



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

John A. Dent Jr.
Site Vice President

December 16, 2014

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852

SUBJECT: Pilgrim Nuclear Power Station's First Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

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

REFERENCES:

1. NRC Order Number EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions, dated June 6, 2013
2. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
3. NRC Endorsement of Industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
4. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions,' Revision 0, dated November 2013.
5. Entergy's Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014.

LETTER NUMBER 2.14.083

Dear Sir or Madam:

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an order (Reference 1) to Entergy Nuclear Operations, Inc. (Entergy). Reference 1 was immediately effective and directs Entergy to install a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris. Specific requirements are outlined in Attachment 2 of Reference 1.

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Reference 1 required submission of a phase 1 overall integrated plan pursuant to Section IV, Condition D. Reference 2 endorses industry guidance document NEI 13-02, Revision 0 (Reference 4) with clarifications and exceptions identified in Reference 2. Reference 5 provided the Entergy overall integrated plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the overall integrated plan. References 2 and 4 provide 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 D, 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.

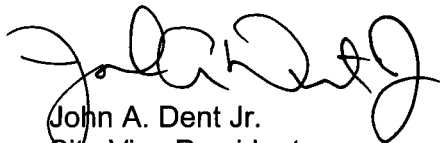
This letter contains no new regulatory commitments.

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 December 16, 2014.

Sincerely,



John A. Dent Jr.
Site Vice President

JAD/rmb

Attachment: Pilgrim Nuclear Power Station's First Six-Month Status Report in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

cc: Mr. Daniel H. Dorman
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-1415

U. S. Nuclear Regulatory Commission
Director, Office of Nuclear Reactor Regulation
One White Flint North
11555 Rockville Pike
Washington, DC 20555-0001

Ms. Nadiyah Morgan, Project Manager
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-8C2A
Washington, DC 20555

Mr. John Giarrusso Jr.
Planning, Preparedness & Nuclear Section Chief
Mass. Emergency Management Agency
400 Worcester Road
Framingham, MA 01702

NRC Resident Inspector
Pilgrim Nuclear Power Station

ATTACHMENT

To

PNPS Letter 2.14.083

**Pilgrim Nuclear Power Station's
First Six-Month Status Report in Response to June 6, 2013 Commission Order
Modifying Licenses with Regard to Reliable Hardened Containment Vents
Capable of Operation Under Severe Accident Conditions
(Order Number EA-13-109)**

Attachment to PNPS Letter 2.14.083

Pilgrim Nuclear Power Station's First Six Month Status Report for the Implementation of Order EA-13-109, "Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions"

1 Introduction

Pilgrim developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Phase 1 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 November 30, 2014.

- The Overall Integrated Plan was issued on June 30, 2014.

3 Milestone Schedule Status

The following provides an update to Part 5 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.

Milestone	Target Completion Date	Activity Status	Comments
Complete HCVS Gap Analysis	Jun, 2014	Complete	
Submit Overall Integrated Implementation Plan	Jun, 2014	Complete	
Submit 6 Month Status Report	Dec. 2014	Complete	
Submit 6 Month Status Report	Jun. 2015	Not Started	
Submit 6 Month Status Report	Dec. 2015	Not Started	Simultaneous with Phase 2 OIP
Design Engineering On-site/Complete	Dec, 2015	Not Started	
Submit 6 Month Status Report	Jun. 2016	Not Started	
Operations Procedure Changes Developed	Dec, 2016	Not Started	
Site Specific Maintenance Procedure Developed	Dec, 2016	Not Started	

Pilgrim Nuclear Power Station's First Six Month Status Report for the Implementation of HCVS
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Milestone	Target Completion Date	Activity Status	Comments
Submit 6 Month Status Report	Dec. 2016	Not Started	
Training Complete	Dec, 2016	Not Started	
Implementation Outage	Mar, 2017	Not Started	
Procedure Changes Active	Mar, 2017	Not Started	
Walk Through Demonstration/Functional Test	Mar, 2017	Not Started	
Submit Completion Report	Jun. 2017	Not Started	

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the Phase 1 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

None.

7 Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8 References

The following references support the updates to the Phase 1 Overall Integrated Plan described in this enclosure.

1. Pilgrim's Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014.
2. 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.
3. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions,'" Revision 0, dated November 2013.

Pilgrim Nuclear Power Station's First Six Month Status Report for the Implementation of HCVS
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4. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
5. NRC Endorsement of industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
6. Nuclear Regulatory Commission Audits of Licensee Responses to Phase 1 of Order EA-13-109 to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Accession No. ML14126A545).