

May 10, 2004

Mr. Michael Balduzzi  
Site Vice President  
Entergy Nuclear Operations, Inc.  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

SUBJECT: PILGRIM NUCLEAR POWER STATION - NRC EVALUATED EMERGENCY  
PREPAREDNESS EXERCISE - INSPECTION REPORT NO.  
05000293/2004003

Dear Mr. Balduzzi:

On April 14, 2004, the US Nuclear Regulatory Commission (NRC) completed an inspection at your Pilgrim Nuclear Power Station. The enclosed inspection report documents the inspection findings, which were discussed on April 15, 2004, with yourself and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10CFR2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

*/RA/*

Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

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

Enclosure: Inspection Report No. 05000293/2004003

cc w/encl:

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The Honorable Therese Murray  
The Honorable Vincent deMacedo  
Chairman, Plymouth Board of Selectmen  
Chairman, Duxbury Board of Selectmen  
Chairman, Nuclear Matters Committee  
Plymouth Civil Defense Director  
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## SUMMARY OF FINDINGS

IR 05000293-04-003; 04/13 - 15/2004; Pilgrim Nuclear Power Station. Emergency Preparedness Exercise Report.

This inspection was conducted by region-based inspectors and the resident inspector. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

### **A. NRC-Identified Findings**

Cornerstone: Emergency Preparedness

No findings of significance were identified.

### **B. Licensee-Identified Findings**

None.

U. S. NUCLEAR REGULATORY COMMISSION REGION I

REGION I

Docket Nos: 50-293

License Nos: DPR-35

Report Nos: 05000293/2004003

Licensee: Entergy Nuclear Operations

Facility: Pilgrim Nuclear Power Station

Location: 600 Rocky Hill Road  
Plymouth, MA 02360

Dates: April 13-15, 2004

Inspectors: D. Silk, Sr. Emergency Preparedness Inspector, Division of Reactor  
Safety (DRS), (Lead)  
N. McNamara, Emergency Preparedness Inspector, DRS  
J. Williams, Operations Engineer, DRS  
C. Welch, Pilgrim Resident Inspector, Division of Reactor Projects (DRP)  
J. Talieri, Reactor Engineer, DRS

Observers: T. Sicola, Intern (Observer), DRS  
D. Johnson, Intern (Observer), DRP

Approved by: Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

## Report Details

### 1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

#### 1EP1 Exercise Evaluation (71114.01)

##### a. Inspection Scope

Prior to the exercise, an in-office review was conducted of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of Entergy's performance in the biennial full-participation exercise regarding the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of Entergy's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the simulator, Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), and the media center.
- Other performance areas besides the RSPS, such as the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Entergy's drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).
- The post-exercise critique to evaluate Entergy's self-assessment of its ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

The inspectors reviewed various documents which are listed in Attachment 1 to this report.

##### b. Findings

Enclosure

No findings of significance were identified.

#### 4. OTHER ACTIVITIES (OA)

##### 4OA1 Performance Indicator (PI) Verification (71151)

###### a. Inspection Scope

The inspectors reviewed the licensee's procedure for developing the data for the EP PIs which are: (1) Drill and Exercise Performance (DEP); (2) ERO Drill Participation; and (3) ANS Reliability. The inspector also reviewed the licensee's 2003/2004 drill and exercise reports, training records and ANS testing data to verify the accuracy of the reported data. Data generated since the July 2003 EP PI verification was reviewed during this inspection. In particular, the inspectors reviewed how the licensee dispositioned the failure to test 29 or 112 sirens in September of 2003 due to an administrative oversight (CR-PNP-2004-01377). The review of these performance indicators was conducted in accordance with NRC Inspection Procedure 71151. The acceptance criteria used for the review were 10 CFR 50.9 and NEI 99-02, Revision 1, Regulation Assessment Performance Indicator Guideline.

###### b. Findings

No findings of significance were identified.

##### 4OA2 Identification and Resolution of Problems (71152)

###### a. Inspection Scope

The inspectors reviewed Entergy's critique findings as documented in 2002-2004 exercise and drill reports. This review was conducted to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during this exercise. The inspectors verified that issues identified during this exercise were entered into Entergy's corrective action program and are listed in an attachment to this report. The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 01, 10 CFR 50.47(b)(14), and Appendix E IV.F.2.g were used as reference criteria

###### b. Findings and Observations

No findings of significance were identified.

##### 4OA6 Meetings, Including Exit

The inspectors presented the inspection results to Mr. Balduzzi and other members of the licensee's staff at the conclusion of the inspection on April 15, 2004. The licensee had no objections to the NRC findings or observations. No proprietary information was provided to the inspectors during this inspection.

**SUPPLEMENTAL INFORMATION**

**KEY POINTS OF CONTACT**

Licensee Personnel

T. Sowdon, Emergency Preparedness Supervisor  
K. Sullivan, Emergency Preparedness Staff  
E. Solomon, Emergency Preparedness Staff

**LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED**

Opened/Closed/Discussed

None

**LIST OF DOCUMENTS REVIEWED**

**Section 1EP1: Exercise Evaluation**

Pilgrim Nuclear Power Station Emergency Plan  
Emergency Plan Implementing Procedures  
EP-AD-150, Emergency Preparedness Performance Indicator Tracking Guideline, Rev 0  
Focus Sessions Report No. 02-01  
Dry Run Drill Report No. 02-02  
Dry Run Drill Report No. 02-03  
NRC Evaluated Exercise Report No. 02-04  
Activation Drill Report No. 02-06  
December 17<sup>th</sup> Combined Functional Drill Report No. 02-10  
Augmentation Drill Report No. 03-05  
Combined Functional Drill Report No. 02-08  
Combined Functional Drill Report No. 03-01  
Activation Drill Report No. 03-03  
HP Drill Report No. 03-06

**Section 40A2: Identification and Resolution of Problems**

01141 EOF DNN Client would not print notification form  
01142 Several emergency conference bridge problems were encountered  
01143 Several instances of inappropriate controller interfacing with players  
01144 Dose assessment calculation issues  
01145 ED did not seek explicit concurrence from EPM and EPOS for the upgrade to the GE  
01146 Second page of notification form not promptly provided to offsite officials in the EOF  
01147 TSC ventilation system could not be started  
01148 ED delegated followup notification back to control room after EOF was activated  
01149 Procedural ambiguities related to notification of KI PARs were discovered  
01150 Procedural inconsistencies regarding radiological information form were noted  
01152 EPIP 225 was not fully implemented by the TSC staff  
01153 PDP display computer in the TSC malfunctioned

01154 Media Center relocation procedure was insufficiently detailed  
01213 Inaccuracy in press releases

Note: All CRs have a pre-fix of "CR-PNP-2004."

### **LIST OF ACRONYMS**

ANS	Alert and Notification System
CFR	Code of Federal Regulations
EAL	Emergency Action Level
ERO	Emergency Response Organization
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
OSC	Operations Support Center
PI	Performance Indicator
RSPS	Risk Significant Planning Standard
TSC	Technical Support Center