an Integrated Assessment and Due Date for Response</i> , regarding the trigger conditions and scope of any required Integrated Assessment. PNPS Commitment No. A16861 | ✓ | | March 12, 2017 [Upon submittal of the Integrated Assessment Report, if required, which is two years following submittal of the site's Hazard Reevaluation Report.] |