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Cc: [Buckberg, Perry](#); [Orenak, Michael](#)
Subject: 2.206 Petition Regarding Pilgrim Nuclear Power Station's Current Licensing Basis for Flooding – Status Update (OEDO-15-00479) (CAC NO. MF6460; EPID L-2015-CRS-0002)
Date: Thursday, June 06, 2019 8:34:00 AM

Ms. Lampert et al.,

In accordance with Management Directive 8.11, "Review Process for 10 CFR 2.206 Petitions," I am writing to provide a status update on your petition submitted in accordance with 10 CFR 2.206, dated June 24, 2015, regarding the current licensing basis on flooding for the Pilgrim Nuclear Power Station (Pilgrim). This e-mail provides a status since my last update to you on April 3, 2019.

In my April 3, 2019, update, I informed you that the Commission provided direction on the mitigation of beyond-design-basis event rule on January 24, 2019. The SRM and other documents related to SECY-16-0142, "Final Rule-Mitigation of Beyond-Design-Basis events," are available under ADAMS Accession No. ML19023A038. The Commission's ruling removed the consideration of reevaluated hazards as a generic requirement in the design basis, and directed the staff to use the 10 CFR 50.54(f) process to ensure that the agency and its licensees will take the needed actions, if any, to ensure that each plant is able to withstand the effects of the reevaluated flooding and seismic hazards. We cannot, therefore, rely on the rule to disposition your petition. The petition review board met on Feb 21, 2019 and recommended that the staff's ongoing review of the March 12, 2012 request for information pursuant to 10 CFR 50.54(f) should be used to address the petition consistent with the Commission's direction in response to SECY-16-0142.

Pilgrim permanently ceased power operations on May 31, 2019. The licensee plans to submit documentation regarding the reevaluated flood hazard activities by mid-summer 2019 for staff review. It is estimated that the staff's 10 CFR 50.54(f) review will be completed by October 2019 and the NRC's proposed director's decision based on this review will potentially be issued by December 2019.

Sincerely, Booma

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