



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
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John A. Dent, Jr.
Site Vice President

August 28, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Pilgrim Nuclear Power Station's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

REFERENCE:

1. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events", dated March 12, 2012 (PNPS Letter 1.12.013)
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012 (ML 12229A174)
3. Nuclear Energy Institute (NEI) 12-06, Revision 0, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide", dated August 2012
4. Pilgrim Nuclear Power Station Letter to NRC, "Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", dated October 29, 2012 (PNPS Letter 2.12.072)
5. Pilgrim Nuclear Power Station Letter to NRC, "Overall Integrated Plan Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)", dated February 28, 2013 (PNPS Letter 2.13.012)
6. NRC Order Number EA-12-050, "Order to Modify Licenses With Regard To Reliable Hardened Containment Vents", dated March 12, 2012 (PNPS Letter 1.12.014)

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7. NRC Order Number EA-13-109, "Order to Modify Licenses With Regard To Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions", dated June 6, 2013 (PNPS Letter 1.13.028)

LETTER NUMBER 2.13.069

Dear Sir or Madam:

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to Entergy. Reference 1 was immediately effective and directs Entergy to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Pilgrim Station initial status report regarding mitigation strategies. Reference 5 provided the Pilgrim Overall Integrated Plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provides direction regarding the content of the status reports. The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

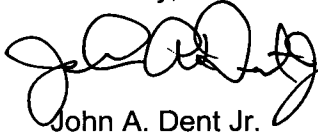
The FLEX strategies in the Overall Implementation Plan currently rely on the current conceptual design of the reliable hardened vent (RHV) system that was developed in response to Reference 6, NRC Order EA-12-050. Reference 7, NRC Order EA-13-109, dated June 6, 2013, rescinds the requirements of NRC Order EA-12-050. Compliance with the requirements of NRC Order EA-12-050, including applicable schedule deadlines for submittals or implementation, is no longer required. The industry, through NEI and the owners' group, is addressing the new requirements provided in NRC Order EA-13-109 on the schedule outlined in NRC Order EA-13-109. Because of the new order (NRC Order EA-13-109), the design of the hardened containment vent is being reevaluated. Any design changes resulting from the revised hardened vent order will be reflected in a future six month update.

Should you have any questions concerning the content of this letter, please contact Mr. Joseph R. Lynch at (508) 830-8403.

This letter contains no new regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 28, 2013.

Sincerely,



John A. Dent Jr.
JAD/rmb

Attachment: Pilgrim Nuclear Power Station's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

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NRC Resident Inspector
Pilgrim Nuclear Power Station

ATTACHMENT

To

PNPS Letter 2.13.069

**PILGRIM NUCLEAR POWER STATION'S
FIRST SIX-MONTH STATUS REPORT IN RESPONSE TO
MARCH 12, 2012 COMMISSION ORDER MODIFYING
LICENSES WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR BEYOND-DESIGN-
BASIS EXTERNAL EVENTS
(ORDER NUMBER EA-12-049)**

Attachment

Pilgrim Nuclear Power Station's First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

1 Introduction

Entergy Nuclear Operations, Inc. (Entergy) developed an Overall Integrated Plan (Reference 1) for Pilgrim Nuclear Power Station (PNPS), documenting the diverse and flexible strategies (FLEX), in response to Reference 2. This attachment provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the Overall Integrated Plan (Reference 1), and are current as of July 31, 2013.

None.

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

- Validation

Demonstration/Functional Test: The demonstrations/functional tests will be completed during and following the FLEX modification implementation outage.

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	October 2012	Complete	
Submit Overall Integrated Implementation Plan	February 2013	Complete	
Submit 6 Month Status Report	August 2013	Complete	
Submit 6 Month Status Report	February 2014	Not Started	
Modifications Approved for Implementation	February 2014	Not Started	
Develop Training Plan	March 2014	Not Started	
Submit 6 Month Status Report	August 2014	Not Started	

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Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Procedure Changes Training Material Complete	October 2014	Not Started	
Submit 6 Month Status Report	February 2015	Not Started	
Implement Training (Schedule LORT Plan to Support Implementation)	March 2015	Not Started	
Modification Implementation Complete	May 2015	Not Started	
Demonstration / Functional Test	June 2015	Not Started	
Submit 6 Month Status Report	August 2015	Not Started	
Submit Completion Report	December 2015	Not Started	

4 Changes to Compliance Method

The FLEX strategies in the Overall Implementation Plan currently rely on the current conceptual design of the reliable hardened vent (RHV) system that was developed in response to Reference 3, NRC Order EA-12-050. Reference 4, NRC Order EA-13-109, dated June 6, 2013, rescinds the requirements of NRC Order EA-12-050. Compliance with the requirements of NRC Order EA-12-050, including applicable schedule deadlines for submittals or implementation, is no longer required. The industry, through NEI and the owners' group, is addressing the new requirements provided in NRC Order EA-13-109 on the schedule outlined in NRC Order EA-13-109. Because of the new order (NRC Order EA-13-109), the design of the hardened containment vent is being reevaluated. Any design changes resulting from the revised hardened vent order will be reflected in a future six month update.

There are no changes to the compliance method as documented in the Overall Integrated Plan (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

PNPS expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan or the Draft Safety Evaluation (SE) and the status of each item.

Overall Integrated Plan Open Item	Status
None.	

Draft Safety Evaluation Open Item	Status
None.	

7 Potential Draft Safety Evaluation Impacts

There are no potential impacts to the Draft Safety Evaluation identified at this time.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Pilgrim Nuclear Power Station's "Overall Integrated Plan in Response To March 12, 2012, Commission Order Modifying Licenses With Regard To Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 28, 2013.
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
3. NRC Order Number EA-12-050, Order to Modify Licenses with Regard to Reliable Hardened Containment Vents, dated March 12, 2012.
4. NRC Order Number EA-13-109, Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated June 6, 2013.