

Pilgrim Nuclear Power Station

ERO Staffing and Training Teleconference with NRC Staff

October 20, 2015



Agenda

- Introduction of Participants
- Background and History
- Problem Statement
- Proposed Resolution
- Basis for Change
- Intended Actions
- NRC Staff Questions and Perspective
- Conclusions

Introduction of Participants

- NRC Staff
- Entergy - Pilgrim



Background and History

- July 14, 2006 letter from Entergy to NRC Staff
 - ERO substitution: Chem Tech for RP Tech
 - Training for Chem Techs described
- Feb 5, 2007 letter from NRC Staff to Entergy
 - Change does not decrease effectiveness of plan
 - No NRC approval necessary
- 2015: Entergy determined Chem Tech training not consistent with July 14, 2006 letter
- Immediate actions; RP Tech added back to shifts;

Problem Statement

- Level of training for Chem Techs acting for RP Techs described in July 14, 2006 letter exceeds actual requirements of the ERO function.

July 14, 2006 Letter: Chem Tech Training

Qualification For "On-Shift" Personnel
Assigned to Perform Radiological Protection Duties in Response to a
Declared Emergency

This is the training and qualification personnel need when assigned to perform radiological protection tasks within the first 30 minutes of a declared emergency.

<u>NUREG 0654</u> <u>Table B-1</u> <u>"On-Shift" Task</u>	<u>Qualification</u>
Perform In-Plant Surveys	<ul style="list-style-type: none"> • Operations Support Center Pool Member Qualification • Respirator User Qualification • Self Contained Breathing Apparatus User Qualification • Walkdown EOP-4 survey point locations • Perform Radiation Surveys • Perform Contamination Surveys • Collect an Airborne Radioactivity Sample • Analyze Smears for contamination levels • Analyze Air Samples • Operate Basic Dose Rate Meters • Operate Basic Count Rate Meters • Operate the Scintillation Alpha Counter • Operate the Beta Counter • Operate the Gamma Spec System • Operate the Regulated Air Sample Pump • Operate the Radeco Air Sampler
Access Control	<ul style="list-style-type: none"> • Operations Support Center Pool Member Qualification • Control High Radiation Areas • RWP Briefing • Perform Stay Time Calculations • Issue and Return Respirators



Proposed Resolution

- Entergy proposal:
 - Return to onshift Chem Techs fulfilling the RP Tech ERO function for first 30 minutes of ERO initiation
 - Reduce the scope of Chem Tech training
 - Submittal to NRC for review and approval prior to implementation
- Entergy has concluded this change is acceptable

Basis for Change

- Reduced level of training – consistent with limited specific actions of the Chem Techs within 30 minutes
- Specific on-shift staffing study supports limited scope of responsibilities of Chem Tech for RP Techs
- OE review identified similar implementations
- February 5, 2007 NRC Staff letter concluded:
 - Previous Entergy proposal met requirements of:
 - 10CFR50.47(b)(2) – adequate staffing provided
 - 10CFR50, App E, IV.A – organization for coping
 - Chem Tech training considered an enhancement
 - No decrease in effectiveness / no NRC approval required

Intended Actions

- Conference call with NRC Staff
- Preparation and submittal of request for prior NRC Staff review and approval
- Revise training
- Revise ERO staffing

NRC Staff Questions and Perspective



Conclusions

- Proposed change in Chemistry Technician is appropriate based on ERO assignments
- Proposed change is justified by staffing study
- Entergy intends on submitting the proposed change for prior NRC review and approval