



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

February 27, 2015

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

**SUBJECT:** Pilgrim Nuclear Power Station's Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

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

LETTER NUMBER 2.15.006

- REFERENCE:**
1. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", dated March 12, 2012 (PNPS Letter 1.12.015) (ADAMS Accession No. ML12054A679)
  2. NRC Interim Staff Guidance JLD-ISG-2012-03, Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation, Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12221A339)
  3. Nuclear Energy Institute (NEI) 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation", dated August 2012 (ADAMS Accession No. ML12240A307)
  4. Pilgrim Nuclear Power Station Letter to NRC, "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)", dated October 29, 2012 (PNPS Letter 2.12.074) (ADAMS Accession No. ML12312A469)
  5. Pilgrim Nuclear Power Station Letter to NRC, "Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)", dated February 28, 2013 (PNPS Letter 2.13.014) (ADAMS Accession No. ML13063A097)

A001  
MLR

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 install reliable spent fuel pool level instrumentation. 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 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 2 endorses industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions. Reference 4 provided the Pilgrim Station initial status report regarding spent fuel pool instrumentation. Reference 5 provided the Pilgrim Station Overall Integrated Plan.

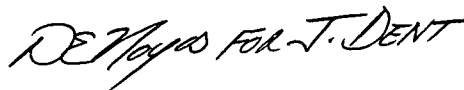
The purpose of this letter is to provide the fourth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The attached report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

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 February 27, 2015.

Sincerely,

A handwritten signature in black ink that reads "John A. Dent Jr." with a stylized flourish at the end.

John A. Dent Jr.  
JAD/rmb

Attachment: Pilgrim Nuclear Power Station's Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

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**ATTACHMENT**

**To**

**PNPS Letter 2.15.006**

**PILGRIM NUCLEAR POWER STATION'S  
FOURTH SIX-MONTH STATUS REPORT IN RESPONSE  
TO MARCH 12, 2012 COMMISSION ORDER MODIFYING  
LICENSES WITH REGARD TO  
RELIABLE SPENT FUEL POOL INSTRUMENTATION  
(ORDER NUMBER EA-12-051)**

## Attachment

### Pilgrim Nuclear Power Station's Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

#### 1 Introduction

PNPS developed an Overall Integrated Plan (Reference 1), documenting the requirements to install reliable spent fuel pool level instrumentation (SFPI), in response to Reference 2. This attachment provides an update of milestone accomplishments since the last status report, 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 July 31, 2014 and are current as of January 31, 2015.

ISE RAIs dated December 5, 2013 (Reference 3) – Submitted

#### 3 Milestone Schedule Status

The following provides an update to milestone schedule to support the Overall Integrated Plan. This section provides the activity status of each item, and the expected completion date noting any change. The dates are planning dates subject to change as design and implementation details are developed.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Reliable SFPI Installed	Spring 2015 Refueling Outage	In Progress	N/A
NRC RAIs dated June 20, 2013 (Reference 5)	July 19, 2013	Submitted July 19, 2013	N/A
ISE RAIs dated December 5, 2013 (Reference 3)	September 30, 2014	Submitted September, 2014	N/A

#### 4 Changes to Compliance Method

There are no additional changes to the compliance method.

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

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

PNPS's Fourth Six-Month Status Report for the Implementation of SFPI  
February 2015

## 6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

PNPS has received an Interim Staff Evaluation that includes 16 RAIs. The following table provides a status of the RAIs.

<b>RAI #</b>	<b>Response Status</b>
1	Submitted in Reference 6
2	Uploaded to e-portal September 30, 2014
3	Uploaded to e-portal September 30, 2014
4	Uploaded to e-portal September 30, 2014
5	Uploaded to e-portal September 30, 2014
6	Uploaded to e-portal September 30, 2014
7	Uploaded to e-portal September 30, 2014
8	Uploaded to e-portal September 30, 2014
9	Uploaded to e-portal September 30, 2014
10	Submitted in Reference 6
11	Uploaded to e-portal September 30, 2014
12	Uploaded to e-portal September 30, 2014
13	Uploaded to e-portal September 30, 2014
14	Uploaded to e-portal September 30, 2014
15	Uploaded to e-portal September 30, 2014
16	Uploaded to e-portal September 30, 2014

## 7 Potential Interim Staff Evaluation Impacts

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

PNPS's Fourth Six-Month Status Report for the Implementation of SFPI  
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## 8 References

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

1. "PNPS's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)," dated February 28, 2013. (ADAMS Accession No. ML13063A097)
2. NRC Order Number EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012. (ADAMS Accession No. ML12054A679)
3. "Pilgrim Nuclear Power Station – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (TAC NO. MF0778)," dated December 5, 2013. (ADAMS Accession No. ML13333A910)
4. "November 26, 2013, Public Meeting Summary for the Discussion Between the NRC Staff and Industry Concerning Responses to Staff Interim Evaluations for Spent Fuel Pool Instrumentation," dated December 26, 2013. (ADAMS Accession No. ML13347B030)
5. "Pilgrim Nuclear Power Station – Request for Additional Information RE: Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation (Order EA-12-051)(TAC NO. MF0778)," dated June 20, 2013. (ADAMS Accession No. ML13165A276)
6. "Pilgrim Nuclear Power Station's Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 28, 2014, (2.14.062) (ADAMS Accession No. ML14253A189)