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

January 17, 2019

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 a letter dated December 13, 2018 (ML18352A753[1]), Entergy Nuclear Operations, Inc. (Entergy) notified the U.S. Nuclear Regulatory Commission (NRC) of its intent to change and/or clarify 5 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).

The NRC staff has completed its review of the proposed changes for the five items associated with Nuclear Safety Culture. The NRC staff determined that the proposed changes are not substantive and do not affect our conclusions regarding the effectiveness of the implementation of the PNPS Recovery Plan. In summary, the staff determined that the proposed changes are either administrative in nature or clarify the specific actions completed. Specifically, they corrected an editorial error associated with a corrective action program reference, updated actions to use current fleet standards, and clarified the intended population and methods used for the rollout of site performance expectations. The Enclosure to this letter describes additional detail for the revisions and the NRC staff's review of the changes.

After consulting with the Director of the Office of Nuclear Reactor Regulation, the NRC staff agrees with the five revised commitments as described in your letter (ML18352A753). The original PNPS CAL, EA-17-086, issued on August 2, 2017, as modified in the Enclosures to the June 7, 2018, August 23, 2018, and October 11, 2018, 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."

[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.

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 JANUARY 17, 2019

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ADAMS ACCESSION NUMBER: **ML19017A035**

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Revised Confirmatory Action Letter Commitments

1. CAL Item NSC-1.1:
   The original CAL item stated: "Implement the Individual Targeted Performance Improvement Plans (TPIP) developed from CR PNP-2016-2052, CA-35 utilizing the guidance contained in EN-FAP-HR-006, Fleet Approach to Leadership Development & Organizational Effectiveness Document review plan progress as determined during the individual Monthly Performance Management Meetings to ensure sufficient evidence exists for plan closures. When a Senior Leader has positively satisfied their TPIP objectives, the Site Vice President (SVP) can close the TPIP."

   Entergy revised this item to read: "Implement the Individual Targeted Performance Improvement Plans (TPIP) for the GMPO and Directors (Senior Leaders) developed from CR PNP-2016-2052, CA-36 utilizing the guidance contained in EN-FAP-HR-006, Fleet Approach to Leadership Development & Organizational Effectiveness. Document review plan progress as determined during the individual Monthly Performance Management Meetings to ensure sufficient evidence exists for plan closures. When a Senior Leader has positively satisfied their TPIP objectives, the Site Vice President (SVP) can close the TPIP."

   The change was needed to properly identify the corrective action program item reference number and to specifically describe the senior leaders to whom the corrective action applied. The NRC staff concluded this change is acceptable.

2. CAL Item NSC-1.5:
   The original CAL item stated: "Implement the Individual Targeted Performance Improvement Plans (TPIP) developed from CR PNP-2016-2052, CA-35 utilizing the guidance contained in EN-FAP-HR-006, Fleet Approach to Leadership Development & Organization Effectiveness Document review plan progress as determined during the individual Monthly Performance Management Meetings to ensure sufficient evidence exists for plan closures. When a Senior Leader has positively satisfied their TPIP objectives, the SVP can close the TPIP."

   Entergy revised this item to read: "Develop and implement Individual Targeted Performance Improvement Plans (TPIP) for Managers, Superintendents and Supervisors using the criteria listed in CR-PNP-2016-2052, CA-36 and utilizing the guidance contained in EN-FAP-HR-006, Fleet Approach to Leadership Development & Organization Effectiveness Document review plan progress as determined during the individual Monthly Performance Management Meetings to ensure sufficient evidence exists for plan closures. When a leader has positively satisfied their TPIP objectives, the one-up leader can close the TPIP."

   The change was needed to properly identify the corrective action program item reference number and to specifically describe the leaders to whom the corrective action applied. The NRC staff concluded this change is acceptable.

3. CAL Item NSC-2.2:
   The original CAL item stated: "Rollout the PNPS Employee handbook (or equivalent) to site personnel. The rollout meeting should include:
   - Senior Leaders (Senior Manager or above) facilitating in the rollout meeting to ensure effective communications and understanding of the commitment to the handbook and its use.

- Individuals signing for their copy of PNPS Employee Handbook and acknowledgement of expectations for use."

Entergy revised this item to read: "Rollout the PNPS Employee handbook (or equivalent) to site personnel. The rollout should include:

- Senior Leaders (Senior Manager or above) facilitating the rollout to ensure effective communications and understanding of the commitment to the handbook and its use.
- Individuals signing for their copy of PNPS Employee Handbook and acknowledgement of expectations for use."

The change was needed to clarify the specific methods used to rollout the employee handbook to PNPS staff. The results of the NRC staff review concluded that the change was acceptable.

4. CAL Item NSC-2.3:
   The original CAL item stated: "Conduct alignment sessions with station leadership on the content and implementation expectations on the PNPS handbook (or equivalent) based on the EN-PL-100, Nuclear Excellence Model (PNPS's vision, mission, strategy, goals, core values, attributes of leader and individual behaviors), and site-specific recovery procedure EN-OM-XXX-PNP-RC (Created in CR PNP-2016-2052, CA-39). These sessions will be led by the Site Vice President and focus on establishing accountability for high standards of performance to align behaviors in support of a strong nuclear safety culture. Station Leadership includes first line supervisor level up to Director and General Manager Plant Operations (GMPO) level."

   Entergy revised this item to read: "Conduct alignment sessions with station leadership on the content and implementation expectations on the PNPS handbook (or equivalent) based on the EN-PL-100, Nuclear Excellence Model (PNPS's vision, mission, strategy, goals, core values, attributes of leader and individual behaviors), and site-specific recovery procedure EN-OM-XXX-PNP-RC (Created in CR PNP-2016-2052, CA-39). These sessions will be led by Station Senior Management and focus on establishing accountability for high standards of performance to align behaviors in support of a strong nuclear safety culture. Station Leadership includes first line supervisor level up to Director and General Manager Plant Operations (GMPO) level."

   The change was needed to allow the Site Vice President to delegate the lead for these sessions to appropriate site leaders. The results of the NRC staff review concluded that the change was acceptable.

5. CAL Item NSC-8.9
   The original CAL item stated: "Reinforce the use of Entergy's Managerial Accountability Model as stated in EN-PL-100, Attachment 3.2 with all full-time site personnel and supplemental personnel to improve consistent performance of Managerial and Individual Accountability."

   Entergy revised this item to read: "Reinforce the use of the Culpability model (accountability) as stated in EN-PL-100 with full-time, actively badged, site assigned personnel to improve consistent performance of Managerial and Individual Accountability."

The change was needed to reflect recent revisions to fleet procedures in this area and to more accurately define the intended audience for the action. The NRC staff concluded this change is acceptable.