



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

February 27, 2018

EA-17-168

Mr. Brian Sullivan
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

**SUBJECT: PILGRIM NUCLEAR POWER STATION – NRC INVESTIGATION REPORT NO.
1-2017-015**

Dear Mr. Sullivan:

This letter refers to an investigation by the U.S. Nuclear Regulatory Commission (NRC) Office of Investigations (OI) conducted at Entergy Nuclear Operations, Inc.'s (Entergy's) Pilgrim Nuclear Power Station (Pilgrim). The investigation, which was completed on September 27, 2017, was conducted to determine whether an Entergy Instruments & Controls (I&C) supervisor at Pilgrim caused Entergy to violate NRC requirements related to work management by denoting a work order as 'Complete' in the site's work management system before the activity was completed. As described below, the NRC determined that the circumstances of the case did not result in a violation of NRC requirements.

On March 27, 2017, during a scheduled work window on the Reactor Core Isolation Cooling (RCIC) system, Pilgrim staff scheduled several RCIC surveillance tests, including the biennial high water level test. As identified during the investigation, the I&C supervisor changed the status of the high water level test work order to 'Complete' at approximately 2:54 PM. Entergy's work management procedure describes that moving a work order to "Complete" status means that all tasks are finished and applicable paperwork has also been signed off. The supervisor informed OI that he changed the work order status after being told by technicians who had been performing the test that the lead technician was in the process of getting the paperwork signed off. However, OI identified that, although all plant manipulations for the test were complete, the lead technician was still performing the final steps in the procedure, and did not complete these until approximately 3:30 PM.

The NRC determined that denoting the work order as 'Complete' did not have any impact on plant equipment or operating status. Specifically, the remaining steps were administrative in nature, and denoting the work order as 'Complete' did not affect their performance or result in the performance of subsequent work activities that should not have been performed at that time. The NRC considered that the work management system is a work scheduling tool that also serves as the electronic repository for scanned copies of completed work procedures and other documents. In light of the above and based on the evidence gathered during the OI investigation, the NRC concluded that the circumstances of the case did not result in a violation of NRC requirements. Therefore, the NRC is not taking any enforcement action against Entergy.

You are not required to respond to this letter. However, should you choose to respond, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Regional Administrator, Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406, and marked "Open by Addressee Only," within 30 days of the date of this letter, with a copy to the NRC Senior Resident Inspector at Pilgrim. In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Please note that final NRC investigation documents, such as the OI report described above, may be made available to the public under the Freedom of Information Act (FOIA) subject to redaction of information appropriate under the FOIA. Requests under the FOIA should be made in accordance with 10 CFR 9.23, Requests for Records. Additional information is available on the NRC website at <http://www.nrc.gov/reading-rm/foia/foia-privacy.html>.

Should you have any questions regarding this letter, please contact Ms. Marjorie McLaughlin at 610-337-5240.

Sincerely,

/RA/

David L. Pelton
Acting Director
Division of Reactor Projects

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NO. 1-2017-015 DATED FEBRUARY 27, 2018

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