

From: McKinley, Raymond
Sent: Thursday, April 02, 2015 11:43 AM
To: Dick0645@yahoo.com
Subject: Response to your E-Mail to NRC Dated February 11, 2015

Dear Mr. Andrews,

I am responding to your February 11, 2015, email to Edwin Hackett, Executive Director of the Advisory Committee on Reactor Safeguards, and Annette Vietti-Cook, Secretary of the Commission, regarding Pilgrim Station.

Your email recommends that Pilgrim be placed on a “troubled plant list.” The current United States Nuclear Regulatory Commission (NRC) Reactor Oversight Process (ROP) does not have such a list. As you are probably aware, in the past, the NRC had a “watch list” of plants needing heightened monitoring. The plants needed to demonstrate a period of sustained good performance before being removed from the list, which was updated semi-annually.

The agency revised its oversight program in 2000; the current program does not include a watch list, although it does provide for enhanced oversight of plants with risk significant inspection findings or performance indicators. A more detailed description of the ROP is posted on the NRC webpage at www.nrc.gov/reactors/operating/oversight/rop-description.html.

Under the ROP, color-coded inspection findings and performance indicators are used to assess plant performance. (Performance indicators are statistical measurements of plant and equipment performance which, if exceeded, trigger additional NRC oversight.) The colors range from green, connoting very low safety or security significance, to white, yellow or red, for an issue of high significance.

Overall, the plant was operated safely during 2014. However, the plant is receiving additional scrutiny from the NRC due to two performance indicators crossing from green to white last year.

Based on the update of data following the third quarter of 2013, Pilgrim saw its performance indicator for Unplanned Scrams (shutdowns) with Complications shift from green to white. This indicator tracks unplanned scrams that require additional operator actions and that are more risk significant than uncomplicated shutdowns. Subsequently, when 2013 fourth-quarter data was finalized, another indicator for the single-reactor plant also transitioned to white. That indicator covers Unplanned Scrams per 7,000 Hours of Operation and becomes white if a plant experiences more than three unplanned shutdowns during that period of time.

These changes led to Pilgrim moving to the Degraded Cornerstone Column of the NRC’s Action Matrix (the third of five such columns that represent increasing levels of NRC oversight), resulting in more inspections by the NRC and greater interaction between NRC senior managers and plant management to reach a better understanding of actions taken or planned to address the problems.

Last fall, a team of NRC inspectors traveled to Pilgrim to evaluate whether the issues behind the unplanned shutdowns had been satisfactorily addressed. The eight-member team found that although the company’s problem identification, root cause evaluation and corrective action plans were generally adequate, deficiencies still existed in the implementation of corrective action plans, as well as in understanding of the issues’ causes.

As a result, per agency processes, the NRC in January assigned two “parallel” “white” inspection findings to Pilgrim. The findings administratively replaced the two “white” performance indicators and mean that the plant will continue to receive heightened attention until the NRC can perform a follow-up team inspection and is satisfied the concerns have been resolved. The NRC will conduct that additional inspection once Entergy notifies the agency of its readiness for it.

As you can see, the NRC is focusing increased attention on Pilgrim. Additional information on NRC’s latest assessment of performance at Pilgrim is posted at www.nrc.gov/NRR/OVERSIGHT/ASSESS/LETTERS/pilg_2014q4.pdf.

In addition, the NRC initiated a Special Inspection to review the plant’s performance during a severe winter storm at the end of January that resulted in a reactor shutdown. The results of the inspection will be contained in a report to be issued this spring.

Regarding your comments on the Institute of Nuclear Power Operations, they should be directed to INPO at 700 Galleria Parkway, SE, Suite 100, Atlanta, GA, 30339.

Thank you again for sharing your concerns with us. If you have any further questions, please feel free to contact me.

Sincerely,

Raymond R. McKinley, Chief
Reactor Projects Branch 5
Division of Reactor Projects
U.S. NRC Region I
Office: (610) 337-5150