



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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John A. Dent, Jr.
Site Vice President

June 26, 2013

U.S. Nuclear Regulatory Commission
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SUBJECT: Entergy's Answer to the June 6, 2013, Commission Order Modifying License With Regard To Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

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

REFERENCE: 1. NRC Letter to Entergy, *Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents*, dated June 6, 2013 (PNPS Letter 1.13.028)

LETTER NUMBER 2.13.050

Dear Sir or Madam:

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an immediately effective order to all licensees that operate boiling-water reactors (BWRs) with Mark I and Mark II containment designs, including Entergy, entitled "Order Modifying License with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Effective Immediately)." (EA-13-109) Order EA-13-109 rescinds an order issued by the NRC on March 12, 2012 (EA-12-050), that required all BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of a reliable hardened vent systems to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged loss of AC power.

Order EA-13-109 requires Entergy to install hardened containment venting systems that can be maintained functional during severe accident conditions, i.e. following significant core damage. The substantive requirements of the Order are contained in Attachment 2 of the Order. The Order includes two separate implementation phases. Phase 1 includes modifications to wetwell venting systems, while Phase 2 includes modifications to drywell venting systems or implementation of a reliable containment strategy that meets regulatory approval. Entergy is required to submit an overall integrated plan describing how compliance with Phase 1 will be achieved to the NRC by June 30, 2014, and is required to complete full implementation of Phase 1 requirements no later than startup from the second refueling outage that begins after June 30, 2014, or June 30, 2018, whichever is sooner. EA-13-109 also requires Entergy to submit an overall

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integrated plan describing how compliance with Phase 2 will be achieved to the NRC by December 31, 2015, and full implementation of Phase 2 requirements must be complete no later than startup from the first refueling outage that begins after June 30, 2017, or June 30, 2019, whichever is sooner.

The NRC states in the Order that it anticipates issuing implementation guidance for Phase 1 by October 31, 2013, and for Phase 2 by April 30, 2015. Upon issuance of the implementation guidance, Entergy understands that it will have twenty days to assess the impact of the guidance and notify the NRC of any challenges with implementation of the order in accordance with Paragraph IV.C of the Order.

Pursuant to 10 C.F.R. § 2.202(a)(2), Entergy hereby submits its answer to the Order. Entergy consents to Order EA-13-109 and does not request a hearing. However, because implementing guidance is not expected to be available until October 31, 2013, for Phase 1, and April 30, 2015, for Phase 2, there remain significant uncertainties about the scope of the work that will be required by EA-13-109. As a result, Entergy is unable to state with certainty that it will be able to meet all of the specified compliance deadlines in the Order. As such, Entergy's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

Because EA-12-050 is rescinded by EA-13-109, Entergy understands that all implementation deadlines and submittal requirements for EA-12-050 are no longer in force. As such, Entergy considers the integrated plan that was submitted to the NRC on February 28, 2013 to be withdrawn, and no further action is required by Entergy with respect to that submittal or any other requirement specific to EA-12-050.

Should you have any questions concerning the content of this letter, please contact Mr. Joseph R. Lynch at (508) 830-8403.

This letter contains no new regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct; executed on June 26, 2013.

Sincerely,

Handwritten signature in black ink that reads "DE DENT FOR JOHN DENT".

John A. Dent Jr.
Site Vice President

JAD/ rmb

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NRC Senior Resident Inspector
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