

William Dean
Ho Nieh
Raymond McKinley
US NRC
Via Email
June 24, 2015

RE: PILGRIM NUCLEAR POWER STATION - NRC 95002 SUPPLEMENTAL FOLLOW-UP INSPECTION REPORT 05000293/2015009 (June 18, 2015)

Pilgrim Watch and organizations listed below request that NRC's 95002 Supplemental Follow-Up Inspection report 05000293/2015009 issued June 18, 2015 is withdrawn and a new report issued. Our reasons are as follows:

Report Is Self-Contradictory and Makes No Sense

For example towards the bottom of page (7) there are two sentences back to back that say:

1. "Activities to perform the effectiveness reviews were already assigned in CR-PNP-2013-0798 but were not completed."
2. "The inspectors determined that the incomplete effectiveness review was completed with supportable conclusions."

The first sentence says that the effectiveness reviews were not completed; the second sentence says that the incomplete effective review was completed. Therefore it is unclear if whether the effectiveness review is complete or incomplete. In the second sentence, the NRC wrote that "the incomplete effective review was completed." Does this mean that the "complete effectiveness review was incomplete?"

The CAP Situation Described on Page 5-6 is Inconsistent

- The NRC said that RCE CR-PNP-2013-5939 did not identify a root or contributing cause.
- The bottom of page 5 records two additional NRC concerns with the condition report (CR) and its root cause evaluation (RCE).

- The top of page 6 indicates that Entergy responded to the NRC's many problems with its corrective action process (CAP) by entering CR-PNP-2015-04443 into the CAP.
- The NRC conducts a supplemental follow-up inspection into previous findings of a deficient Corrective Action Process, identifies even more deficiencies, and dismisses them because Entergy entered them into the known-to-be-broken-and-now-verified-not-to-be-fixed Corrective Action Process.

This does not look like regulatory oversight.

NRC provides No Information to Assure **Entergy's "Fixes"** are either real or timely

Icing in Switchyard: The report says that Entergy plans to address the icing in the switchyard with portable heaters, pressure washing and /or manual brushing.

Regarding the heaters: The report fails to say whether Entergy is buying more heaters; and if so will there be a sufficient number and whether the plan to store them are in locations that they can be brought to the yard in a time effective manner in a severe winter storm; or, are they dragging the heater(s) around and refreezing behind it? How many heaters does the NRC feel are sufficient to avoid re-freezing? Has NRC analyzed the storage location of the heaters and time required under harsh conditions to transport the heaters to location?

Regarding Power Washing: There is no explanation how power washing avoids re-freezing. If heaters are the answer; again, how many are required? Where is the water to power wash coming from? What assurance does NRC have that the power washing equipment and personnel can get to location in a severe winter storm, like Juno?

Brushing: How can the NRC assure energized lines will not be mistakenly brushed by Entergy workers manually brushing lines in the switchyard? What assurance does NRC have that the personnel can get to location in a severe winter storm, like Juno?

Commenters conclude that the real solution is to enclose the switchyard. The switchyard faces northeast, into the eye of the storm, and the surrounding hills channel the wind and spray into it.

Insulator Service Life Issue

Although the report says that the Doble Engineering, the testing company, said that the insulator expected service life was (30) years and therefore all insulators should be tested, Entergy decided not to follow its advice and got into trouble. The Supplemental Report says that Entergy will test them all by 2016. We see this as a lack of commitment for not doing testing in the first place (money); a relaxed schedule to finally get it done; and invitation by the NRC to the industry to run equipment to failure.

The NRC and its Office of Inspector General (OIG) both chronicled this problem. David Lochbaum, Union of Concerned Scientists, blogged about it (<http://allthingsnuclear.org/nuclear-plants-and-nuclear-excuses-this-is-getting-old/>) and outlined how the NRC and its OIG found that some owners replace components before the service lifetimes while other owners run equipment to failure. While NRC prefers the former, they don't sanction the latter. Bottom line - NRC inaction is driving more and more owners toward bad behavior.. Lochbaum concludes that the NRC seems pleased to allow the practice to continue until it kills someone, and then use those deaths to “ask” the industry to change its ways.

Report Again Ignores Emergency Planning during JUNO - No Reasonable Assurance

The January 27, 2015 Winter Storm Juno resulted in significant problems at Pilgrim Nuclear Power Station. The storm itself caused a Loss of the Offsite Power (LOOP) that is required to operate Pilgrim’s safety systems, and this was followed by numerous equipment and operator failures at the reactor.¹ The Scram occurred on January 27 at 04:02 and the HPSI was declared inoperable at 09:48. But on January 26 at 12:55, Governor Baker announced a state of emergency and travel ban. (See Attachment A to the attached 2.206 Petition) The NRC did not require Pilgrim to shut down, as it should have. It was apparent that there was no reasonable

¹ Subject: Pilgrim Nuclear Power Station – NRC Special Inspection Report 05000293/2015007; and Preliminary White Finding, May 27,2015

assurance regarding emergency planning. The attached 2.206 Enforcement Petition shows that the NRC shifted responsibility to FEMA and MEMA saying that they informed the NRC that there was reasonable assurance that the state was capable of implementing its emergency plan, including evacuation. Who is not telling the truth – NRC, FEMA and/or MEMA? There is no shifting responsibility. The buck stops with the NRC and no one would believe that NRC Resident Inspectors and the agency were ignorant about the Governor’s travel ban.

Therefore, the NRC should amend its May 27, 2015 Inspection Report and the June 18, 2015 Supplemental Report to explicitly state that during Juno there was no reasonable assurance that the State was capable of implementing their emergency plan, including evacuation. Pilgrim was out-of-compliance by continuing to operate after the Governor’s announcement; and for all practical purposes should have voluntarily shut down as a precautionary measure before. We believe a White Finding is appropriate in the Emergency Preparedness cornerstone in next year’s ROP.

Thank you for your consideration; we respectfully request a response to issues raised.

Mary Lampert
Pilgrim Watch, Director
148 Washington Street - Duxbury, MA 02332
Tel 781-934-0389/ Email: mary.lampert@comcast.net

Karen Vale
Jones River Watershed Association
55 Landing Road, Kingston, MA 02364,
Tel 781-585-2322/ Email: karen@capecodbaywatch.org

Diane Turco, Cape Downwinders/MA Downwinders
157 Long Road, Harwich, MA 02645
Tel 508-776-3132/tturco@comcast.net

Rebecca Chin
Co-Chair Town of Duxbury Nuclear Advisory Committee
31 Deerpath Trail, North-Duxbury, MA 02332
Tel. 781-837-0009 /Email: rebeccajchin@hotmail.com

Heather Lightner & Norm Pierce
Concerned Neighbors of Pilgrim
54 Settlers Road, Plymouth, MA 02360
Tel. 401-578-4189/Email: heather@concernedneighborsofpilgrim.org