



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

January 23, 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: PILGRIM NUCLEAR POWER STATION – CONFIRMATORY ACTION LETTER
(EA-17-086) FOLLOW-UP INSPECTION REPORT 05000293/2018013**

Dear Mr. Sullivan:

On December 14, 2018, the U.S. Nuclear Regulatory Commission (NRC) completed an on-site team inspection at Pilgrim Nuclear Power Station (PNPS). The NRC inspectors discussed the results of this inspection with you and other members of your staff during an onsite debrief on December 14, 2018, and via teleconference exit on January 16, 2019. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed PNPS's progress in implementing the actions from the PNPS Recovery Plan that were committed to in the Confirmatory Action Letter dated August 2, 2017 (NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML17214A088) (EA-17-086). Specifically, for this inspection the team reviewed the adequacy of the corrective actions that PNPS completed to address the remaining 40 individual Confirmatory Action Letter items that were part of the Nuclear Safety Culture and Procedure Use and Adherence Area Action Plans. The team also reviewed recent site performance to determine whether these Area Action Plans achieved the applicable safety performance improvement objectives stated in the PNPS Recovery Plan. This included an assessment of the additional actions you completed to address NRC-identified problems in your implementation of actions for PUA-4.2 (see NRC Inspection Report 05000293/2018011 (ML18282A039)), and the adverse impact of these problems on the effectiveness of the Procedure Use and Adherence Area Action Plan. As part of its assessment of the effectiveness of PNPS actions to improve safety culture, the team reviewed the results of PNPS's most recent independent third party safety culture assessment and completed its own independent assessment of the site's safety culture through staff interviews and focus groups.

The team determined that all 40 individual Confirmatory Action Letter items reviewed and the two associated Area Action Plans were adequately completed and effective in achieving the associated PNPS Recovery Plan performance improvement objectives. As a result, these 40 Confirmatory Action Letter items and the Area Action Plans for Nuclear Safety Culture and Procedure Use and Adherence are closed.

No findings or violations of NRC requirements were identified during this inspection.

In accordance with the Confirmatory Action Letter, PNPS was to remain in the Multiple/Repetitive Degraded Cornerstone column of the NRC's Reactor Oversight Process Action Matrix until the NRC satisfactorily completed its follow-up inspections to review implementation of all corrective actions listed in Enclosure 2 of the Confirmatory Action Letter and safety performance at Pilgrim had demonstrated sustained improvement. The NRC staff has completed all five of its planned Confirmatory Action Letter follow-up inspections and concluded that all 156 Confirmatory Action Letter actions and their 11 associated Area Action Plans are complete. The NRC staff will assess the results of the quarterly Confirmatory Action Letter follow-up inspections in conjunction with the results of baseline inspections and performance indicators to determine whether improved safety performance at PNPS has been sustained. This determination will be made in conjunction with the 2018 end-of-cycle review for PNPS per the guidance described in Inspection Manual Chapter 0305, Section 7.03 and will be communicated via the annual assessment letter in March 2019.

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 at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Anthony Dimitriadis, Chief
Reactor Projects Branch 5
Division of Reactor Projects

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

Enclosure:
Inspection Report 05000293/2018013
w/Attachment: Confirmatory Action
Letter Item Status

cc w/encl: Distribution via ListServ

SUBJECT: PILGRIM NUCLEAR POWER STATION – CONFIRMATORY ACTION LETTER
(EA-17-086) FOLLOW-UP INSPECTION REPORT 05000293/2018013 DATED
JANUARY 23, 2019

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OFFICE	RI/DRP	RI/DRS	RI/DRP		
NAME	LCline	EDiPaolo	ADimitriadis		
DATE	1/19/19	1/10/19	1/23/19		

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Number: 50-293

License Number: DPR-35

Report Number: 05000293/2018013

Enterprise Identifier: I-2018-013-0002

Licensee: Entergy Nuclear Operations, Inc. (Entergy)

Facility: Pilgrim Nuclear Power Station (PNPS)

Location: Plymouth, MA

Inspection Dates: 12/10/2018 – 12/14/2018

Team Lead: L. Cline Jr., Senior Project Engineer

Assistant Team Lead: E. DiPaolo, Senior Reactor Inspector

Inspectors: L. Micewski, Senior Resident Inspector
D. Kern, Senior Reactor Inspector
M. Keefe-Forsyth, Human Factors Specialist
S. Morrow, Human Factors Engineer
J. Vazquez, Resident Inspector

Approved By: Anthony Dimitriadis, Chief
Reactor Projects Branch 5
Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring Entergy's performance at PNPS by conducting the fifth confirmatory action letter (CAL) follow-up inspection in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

The team reviewed 40 of the 156 items that Entergy committed to complete in the PNPS CAL (EA-17-086). The items reviewed were associated with the Nuclear Safety Culture (NSC) and Procedure Use and Adherence (PUA) Area Action Plans and included an assessment of the additional actions PNPS completed to address previous NRC-identified problems in implementation of PUA-4.2 (ADAMS Accession No. ML18282A039). The team determined that all 40 individual CAL items reviewed and the associated Area Action Plans were adequately completed and effective in achieving the associated PNPS Recovery Plan performance improvement objectives. As a result, the 40 CAL items and the two Area Action Plans are closed.

No findings or more-than-minor violations were identified.

Additional Tracking Items

Type	Issue number	Title	Report Section	Status
CAL	EA-17-086	PNPS Confirmatory Action letter	Inspection Results 92702	Discussed

INSPECTION SCOPE

This inspection was conducted using the appropriate portions of the applicable inspection procedure in effect at the beginning of the inspection unless otherwise noted. Currently approved inspection procedures with their attached revision histories are located on the NRC website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess Entergy's performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT, AND ABNORMAL

92702 – Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders

The inspectors reviewed the status of the corrective actions that Entergy had reported complete for 40 of the 156 items listed on Enclosure 2 of the PNPS CAL (EA-17-086) (ADAMS Accession No. ML17214A088). The inspectors also reviewed the results of PNPS's most recent independent third party safety culture assessment and completed its own independent assessment of the site's safety culture through staff interviews and focus groups.

All 40 items reviewed for this inspection are identified in the Confirmatory Action Letter Item Status summary table included as an Attachment to this report. The inspectors also reviewed the status of the Area Action Plans associated with these 40 items, which in accordance with Enclosure 2 of the PNPS CAL included the NSC and PUA Area Action Plans. Entergy had reported these two Area Action Plans were complete and effective.

The inspectors evaluated these items to determine if:

- (1) CAL item corrective actions were completed in a timely manner consistent with their safety significance.
- (2) Area Action Plans were effective at addressing the performance issues identified in the CAL.
- (3) CAL performance metrics were appropriate and accurate.
- (4) Closure of each CAL item and Area Action Plan was completed in accordance with established PNPS procedural guidance.
- (5) PNPS corrected NRC-identified problems in PNPS implementation of actions taken for PUA-4.2 (see NRC Inspection Report 05000293/2018011 (ADAMS Accession No. ML18282A039)), and the adverse impact of these problems on the effectiveness of the PUA Area Action Plan.

During this review, the inspectors completed the following specific activities:

- (1) Reviewed Entergy's closure packages for each of the CAL action items.
- (2) Reviewed Entergy's closure reports for each of the Area Action Plans.
- (3) Reviewed Entergy's interim and final effectiveness reviews and self-assessments completed for the Area Action Plans.

- (4) Reviewed Entergy's performance indicators and recovery metrics for the Area Action Plans through November 2018.
- (5) Conducted 6 focus group panel discussions that involved 52 staff members who were either new employees or first line supervisors, from the radiation protection, instrumentation and controls, electrical, or mechanical maintenance organizations.
- (6) Conducted field interviews with 65 staff members from the operations, security, and mechanical maintenance organizations.
- (7) interviewed 14 personnel (both managers and staff members) who were directly involved with the PNPS recovery effort. This included contract personnel acting as the corrective action program subject matter expert and the nuclear safety culture advocate.
- (8) Reviewed Organizational Health Index survey results from 2016, 2017, and 2018; Nuclear Safety Culture Leadership Team and Monitoring Panel meeting minutes; and Nuclear Safety Culture Advocate reports.
- (9) Observed site meetings including: Leadership and Alignment, Nuclear Safety Culture Leadership Team, and the Pilgrim People Health Committee.
- (10) Performed independent field observations of the conduct of 15 in-progress maintenance activities including pre-job briefings and field work covering all three maintenance disciplines (electrical, mechanical, and instrumentation and controls).
- (11) Reviewed PNPS human performance observation records and metrics for the period of April 2018 through November 2018.
- (12) Reviewed the PNPS Human Performance Focused Improvement Plan (CR-PNP-2018-5611, CA-6, CA-7, and CA-8).

INSPECTION RESULTS

Observation	92702
<p><u>CAL Items Closed</u></p> <p>The team closed all of the following 40 CAL items (a narrative description of each item is listed in Enclosure 1 to the PNPS CAL (ADAMS Accession No. ML17214A088):</p> <ul style="list-style-type: none"> • Nuclear Safety Culture (NSC) – 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.10, 2.2, 2.3, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 4.1, 4.2, 5.1, 5.2, 5.3, 5.4, 6.1, 7.1, 8.1, 8.6, 8.8, 8.9, 8.10, 8.21, 8.22, 8.25, 8.26, 8.27, 8.2, and 8.29. • Procedure Use and Adherence (PUA) – 4.2 <p><u>CAL Area Action Plan Summary Review</u></p> <p>The inspectors concluded that the individual NSC CAL items described above and the associated Area Action Plan were adequately completed and effective in achieving the applicable performance improvement objectives described in the PNPS Recovery Plan. Therefore, the NSC Area Action Plan as described in Enclosure 2 to the PNPS CAL is closed.</p> <p>Actions associated with the PUA Area Action Plan were reviewed during previous inspections, but the Area Action Plan was held open because additional action and review was required to address concerns documented in NRC Inspection Report 05000293/2018011 (ADAMS Accession No. ML18282A039). Based on the activities conducted and the documents reviewed during this inspection, the inspectors determined that PNPS's comprehensive station human performance gap closure plan (as described in CR-PNP-2018-5611, CA-6, CA-7, and CA-8) was complete and adequate to address the additional action and review required. Combined with the adequate completion of the other PUA Area Action Plan CAL</p>	

items as documented in NRC Inspection Report 05000293/2018011, the inspectors concluded that the PUA Area Action Plan was adequately completed and effective in achieving the associated performance improvement objectives described in the PNPS Recovery Plan. The PUA Area Action Plan is closed.

Independent Safety Culture Assessment

In total, through focus groups, maintenance and control room field observations, and individual interviews, the inspectors spoke with 131 people during the onsite week for this inspection. The discussions focused on site communications, the environment for raising safety concerns, the status of the site recovery, the corrective action program and workforce planning. Combined with the safety culture assessment activities completed during the fourth CAL follow-up inspection in September 2018, NRC safety culture assessment activities included discussions with approximately 40% of the PNPS workforce.

Based on the results of these NRC inspection activities and the third party safety culture assessment performed in September and October 2018, the NRC observed an improvement in PNPS safety culture since the NRC conducted its previous independent safety culture assessment during the Phase 'C' Inspection Procedure 95003 inspection in November 2016 and January 2017.

The results of the NRC focus groups and interviews conducted during this inspection indicated the following:

- There has been increased focus on performing day-to-day activities safely. The entire workforce, from the senior management team to the technicians and operators in the field, is aligned with the new site standard.
- Management's demonstrated willingness to shutdown the plant in response to forecasted or actual severe winter weather conditions reinforced this safety focus with site staff.
- PNPS employees feel free to raise safety concerns through multiple avenues without fear of retaliation.
- Communication regarding the disposition of corrective action program condition reports and operational decision making has improved significantly.

Additionally, NRC inspector observations of day-to-day activities identified multiple examples of the PNPS staff's alignment with the new site standards including:

- Widespread use of the employee handbook by site staff.
- More frequent management and supervisor field observations that focused on proper use of human performance tools during day-to-day activities.
- Regular peer-to-peer coaching regarding proper adherence to site standards during day-to-day activities.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On December 14, 2018, the inspectors presented a debrief of the CAL follow-up inspection results to Mr. Brian Sullivan, Site Vice President and other members of PNPS staff.
- On January 16, 2019, inspectors conducted a telephonic exit meeting and presented the final results for the CAL follow-up inspection items documented in this report to Mr. Brian Sullivan, Site Vice President and other members of PNPS staff.

DOCUMENTS REVIEWEDCAL Item Closure Packages

NSC 1.1 and 1.5	NSC 3.7	NSC 8.10
NSC 1.3, 1.4, 1.6, 1.7 and 1.8	NSC 3.8	NSC 8.28
NSC 1.10	NSC 4.1	NSC 8.29
NSC 2.2	NSC 4.2	NSC 8.9
NSC 2.3	NSC 6.1	PUA 4.2 (Supplement 1)
NSC 3.6	NSC 7.1	

CAL Area Action Plan Closure Reports

Comprehensive Recovery Plan Procedure Use and Adherence Area Action Plan Closure Report, dated 5/15/2018
 Comprehensive Recovery Plan Nuclear Safety Culture Area Action Plan Closure Report, dated 11/1/2018

Procedures

1.3.143, PNPS Accountability Model, Revision 1
 1.3.145, PNPS Recovery Procedure, Revision 1
 1.3.145, PNPS Recovery Procedure, Revision 2
 1.3.145, PNPS Recovery Procedure, Revision 5
 3.M.2-24, Standby Liquid Control Level Instrumentation Sensing Line Maintenance, Revision 6
 3.M.3-47, Load Shed Relay Operational Functional Test – Critical Maintenance, Revision 95
 3.M.3-51, Electrical Termination Procedure, Revision 32
 3.M.3-47.2, “B” Train Functional Test of Individual Load Shed Components – Critical Maintenance, Revision 36
 3.M.3-61.3, Emergency Diesel Generator Quarterly Preventative Maintenance – Critical Maintenance, Revision 36
 8.M.1-32.8, Analog Trip System Trip Unit Calibration Cabinet C2233B Section B-Critical Maintenance, Revision 36
 EN-AD-101-03, Recovery Procedure Process, Revision 2
 EN-FAP-HR-006, Fleet Approach to Leadership Development & Organizational Effectiveness, Revision 1
 EN-FAP-OM-016, Performance Management Processes and Practices, Revision 9
 EN-HR-107-PNP-RC, PNPS People Health Committee, Revision 0
 EN-HR-135, Disciplinary Action, Revision 1
 EN-HU-102, Human Performance Traps & Tools, Revision 16
 EN-HU-105, Human Performance – Managed Defenses, Revision 17
 EN-HU-106, Procedure and Work Instruction Use and Adherence. Revision 7
 EN-IS-123, Electrical Safety, Revision 20
 EN-LI-102, Corrective Action Program, Revision 28
 EN-LI-118, Cause Evaluation Process, Revision 28
 EN-LI-123-12-PNP-RC, Comprehensive Recovery Plan and Performance Metrics, Revision 2
 EN-MA-101, Conduct of Maintenance, Revision 27
 EN-MA-101-03, Maintenance Work Preparation Process, Revision 9
 EN-MA-118, Foreign Material Exclusion, Revision 12
 EN-MA-135, Online Motor Electrical Testing, Revision 8
 EN-MA-157, Maintenance Configuration Control, Revision 1
 EN-OP-102, Protective and Caution Tagging, Revision 23
 EN-OP-115-08, Annunciator Response, Revision 4
 EN-PL-100, Nuclear Excellence Model, Revision 7

EN-PL-100, Nuclear Excellence Model, Revision 8
 EN-QV-136, Nuclear Safety Culture Monitoring, Revision 15
 EN-RP-141, Job Coverage, Revision 9
 EN-WM-102, Work Implementation and Closeout, Revision 10

Audits/Self Assessments/Surveillances

CR-PNP-2016-02052 CA105, Implement People Health Committee to Prioritize Staffing and Retention Issues
 CR-PNP-2016-02052 CA120, Create and Execute Plan to Improve Response to Oversight-Identified Issues
 CR-PNP-2016-02052 CA44, Site Wide Alignment with Leadership on PNPS Employee Handbook
 CR-PNP-2016-02052 CA45, Rollout PNPS Employee Handbook
 CR-PNP-2016-02052 CA46, Update New Employee Onboarding Checklist to Include PNPS Employee Handbook
 CR-PNP-2016-02052 CA57, Develop People Health Committee Procedure
 CR-PNP-2016-02052 CA92, Leadership Alignment on PNPS Employee Handbook
 LO-PNPLO-2018-00028, Nuclear Safety Culture Area Action Plan (AAP) - Focused Self-Assessment - Pre-NRC 95003 Inspection, dated 9/27/2018

Condition Report (CR) [*written as a result of NRC inspection]

CR-PNP-2016-02052	CR-PNP-2018-01123	CR-PNP-2018-09621*
CR-PNP-2016-02952	CR-PNP-2018-01145	CR-PNP-2018-09635*
CR-PNP-2016-09646	CR-PNP-2018-03636	CR-PNP-2018-09647*
CR-PNP-2017-00406	CR-PNP-2018-03774	CR-PNP-2018-09656
CR-PNP-2017-00595	CR-PNP-2018-04039	CR-PNP-2018-09658*
CR-PNP-2017-01479	CR-PNP-2018-07487	CR-PNP-2018-09659*
CR-PNP-2017-01689	CR-PNP-2018-08020	CR-PNP-2018-09662*
CR-PNP-2017-02785	CR-PNP-2018-08178*	CR-PNP-2018-09664*
CR-PNP-2017-03025	CR-PNP-2018-08949	CR-PNP-2018-09709*
CR-PNP-2017-06217	CR-PNP-2018-09151*	CR-PNP-2018-09745
CR-PNP-2017-07936	CR-PNP-2018-09531*	CR-PNP-2018-09749
CR-PNP-2017-08637	CR-PNP-2018-09598*	CR-PNP-2018-09752*
CR-PNP-2017-08678	CR-PNP-2018-09609	CR-PNP-2018-09754*
CR-PNP-2018-00595	CR-PNP-2018-09610*	

Work Orders

00234759	05272484	52833625
00476066	52729473	52834901
00506412	52740199	

Miscellaneous

Adverse Condition Analysis CR-PNP-2017-03025, CAP SME Feedback, issued 7/6/17
 CAP SME Assessment Report - Corrective Action Program Behaviors, 1st Quarter 2018
 CAP SME Assessment Report - Corrective Action Program Behaviors, 2nd Quarter 2018
 CAP SME Assessment Report - Corrective Action Program Behaviors, 3rd Quarter 2018
 Comprehensive Recovery Plan Nuclear Safety Culture Area Action Plan Closure Report, dated 11/1/2018
 Condition Report Classification, workshop presentation dated 7/14/2017
 EN-PL-100, 2017-2021 Nuclear Excellence Model
 Entergy Organizational Health Index Survey Results, 2016, 2017, 2018

Leadership and Alignment meeting presentation from 9/5/17
 Leadership and Alignment meeting presentation from 10/31/17
 Leadership and Alignment meeting presentation from 11/28/17
 LO-PNPLO-2014-111 Corrective Actions 4377 through 4840
 NIOS Observation O2C-PNP-2017-0480 - Follow-up of CR-PNP-2017-3025, dated 9/28/17
 NRC Confirmatory Action Letter – Pilgrim Nuclear Power Station dated 8/2/17
 NRC Inspection Report 05000293/2018011, PNPS Confirmatory Action Letter (EA-17-086)
 Follow-Up Inspection Report dated 10/09/18
 Nuclear Safety Culture Interim Actions Report # 152, 11/21/18
 Nuclear Safety Culture Interim Actions Report Summaries for Weeks 23 through 150
 Nuclear Safety Culture Monitoring Panel 4th Quarter for 2017 meeting minutes, dated 10/16/17
 Nuclear Safety Culture Monitoring Panel April – June 2017 meeting minutes, dated 6/15/17
 Nuclear Safety Culture Monitoring Panel April 20, 2017 emergent meeting minutes, dated 5/2/17
 Nuclear Safety Culture Monitoring Panel August 2016 meeting minutes, dated 9/6/16
 Nuclear Safety Culture Monitoring Panel December 2016 meeting minutes, dated 12/15/16
 Nuclear Safety Culture Monitoring Panel December 6, 2018 emergent meeting minutes, dated 12/11/18
 Nuclear Safety Culture Monitoring Panel February 2017 meeting minutes, dated 2/28/17
 Nuclear Safety Culture Monitoring Panel first quarter 2018 meeting minutes, dated 3/25/18
 Nuclear Safety Culture Monitoring Panel January 2017 meeting minutes, dated 2/1/17
 Nuclear Safety Culture Monitoring Panel January 26, 2018 meeting minutes, dated 2/26/18
 Nuclear Safety Culture Monitoring Panel July 12, 2018 meeting minutes, dated 7/27/18
 Nuclear Safety Culture Monitoring Panel July 2016 meeting minutes, dated 8/26/16
 Nuclear Safety Culture Monitoring Panel June 15 to Current meeting minutes, dated 8/17/17
 Nuclear Safety Culture Monitoring Panel June 2016 meeting minutes, dated 7/18/16
 Nuclear Safety Culture Monitoring Panel March 2017 meeting minutes, dated 4/17/17
 Nuclear Safety Culture Monitoring Panel May 3, 2018 emergent meeting minutes, dated 5/8/18
 Nuclear Safety Culture Monitoring Panel November 2016 meeting minutes, dated 12/5/16
 Nuclear Safety Culture Monitoring Panel October 2016 meeting minutes, dated 11/4/16
 Nuclear Safety Culture Monitoring Panel September 2016 meeting minutes, dated 1/0/24/16
 Nuclear Safety Culture Monitoring Panel September 27, 2018 meeting minutes, dated 10/17/18
 Nuclear Safety Culture Monitoring Panel September 6, 2017 emergent meeting minutes, dated 9/14/17
 Pilgrim People Health Committee Meeting Minutes for Meetings dated 2/28/17, 6/28/17, 2/22/18, 3/22/18, 7/19/18, and 12/13/18
 Pilgrim's Progress: Our Return to Excellence, edition dated 8/15/17
 PNPS Employee Handbook, Achieving and Sustaining Excellence, Revision 0
 PNPS Operations Standards and Fundamentals Handbook, Revision 0
 Report of the Third-Party Safety Culture Assessment of Pilgrim Nuclear Power Station, dated 12/3/19
 Safety Culture Lead Team Monitoring Report for January-March 2017, dated 5/5/17
 PNPS Excellence Plan, Revision 2, dated 11/14/2018
 CR-PNP-2017-06753, Procedure Use and Adherence Adverse Condition Analysis, dated 7/3/2017
 CR-PNP-2016-2059, Procedure Use and Adherence Apparent Cause Evaluation, Revision 1, dated 9/29/2016
 Operational Excellence Management Review Meeting Pilgrim Nuclear Power Station, Presentation Slides, dated 11/13/2019,
 Maintenance Observation Roll-up Meeting Minutes dated 11/28/18

EN-LI-121, Trending and Performance Review Process, Revision 24, Performance Improvement Integrated Matrix, updated for August 2018, APRM for May, June, July 2018

EN-LI-121, Trending and Performance Review Process, Revision 24, Attachment 9.1, DPRM/APRM Report, updated for Pilgrim Station Maintenance Department, October 2018 (LO-PNPLO-2018-0107, CA 16)

WT-WTPNP-2016-00072

WT-WTPNP-2018-00349

Confirmatory Action Letter Item Status

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
1	Nuclear Safety Culture	NSC-1.1	05000293/2018013	Y
2	Nuclear Safety Culture	NSC-1.2	05000293/2018013	Y
3	Nuclear Safety Culture	NSC-1.3	05000293/2018013	Y
4	Nuclear Safety Culture	NSC-1.4	05000293/2018013	Y
5	Nuclear Safety Culture	NSC-1.5	05000293/2018013	Y
6	Nuclear Safety Culture	NSC-1.6	05000293/2018013	Y
7	Nuclear Safety Culture	NSC-1.7	05000293/2018013	Y
8	Nuclear Safety Culture	NSC-1.8	05000293/2018013	Y
9	Nuclear Safety Culture	NSC-1.10	05000293/2018013	Y
10	Nuclear Safety Culture	NSC-2.2	05000293/2018013	Y
11	Nuclear Safety Culture	NSC-2.3	05000293/2018013	Y
12	Nuclear Safety Culture	NSC-3.1	05000293/2018013	Y
13	Nuclear Safety Culture	NSC-3.2	05000293/2018013	Y
14	Nuclear Safety Culture	NSC-3.3	05000293/2018013	Y
15	Nuclear Safety Culture	NSC-3.4	05000293/2018013	Y
16	Nuclear Safety Culture	NSC-3.5	05000293/2018013	Y
17	Nuclear Safety Culture	NSC-3.6	05000293/2018013	Y
18	Nuclear Safety Culture	NSC-3.7	05000293/2018013	Y
19	Nuclear Safety Culture	NSC-3.8	05000293/2018013	Y
20	Nuclear Safety Culture	NSC-4.1	05000293/2018013	Y
21	Nuclear Safety Culture	NSC-4.2	05000293/2018013	Y
22	Nuclear Safety Culture	NSC-5.1	05000293/2018013	Y
23	Nuclear Safety Culture	NSC-5.2	05000293/2018013	Y
24	Nuclear Safety Culture	NSC-5.3	05000293/2018013	Y
25	Nuclear Safety Culture	NSC-5.4	05000293/2018013	Y
26	Nuclear Safety Culture	NSC-6.1	05000293/2018013	Y
27	Nuclear Safety Culture	NSC-7.1	05000293/2018013	Y
28	Nuclear Safety Culture	NSC-8.1	05000293/2018013	Y
29	Nuclear Safety Culture	NSC-8.6	05000293/2018013	Y
30	Nuclear Safety Culture	NSC-8.8	05000293/2018013	Y
31	Nuclear Safety Culture	NSC-8.9	05000293/2018013	Y
32	Nuclear Safety Culture	NSC-8.10	05000293/2018013	Y
33	Nuclear Safety Culture	NSC-8.21	05000293/2018013	Y
34	Nuclear Safety Culture	NSC-8.22	05000293/2018013	Y
35	Nuclear Safety Culture	NSC-8.25	05000293/2018013	Y
36	Nuclear Safety Culture	NSC-8.26	05000293/2018013	Y
37	Nuclear Safety Culture	NSC-8.27	05000293/2018013	Y
38	Nuclear Safety Culture	NSC-8.28	05000293/2018013	Y
39	Nuclear Safety Culture	NSC-8.29	05000293/2018013	Y
40	Corrective Action Program	CAP-1.1	05000293/2017010	Y
41	Corrective Action Program	CAP-1.2	05000293/2018011	Y

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
42	Corrective Action Program	CAP-1.3	05000293/2018011 05000293/2018012	Y
43	Corrective Action Program	CAP-1.4	05000293/2018011	Y
44	Corrective Action Program	CAP-1.5	05000293/2018011	Y
45	Corrective Action Program	CAP-1.7	05000293/2018011	Y
46	Corrective Action Program	CAP-1.8	05000293/2018011 05000293/2018012	Y
47	Corrective Action Program	CAP-1.9	05000293/2018011	Y
48	Corrective Action Program	CAP-1.10	05000293/2018011	Y
49	Corrective Action Program	CAP-1.11	05000293/2018011	Y
50	Corrective Action Program	CAP-2.1	05000293/2018011	Y
51	Corrective Action Program	CAP-2.2	05000293/2018011	Y
52	Corrective Action Program	CAP-2.3	05000293/2018011	Y
53	Corrective Action Program	CAP-3.1	05000293/2018011	Y
54	Corrective Action Program	CAP-3.2	05000293/2018011	Y
55	Corrective Action Program	CAP-4.2	05000293/2018011	Y
56	Corrective Action Program	CAP-4.3	05000293/2018011	Y
57	Procedure Use and Adherence	PUA-1.1	05000293/2017010	Y
58	Procedure Use and Adherence	PUA-1.2	05000293/2017010	Y
59	Procedure Use and Adherence	PUA-1.3	05000293/2017010	Y
60	Procedure Use and Adherence	PUA-1.4	05000293/2017010	Y
61	Procedure Use and Adherence	PUA-1.6	05000293/2018011	Y
62	Procedure Use and Adherence	PUA-2.2	05000293/2018011	Y
63	Procedure Use and Adherence	PUA-2.3	05000293/2018011	Y
64	Procedure Use and Adherence	PUA-2.4	05000293/2018011	Y
65	Procedure Use and Adherence	PUA-2.5	05000293/2018011	Y
66	Procedure Use and Adherence	PUA-3.1	05000293/2018011	Y
67	Procedure Use and Adherence	PUA-3.2	05000293/2018011	Y
68	Procedure Use and Adherence	PUA-3.3	05000293/2018011	Y
69	Procedure Use and Adherence	PUA-3.4	05000293/2018011	Y

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70	Procedure Use and Adherence	PUA-4.1	05000293/2018011	Y
71	Procedure Use and Adherence	PUA-4.2	05000293/2018011 05000293/2018013	Y
72	Procedure Use and Adherence	PUA-4.3	05000293/2018011	Y
73	Procedure Use and Adherence	PUA-5.1	05000293/2018011	Y
74	Procedure Use and Adherence	PUA-5.2	05000293/2018011	Y
75	Procedure Use and Adherence	PUA-5.7	05000293/2018011	Y
76	Procedure Use and Adherence	PUA-5.8	05000293/2018011	Y
77	Procedure Use and Adherence	PUA-5.9	05000293/2018011	Y
78	Operability Determinations and Functionality Assessments	ODFA-1.1	05000293/2017010	Y
79	Operability Determinations and Functionality Assessments	ODFA-1.2	05000293/2018010	Y
80	Operability Determinations and Functionality Assessments	ODFA-1.3	05000293/2018010	Y
81	Operability Determinations and Functionality Assessments	ODFA-1.4	05000293/2018010	Y
82	Operability Determinations and Functionality Assessments	ODFA-1.5	05000293/2018010	Y
83	Operability Determinations and Functionality Assessments	ODFA-1.6	05000293/2018010	Y
84	Operability Determinations and Functionality Assessments	ODFA-2.2	05000293/2018010	Y
85	Operability Determinations and Functionality Assessments	ODFA-3.1	05000293/2018010	Y
86	Operability Determinations and Functionality Assessments	ODFA-5.1	05000293/2018010	Y

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87	Operability Determinations and Functionality Assessments	ODFA-5.2	05000293/2018010	Y
88	Operability Determinations and Functionality Assessments	ODFA-5.3	05000293/2018010	Y
89	Operability Determinations and Functionality Assessments	ODFA-5.4	05000293/2018010	Y
90	Operability Determinations and Functionality Assessments	ODFA-5.5	05000293/2018010	Y
91	Operability Determinations and Functionality Assessments	ODFA-5.6	05000293/2018010	Y
92	Operability Determinations and Functionality Assessments	ODFA-5.7	05000293/2018010	Y
93	Operability Determinations and Functionality Assessments	ODFA-5.8	05000293/2018010	Y
94	Operations Department Standards and Leadership	OPS-1.1	05000293/2018012	Y
95	Operations Department Standards and Leadership	OPS-1.2	05000293/2018012	Y
96	Operations Department Standards and Leadership	OPS-1.4	05000293/2018012	Y
97	Operations Department Standards and Leadership	OPS-1.6	05000293/2018012	Y
98	Operations Department Standards and Leadership	OPS-1.7	05000293/2018012	Y
99	Operations Department Standards and Leadership	OPS-2.2	05000293/2018012	Y
100	Operations Department Standards and Leadership	OPS-3.1	05000293/2018012	Y
101	Operations Department Standards and Leadership	OPS-3.2	05000293/2018012	Y
102	Operations Department Standards and Leadership	OPS-4.1	05000293/2018012	Y
103	Operations Department Standards and Leadership	OPS-4.2	05000293/2018012	Y
104	Risk Recognition and Decision Making	RRDM-1.1	05000293/2018012	Y

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105	Risk Recognition and Decision Making	RRDM-1.2	05000293/2018012	Y
106	Risk Recognition and Decision Making	RRDM-1.3	05000293/2018012	Y
107	Risk Recognition and Decision Making	RRDM-2.1	05000293/2018012	Y
108	Risk Recognition and Decision Making	RRDM-3.1	05000293/2018012	Y
109	Risk Recognition and Decision Making	RRDM-3.2	05000293/2018012	Y
110	Risk Recognition and Decision Making	RRDM-3.3	05000293/2018012	Y
111	Risk Recognition and Decision Making	RRDM-4.3	05000293/2018012	Y
112	Risk Recognition and Decision Making	RRDM-4.8	05000293/2018012	Y
113	Risk Recognition and Decision Making	RRDM-4.9	05000293/2018012	Y
114	Procedure Quality	PQ-1.1	05000293/2017010 05000293/2018012	Y
115	Procedure Quality	PQ-2.1	05000293/2017010	Y
116	Procedure Quality	PQ-2.2	05000293/2017010	Y
117	Procedure Quality	PQ-3.1	05000293/2017010	Y
118	Procedure Quality	PQ-3.2	05000293/2017010	Y
119	Procedure Quality	PQ-3.3	05000293/2017010	Y
120	Procedure Quality	PQ-5.1	05000293/2017010	Y
121	Procedure Quality	PQ-5.2	05000293/2017010 05000293/2018012	Y
122	SRV White Finding	SRV-1.1	05000293/2018010	Y
123	SRV White Finding	SRV-1.2	05000293/2018010	Y
124	SRV White Finding	SRV-1.3	05000293/2017010	Y
125	SRV White Finding	SRV-2.1	05000293/2017010	Y
126	SRV White Finding	SRV-3.1	05000293/2018010	Y
127	SRV White Finding	SRV-3.2	05000293/2018010	Y
128	SRV White Finding	SRV-3.3	05000293/2018010	Y
129	SRV White Finding	SRV-3.4	05000293/2018010	Y
130	SRV White Finding	SRV-4.1	05000293/2018010	Y
131	SRV White Finding	SRV-5.1	05000293/2018010	Y
132	SRV White Finding	SRV-5.2	05000293/2018010	Y
133	Engineering Programs	EP-1.1	05000293/2017010	Y
134	Engineering Programs	EP-1.2	05000293/2018012	Y
135	Engineering Programs	EP-2.1	05000293/2018012	Y
136	Engineering Programs	EP-2.2	05000293/2018012	Y
137	Engineering Programs	EP-2.3	05000293/2018012	Y

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138	Engineering Programs	EP-2.4	05000293/2018012	Y
139	Engineering Programs	EP-3.1	05000293/2018012	Y
140	Engineering Programs	EP-4.1	05000293/2018012	Y
141	Equipment Reliability	ER-1.1	05000293/2017010	Y
142	Equipment Reliability	ER-1.2	05000293/2017010	Y
143	Equipment Reliability	ER-1.3	05000293/2018012	Y
144	Equipment Reliability	ER-2.1	05000293/2018012	Y
145	Equipment Reliability	ER-2.2	05000293/2018012	Y
146	Equipment Reliability	ER-3.1	05000293/2018012	Y
147	Equipment Reliability	ER-3.2	05000293/2018012	Y
148	Equipment Reliability	ER-3.3	05000293/2018012	Y
149	Work Management	WM-1.1	05000293/2018012	Y
150	Work Management	WM-1.2	05000293/2018012	Y
151	Work Management	WM-1.3	05000293/2018012	Y
152	Work Management	WM-2.1	05000293/2018012	Y
153	Work Management	WM-2.2	05000293/2018012	Y
154	Work Management	WM-3.1	05000293/2018012	Y
155	Work Management	WM-3.3	05000293/2018012	Y
156	Work Management	WM-4.2	05000293/2018012	Y