

NRR-DMPSPeM Resource

From: Lamb, John
Sent: Friday, May 4, 2018 9:10 AM
To: Miner, Peter
Cc: Byrne, Robert M
Subject: RAI - Pilgrim ERO Staffing License Amendment Request (EPID NO.: L-2018-LLA-0046)

Importance: High

Dear Mr. Miner:

By letter dated November 10, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15328A053), Entergy Nuclear Operations, Inc. (Entergy or the licensee), submitted its Notification of Permanent Cessation of Power Operations for Pilgrim Nuclear Power Station (PNPS). In this letter, Entergy provided notification to the U.S. Nuclear Regulatory Commission (NRC) of its intent to permanently cease power operation no later than June 1, 2019.

By application dated January 12, 2018 (ADAMS Accession No. ML18023A687), Entergy requested a license amendment request (LAR) for PNPS to revise the Site Emergency Plan (SEP) for a permanently shut down and defueled condition. This LAR proposes to revise the on-shift and Emergency Response Organization staffing for permanent cessation of power operations and permanent removal of fuel from the reactor vessel.

The NRC staff has reviewed Entergy's submittal and determined that additional information is required to enable the NRC staff to make an independent assessment regarding its technical review.

The enclosure to this email provides the request for additional information (RAI). On May 2, 2018, the draft RAI questions were sent to yourself and Mr. Byrne of your staff to ensure that they were understandable, the regulatory bases for the questions were clear, and to determine if the information was previously docketed. On May 3, 2018, you said that Entergy did not need a clarifying call and Entergy would respond to the RAI within 30 days of the date of this email.

If you have any questions, please contact me at 301-415-3100 or via e-mail at John.Lamb@nrc.gov.

Sincerely,

John G. Lamb, Senior Project Manager
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure:
Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT REQUEST FOR

CHANGES TO THE POST SHUTDOWN EMERGENCY PLAN

PILGRIM NUCLEAR POWER STATION

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-293

By application dated January 12, 2018, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18023A795), Entergy Nuclear Operations, Inc. (Entergy or licensee), submitted changes to the Pilgrim Nuclear Power Station (PNPS) Post Shutdown Emergency Plan (PSEP) for Commission review and prior approval pursuant to Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR). The proposed changes would revise the existing PNPS Site Emergency Plan for the permanently defueled condition.

The NRC staff has reviewed the licensee's submittal and determined that additional information is required to enable the NRC staff to make an independent assessment regarding its technical review.

RAI-PNPS-1

Section 3.2.1.6, "Major Functional Area: Repair and Corrective Actions," of Attachment 1, "Description and Evaluation of the Proposed Changes," states on page 17 of 40:

Eliminate two (2) Nuclear Control Technicians (augmenting within 30 minutes)

However, on page 18 of 40, it states:

Nuclear Maintenance Technician (electrical) duties include providing repairs and corrective actions for plant electrical equipment, as directed. ***Nuclear Control Technician*** duties include providing repairs and corrective actions to plant instrumentation, as directed.

Please explain the apparent contradiction as to whether a Nuclear Control Technician will be an augmenting responder.

RAI-PNPS-2

Section 3.2.1.6 of Attachment 1, states on page 18 of 40:

The Engineering Coordinator is tasked with performing an engineering assessment of plant conditions and/or actions needed to mitigate damage to the plant. With respect to responding to engineering requests from the Engineering Coordinator, this function will ***continue to be performed by augmenting qualified engineering resources***. The Engineering Coordinator ***will continuously evaluate the need for engineering resources and coordinate with the [Emergency Operations Facility] EOF Technical Advisor to call in additional qualified engineering personnel***. These individuals may be tasked with activities to be completed at engineering offices external to the [Technical Support Center] TSC, called to report to the TSC, or directed to other facilities.

Please clarify if the Engineering Coordinator is or will be qualified to provide "engineering assessment of plant conditions and/or actions needed to mitigate damage to the plant," specifically in response to a fuel handling accident or an event resulting in damage to the spent fuel pool (SFP) integrity or the loss of SFP cooling or inventory.

RAI-PNPS-3

Attachment 3, "Proposed Revisions to the PNPS Site Emergency Plan, Revision 48 (Marked-up Version)," provides in Appendix 3, "Sample Copies of Letters of Agreements," letters of agreement with

the Town of Plymouth Police Department and the Plymouth Fire Department, that include statements indicating that the agreements are valid until December 31, 2014. Please provide the most recent letters of agreement or documentation that these letters of agreement will continue to be in effective upon the implementation of the proposed plan changes.

Hearing Identifier: NRR_DMPS
Email Number: 346

Mail Envelope Properties (John.Lamb@nrc.gov20180504090900)

Subject: RAI - Pilgrim ERO Staffing License Amendment Request (EPID NO.: L-2018-LLA-0046)
Sent Date: 5/4/2018 9:09:54 AM
Received Date: 5/4/2018 9:09:00 AM
From: Lamb, John
Created By: John.Lamb@nrc.gov

Recipients:
"Byrne, Robert M" <rbyrne@entergy.com>
Tracking Status: None
"Miner, Peter" <pminer@entergy.com>
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	5330	5/4/2018 9:09:00 AM

Options
Priority: High
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: