

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 2100 RENAISSANCE BLVD., SUITE 100 KING OF PRUSSIA. PA 19406-2713

March 19, 2015

Ms. Mary Lampert
Pilgrim Watch/Duxbury Nuclear Advisory Committee
148 Washington St.
Duxbury, MA 02332

Ms. Rebecca Chin Duxbury Nuclear Advisory Committee Deerpath Trail North Duxbury, MA 02332

Dear Ms. Lampert and Ms. Chin:

I am responding to your February 2, 2015, letter to Mr. Stephen Burns, NRC Chairman, and Mr. Raymond McKinley, Branch Chief in the Region I Division of Reactor Projects, requesting that Pilgrim be kept shut down based on issues discussed in your letter.

Your letter discussed, in part, a January 26, 2015, NRC inspection report as well as the events surrounding the January 27, 2015, Pilgrim shutdown during a severe winter storm.

The NRC's decision-making process for our oversight of licensee performance is in accordance with the Reactor Oversight Process (ROP) as described in NRC Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program,"

http://pbadupws.nrc.gov/docs/ML1419/ML14198A117.pdf Prior to issuance of the January 26, 2015, inspection report, Pilgrim was in the Degraded Cornerstone of the IMC 0305 Action Matrix due to two White performance indicators (PIs) in the Initiating Events cornerstone. As a result, a supplemental inspection was performed in late 2014 and the results of this inspection were documented in the January 26 inspection report. The inspectors determined that, in general, Entergy's problem identification, cause evaluation, and corrective action plans for the White Pls were adequate. However, they identified deficiencies regarding Entergy's execution of corrective actions as well as Entergy's understanding of some of the causes of the issues. As a result, the inspectors determined that Entergy's actions did not provide the assurance level required to meet all the inspection objectives and the NRC assigned two parallel White PI inspection findings. In addition, two findings of very low safety significance (Green) were identified during this inspection. The two parallel White PI inspection findings led to Pilgrim remaining in the Degraded Cornerstone of the Action Matrix as documented in the January 26 inspection report. This condition (i.e., two White inspection findings in the same cornerstone) warrants continued increased NRC oversight since licensee performance is outside the normal performance range, but still represents an acceptable level of performance. Cornerstone objectives are still met with minimal reduction in safety margin. This condition does not lead to an indicated need for the plant to remain shut down. The NRC will resume the supplemental inspection at Pilgrim when the licensee notifies the NRC of their readiness. In addition, the

NRC will continue to assess the effectiveness and sustainability of the licensee's efforts to address challenges in corrective action program (CAP) implementation during the next NRC biennial problem identification and resolution inspection, scheduled for August 2015.

Your February 2, 2015, letter also discussed the January 27, 2015, plant shutdown and equipment issues experienced during the shutdown, including the partial loss of off-site power. As a result of this shutdown and related equipment issues, the NRC launched a special inspection on February 2. The event and related issues are being evaluated and the results of the NRC inspection will be made publicly available within 45 days of the inspection's completion. Given that the inspection is still in-progress, we cannot provide specific responses to your questions about the equipment issues. In accordance with the ROP, the inspection results will be factored into the NRC's assessment of Pilgrim and their position in the Action Matrix. Appropriate follow-up actions will be determined at that time. Please keep in mind that although equipment issues were experienced during the shutdown, the reactor was safely shut down.

Lastly, with respect to your questions associated with Pilgrim's Waterways Project, the NRC review and evaluation of Entergy's plan is still ongoing. The questions raised in Attachment A to your letter will be forwarded to the technical and project management staff who are reviewing Entergy's submittal.

Thank you for making us aware of your concerns. If you have any additional questions, please contact Mr. Raymond McKinley at 610-337-5150.

Sincerely,

/RA/

Michael L. Scott Deputy Director Division of Reactor Projects NRC will continue to assess the effectiveness and sustainability of the licensee's efforts to address challenges in corrective action program (CAP) implementation during the next NRC biennial problem identification and resolution inspection, scheduled for August 2015.

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Lastly, with respect to your questions associated with Pilgrim's Waterways Project, the NRC review and evaluation of Entergy's plan is still ongoing. The questions raised in Attachment A to your letter will be forwarded to the technical and project management staff who are reviewing Entergy's submittal.

Thank you for making us aware of your concerns. If you have any additional questions, please contact Mr. Raymond McKinley at 610-337-5150.

Sincerely,

/RA/

Michael L. Scott Deputy Director Division of Reactor Projects

<u>Distribution</u>: (via email) J. Trapp, DRS B. Scrabeck, DRP, RI D. Dorman, RA R. McKinley, DRP K. MorganButler, RI OEDO D. Lew, DRA S. Shaffer, DRP RidsNrrPMPilgrim Resource H. Nieh, DRP E. DiPaolo, DRP RidsNrrDorlLPL1-1 Resource M. Scott, DRP J. DeBoer, DRP E. Miller, DRP, SRI (Acting) R. Lorson, DRS

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