



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
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Brian R. Sullivan
Site Vice President

June 1, 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

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

REFERENCES:

1. NRC letter to Entergy, "Confirmatory Action Letter – Pilgrim Nuclear Power Station," dated August 2, 2017 (ML 17214A088)
2. Entergy Letter Number 2.18.012, "Notification of Changes to Comprehensive Recovery Plan and Area Action Plan Action Completion Dates," dated March 14, 2018

LETTER NUMBER: 2.18.037

Dear Mr. Lew:

On August 2, 2017, the NRC transmitted the Pilgrim Nuclear Power Station (PNPS) Confirmatory Action Letter (CAL) (Reference 1). On March 14, 2018, Entergy Nuclear Operations, Inc. (Entergy) requested changes to the CAL commitments to: (1) revise the schedule of inspections and (2) modify and clarify language to support common understanding of the required actions (Reference 2). The purpose of this letter is to provide a correction and additional technical justification for one of the changes requested in Reference 2. Specifically, CAL actions RRDM-4.1, RRDM-4.2, and RRDM-4.3 established a plan for five mentor visits by the former Indian Point Energy Center (IPEC) Operations Manager and assignment of additional actions based on the results and insights from those visits. The intent of these actions, as defined in the PNPS recovery plan corrective action document, was to provide insights into the organizational effectiveness of PNPS Operations Leadership and to identify weaknesses and corrective actions necessary to address those weaknesses. During the course of these visits, personnel changes occurred within the senior leadership of the PNPS Operations Department. The oversight of these position changes included a comprehensive leadership assessment of the department management performed by Entergy fleet personnel. The conduct of this assessment and execution of the ensuing corrective actions addresses identified and latent weaknesses in leadership that negatively impacted department, and station performance. This assessment provides a more robust action plan than the originally planned mentor visits, since it was accomplished in accordance with a structured process and utilized a team of individuals with industry proven experience specific to performance improvement and organizational effectiveness.

The proposed CAL changes below support crediting these superior actions:

- (1) OPS-5.2 (formerly RRDM-4.2) should be reworded to read "Conduct a Leadership Effectiveness Assessment to assess leadership and management capabilities of the Operations Department."
- (2) OPS-5.3 (formerly RRDM-4.3) should be reworded to read "Issue additional actions based on the results and insights from the assessment performed in OPS-5.2."

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/mp

cc:

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