

March 8, 2018

Vanessa Quinn, Chief
Radiological Emergency Preparedness Branch
Technological Hazards Division
Federal Emergency Management Agency – Area 8
400 C Street, South West
Washington, DC 20024

SUBJECT: FEDERAL EMERGENCY MANAGEMENT AGENCY REVIEW REQUESTED OF
REVISION TO THE PILGRIM NUCLEAR POWER STATION EMERGENCY PLAN
TO ADDRESS THE PERMANENTLY DEFUELED CONDITION

Dear Ms. Quinn:

By letter dated November 10, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A053), Entergy Nuclear Operations, Inc. (ENO) provided formal notification to the U.S. Nuclear Regulatory Commission (NRC) of ENO's intent to permanently cease power operations at the Pilgrim Nuclear Power Station (PNPS) no later than June 1, 2019. In preparation for the permanent cessation of operations at PNPS, by letter dated January 12, 2018 (ADAMS Accession No. ML18023A795), ENO submitted for NRC approval, a license amendment request (LAR) to the PNPS Site Emergency Plan (SEP). Refer to URL below to access the LAR submittal.

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML18023A795>

The proposed changes to the PNPS SEP would revise the licensee's on-shift and augmented emergency response organization (ERO) positions, based on written certification to the NRC pursuant to Section 50.82(a)(1) of Title 10 of the *Code of Federal Regulations* (10 CFR) for the permanent cessation of reactor operation and transfer of spent fuel from the reactor vessel. The proposed licensee on-shift and augmented ERO staffing changes are commensurate with the reduced spectrum of credible accidents from that of an operating power reactor or a power reactor with fuel remaining in the reactor vessel. These proposed changes are not associated with any requests for exemption to NRC regulations and must continue to meet the standards of 10 CFR 50.47, "Emergency plans," and the requirements of Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities."

Attachment 1, "Description and Evaluation of the Proposed Changes," to ENO's January 12, 2018 letter provides a description and evaluation of the proposed licensee on-shift and augmented ERO staffing changes. Table 1, "Proposed Post-Shutdown ERO Staffing," to Attachment 1, provides a comparison of the current augmented ERO positions against the proposed post-shutdown augmented ERO positions. Section 3.2.2.6, "Impact on Off-Site Response Organizations," to Attachment 1, provides ENO's evaluation of impact of the proposed licensee ERO staffing changes against the existing Federal Emergency Management Agency (FEMA)-approved radiological emergency preparedness (REP) plans for the

Commonwealth of Massachusetts and local municipalities. Specifically, Section 3.2.2.6 to Attachment 1 describes discussions with the Emergency Directors from the towns of Carver, Kingston, Duxbury and Marshfield regarding the elimination of the Offsite Liaison positions at the respective town emergency operations centers (EOCs).

The NRC's initial review of the proposed PNPS SEP indicates that these changes would not impact the methods or timing for the notification of State and local agencies of an emergency declaration and/or offsite protective action recommendation, offsite radiological monitoring and assessment capabilities, or the current location or timing of activation for the licensee's emergency response facilities. However, due to the extent of proposed changes to the licensee's ERO staffing, specifically at the PNPS Emergency Operations Facility (EOF) and Joint Information Center (JIC), the NRC is requesting FEMA's review of the proposed licensee staffing changes to verify that no potential adverse impacts exist that would preclude the effective implementation of State and local REP plans.

Per their January 12, 2018 letter, 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. Based on the number of on-going and projected licensing actions, I am requesting that FEMA provide its assessment to the NRC by no later than April 25, 2018, to support any further request for additional information to ENO, as needed to support the NRC's continued technical review.

In Section 3.2.2, "Augmented ERO Staffing," of Attachment 1 to their January 12, 2018 letter, ENO states, in part:

To validate the results of the proposed changes to the augmented ERO, one or more drills will be developed and conducted prior to implementation of the changes described within this LAR. The drills will be conducted to confirm the ability of the post-shutdown augmented ERO to perform the necessary functions of each ERF [emergency response facility] and will utilize the post-shutdown procedures that will be developed depicting the revised assignment of duties. The drills will be used to train and qualify post-shutdown augmented ERO members, evaluate and validate the ability to accomplish the stated mission of each ERF, and ensure that the planning standard functions are preserved with no degradation in time-sensitive activities or in the ability to communicate with OROs. The drills will also validate that the post-shutdown augmented ERO continues to address the risks to public health and safety and comply with the PNPS SEP, site commitments, and applicable regulations. Implementing procedures will be revised to address the permanently shut down and defueled conditions...

...Major elements to be tested will include communications and coordination with OROs, including the JIC. State, local, and Federal response organizations will be provided the opportunity to participate in or observe the drills. New regulatory commitments for scenario elements and communication with offsite agencies are included in Attachment 7 ["List of Commitments"].

As always, thank you for your assistance. If you have any questions regarding the specifics of the changes requested to the PNPS SEP; the NRC's evaluation of these proposed changes, or if FEMA will be unable to meet the requested due date of April 25, 2018, please contact Jeannette Arce at (301) 287-9053.

Sincerely,

/RA/

Joseph D. Anderson, Chief
Reactor Licensing Branch
Division of Preparedness and Response
Office of Nuclear Security and Incident Response

cc: C. Fiore, FEMA HQ
S. Colman, FEMA Region I

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DATED: 03/08/18

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ADAMS Accession Number: ML18067A118

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