



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

October 11, 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:

In letters dated August 9, 2018 (ML18226A085¹) and September 21, 2018 (ML18268A134), Entergy Nuclear Operations, Inc. (Entergy) notified the U.S. Nuclear Regulatory Commission (NRC) of its intent to change and/or clarify 14 of the 156 actions in the Pilgrim Nuclear Power Station (PNPS) Recovery Plan that were included within the scope of the Confirmatory Action Letter (CAL) (ML17214A088).

On August 23, 2018, the NRC staff determined that the changes proposed for 5 of the 14 PNPS Recovery Plan items, which were associated with the Corrective Action Program and Procedure Use and Adherence Area Action Plans, were acceptable (ML18235A028). The NRC staff has since completed its review of the changes proposed for the remaining nine items associated with the Equipment Reliability, Operations Performance Standards, Risk Recognition and Decision Making, Work Management, and Engineering Programs Area Action Plans. Your letter dated September 21, 2018 provided further clarification on one of the remaining nine items, associated with Equipment Reliability (ER 3.2).

The NRC staff has determined that the remaining nine proposed changes were not substantive and did not affect our conclusions regarding the effectiveness of the implementation of the PNPS Recovery Plan. In summary, the staff has determined that the proposed changes were either administrative in nature or enhanced the action specified. Specifically, these changes corrected an error regarding a maintenance item that was previously completed; updated standards for operating crew evaluations; specified the method for documenting feedback for site leaders; updated actions to use current site processes; and clarified roles for subject matter experts, methods used to allocate resources, and expectations for management oversight of the work management process. The Enclosure to this letter describes additional detail for the revisions and the NRC staff's review of the changes.

¹ Designation in parentheses refers to an Agencywide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter 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 the 14 revised commitments as described in the two letters (ML18235A028 and ML18268A134). The original PNPS CAL, EA-17-086, issued on August 2, 2017, (ML17214A088) as modified in the Enclosures to the June 7, 2018, (ML18158A134) and August 23, 2018, (ML18235A028) letters from the NRC to Entergy, 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
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 OCTOBER 11, 2018

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Revised Confirmatory Action Letter Commitments

1. CAL Item EP-2.2:

The original CAL item stated: "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." Entergy revised this item to read: "Based upon the results of CR PNP-2016-2061, CA-24, reapportion the workload of the System Engineer 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."

The NRC staff reviewed the change and determined it was administrative because, while it revised the wording to reflect direction provided in the referenced procedure it did not change the expected outcome of the action. The NRC staff concluded this change is acceptable.

2. CAL Item ER-2.2:

The original CAL item stated: "Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals using the CFAM work management supply and demand model." Entergy revised this item to read: "Reassess the additional resources brought under CR PNP-2016-2057, CA-41. As part of that assessment, perform the following: Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals and procure additional contract resources if necessary."

The NRC staff reviewed the change and determined that it provided a commensurate method for resource assessment. NRC inspectors determined that the change enhanced the items by adding the requirement to procure additional resources if needed. The NRC staff concluded this change is acceptable.

3. CAL Item ER-3.2:

The original CAL item stated: "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: Replace Feedwater Level A/B Channel Selector Switch (604-301), if required based on scheduled testing, Replace Feedwater Level Control Single Element/ Three Element Selector Switch (604- 302), if required based on scheduled testing, Perform Motor Rewind on Sea Water Pump B (P-105B), and Perform Startup Transformer CCVT Inspections and Testing (X4)". Entergy revised this item to read: "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: Replace Feedwater Level A/B Channel Selector Switch (604-301), if required based on scheduled testing, Replace Feedwater Level Control Single Element/ Three Element Selector Switch (604- 302), if required based on scheduled testing, and Perform Motor Rewind on Sea Water Pump B (P-105B)". Entergy determined that the CCVT was incorrectly listed as an unmitigated single point vulnerability, because Entergy originally believed that the CCVT had not been replaced in over 30 years. Entergy subsequently determined that the CCVT was replaced in 2007.

The NRC verified that the CCVTs were replaced in 2007 and concluded the change was acceptable.

4. CAL Item OPS-2.2:

The original CAL item stated: "Conduct Focused Self-Assessments of Operator Fundamentals for each shift crew using the position specific "Roles and Responsibilities" attachments in EN-OP-120, *Operator Fundamentals Program*. The assessment teams should include industry peers." Entergy revised this item to read: "Conduct crew observations for each crew using EN-OP-117 "Operations Assessment Fundamentals Grading Sheets (IER L1-11-3)." The assessment teams should include resources external to Pilgrim."

The NRC staff discussed with Pilgrim operations leadership the intent of this change and determined that the criteria from EN-OP-120 overlapped with EN-OP-117 such that there would be no missed evaluation by using this methodology. The NRC staff concluded this change is acceptable.

5. CAL Item RRDM-1.1

The original CAL item stated: "Perform observations of leadership performance against the leadership expectations established in CAPR-1 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." Entergy revised this item to read: "Perform observations of leadership expectations established in CAPR-1 and document the observations in Leadership WILL Sheets. Roll these observations up into 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 weeks basis, or at a frequency agreed to by the SVP and SME. This action will remain in place until the end of operating plant life or the effectiveness reviews determine that the leadership behaviors are meeting established expectations and are self-sustaining."

The NRC staff reviewed the change and determined it was administrative because it only specified the format for the documentation of feedback on leadership performance and identified the intended audience. The NRC staff concluded this change is acceptable.

6. CAL Item RRDM-1.2

The original CAL item stated: "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." Entergy revised this item to read: "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. 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 the leadership behaviors are meeting the established expectations and are self-sustaining."

The NRC staff reviewed the change and determined that the implementation of a Recovery Mentor Team approach did not change the extent of the mentoring directed by the action. The NRC staff concluded this change is acceptable.

7. CAL Item WM-1.1:

The original CAL item stated: "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." Entergy revised this item to read: "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." Entergy's proposed change combines items WM-1.1 and WM-1.3.

The NRC reviewed the change and determined that it clarified the actions and provided a more specific "familiarization guide" to managers to promulgate the standards and expectations for work management meetings. The NRC staff concluded this change is acceptable.

8. CAL Item WM-1.3

The original CAL item stated: "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." Entergy revised this item to read: "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." Entergy's proposed change combines items WM-1.1 and WM-1.3.

The NRC reviewed the change and determined that it clarified the actions and provided a more specific "familiarization guide" to managers to promulgate the standards and expectations for work management meetings. The NRC staff concluded this change is acceptable.

9. CAL Item WM-3.3

The original CAL item stated: "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. Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals using the CFAM work management supply and demand model." Entergy revised this item to read: "Reassess the additional resources brought in under CR PNP-2016-2057, CA-41. As part of that assessment, perform the following: Determine the estimated man-hours required to reduce backlogs and maintain fleet performance goals and procure additional contract resources if necessary.

The NRC staff determined that this change eliminated the specific method for evaluating additional work management and maintenance resources brought in to reduce backlogs, but

it does not change the underlying action to be taken. The NRC staff concluded the change is acceptable.