

Mr. Robert M. Bellamy
Site Vice President
Entergy Nuclear Generation Corporation
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, Massachusetts 02360-5599

SUBJECT: PLANT PERFORMANCE REVIEW - PILGRIM NUCLEAR POWER STATION

Dear Mr. Bellamy:

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On February 23, 2000, we completed a Plant Performance Review (PPR) of Pilgrim Nuclear Power Station. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from January 16, 1999 to January 31, 2000, but emphasized the last six months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance at Pilgrim was provided to you in a letter dated April 9, 1999, and was discussed with you in a public meeting on August 31, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide on April 2, 2000.

This PPR reflects continued NRC process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing your performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the last six months of the assessment period, the plant operated at full power with the exception of two reactor shutdowns and one forced power reduction.

Although the NRC noted some performance issues during this assessment period, we note that Pilgrim Nuclear Power Station continues to operate in a safe manner. In an effort to ensure that these issues are addressed, additional inspection resources will be allocated in certain areas as noted in this letter and the attached inspection plan.

There were no significant performance issues in the reactor safety strategic area. We noted that several plant challenges, including an engineered safety feature actuation and an inadvertent trip of the main turbine, were caused by operator errors. Your staff initiated several broad and long-term actions designed to obtain more consistent operator performance. Although some improvement was noted in the identification and handling of degraded equipment condition, engineering support, particularly in preventing and resolving degraded balance of plant equipment condition, was sometimes lacking. We also noted several problems in the post-modification testing process. No significant performance issues were observed in the radiation safety strategic area. Therefore, for the reactor safety and radiation safety strategic areas, we currently plan to conduct only our normal baseline inspections at your facility as noted in the attached inspection plan.

Although there were no significant performance issues in the safeguards strategic area, security had to frequently use compensatory measures for out-of-service equipment. Therefore, in addition to the inspections under the new baseline inspection program, we plan to perform an initiative inspection focused on reviewing the effectiveness of your security system detection aids.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The attached PIM includes items summarized from inspection reports or other docketed correspondence between the NRC and Entergy Nuclear Generation Corporation regarding Pilgrim Nuclear Power Station. We did not document all aspects of licensee programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2000 through March 2001 at Pilgrim Nuclear Power Station to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival onsite. Since many of the inspections at Pilgrim Nuclear Power Station and at other Region 1 facilities during this period involve a team of inspectors, our ability to reschedule inspections is limited. Therefore we request you inform us as soon as possible of any scheduling conflicts. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Pilgrim Nuclear Power Station or other Region I facilities. We also included some NRC non-inspection activities in Enclosure 2 for your information. Routine resident inspections are not listed due to their ongoing and continuous nature.

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We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 610-337-5227.

Clifford J. Anderson, Chief
Reactor Projects Branch 5
Division of Reactor Projects

Docket No. 50-293
License No. DPR-35

Enclosures:

1. Plant Issues Matrix
2. Inspection Plan

cc w/encl:

M. Krupa, Director, Nuclear Safety & Licensing
J. Alexander, Director, Nuclear Assessment Group
D. Tarantino, Nuclear Information Manager
S. Brennon, Regulatory Affairs Department Manager
J. Fulton, Assistant General Counsel
R. Hallisey, Department of Public Health, Commonwealth of Massachusetts
The Honorable Therese Murray
The Honorable Vincent DiMacedo
Chairman, Plymouth Board of Selectmen
Chairman, Duxbury Board of Selectmen
Chairman, Nuclear Matters Committee
Plymouth Civil Defense Director
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