



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

August 28, 2014

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

SUBJECT: Pilgrim Nuclear Power Station's Third 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

LETTER NUMBER 2.14.061

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)

8. Pilgrim Nuclear Power Station Letter to NRC, "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)" dated August 28, 2013 (PNPS Letter 2.13.069)

9. Pilgrim Nuclear Power Station Letter to NRC, "Pilgrim Nuclear Power Station's Second 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)" dated February 28, 2014 (PNPS Letter 2.14.011)

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. Reference 8 provided the first six-month status report. Reference 9 provided the second six-month status report. The purpose of this letter is to provide the third 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), there will be additional independent instrumentation improvements made to the hardened containment vent, but the wetwell vent is

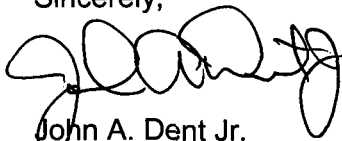
otherwise not changing from what is already required and being prepared for the FLEX Strategy Containment Venting.

Should you have any questions concerning the content of this letter, please contact Mr. Everett (Chip) Perkins Jr. at (508) 830-8323.

This letter contains no new regulatory commitments.

I declare under penalty of perjury that the foregoing is true and correct; executed on August 28, 2014.

Sincerely,



John A. Dent Jr.
JAD/rmb

Attachment: Pilgrim Nuclear Power Station's Third 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 2.14.061

**PILGRIM NUCLEAR POWER STATION'S
THIRD 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 Third 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 January 31, 2014, and are current as of July 31, 2014.

- Second Six-Month Status Report — February 2014
- Third Six-Month Status Report — Complete with submission of this document in August 2014.

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.

- No new additions or changes to target completion dates for this report.

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 Six-Month Status Report	August 2013	Complete	
Submit Six-Month Status Report	February 2014	Complete	
Modifications Approved for Implementation	February 2014	Complete	

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

*Target Completion Date is the last submitted date from either the overall integrated plan or previous six-month status report.

4 Changes to Compliance Method

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 Interim Staff Evaluation

The following tables provide a summary and status of any open items documented in the Overall Integrated Plan and any open items or confirmatory items documented in the Interim Staff Evaluation (ISE). A fourth table includes a listing of Audit Questions and their status.

Overall Integrated Plan Open Item	Status
1. Beyond-design-basis external event impact on requirements in existing licensing documents will be determined based on input from the industry groups and direction from the NRC.	Entergy has determined that no FSAR changes are required to reflect FLEX.

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Overall Integrated Plan Open Item	Status
2. Structure, content and details of the Regional Response Center playbook will be determined.	Not Started

Interim Staff Evaluation Open Items	Status
3.2.1.4.A — On pages 16, 23, and 63 of the Integrated Plan regarding Portable Equipment to Maintain Core Cooling, the licensee describes the use of portable pumps to provide RPV injection. No technical basis or a supporting analysis was provided for the diesel-driven FLEX pump capabilities considering the pressure within the RPV and the loss of pressure along with details regarding the FLEX pump supply line routes, length of hoses runs, connecting fittings, and elevation changes to show that the pump is capable of injecting water into the RPV with a sufficient rate to maintain and recover core inventory for both the primary and alternate flow paths.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.

Interim Staff Evaluation Confirmatory Items	Status
3.1.1.1.A — The Integrated Plan does not specify procedures and programs will provide for securing large portable equipment to protect them during a seismic event or to ensure unsecured and/or non-seismic components do not damage the equipment as is specified in NEI 12-06, Section 5.3.1, considerations 2 and 3.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.1.1.2.A — The licensee identified that access to at least one connection point for the equipment will requires access through routes that are not FSAR Seismic Class I, however they have been evaluated and the potential for large scale debris field that would prevent access to the equipment needed to be repowered is not present. Their evaluation should be validated during the site audit.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.1.1.3.A — The licensee was requested to provide additional information concerning coping strategies for the failure of seismically qualified electrical equipment that can be affected by beyond-design-basis seismic events as discussed in NEI 12-06, Section 5.3.3 consideration 1.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.1.3.1.A — The storage of the FLEX equipment is in sea vans. The licensee is in the process of performing a calculation to demonstrate conformance with NEI 12-06, Section 7.3.1.b, bullet 4 related to adequate tie down of the	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the

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Interim Staff Evaluation Confirmatory Items	Status
sea vans. Evaluation of the completed calculation must be completed to determine if it demonstrates conformance to guidance in NEI 12-06, Section 7.3.1.b, bullet 4.	ePortal.
3.1.3.2.A — During the audit process, the licensee identified that there are existing plant procedures that address hurricanes. The procedures need to be evaluated for conformance to NEI 12-06, considerations 1, 2, and 5.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.1.1.A — From the June 2013 position paper, benchmarks must be identified and discussed which demonstrate that the Modular Accident Analysis Program (MAAP) 4 is an appropriate code for the simulation of an Extended Loss of AC Power (ELAP) event at your facility.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.1.1.B — The collapsed level must remain above Top of Active Fuel (TAF) and the cool down rate must be within technical specification limits.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.1.1.C — MAAP4 must be used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013 position paper.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.1.1.D — In using MAAP4, the licensee must identify and justify the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP4 Application Guidance, Desktop Reference for Using MAAP4 Software, Revision 2" (Electric Power Research Institute Report 1 020236). This should include response at a plant-specific level regarding specific modeling options and parameter choices for key models that would be expected to substantially affect the ELAP analysis performed for that licensee's plant.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.1.1.E — The specific MAAP4 analysis case that was used to validate the timing of mitigating strategies in the integrated plan must be identified and should be available on the ePortal for NRC staff to view. Alternately, a comparable level of information may be included in the supplemental response. In either case, the analysis should include a plot of the collapsed vessel level to confirm that TAF is not reached (the elevation of the TAF should be provided) and a plot of the temperature cool down to confirm that the cool down is within tech spec limits.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.

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Interim Staff Evaluation Confirmatory Items	Status
<p>3.2.1.2.A —The following is requested:</p> <ol style="list-style-type: none"> 1. Justification for the assumptions made regarding primary system leakage from the recirculation pump seals and other sources. 2. Assumed pressure-dependence of the leakage rate. 3. Clarification on whether the leakage was determined or assumed to be single-phase liquid, two-phase mixture, or steam at the donor cell and discuss how mixing of the leakage flow with the drywell atmosphere is modeled. 	<p>The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.</p>
<p>3.2.1.5.A — The integrated plan does not identify non-powered local instrumentation other than Containment pressure and RPV level and pressure. The integrated plan identifies that phase 2 equipment will have installed local instrumentation needed to operate the equipment. The licensee needs to identify the instrumentation that will be used to monitor portable FLEX electrical power equipment.</p>	<p>The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.</p>
<p>3.2.4.2.A — The licensee was requested to provide the maximum calculated MCR temperature and a detailed summary of the analysis used to determine the temperature and the procedure for control of MCR temperature. The licensee response was that existing procedure 2.4.149 addresses "Loss of MCR H&V". The procedure is symptom driven, containing temperature limits to perform actions, and it is not time driven. Pilgrim will provide the referenced "GOTHIC" evaluation. Evaluation of the "GOTHIC" analysis is needed to evaluate the MCR temperature.</p>	<p>The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.</p>
<p>3.2.4.4.A — The licensee needs to provide complete details of portable lighting.</p>	<p>The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.</p>
<p>3.2.4.4.B — The licensee provided its communications assessment in letters dated October 31, 2012 and February 21, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12321A051 and ML13058A032) in response to the NRC letter dated March 12, 2012, 50.54(f) request for information letter. The NRC staff provided its evaluation on May 21, 2013 (ADAMS Accession No. ML13127A179). The NRC staff has determined that the assessment for communications is reasonable, and the analyzed existing systems, proposed enhancements, and interim measures will help to ensure</p>	<p>The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.</p>

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Interim Staff Evaluation Confirmatory Items	Status
that communications are maintained. This has been identified for confirmation that upgrades to the site's communications systems have been completed.	
3.2.4.5.A — The Integrated Plan does not identify procedures/guidance with regard to the access to the Protected Area and internal locked areas. During the audit process, the licensee identified existing security doors that provide egress capability and have key access in the event of a power loss. Operations and Security are currently researching options, the intention is to include it in the Emergency procedures addressing DDBEE perimeters, the site declaration of 50.54(x), and recognizing resource needs, including Security, and compensatory measures based on the event.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.4.8.A — During the audit process, the licensee was requested to provide electrical Single Line Diagrams showing the proposed connections of Phase 2 and 3 electrical equipment to permanent plant equipment. The licensee responded that Engineering Change markup of the One-Line Diagrams E13 and E14Sh1 (EC45555 & EC45556), will be posted to the ePortal. The NRC staff will complete the review after they are posted.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.4.8.B — During the audit process, the licensee identified Engineering Changes are being developed to support the FLEX project which requires electrical studies to be performed. This includes the electrical diesel loading and load flow studies. The addition of the transfer switches and additional cable lengths are being incorporated into the Pilgrim design calculations (load flow, short circuit and coordination.) The FLEX diesel generator sizes need to be verified after the loading calculations are finalized.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.4.10.A — Attachment 1 A of the Integrated Plan notes that at one hour, the ELAP decision is made and deep dc load shedding begins at one hour (item 3), and at 2 hours the dc load shed is complete (item 4). The licensee was requested to provide the dc load profile with the required loads for the mitigating strategies to maintain core cooling, containment, and spent fuel pool cooling. During the audit process, the licensee responded that the dc load flow profiles are being developed as part of a new electrical battery FLEX extended operation load flow and battery sizing study PS258.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.
3.2.4.10.B — The licensee was requested to provide a detailed discussion on the loads that will be shed from the dc	The PNPS ISE Open and Confirmatory Items are

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Interim Staff Evaluation Confirmatory Items	Status
bus, the equipment location (or location where the required action needs to be taken). During the audit process, the licensee responded by identifying that a tentative list of loads proposed to isolate, isolation time and panel locations are available and provided in the ePortal. The licensee will finalize the load-shed list after a review by Operations.	addressed in a single document that has been uploaded to the ePortal.
3.4.A — The licensee's plans for the use of off-site resources did not address considerations 2 through 10 of NEI 12-06, Section 12.2.	The PNPS ISE Open and Confirmatory Items are addressed in a single document that has been uploaded to the ePortal.

Audit Questions	Status	Completion or Target Date
PNPS-002	Closed*	
PNPS-003	Closed* (See ISE Confirmatory Item 3.1.1.2.A response)	
PNPS-004	Closed*	
PNPS-006	Closed*	
PNPS-007	Closed*	
PNPS-008	Closed* (See ISE Confirmatory Item 3.1.3.2.A response)	
PNPS-009	Closed* (See ISE Confirmatory Item 3.1.3.1.A response)	
PNPS-010	Closed*	
PNPS-011	Closed*	
PNPS-012	Closed*	
PNPS-014	Closed*	
PNPS-015	Closed* (See ISE Confirmatory Items 3.2.1.1.A and 3.2.1.1.E responses)	
PNPS-016	Closed* (See ISE Confirmatory Item 3.2.1.1.C response)	
PNPS-017	Closed* (See ISE Confirmatory Items 3.2.1.1.B and 3.2.1.1.D responses)	

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Audit Questions	Status	Completion or Target Date
PNPS-018	Closed*	
PNPS-019	Closed* (See ISE Confirmatory Item 3.2.1.1.A)	
PNPS-020	Closed*	
PNPS-021	Closed*	
PNPS-022	Closed*	
PNPS-024	Closed*	
PNPS-025	Closed*	
PNPS-026	Updated response available on the ePortal	
PNPS-027	Closed*	
PNPS-030	Closed*	
PNPS-032	Closed*	
PNPS-033	Closed* (See ISE Confirmatory Item 3.2.4.2.A)	
PNPS-034	Closed*	
PNPS-035	Closed*	
PNPS-036	Closed*	
PNPS-037	Closed*	
PNPS-038	Closed*	
PNPS-039	Closed* (See ISE Confirmatory Items 3.2.4.4.A and 3.2.4.4.B responses)	
PNPS-040	Closed* (See ISE Confirmatory Item 3.2.4.5.A response)	
PNPS-042	Closed*	
PNPS-043	Closed*	
PNPS-044	Closed*	
PNPS-046	Closed*	
PNPS-047	Closed* (See ISE Confirmatory Item 3.4.A)	
PNPS-049	Closed*	

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Audit Questions	Status	Completion or Target Date
PNPS-053	Closed*	
PNPS-054	Closed* (See ISE Confirmatory Item 3.2.4.10.A response)	
PNPS-055	Closed* (See ISE Confirmatory Item 3.2.4.10.B)	
PNPS-056	Closed*	
PNPS-057	Closed* (See ISE Confirmatory Item 3.2.4.8.B)	
PNPS-058	Closed*	
PNPS-059	Closed*	
PNPS-060	Closed*	
PNPS-065	Updated response available on ePortal	
PNPS-066	Closed* (See ISE Confirmatory Item 3.2.4.8.A)	
PNPS-067	Closed*	
PNPS-068	Closed*	
PNPS-070	Closed*	
PNPS-071	Closed*	

*Closed indicates that Entergy's response is complete.

7 Potential Interim Staff Evaluation Impacts

Entergy has not identified any additional potential impacts to the Interim Staff Evaluation since the previous six month status report (Reference 9).

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.

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PNPS Letter 2.14.061

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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.
5. Pilgrim Nuclear Power Station Letter to NRC, "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)" dated August 28, 2013 (PNPS Letter 2.13.069).
6. NRC Letter, "Pilgrim Nuclear Power Station - Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC No. MF0777)," dated December 16, 2013.
7. NRC Letter to NEI (ML13275A318), dated October 3, 2013.
8. "Use of Modular Accident Analysis Program (MAAP4) in Support of Post-Fukushima Applications," Report No. 3002001785, EPRI, June 2013 (ML13190A201).
9. Pilgrim Nuclear Power Station Letter to NRC, "Pilgrim Nuclear Power Station's Second 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)" dated February 28, 2014 (PNPS Letter 2.14.011)