



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

September 2, 2014

Mr. John Dent
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR PILGRIM NUCLEAR POWER
STATION (REPORT 05000293/2014006)**

Dear Mr. Dent:

On August 12, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of Pilgrim Nuclear Power Station (Pilgrim). The NRC reviewed the most recent quarterly performance indicators in addition to inspection results and enforcement actions from July 1, 2013 through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined the performance at Pilgrim during the most recent quarter was within the Degraded Cornerstone Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because two white performance indicators were crossed in the Initiating Events cornerstone. In the third quarter of 2013, the unplanned SCRAMS with complications performance indicator crossed the green to white threshold, which moved Pilgrim to the regulatory response column from the licensee response column. Due to a SCRAM on October 14, 2013, Pilgrim crossed the green to white threshold for a second performance indicator for unplanned SCRAMs per 7000 critical hours.

The NRC will conduct a supplemental inspection to review the actions taken to address the performance issues when your staff notifies the NRC of your readiness. Therefore, in addition to ROP baseline inspections, the NRC plans to conduct a supplemental inspection in accordance with Inspection Procedure (IP) 95002, "Supplemental Inspection for One Degraded Cornerstone or Any Three White Inputs in a Strategic Performance Area," when Pilgrim has completed these actions.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 will reflect this revision to Inspection Manual Chapter (IMC) 0310. During the 2014 mid-cycle assessment review, cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310, and were evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The NRC evaluates cross-cutting themes to determine whether a substantive cross-cutting issue exists in a particular area and to encourage licensees to take appropriate actions before more significant performance issues emerge. The NRC identified a cross-cutting theme in the Problem Identification and Resolution area. Specifically, the NRC identified four findings with a documented cross-cutting aspect of P.3 – Resolution of Corrective Actions. The NRC determined that a substantive cross-cutting issue associated with aspect P.3 does not exist because your staff's scope of effort and progress in addressing the cross-cutting theme are still ongoing and we have not identified any additional cross-cutting aspects with P.3. Entergy has recognized the cross-cutting theme and has initiated actions to develop an improvement plan. The NRC will continue to monitor your staff's effort and progress in addressing the theme until the theme criteria are no longer met.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. In addition to baseline inspections, the NRC will perform IP 60854.1, "Preoperational Testing of an Independent Spent Fuel Storage Facility Installations at Operating Plants," IP 60855.1, "Operation of an Independent Spent Fuel Storage Installation (ISFSI) at Operating Plants," and IP 60856.1, "Review of 10 CFR 72.212(b) Evaluations." These Inspections will provide oversight to the construction and operation of your ISFSI. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is scheduled for the week of October 6, 2014. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records

J. Dent

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component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Raymond McKinley at (610)337-5150 with any questions you have regarding this letter.

Sincerely,

/RA/

William M. Dean
Regional Administrator

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

Enclosure: Pilgrim Inspection/Activity Plan

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DOCUMENT NAME: S:\ROP Assessment Meetings\ROP-15 Mid-Cycle Review\Branch 5\Pilgrim\2014 MC Letter Pilgrim.docx
ADAMS ACCESSION NUMBER: **ML14241A398**

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DATE	08/26/14	08/27/14	08/28/14	08/29/14	

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Pilgrim
Inspection / Activity Plan
07/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			ISFSI - DRY RUN & INITIAL ISFSI INSPECTION		3
1	09/01/2014	09/19/2014	IP 60854	Preoperational Testing Of An ISFSI	
1	09/01/2014	09/19/2014	IP 60854.1	Preoperational Testing of Independent Spent Fuel Storage Facility Installation at Operating Plants	
1	09/01/2014	09/19/2014	IP 60855	Operation Of An ISFSI	
1	09/01/2014	09/19/2014	IP 60856	Review of 10 CFR 72.212(b) Evaluations	
1	09/01/2014	09/19/2014	IP 60856.1	Review of 10 CFR 72.212(b) Evaluations at Operating Plants	
1	09/22/2014	09/26/2014	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
			ISFSI - DRY RUN & INITIAL ISFSI INSPECTION		3
1	10/01/2014	11/28/2014	IP 60854	Preoperational Testing Of An ISFSI	
1	10/01/2014	11/28/2014	IP 60854.1	Preoperational Testing of Independent Spent Fuel Storage Facility Installation at Operating Plants	
1	10/01/2014	11/28/2014	IP 60855	Operation Of An ISFSI	
1	10/01/2014	11/28/2014	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
1	10/01/2014	11/28/2014	IP 60856	Review of 10 CFR 72.212(b) Evaluations	
1	10/01/2014	11/28/2014	IP 60856.1	Review of 10 CFR 72.212(b) Evaluations at Operating Plants	
			71124 - 71151 PI VERIFY 71124.01 AND 71124.05 HP		1
1	11/03/2014	11/06/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	11/03/2014	11/06/2014	IP 71124.05	Radiation Monitoring Instrumentation	
1	11/03/2014	11/06/2014	IP 71151	Performance Indicator Verification	
			71124 - 01 EXPOSURE CONTROL 02 ALARA		1
1	03/02/2015	03/05/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	03/02/2015	03/05/2015	IP 71124.02	Occupational ALARA Planning and Controls	
			EP - EP PROGRAM INSPECTION		1
1	03/16/2015	03/20/2015	IP 7111402	Alert and Notification System Testing	
1	03/16/2015	03/20/2015	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	03/16/2015	03/20/2015	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
			7111108G - INSERVICE INSPECTION		1
1	04/20/2015	04/24/2015	IP 7111108G	Inservice Inspection Activities - BWR	
			71124 - 01 EXPOSURE 02 ALARA 03 AIRBORNE 04 DOSE		1
1	05/04/2015	05/08/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	05/04/2015	05/08/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1	05/04/2015	05/08/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	05/04/2015	05/08/2015	IP 71124.04	Occupational Dose Assessment	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Enclosure

Pilgrim
Inspection / Activity Plan
07/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			71124.08 - RADWASTE		1
1	06/08/2015	06/12/2015	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
			71124 - RADIOACTIVE EFFLUENT CONTROL RETS		1
1	06/22/2015	06/26/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
			71124 - REMP		1
1	07/20/2015	07/23/2015	IP 71124.07	Radiological Environmental Monitoring Program	
			PI&R - PI&R - BIENNIAL		1
1	08/03/2015	08/07/2015	IP 71152B	Problem Identification and Resolution	
1	08/17/2015	08/21/2015	IP 71152B	Problem Identification and Resolution	
			711111B - REQUAL INSP W/ P/F RESULTS		2
1	10/19/2015	10/23/2015	IP 711111B	Licensed Operator Requalification Program	
			TRI FI - TRIENNIAL FIRE PROTECTION INSPECTION		4
1	11/02/2015	11/06/2015	IP 7111105T	Fire Protection [Triennial]	
1	11/16/2015	11/20/2015	IP 7111105T	Fire Protection [Triennial]	
			71151 - RP CHEM PI VERIFY		1
1	11/16/2015	11/19/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	11/16/2015	11/19/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1	11/16/2015	11/19/2015	IP 71151	Performance Indicator Verification	

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