



Entergy Nuclear Generation Co.  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

50.90

Mike Bellamy  
Site Vice President

November 18, 1999  
ENGCLtr. 2.99.120

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

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

Request for Revision to Facility Operating License DPR - 35

In accordance with 10 CFR 50.90, Entergy Nuclear Generation Company requests a revision to Facility Operating License DPR-35 for the Pilgrim Nuclear Power Station. The revision consists of deleting license condition 3.H, "Long Term Program".

License condition 3.H was added to the license via Reference 1. The original objective of the Long Term Program (LTP) was to coordinate and schedule major work activities at Pilgrim Station in an integrated fashion with due consideration of both regulatory and station betterments. NRC mandates, regulatory commitments, and self-identified enhancements were prioritized based on level of significance and resource availability. Since that time the usefulness of the LTP as an integrated work-planning tool has diminished and the upkeep of the program has become a regulatory burden. Numerous changes have taken place, as discussed in Attachment 1, that better enable Pilgrim to control and manage resources. As a result, Pilgrim seeks to eliminate the LTP as a license condition.

Attachment 1 further details the background and reason for the license amendment request, provides a discussion of no significant hazards determination and environmental considerations, and includes a listing of references.

Sincerely,

Mike Bellamy

Attachment  
1 signed original & 3 copies

cc: See Page 2

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ADD1

Commonwealth of Massachusetts)  
County of Plymouth )

Then personally appeared before me, Mike Bellamy, who being duly sworn, did state that he is Site Vice President, Entergy Nuclear Generation Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Entergy Nuclear Generation Company and that the statements are true to the best of his knowledge and belief.

My commission expires: September 20, 2002  
DATE

*Peter M. Kahler*  
NOTARY PUBLIC

cc: Mr. Alan B. Wang, Project Manager  
Project Directorate I-3  
U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Mail Stop: OWF 8F2  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

U. S. Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
Pilgrim Nuclear Power Station

Mr. Robert Hallisey  
Radiation Control Program  
Commonwealth of Massachusetts  
Exec Offices of Health & Human Services  
174 Portland Street  
Boston, MA 02114

Mr. Stephen McGrail, Director  
Massachusetts Emergency Management Agency  
400 Worcester Road  
Framingham, MA 01701-0317

## **Attachment 1 to ENGC Letter 2.99.120**

### **Request to Eliminate License Condition 3.H**

#### **Background**

The Long Term Program (LTP) was developed by Pilgrim Station to coordinate and schedule major necessary work, whether mandated by NRC or identified by Pilgrim. Its intention was to integrate planned work over a nominal three-year period to enable effective scheduling and coordination of individual tasks with input and interaction with the NRC staff.

By Reference 2, Pilgrim submitted the LTP for NRC review and approval. Subsequently, Pilgrim voluntarily requested (References 3 & 4) that the LTP be added as a license condition. Reference 4 presented the "Plan for the Long Term Program for Pilgrim Nuclear Power Station" which described how the LTP functions, the mechanisms for changing and updating it, and the interaction of the NRC and Pilgrim under the provisions of the LTP and its associated schedules.

The NRC approved the request via License Amendment No. 75 issued on July 13, 1984. The amendment consisted of adding Section 3.H to the facility operating license as follows.

#### **3.H. Long Term Program**

- (1) The "Plan for the Long Term Program for Pilgrim Nuclear Power Station" (the Plan) submitted on May 7, 1984, is approved.
  - a) The Plan shall be followed by the licensee from and after the effective date of this amendment.
  - b) Changes to dates for completion of items identified in Schedule B of the Plan do not require a license amendment. Dates specified in Schedule A shall be changed only in accordance with applicable NRC procedure.

Routine reporting on the status of items in the LTP was prepared and transmitted to the NRC on a semi-annual frequency.

#### **Proposed Change**

The requested change involves the deletion of Section 3.H as a condition of the Facility Operating License.

## Reason for Change

The Long Term Program (LTP) was developed to coordinate and schedule major work activities at Pilgrim Station in an integrated fashion with due consideration of both regulatory and station betterments. Its original objectives were to ensure conformance with regulatory requirements, provide sufficient lead times for modifications, minimize changes for operators, assure training requirements were fulfilled, effectively manage financial and human resources, and specify the framework for changes to developed schedules. However, the LTP is no longer needed to meet these objectives. The organizational structure and processes that have evolved since the initial inception of the LTP appropriately control the management and planning of major work activities at Pilgrim. For example, various groups such as outage planning, project engineering, and the nuclear managers oversight committee deal with work planning and scheduling. Factors such as safety significance, risk assessment, and benefit relative to existing workloads are evaluated for all major work activities in a routine manner. NRC mandates, regulatory commitments, and self-identified enhancements are integrated and prioritized based on level of significance and resource availability.

Also, the number of regulatory imposed major projects has decreased significantly since the LTP's inception. Most notable is the decrease due partly through the industry's implementation of the Maintenance Rule. For example, the Maintenance Rule requires licensees to establish performance goals for structures, systems, and components. Work activities such as preventive and corrective actions are established and prioritized to ensure that plant equipment meets the established goals. Issues outside the influence of the Maintenance Rule typically are already addressed and receive NRC staff interaction through separate correspondence with the NRC. This creates tracking and upkeep redundancies for some of these items in our commitment control system.

In summary, the LTP objectives continue to be met through ongoing but different methods. The internal processes and organizational interfaces, as discussed above, are used by Pilgrim to integrate, schedule, and manage its work activities and resources. The usefulness of the LTP as an integrated work-planning tool has diminished, and the administrative upkeep and routine reporting requirements of the program have become a regulatory burden. Continuing to maintain the LTP as a license condition is no longer needed to accomplish its original objectives. Accordingly, we hereby seek to remove the LTP as a license condition.

## No Significant Hazards Consideration

The NRC has provided standards (10 CFR 50.92(c)) for determining whether a proposed amendment to an operating license for a facility involves no significant hazards consideration. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

- (1) The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. No physical changes to the facility will occur as a result of this amendment. Work activities will continue to receive the appropriate level of review in accordance with Pilgrim procedures and practices. The organizational structure and processes that control and manage these activities ensure activities are prioritized and performed in a manner consistent with plant safety. The proposed amendment removes an administrative burden that is no longer required.
- (2) The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. No changes to the physical design and operation of the plant will occur as a result of this amendment. The processes by which activities are planned, prioritized, and controlled are not affected. The appropriate level of technical review and management oversight will continue to be performed in accordance with existing procedures and practices to ensure activities are performed in a manner consistent with plant safety.
- (3) The proposed amendment does not involve a significant reduction in a margin of safety. As stated earlier, no changes to the physical design and/or operation of any plant systems will occur as a result of this amendment; therefore, there is no reduction in any margins of safety. Work activities will continue to receive the appropriate technical review and management oversight to ensure activities are prioritized and performed in a manner consistent with plant safety. The proposed amendment removes an administrative burden that is no longer required.

#### Environmental Consideration

10 CFR 51.22(c)(10) identifies certain licensing and regulatory actions that are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if the proposed amendment changes recordkeeping, reporting, or administrative procedures or requirements. Since this amendment involves only administrative changes, in accordance with 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### References:

- 1) Operating License Amendment No. 75, dated July 13, 1984
- 2) BECo Ltr. 83-091, dated April 14, 1983, "Long Term Program and Schedule"
- 3) BECo Ltr. 83-169, dated July 5, 1983, "Proposed Amendment to Facility Operating License; Long Term Program"
- 4) BECo Ltr. 84-066, dated May 7, 1984, "Revision 1 to Proposed Amendment to Facility Operating License; Long Term Program"