



Entergy Nuclear Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5138

Ron Gaston
Director, Nuclear Licensing

10 CFR 50.54(f)

2.19.044

June 19, 2019

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

Subject: Final Response Regarding Request for Information Pursuant to Title
10 CFR 50.54(f) Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task
Force Review of Insights from the Fukushima Dai-ichi Accident

Pilgrim Nuclear Power Station
NRC Docket No. 50-293
Renewed Facility Operating License No. DPR-35

On March 12, 2012 (Reference 1), the Nuclear Regulatory Commission (NRC) issued "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" to all NRC power reactor licensees and holders of construction permits in active or deferred status. The enclosures in Reference 1 contain specific requested actions, requested information, and required responses associated with Recommendations 2.1 (Seismic), 2.3 (Flooding) and 9.3 (Emergency Preparedness). Concurrent with the reevaluation of flooding and seismic hazards, licensees were required to develop and implement mitigating strategies under NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (ADAMS Accession No. ML12054A735).

By letter dated August 18, 2016 (Reference 2), Entergy requested deferral of the remaining 50.54(f) letter activities related to the reevaluation of seismic hazards for Pilgrim, including completion of a seismic Mitigating Strategies Assessments (MSA), until December 31, 2019. In a separate August 18, 2016, letter (Reference 3) Entergy requested that the remaining 50.54(f) letter activities related to the reevaluation of flooding hazards for Pilgrim, including completion of the flooding MSA, be permanently deferred. By letter dated April 17, 2017 (Reference 4), the NRC determined that deferring the actions related to flooding and seismic hazard reevaluations described in References 2 and 3 for Pilgrim Nuclear Power Station (PNPS) in anticipation of the planned permanent shutdown in mid-2019 was acceptable.

In the Conclusion section of Reference 4, the NRC requested additional information if PNPS permanently ceased operations before the deferral date, and determined that the remaining 10 CFR 50.54(f) letter activities and the MSAs are no longer necessary based on the shutdown conditions of the plant. Specifically, the NRC requested Entergy to document such a request in a letter, with the appropriate basis supporting the request, prior to December 31, 2019.

Accordingly, Entergy provides the following information to close out the 10 CFR 50.54(f) request. By letter dated June 10, 2019 (Reference 5), Entergy certified that power operations ceased at Pilgrim on May 31, 2019, and that the fuel was permanently removed from the Pilgrim reactor vessel and placed in the spent fuel pool on June 9, 2019. Entergy further acknowledged that the Pilgrim 10 CFR Part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. This was acknowledged by the NRC in letter dated June 11, 2019 (Reference 6).

The recommendations in Reference 1 are intended for operating units. As Reference 1 indicates, "Operating power reactor licensees under 10 CFR Part 50 are required to respond to all of the information requests." The list of licensees to which Reference 1 applies does not include permanently shutdown units. Pilgrim is no longer an operating plant, but is rather a plant where the reactor has been permanently shutdown and defueled. Therefore, the requests of Reference 1 are no longer applicable to PNPS. As such, PNPS no longer plans on proceeding with any further implementation of the recommendations in Reference 1 or any alternative approach for Recommendations 2.1, 2.3 and 9.3, including the MSAs.

Should you have any questions regarding this submittal, please contact Mr. Peter J. Miner at (508) 830-7127.

This letter contains no new regulatory commitments.

Respectfully,



Ronald W. Gaston

RWG/rjm

- References:
- 1) NRC Letter to Entergy, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" (ADAMS Accession No. ML12053A340), dated March 12, 2012
 - 2) Entergy letter to NRC, "Request for Deferral of Actions Related to Beyond-Design-Basis External Events Seismic Actions - Commitment Changes" (ADAMS Accession No. ML16250A017), dated August 18, 2016
 - 3) Entergy letter to NRC, "Request for Deferral of Actions Related to Beyond-Design-Basis External Events Flooding Actions - Commitment Changes" (ADAMS Accession No. ML16250A018), dated August 18, 2016
 - 4) NRC Letter to Entergy, "Pilgrim Nuclear Power Station – NRC Response to Request for Deferral of Actions Related to Beyond-Design Basis Seismic and Flooding Hazards Reevaluations" (ADAMS Accession No. ML16278A313), dated April 17, 2017

- 5) Entergy letter to NRC, "Certifications of Permanent Cessation of Power Operations and Permanent Removal of Fuel from the Reactor Vessel" (ADAMS Accession No. ML19161A033), dated June 10, 2019
- 6) NRC letter to Entergy, "Termination of Reactor Oversight Process for Pilgrim Nuclear Power Station and Commencement of Decommissioning Inspection Program" (ADAM Accession No. ML19162A033), dated June 11, 2019

cc: NRC Region I, Regional Administrator
NRC Senior Resident Inspector - Pilgrim
NRC NRR Project Manager - Pilgrim