Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Brian R. Sullivan
Site Vice President

January 12, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: License Amendment Request to Revise the Pilgrim Nuclear Power Station Emergency Plan to Address the Permanently Defueled Condition

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

REFERENCE: 1. PNPS Letter to NRC, Subject: "Notification of Permanent Cessation of Power Operations," dated November 10, 2015 (Letter Number 2.15.080) (ML15328A053)

LETTER NUMBER: 2.18.004

Dear Sir or Madam:

Pursuant to Title 10, Code of Federal Regulations (CFR) 50.90, Entergy Nuclear Operations, Inc. (ENO) hereby requests U.S. Nuclear Regulatory Commission (NRC) review and approval of a revision to the Pilgrim Nuclear Power Station (PNPS) Site Emergency Plan (SEP).

In Reference 1, ENO certified to the NRC that it plans to permanently cease power operations of PNPS no later than June 1, 2019 in accordance with 10 CFR 50.82, paragraph (a)(1)(i). Once certification of permanent removal of fuel from the reactor vessel is submitted to the NRC in accordance with 10 CFR 50.82, paragraph (a)(1)(ii), and docketed, the 10 CFR Part 50 license will no longer authorize operation of the reactor or emplacement of fuel in the reactor vessel in accordance with 10 CFR 50.82(a)(2). Therefore, the reason for this proposed amendment is to revise the PNPS SEP for the permanently shut down and defueled condition. The proposed changes are being submitted to the NRC for approval prior to implementation, as required under 10 CFR 50.54(q)(4).

Specifically, this request proposes to revise the on-shift and Emergency Response Organization (ERO) staffing given the permanent cessation of power operations and permanent removal of fuel from the reactor vessel. ENO has reviewed the proposed changes against the planning standards in 10 CFR 50.47(b) and requirements in 10 CFR Part 50, Appendix E and concludes that the standards and requirements will continue to be met.

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The description and evaluation of the proposed changes are contained in Attachment 1. Attachment 2 provides a tabular summary of the proposed changes to the current PNPS SEP (Revision 48). Attachments 3 and 4 provide a marked-up version and a clean version (no mark-up) of the PNPS SEP, respectively. Attachment 5 provides the analysis of the proposed post-shutdown on-shift staffing. Attachment 6 provides the analysis of ERO tasks that will be transferred to remaining ERO positions following permanent cessation of power operations.

Because of the location of PNPS, the planning and responsibilities at the state and local levels involve coordination with the Commonwealth of Massachusetts and the towns of Plymouth, Carver, Kingston, Duxbury, and Marshfield. During the last week of September 2017, PNPS Emergency Planning management and staff discussed the proposed changes to the PNPS SEP, including the proposed elimination of Offsite Liaison positions in the Carver, Kingston, Duxbury, and Marshfield Emergency Operation Centers, with the Emergency Management Directors from each of these towns. Subsequently, on November 9, 2017, a meeting with representatives from the Commonwealth of Massachusetts and the towns of Plymouth, Duxbury, and Marshfield, and the U. S. Federal Emergency Management Agency (FEMA) regional office was conducted. One of the topics discussed was the proposed changes to the ERO staffing and the PNPS SEP to address the permanently shut down and defueled condition. The proposed changes were evaluated for impacts on the ability of the Commonwealth and local response organizations to effectively implement their FEMA-approved radiological emergency preparedness (REP) plans.

ENO requests approval of the proposed license amendment by January 11, 2019. Further, ENO requests that the approved amendment become effective following submittal of the required 10 CFR 50.82(a)(1)(ii) certification that the PNPS reactor vessel has been permanently defueled, with a 90-day implementation period following the effective date of the amendment.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c), and ENO has determined that this change involves no significant hazards consideration. ENO has also determined that the proposed changes satisfy the criteria for categorical exclusion in accordance with 10 CFR 51.22(c)(9) and do not require an environmental review. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Commonwealth of Massachusetts officials.

If you have any questions or require additional information, please contact Mr. Peter J. Miner at (508) 830-7127.

This submittal contains five new regulatory commitments and no revisions to existing commitments in Attachment 7.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 12, 2018.

Sincerely,

Brian R. Sullivan
Site Vice President

BRS/pm

Attachments:

1. Description and Evaluation of the Proposed Changes
2. Tabular Summary of Proposed Changes to the PNPS Site Emergency Plan, Revision 48
3. Proposed Revisions to the PNPS Site Emergency Plan, Revision 48 (Marked-up Version)
4. Proposed Revisions to the PNPS Site Emergency Plan, Revision 48 (Clean Version)
5. Analysis of Proposed Post-Shutdown On-Shift Staffing
6. Emergency Response Organization Task Analysis
7. List of Regulatory Commitments

cc:

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