



**NRC – Massachusetts
State Legislature Meeting
November 10, 2015**

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NRC Region I

Pilgrim Performance

- The plant had been in Column 3 (Degraded Cornerstone) since 4th quarter 2013.
 - Due to an increased number of reactor scrams and scrams with complications.
- January 27, 2015 – complicated scram due to loss of offsite power. In addition, problems were identified with one of the safety relief valves (SRVs). Similar to a previous scram in February 2013.
- On Sept. 1, 2015, NRC issued a white inspection finding for failure to identify, correct and prevent a similar condition with the SRVs during a previous scram event in February 2013.

NRC Action Matrix

- As a result of the White finding, and in light of Pilgrim's failure to address in a timely manner the causes of multiple reactor shutdowns that occurred in 2013, the NRC placed the plant in Column 4 (Repetitive Degraded Cornerstone) of the Action Matrix.

Figure 1: Reactor Oversight Process Action Matrix

| | | Licensee Response Column (Column 1) | Regulatory Response Column (Column 2) | Degraded Cornerstone Column (Column 3) | Multiple/Repetitive Degraded Cornerstone Column (Column 4) | Unacceptable Performance Column (Column 5) | IMC 0350 Process ¹ |
|---------------|---|--|---|--|---|---|---|
| RESULTS | | All assessment inputs (performance indicators and inspection findings) green; Cornerstone objectives fully met | One white input, or Two white inputs (in different cornerstones) in a strategic performance area; Cornerstone objectives met with minimal degradation in safety performance | One degraded cornerstone (2 white inputs or 1 yellow input), or Any 3 white inputs in a strategic performance area; Cornerstone objectives met with moderate degradation in safety performance | Repetitive degraded cornerstone, Multiple degraded cornerstones, Multiple yellow inputs, or One red input; Cornerstone objectives met with longstanding issues or significant degradation in safety performance | Overall unacceptable performance; Plants not permitted to operate within this band; Unacceptable margin to safety | Plants in a shutdown condition with performance problems are placed in the IMC 0350 process |
| | | | | | | | |
| RESPONSE | Regulatory Performance Meeting | None | Branch Chief or Division Director meets with licensee | Regional Administrator or designee meets with senior licensee management. | EDO/DEDO or designee meets with senior licensee management | EDO/DEDO or designee meets with senior licensee management | RA/EDO or designee meets with senior licensee management |
| | Licensee Action | Licensee corrective action | Licensee root cause evaluation and corrective action with NRC oversight | Licensee cumulative root cause evaluation with NRC oversight | Licensee performance improvement plan with NRC oversight | | Licensee performance improvement & restart plan with NRC oversight |
| | NRC Inspection | Risk-informed baseline inspection program | Baseline and supplemental inspection (IP 95001) | Baseline and supplemental inspection (IP 95002) | Baseline and supplemental inspection (IP 95003) | | Baseline and supplemental as practicable; Special inspections per restart checklist. |
| | Regulatory Actions ² | None | Supplemental inspection only | Supplemental inspection only; Plant discussed at AARM if conditions met | 10 CFR 2.204 DFI; 10 CFR 50.54(f) letter; CAL/Order; Plant Discussed at AARM | Order to modify, suspend, or revoke license; Plant discussed at AARM | CAL/Order requiring NRC approval for restart; Plant discussed at AARM |
| COMMUNICATION | Assessment Letters | Branch Chief or Division Director reviews and signs assessment letter w/ inspection plan | Division Director reviews/signs assessment letter w/ inspection plan | Regional Administrator reviews/signs assessment letter w/ inspection plan | Regional Administrator reviews/signs assessment letter w/ inspection plan | | N/A. RA or 0350 Panel Chairman review/ sign 0350-related correspondence |
| | Annual Involvement of Public Stakeholders | Various public stakeholder options involving the senior resident inspector or Branch Chief | Various public stakeholder options involving the BC or DD | Regional Administrator or designee discusses performance with senior licensee management | EDO/DEDO or designee discuss performance with senior licensee management | | N/A. 0350 Panel Chairman conducts periodic public status meetings |
| | External Stakeholders ³ | None | State Governors | State Governors, DHS, Congress | State Governors, DHS, Congress | State Governors, DHS, Congress | |
| | Commission Involvement | None | None | Possible Commission meeting if licensee remains for 3 years | Commission meeting with senior licensee management within 6 months. | Commission meeting with senior licensee management | Commission meetings as requested; Restart approval in some cases. |
| | INCREASING SAFETY SIGNIFICANCE → | | | | | | |

Next Steps:

- NRC staff will conduct internal quarterly assessment meetings.
- Entergy must provide their performance improvement plan before the NRC Commission.
- NRC will conduct a thorough diagnostic supplemental inspection to better assess the safety, organizational, and performance issues at the site.

95003 Supplemental Inspection

A number of inspections will be conducted throughout 2016 to assess the licensee's improvement efforts of their corrective action program and will conclude with a large specialized team inspection for confirming that the licensee has taken appropriate actions and has made substantive progress toward resolving performance issues.

95003 Supplemental Inspection

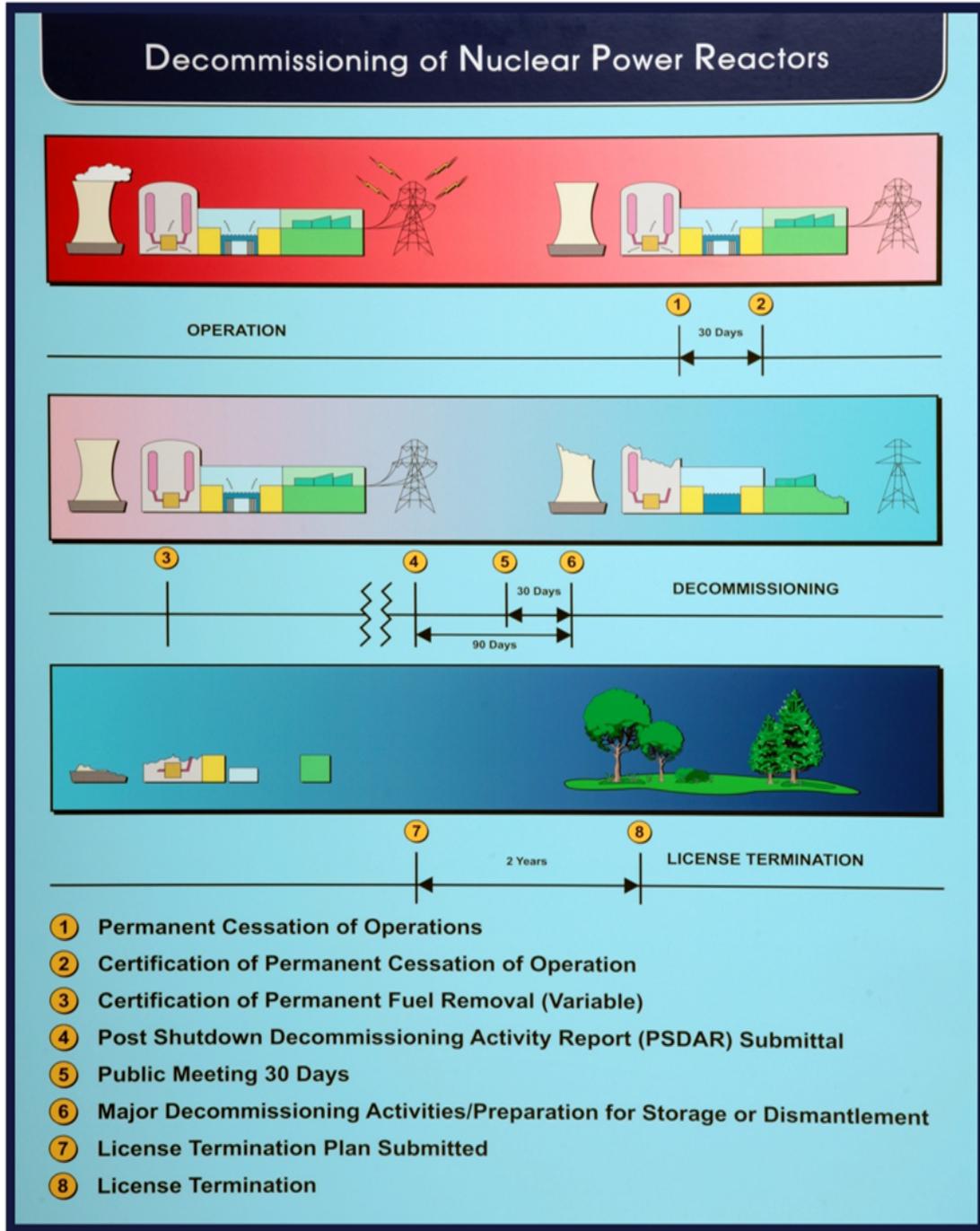
- These efforts are in addition to the normal ongoing activities monitored by our onsite resident inspectors (2) and our normal baseline inspection program.
- A third resident inspector has been added for performing additional inspection activities and in support of the current resident staff in their daily activities.

Public Meetings

- Entergy meeting before NRC Commission in Spring 2016
- Annual Assessment and 95003 status meeting in Spring 2016
- 95003 public exit meeting after completion of the inspection

Entergy's Plans for Closure of Pilgrim

- Entergy has publicly stated they will close Pilgrim no later than June 1, 2019.
- Entergy has formally notified the NRC of their intent to shut down Pilgrim.



Decommissioning Strategies

- Licensees may choose from three decommissioning strategies.
 - DECON
 - SAFSTOR
 - ENTOMB
- Decommissioning must be completed within 60 years of the plant ceasing operations.

Licensee Use of Decommissioning Trust Funds (DTFs)

- Site specific cost estimate/Post Shutdown Decommissioning Activities Report
- Annual Financial Report Reviews

Safety During Decommissioning Activities

- NRC continues to ensure safety during the entire decommissioning process
 - Inspections and oversight continue
 - Ensure decommissioning activities do not endanger the health and safety of the public
 - Ensure that decommissioning activities do not result in a detrimental impact to the environment
 - Review of license amendment requests and exemptions based on reduction in risk

Decommissioning Rulemaking

- The NRC has started working on a revision to the decommissioning regulations
- Major Milestones
 - Advance Notice of Proposed Rulemaking (ANPR) (11/19/2015)
 - Public meeting, Rockville, MD on 12/9/2015 to receive stakeholder comments. Comment Period ends: 01/04/2016
 - Draft and Final Regulatory Bases (2016/2017)
 - Proposed Rule/Draft Regulatory Guidance (2018)
 - Final Rule/Regulatory Guidance (to the Commission in 2019)
- The NRC will solicit feedback from nuclear industry, States and local governments, and members of the public at various stages of the rulemaking process.

Expedited Transfer to Dry Cask Storage

- The NRC evaluated expedited transfer from the spent fuel pool to dry cask storage.
- Once spent fuel is cool enough to be placed in dry storage, there is little difference in risk whether it is actually stored in the pool or moved to dry cask.

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