



Entergy Nuclear Generation Company
Pilgrim Nuclear Power Station
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10 CFR 50.4

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Director
Nuclear Assessment

January 20, 2000
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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Docket Number 50-293
License Number DPR-35

Subject: Submittal of Historical Pilgrim Station Performance Indicator Data

Dear Sir:

This letter formally documents the electronic submittal of historical Pilgrim Station data that comprise the new NRC Performance Indicators. The data was submitted voluntarily, on January 20, 2000, as described in NRC Regulatory Issue Summary 99-06, "Voluntary Submission of Performance Indicator Data." The data submittal is part of the power reactor industry and NRC effort to improve the NRC oversight process that is summarized in NUREG-1649 (rev. 1), "New NRC Reactor Inspection and Oversight Program."

The data elements that form the basis for the submitted performance indicator data were assimilated using the guidance contained in Nuclear Energy Institute (NEI) document 99-02, "Regulatory Assessment Performance Indicator Guideline." NEI 99-02 draft revisions C (September 1999) and D (November 1999) were in effect when the data was being assimilated. Additional guidance was obtained from the NRC during the performance indicator portion of the NRC Lessons Learned Workshop conducted January 10 – 13, 2000. Therefore, the data elements that form the basis for this submittal were assimilated using the best available guidance. It is our understanding from the workshop that additional guidance will be available when NEI 99-02 (rev. 0) is issued.

The assimilated data elements were reviewed and input to the NEI performance indicator program (PIWeb). The onsite Operations Review Committee and management reviewed the data. The NEI program provides controlled input of data elements and comments through password access, and includes encryption for security. The data was input and crosschecked by authorized Regulatory Affairs staff who attended NEI and NRC workshops on the performance indicators.

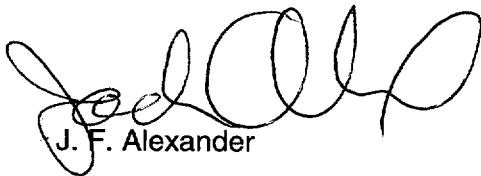
The NEI program also contains algorithms, reporting and downloading features that in conjunction with the Pilgrim Station data elements resulted in the performance indicator data that was submitted. The data (and comments) was submitted electronically to the NRC at the specified NRC website address. The electronic submittal process, however, does not currently provide security by way of encryption. The performance data, however, is to be posted on the NRC website about two to three weeks after the data submittal. Therefore, the NRC website will be accessed by the Regulatory Affairs staff to verify the Pilgrim Station performance indicator data on the website is consistent with the performance indicator data (and comments) that was electronically submitted to the NRC.

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In summary, the voluntary submittal of the Pilgrim Station historical performance indicator data was based on the foregoing guidance and processes. Unless the review of the Pilgrim Station performance indicator portion of the NRC website indicates otherwise, the submittal is believed to be complete and accurate. A hard copy of the NEI program reports for this submittal is being retained for future reference.

Please feel free to contact Mr. Douglas Ellis of my staff, at (508) 830-860, if you have any questions regarding this subject.

Sincerely,



J. F. Alexander

DWE/vc

cc:

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