



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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Plymouth, MA 02360

Brian R. Sullivan
Site Vice President

Letter Number 2.18.047

August 9, 2018

Mr. David C. Lew
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)

Dear Mr. Lew:

On August 2, 2017, the NRC transmitted the Pilgrim Nuclear Power Station (PNPS) Confirmatory Action Letter (CAL) (Reference 1) which confirmed the actions PNPS planned to take in accordance with our Comprehensive Recovery Plan (CRP).

An ongoing review has identified that a number of CRP action changes are appropriate to ensure the wording of the actions better align with the intent of the action and actions taken. These changes to the CRP require notification to the NRC pursuant to the CAL.

Details of the proposed changes are provided in Attachment 1.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Pee".

BRS/rb

RGNDI
A001
NRR
RGNI

cc:

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Mr. John Lamb, Senior Project Manager
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NRC Senior Resident Inspector
Pilgrim Nuclear Power Station

Attachment 1

Letter Number 2.18.047

Notification of Changes to Comprehensive Recovery Plan

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CAL Action #	Current CAL Action Description	Proposed CAL Action Description	Reason for Change
CAP-1.2	When interim actions EOC-3 / CA-15 and 4/ CA-16 are closed, assign a part-time (two weeks per month) SME to coach and mentor DPIC and CAP performance and independently review RCEs and ACEs to acquire the data for populating the CAP Performance Indicators.	When interim actions EOC-3 / CA-15 and 4 / CA-16 are closed, assign a part-time (two weeks per month minimum) SME to coach and mentor DPIC and CAP performance and independently review RCEs and ACAs to acquire the data for populating the CAP Performance Indicators. Mentoring and coaching may be performed by contracted consultants designated as SMEs or Mentors.	These corrective action program mentoring and coaching actions are performed by a team of three individuals. Two individuals designated as SMEs in the recovery action plan independently review causal products, coach and correct Performance Improvement Review Group (PRG) behaviors, and populate the CAP Performance Indicators. A third individual, designated as a mentor in the recovery action plan, coaches and corrects Department Performance Improvement Coordinator (DPIC) behaviors. This reflects division of work responsibilities and exceeds the intended interactions designated in the original action. Updated abbreviation of the cause analysis from ACE to ACA to match current procedure terminology.
CAP-1.5	Generate the CAP SME monthly status report for July 2016 (performed by the CAP SME required in CA 74). Also generate a new CA to require each additional monthly report in the same fashion. These monthly status reports must continue until end of plant operating life.	Generate the CAP SME status report for July 2016 (performed by the CAP SME required in CA 74). Also generate a new CA to require each additional report in the same fashion. These status reports must continue until end of plant operating life on a frequency not to exceed quarterly.	CAP SME status reports were initially completed on a monthly basis. A change to quarterly allows for an appropriate period to discern performance trends with no impact on the intent of the action.
EP-2.2	Based upon the results of CR PNP-2016-2061, CA-24, reapportion the workload of the System Engineering Supervisors such that they have an adequate amount of time (25% is required by EN-FAP-OM-016) of their time available for mentoring and supervising their staff, excluding PCRS time.	Based upon the results of CR PNP-2016-2061, CA-24, reapportion the workload of the System Engineering Supervisors such that they have an adequate amount of time available for mentoring and supervising their staff, excluding PCRS time. Work load is discussed during the EN-FAP-OM-016 "Monthly Performance Management Meeting" process.	Entergy procedure EN-FAP-OM-016 did not have a requirement of 25%, rather it was a goal. The procedure has been revised to no longer specify any value. There is no change to the standard contained in the original action.

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ER-2.2	Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals using the CFAM work management supply and demand model.	<p>Reassess the additional resources brought in under CR PNP-2016-2057, CA-41. As part of that assessment, perform the following:</p> <p>Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals and procure additional contract resources if necessary.</p>	This change replaces the work management supply and demand model with an equivalent method for resource assessment, and adds the requirement to provide additional staffing if necessary to reduce backlogs and maintain fleet performance goals.
ER-3.2	<p>Track the completion of the mitigation strategies for the 4 open unmitigated Single Point Vulnerabilities at PNPS. These are scheduled to be completed during RF021 and include the following:</p> <ul style="list-style-type: none"> * Replace Feedwater Level A/B Channel Selector Switch (604-301), if required based on scheduled testing * Replace Feedwater Level Control Single Element I Three Element Selector Switch (604- 302), if required based on scheduled testing * Perform Motor Rewind on Sea Water Pump B (P-1058) * Perform Startup Transformer CCVT Inspections and Testing (X4) 	<p>Track the completion of the mitigation strategies for the 4 open unmitigated Single Point Vulnerabilities at PNPS. The mitigation strategies for the 4 open unmitigated Single Point Vulnerabilities will be completed prior to startup from RF021 and include the following:</p> <ul style="list-style-type: none"> * Replace Feedwater Level A/B Channel Selector Switch (604-301), if required based on scheduled testing * Replace Feedwater Level Control Single Element I Three Element Selector Switch (604- 302), if required based on scheduled testing * Perform Motor Rewind on Sea Water Pump B (P-1058) * Perform Startup Transformer CCVT Inspections and Testing (X4) 	The revised wording presents no change in intent. The revised wording allows for the fact that one of the open unmitigated Single Point Vulnerabilities was actually mitigated prior to the start of RFO-21.
OPS-2.2	Conduct Focused Self-Assessments of Operator Fundamentals for each shift crew using the position specific	Conduct crew observations for each crew using EN-OP-117 "Operations Assessment Resources" "Operator Fundamentals	CAL item OPS-2 is to "Improve the operations department "Picture of Excellence" with regard to operations standards, ownership, and leadership".

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	"Roles and Responsibilities" attachments in EN-OP-120, Operator Fundamentals Program. The assessment teams should include industry peers.	Grading Sheets (IER L1-11-3)". The assessment teams should include resources external to Pilgrim.	EN-OP-120 "Operator Fundamental Program" is a program document that does not establish discrete criteria necessary to assess standards, ownership, and leadership. The grading sheet established in EN-OP-117 aligns with more effective assessment of standards, ownership, and leadership by establishing discrete observation and comment criteria for assessment teams.
PUA-1.6/5.9	Site department managers communicate senior management's procedure use and adherence expectations once per quarter for a year.	Site department managers communicate senior management's procedure use and adherence expectations utilizing a different quarter's data not less than 4 times.	The proposed revision allows for an equivalent number of interactions while allowing for some flexibility in schedule and still meeting the intent of the action.
PUA-2.3	Perform Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet concurrently with performance of HU observations for the assessment period of one year, June 1, 2016 through June 1, 2017, or until closure of Procedure Use and Adherence effectiveness review.	Perform Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet criteria concurrently with performance of HU observations for the assessment period of not less than one year. The Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet criteria will continue until closure of Procedure Use and Adherence effectiveness review.	This change clarifies that the requirement to perform Procedure Use and Adherence observations using the 95003 Recovery Human Performance WILL Sheet criteria must continue until both a successful Procedure Use and Adherence effectiveness review has been completed and no less than one year of observations have been completed. This change also allows the use of recent data which is most indicative of current behaviors.
PUA-3.4	Communicate the PU&A Lessons Learned/Results from the PU&A 95003 Recovery WILL sheet as analyzed in Monthly Snap Shot Assessments quarterly via L&A meetings.	Communicate the PU&A Lessons Learned/Results from the PU&A 95003 Recovery WILL sheet attribute ratings quarterly via L&A meetings.	The data that provides behavior performance information is the rating of the Procedure Use and Adherence attributes listed on the WILL Sheet. The phrase "in Monthly Snap Shot Assessments" has been deleted because Snap Shot assessments have been deleted from the Entergy self-assessment procedure (EN-LI-104). The intent of communicating lesson learned and observation results are unchanged.
RRDM-1.1	Perform observations of leadership performance against the leadership expectations established in CAPR-1	Perform observations of leadership performance against the leadership expectations established in CAPR-1 and	This action is equivalent to the previous action and the change provides the proper clarity of the documentation of observations and the audience

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	<p>and provide feedback to that leader's Manager or Director. Provide a summary of the observations of leadership performance to the site vice president at a frequency agreed to by the site vice president and the subject-matter expert. This action will remain in place until the end of plant operating life or the effectiveness reviews determine that leadership behaviors are meeting established expectations and are self-sustaining.</p>	<p>document the observations in Leadership WILL Sheets. Roll these observations up into a periodic report and share this report with key site leadership personnel including applicable managers or directors. Provide a summary of the observations of leadership performance to the SVP on a once every two week basis, or at a frequency agreed to by the SVP and SME. This action will remain in place until the end of plant operating life or the effectiveness reviews determine that leadership behaviors are meeting established expectations and are self-sustaining.</p>	<p>to which the feedback is communicated. No changes were made to the actions originally committed.</p>
<p>RRDM-1.2</p>	<p>Augment the station staff with an external subject matter expert (SME) in the area of risk assessment as a full-time position to mentor and assess individual leadership behaviors and performance against the leadership expectations established in CAPR-1.</p>	<p>Augment the station staff with an external subject matter expert (SME) in the area of risk assessment as a full-time equivalent position to mentor and assess individual leadership behaviors and performance against the leadership expectations established in CAPR-1. The position will be part of the overall Recovery mentor team covering RRDM, Equipment Reliability, Operations Standards, and Leadership Behaviors. This action will remain in place until the end of plant operating life or the effectiveness reviews determine that leadership behaviors are meeting established expectations and are self-sustaining.</p>	<p>This action is equivalent to the previous action in that SME observation, assessment, and feedback is being done on a shared basis with other focus areas closely linked to risk recognition and decision-making. This is considered a clarification of the established SME role and acknowledges that a team approach is used to broaden diversity of the independent evaluations. No changes were made to the actions originally committed. Added the termination criteria from RRDM-1.1 for clarity.</p>

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WM-1.1	Management T-week sponsors to provide management oversight and coaching for work week preparation meetings. The sponsors/designees attendance and coaching will be documented using the meeting WILL sheets.	The T-week management sponsors complete a 'PNPS T-Meeting Observer Familiarization Guide' which requires work management process discussions for the T-week process, guiding principles, desired and undesired behaviors, and the risk assessment overview. The 'PNPS T-Meeting Observer Familiarization Guide' also provides scorecard guidelines for management sponsors use when performing T-meeting observations and coaching. Demonstrate effectiveness by sampling completed WM scorecards/WILL sheets for T-meeting performance.	CR-PNP-2017-6767 ACE was performed in July 2017 when the WM Problem Area previous actions were deemed not being fully effective to improve WM performance. This action provides steps for ensuring consistent management oversight and reinforcement of desired behaviors such as, key roles and responsibilities supporting the WM process. The action improves sustainability by using a standard approach for coaching WM T-week desired behaviors.
WM-1.3	For the time period of 11/01/16 through 4/30/17 the T-week meeting management sponsors or designees will be required quorum members for the meeting. This will be documented using the meeting WILL sheets.	The T-week management sponsors complete a 'PNPS T-Meeting Observer Familiarization Guide' which requires work management process discussions for the T-week process, guiding principles, desired and undesired behaviors, and the risk assessment overview. The 'PNPS T-Meeting Observer Familiarization Guide' also provides scorecard guidelines for management sponsors use when performing T-meeting observations and coaching. Demonstrate effectiveness by sampling completed WM scorecards/WILL sheets for T-meeting performance.	CR-PNP-2017-6767 ACE was performed in July 2017 when the WM Problem Area previous actions were deemed not being fully effective to improve WM performance. This action provides a more effective process for ensuring consistent management oversight and reinforcement of desired behaviors as key roles and responsibilities supporting the WM process. The action improves sustainability by using a standard approach for coaching WM T-week desired behaviors.

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WM-3.3	<p>Reassess the additional resources brought in under CR PNP-2016-2057, CA-41. As part of that assessment, perform the following: Design and implement a resource-loading plan for maintenance shops based on the workload expectations for the remaining 2 years of plant life.</p> <p>Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals using the CFAM work management supply and demand model.</p>	<p>Reassess the additional resources brought in under CR PNP-2016-2057, CA-41. As part of that assessment, perform the following:</p> <p>Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals and procure additional contract resources if necessary.</p>	<p>This change replaces the work management supply and demand model with an equivalent method for resource assessment, and adds the requirement to provide additional staffing if necessary to reduce backlogs and maintain fleet performance goals.</p>