



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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Brian R. Sullivan
Site Vice President

March 14, 2018

Mr. David C. Lew
Acting Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

SUBJECT: Notification of Changes to Comprehensive Recovery Plan and Area Action Plan
Action Completion Dates

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

REFERENCES: 1. Entergy letter to NRC, "Pilgrim Nuclear Power Station Recovery Plan," dated
July 28, 2017 (Letter Number 2.17.056) (ML 17212A571)
2. NRC letter to Entergy, "Confirmatory Action Letter – Pilgrim Nuclear Power
Station," dated August 2, 2017 (ML 17214A088)

LETTER NUMBER: 2.18.012

Dear Mr. Lew:

On July 28, 2017, Entergy Nuclear Operations, Inc. (Entergy) transmitted the Pilgrim Nuclear Power Station (PNPS) Comprehensive Recovery Plan (CRP) (Reference 1) to the U.S. Nuclear Regulatory Commission (NRC). The CRP contains the actions that Entergy is taking to address the decline in performance at PNPS, including actions to address the issues that led to PNPS being placed in the Multiple/Repetitive Degraded Cornerstone Column (Column IV) of the NRC Action Matrix.

In response, the NRC transmitted the PNPS Confirmatory Action Letter (CAL), dated August 2, 2017, confirming the commitments made by Entergy (Reference 2). Subsequent to the issuance of the CAL, refinement of the schedule for Area Action Plan (AAP) inspections has been discussed with the NRC Staff. The purpose of these discussions was to ensure alignment between the PNPS schedule for completion of Enclosure 2 action items supporting closure of AAPs, and the availability of NRC inspection resources. Based on coordination with the NRC Staff, the schedule of inspections was revised. Accordingly, correspondence is required pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232 to notify the NRC in advance, if for any reason, an action listed in the CAL cannot be completed within the specified schedule. Since some of the dates will be shifted, NRC notification is required in advance of the changes.

ADD
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In addition, during preparation activities for the upcoming CAL inspections, Entergy identified a number of AAP actions in Enclosure 1 of Reference 2 (the CRP) that need to be clarified or modified to ensure common understanding of the required actions. The changes are provided in Attachment 1 of this letter. Notification of the modified PNPS schedule is provided in Attachment 2.

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

Sincerely,



Brian R. Sullivan
Site Vice President

BRS/pm

Attachment:

1. Notification of Changes to Actions in Comprehensive Recovery Plan
2. Notification of Changes to Area Action Plan Action Completion Dates to Support Revised Inspection Schedule

cc:

U.S. Nuclear Regulatory Commission
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NRC Senior Resident Inspector
Pilgrim Nuclear Power Station

Attachment 1

Letter Number 2.18.012

Notification of Changes to Actions in Comprehensive Recovery Plan

Attachment 1
Notification of Changes to Actions in Comprehensive Recovery Plan

1. ODFA-5.6 should state, "The actions specified in ODFA-5.1 and 5.2 also address deficiencies identified during the 95003 inspection."
2. The following Operations Standards and Site Leadership actions are listed under the Risk Recognition and Decision-Making Action Plan (RRDM) and are more appropriately addressed under the Operations Standards and Site Leadership Action Plan (OPS). To address this the following revisions are requested:
 - a. Add new section OPS-5: Additional Actions (Enclosure 1 and 2)
 - b. RRDM-4.1 to become OPS-5.1 (Enclosure 1)
 - c. RRDM-4.2 to become OPS-5.2 (Enclosure 1)
 - d. RRDM-4.3 to become OPS-5.3 (Enclosure 1 and 2)
 - e. RRDM-4.5 to become OPS-5.4 (Enclosure 1)
 - f. RRDM-4.6 to become OPS-5.5 (Enclosure 1)
3. OPS-5.2 (formerly RRDM-4.2) should be reworded to read "Schedule 3 operations manager mentor visits to Pilgrim following RFO-21."
4. OPS-5.3 (formerly RRDM-4.3) should be reworded to read "Issue additional actions based on the results and insights from the mentor visits conducted per OPS-5.1 and OPS-5.2."
5. Revise RRDM-4.8 to read:

"RRDM-4.8 addresses the NRC 95003 observation that based on interviews and a review of current open corrective action program items generated by the subject matter experts, the NRC team noted resistance to the improvement recommendations of the subject matter experts by some station managers. For example, in reference to CR-PNP-2016-07486, subject matter experts identified that numerous outage preventive maintenance activities were extended without sufficient technical justification and without conducting a risk review in accordance with procedure 1.3.142, PNPS Risk Review and Disposition.
6. Revise RRDM-4.9 to read:

"RRDM-4.9 addresses the NRC 95003 observation that some station leaders (managers and first-line supervisors) from across multiple departments appeared to be lagging in their demonstration of the new decision-making principles and implementation of procedure 1.3.142, PNPS Risk Review and Disposition, and the NRC 95003 observation that the current action plans allow the station 'the flexibility to remove the SMEs and mentors following a successful effectiveness review of the related area.' Implementation of the SMEs and mentors should continue until a positive change in safety culture is sustained and verified by NRC inspection."

Attachment 2

Letter Number 2.18.012

Notification of Changes to Area Action Plan Action Completion Dates to Support Revised
Inspection Schedule

Attachment 2

Notification of Changes to Area Action Plan Action Completion Dates to Support Revised Inspection Schedule

Inspection Area	Area Action Plan	Original AAP Action Completion Commitment Date (Enclosure 2)	Revised AAP Action Completion Commitment Date (Enclosure 2) to align with Revised CAL Inspection Dates
Human Performance	Procedure Use and Adherence	02/28/18	05/18/18
	Operability Determinations and Functionality Assessments	02/28/18	No Change
Corrective Action Program	Corrective Action Program	03/30/18	05/18/18
SRV White Finding	SRV White Finding	03/30/18	No Change
Nuclear Safety Culture	Nuclear Safety Culture	05/31/18	11/23/18
Operational Standards and Leadership	Operational Standards and Leadership	05/31/18	08/24/18
	Risk Recognition and Decision Making	05/31/18	08/24/18
Engineering Programs and Equipment Performance	Engineering Programs	06/28/18	08/24/18
	Equipment Reliability	06/28/18	08/24/18
	Work Management	06/28/18	08/24/18