

February 28, 2013

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

SUBJECT: Overall Integrated Plan in Response to March 12, 2012, Commission Order Modifying Licenses With Regard to Reliable Hardened Containment Vents (Order Number EA-12-050)

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

- REFERENCES:**
1. NRC Order Number EA-12-050, "Order to Modify Licenses With Regard To Reliable Hardened Containment Vents", dated March 12, 2012 (PNPS Letter 1.12.014)
 2. NRC Interim Staff Guidance JLD-ISG-2012-02, "Compliance with Order EA-12-050, Reliable Hardened Containment Vents", Revision 0, dated August 29, 2012 (ML 12229A475)
 3. Pilgrim Nuclear Power Station Letter to NRC "Initial Status Report in Response to March 12, 2012, Commission Order to Modify Licenses with Regard to Reliable Hardened Containment Vents (Order Number EA-12-050)", dated October 29, 2012 (PNPS Letter 2.12.073)

LETTER NUMBER 2.13.013

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Entergy Nuclear Operations, Inc. (Entergy). Reference 1 was immediately effective and directs Entergy to have a reliable hardened vent (RHV) to remove decay heat and maintain control of containment pressure within acceptable limits following events that result in the loss of active containment heat removal capability or prolonged station blackout (SBO). Specific requirements are outlined in Attachment 2 of the Reference 1.

Reference 1 requires submission of an Overall Integrated Plan by February 28, 2013. The interim staff guidance (Reference 2) was issued August 29, 2012 which provides direction regarding the content of this Overall Integrated Plan. The purpose of this letter is to provide the Overall Integrated Plan pursuant to Section IV, Condition C.1, of Reference 1.

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NRR


This letter confirms Entergy has an Overall Integrated Plan complying with the guidance for the purpose of ensuring the functionality of reliable hardened vent (RHV) systems to remove decay heat and control of containment pressure following events that result in loss of active containment heat removal capability or prolonged Station Blackout (SBO) as described in Attachment 2 of Reference 1.

For the purposes of compliance with Order EA-12-050, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents, Entergy plans to use a wetwell vent.

The enclosure contains design information as of the writing of this letter, much of which is still preliminary, pending completion of on-going evaluations and analyses. Due to the synergy between the design of the RHV system and the equipment to be utilized in the Diverse and Flexible Coping Strategies (FLEX) required by Order EA-12-049, some of the design details are still being developed. As further design details and associated procedure guidance are finalized, revisions to the information contained in the enclosure will be communicated to the NRC in the 6-month updates required by the Order.

Entergy and PNPS have performed in-depth reviews of the INPO 11-005 Special Report on the Nuclear Accident at the Fukushima Daiichi Nuclear Power Station (w/Addendum) and other available studies of the events at the Fukushima Daiichi plants in Japan following the March 11, 2011 earthquake and tsunamis. As a result of this review, a "FLEX" Strategy has been developed that provides substantial new capabilities that are simple, robust, and independent, to the extent practicable, from permanent plant systems that may be affected by even the most unforeseen Beyond-Design-Basis-External-Events. These capabilities are focused on the principal and highest priority goal of maintaining core cooling and submergence under all conditions using the most reliable methods available that can be implemented under potentially severe environmental conditions with only on-site assets, and subsequently maintaining that capability indefinitely with additional off-site resources. It is our belief that the proposed PNPS FLEX Strategy addresses the serious shortcomings in the original response to the Fukushima events, and that these actions, if ever required, would preclude the occurrence of any core damage and the resulting serious complications from similar events that include an Extended Loss of AC Power together with a Loss of Ultimate Heat Sink and significant damage to plant systems.

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 February 28, 2013.

Sincerely,



Robert G. Smith
Site Vice President

RGS/rmb

Enclosure: Pilgrim Nuclear Power Station Overall Integrated Plan For Reliable Hardened Containment Vents

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