

**From:** [Boyer, Rachel](mailto:Boyer.Rachel)  
**To:** [Boyer, Rachel](mailto:Boyer.Rachel)  
**Subject:** 2.206 petition regarding Pilgrim's flood licensing basis  
**Date:** Monday, July 06, 2015 3:25:33 PM  
**Attachments:** [20150624-pg-ucs-et-al-rainfall-petition.pdf](#)

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**From:** Dave Lochbaum [<mailto:DLochbaum@ucsusa.org>]  
**Sent:** Wednesday, June 24, 2015 9:17 AM  
**To:** Satorius, Mark  
**Cc:** [pine@jonesriver.org](mailto:pine@jonesriver.org); Lampert, Mary; [tturco@comcast.net](mailto:tturco@comcast.net); [timj@nirs.org](mailto:timj@nirs.org); Gunter, Paul; [debbie@c-10.org](mailto:debbie@c-10.org); [sandra@c-10.org](mailto:sandra@c-10.org); [gogreens@comcast.net](mailto:gogreens@comcast.net); Dorman, Dan; Dean, Bill; Screnci, Diane; Nieh, Ho  
**Subject:** [External\_Sender] 2.206 petition regarding Pilgrim's flood licensing basis

Dear Mr. Satorius:

Attached is a petition submitted per 10 CFR 2.206 on behalf of eight organizations and individuals. I do not plan on also mailing in a hard copy of this petition, but would gladly do so upon request.

As detailed in the petition, we request that the NRC take enforcement action that results in heavy rainfall events (including Local Intense Precipitation and Probable Maximum Precipitation) being included within the licensing basis for the Pilgrim nuclear plant.

When it was discovered that the licensing basis for the Watts Bar nuclear plant did not properly account for Probable Maximum Flood events, that licensee applied to the NRC (see <https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML12236A167> and also <https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML13067A393>) for its approval to remedy this situation.

The flooding hazard re-evaluation performed for Pilgrim revealed a very similar situation involving its flooding licensing basis. Consequently, the petitioners seek the remedy similar to that used to resolve the matter at Watts Bar.

To simplify the NRC's processing of this petition, I would be glad to be the point of contact between the NRC and the petitioners.

Thanks,  
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