



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

June 7, 2018

EA-17-086

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

**SUBJECT: REVISION TO CONFIRMATORY ACTION LETTER – PILGRIM NUCLEAR
POWER STATION**

Dear Mr. Sullivan:

On July 28, 2017, Entergy Nuclear Operations, Inc. (Entergy) submitted to the U.S. Nuclear Regulatory Commission (NRC) the Pilgrim Nuclear Power Station Recovery Plan (ML17212A571¹) describing the actions Entergy is taking to resolve the causes for declining performance that led to Pilgrim being placed in the Multiple/Repetitive Degraded Cornerstone Column (Column 4) of the NRC Action Matrix. On August 2, 2017, the NRC issued a Confirmatory Action Letter (CAL) (ML17214A088) that identified a subset of actions from the Recovery Plan the NRC considers essential to address the underlying problems that resulted in Pilgrim's decline in performance.

In letters dated March 14, 2018 (ML18087A041), and June 1, 2018 (ML18156A114), Entergy notified the NRC of its intent to change, in two instances, the corrective actions documented in the CAL involving operations manager mentoring visits and follow-up activities. In addition, Entergy identified several schedule changes and clarifications to corrective actions as described in the CAL. The Enclosure to this letter describes these revisions as items one through seven and the NRC staff's conclusions.

The staff concluded that the revisions do not reduce the scope or depth of actions required to complete the CAL commitments and do not impact the NRC inspection plan for independently assessing the completion of the effectiveness of these actions. Items 1, 2, 5, and 6 in the Enclosure are administrative in nature because they correct an error made in the original CAL or better describe the problems being addressed. Items 3 and 4 are enhancements intended to ensure the underlying problems are more fully addressed. Finally, item 7 involves revisions to Entergy's scheduled action completion dates for several Area Action Plans. The NRC staff determined the date changes are acceptable because they provide for additional time to determine effectiveness of completed actions and the new completion dates are consistent with the NRC's planned inspections of these areas.

¹ Designation in parentheses refers to an Agencywide Documents Access and Management System (ADAMS) accession number. Documents referenced in this report are publicly available using the accession number in ADAMS.

After consulting with the Director of the Office of Nuclear Reactor Regulation, the NRC staff agrees with your revised commitments as described in the attached Enclosure.

The original Pilgrim Nuclear Power Station CAL, EA-17-086, issued on August 2, 2017, remains in effect, except as modified in the Enclosure to this letter.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and the NRC's Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2.390, "Public Inspections, Exemptions, Requests for Withholding."

If you have any questions, please contact Anthony Dimitriadis at (610) 337-6953 or e-mail at Anthony.Dimitriadis@nrc.gov.

Sincerely,

/RA/

David C. Lew
Acting Regional Administrator

Docket No. 50-293
License No. DPR-35

Enclosure:
Revised Confirmatory Action Letter Commitments

cc: Distribution via ListServ

SUBJECT: REVISION TO CONFIRMATORY ACTION LETTER – PILGRIM NUCLEAR POWER STATION dated June 7, 2018

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Revised Confirmatory Action Letter Commitments

1. CAL Item ODFA-5.6:
The original CAL item stated: "The actions specified in ODFA-1.4 also address deficiencies identified during the 95003 inspection." Entergy revised this item to read: "The actions specified in ODFA-5.2 also address deficiencies identified during the 95003 inspection." The NRC staff reviewed the change and determined it was administrative because it did not change the action that Entergy committed to perform in the CAL. The change ensures the CAL item identifies the correct PNPS Recovery Plan action. The NRC concluded this change is acceptable.
2. CAL Items RRDM-4.1, -4.2, -4.3, -4.5, and -4.6:
Entergy moved these five CAL items that were included in the Risk Recognition and Decision-Making Area Action Plan (RRDM) to the Operations Standards and Site Leadership (OPS) Area Action Plan. The change added a new section to the OPS Area Action Plan, OPS-5, Additional Actions, and revised the designators for these items as follows:
 - a. RRDM-4.1 to OPS-5.1
 - b. RRDM-4.2 to OPS-5.2
 - c. RRDM-4.3 to OPS-5.3
 - d. RRDM-4.5 to OPS-5.4
 - e. RRDM-4.6 to OPS-5.5

For this revision, no changes were made to the actions that Entergy had committed to for these items.

The NRC staff reviewed this change and concluded it is administrative because it does not change the actions that Entergy committed to perform in the CAL. This specific change only moves actions from one Area Action Plan to another. The NRC concluded this change is acceptable.

3. CAL Item OPS-5.2 (formerly RRDM-4.2 as described in Item 2 above):
The original wording for this item in the original CAL was: "Schedule three operations manager mentor visits to Pilgrim in 2017, following RFO-21, with former Indian Point Entergy Center Operations Manager." Entergy revised this item to read: "Conduct a Leadership Effectiveness Assessment to assess leadership and management capabilities of the Operations Department." Entergy revised this CAL item to account for changes in Operations Department Management and to more broadly assess departmental leadership.

The NRC staff determined that the new action will use an experienced corporate team to assess the leadership and management capabilities of the Operations department instead of multiple site visits by a single individual mentor with operations management experience. The NRC concluded that this change is an enhancement to the original CAL item and is acceptable.
4. CAL Item OPS-5.3 (formerly RRDM-4.3 as described in Item 2 above):
The original wording for this item in the original CAL was: "Issue additional actions based on the results and insights from the mentor visits conducted per CR-PNP-2017-2003 CA-04

and CR-PNP-2017-2003 CA-05.” Entergy revised this item to read: "Issue additional actions based on the results and insights from the Assessment performed in OPS-5.2."

The NRC staff determined that this change is an enhancement needed due to the change to CAL Item OPS-5.2 described above. The change to OPS-5.3 ensures the additional actions issued are based on insights from the leadership assessment conducted in accordance with the revised OPS-5.2 not the originally proposed mentor visits. The NRC concluded that this change is an enhancement to the original CAL item because the additional actions are based on a broader and more in-depth review of the Operations Department leadership and is acceptable.

5. CAL Item RRDM-4.8:

The original wording for this item was: “The action specified in RRDM-1.2 also address deficiencies identified during the 95003 inspection.” Entergy revised this item 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.”

The NRC staff reviewed this item and concluded that the revised wording provides clarification that accurately describes the applicable 95003 deficiencies to be addressed. No changes were made to the actions that Entergy committed to for this item. The NRC concluded this change is acceptable.

6. CAL Item RRDM-4.9:

The original wording for this item was: “The action specified in RRDM-1.3 also address deficiencies identified during the 95003 inspection.” Entergy revised this item 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."

The NRC staff reviewed this item and concluded that the revised wording provides clarification that accurately describes the applicable 95003 deficiencies to be addressed. No changes were made to the actions that Entergy had committed to for this item. This change is acceptable.

7. Area Action Plan Completion Commitment date adjustments:

Entergy requested to revise multiple Area Action Plan completion dates to align with the current NRC CAL inspection schedule. The details of the requested changes were included in Attachment 2 to Entergy letter dated March 14, 2018, letter.

For each affected Area Action Plan, the NRC determined that the requested Area Action Plan completion date extensions support completion of activities intended to support

Entergy's assessment of the effectiveness of the associated Area Action Plan. The NRC further notes these changes do not affect the NRC CAL inspection schedule described in our letter dated February 28, 2018 (ML18058A025). The NRC finds the revised completion date changes acceptable. The revised completion dates for the affected Area Action Plans are listed below:

Area Action Plan (AAP)	Original AAP Action Completion Commitment Date	Revised AAP Action Completion Commitment Date
Procedure Use and Adherence	02/28/18	05/18/18
Corrective Action Program	03/30/18	05/18/18
Nuclear Safety Culture	05/31/18	11/23/18
Operational Standards and Leadership	05/31/18	08/24/18
Risk Recognition and Decision Making	05/31/18	08/24/18
Engineering Programs	06/28/18	08/24/18
Equipment Reliability	06/28/18	08/24/18
Work Management	06/28/18	08/24/18