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Director, Nuclear Licensing

10 CFR 50.12  
10 CFR 50.47  
10 CFR 50, Appendix E

2.19.011

February 18, 2019

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

Subject: Response to Request for Additional Information – Exemption from the Requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50

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

- References:
- 1) Entergy Nuclear Operations, Inc. letter to NRC, "Request for Exemptions from Portions of 10 CFR 50.47 and 10 CFR Part 50 Appendix E," dated July 3, 2018 (ADAMS Accession No. ML18186A635)
  - 2) NRC email to Entergy Nuclear Operations, Inc., "RAI – Pilgrim EP Exemption (EPID: L-2018-LLE-0011)," dated November 6, 2018 (ADAMS Accession No. ML18310A021)
  - 3) Entergy Nuclear Operations Inc. Letter to NRC "Response to Request for Additional Information – Exemption from the Requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50," dated December 4, 2018 (ADAMS Accession No. ML18341A219)
  - 4) NRC email to Entergy Nuclear Operations, Inc., "RAI – Pilgrim EP Exemption (EPID: L-2018-LLE-0011)," dated February 4, 2019 (ADAMS Accession No. ML19036A651)

In Reference 1, Entergy Nuclear Operations, Inc. (Entergy) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for exemption from portions of Title 10 Code of Federal Regulations (CFR) 50.47 and 10 CFR Part 50, Appendix E for the Pilgrim Nuclear Power Station (PNPS).

The NRC requested additional information on November 6, 2018 (Reference 2) related to heat transfer within the adiabatic analysis boundary. By letter dated December 4, 2018 (Reference 3), Entergy provided a response to the NRC request for additional information.

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In Reference 4, the NRC requested additional information concerning the exemption request related to justification and/or discussion of how heat transfer could occur to all components within the adiabatic envelope, specifically the upper and lower plenums.

Attachment 1 to this letter provides the Entergy response to the NRC request for additional information (RAI). Attachment 2 to this letter provides the revision of Entergy calculation PNPS-EC-81416-M1418 in support of the response to the NRC RAI. This revised calculation replaces the calculation that was provided in Attachment 2 of Reference 1.

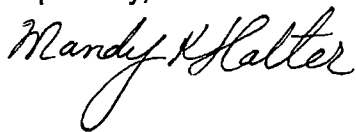
This RAI response does not impact the conclusions of the evaluation presented in Reference 1.

This letter contains no new commitments and no revisions to existing commitments.

If you have any questions or require additional information, please contact Mr. Peter J. Miner at (508) 830-7127.

A copy of this submittal has been provided to the designated Commonwealth of Massachusetts officials.

Respectfully,



Mandy K. Halter

MKH/db/mp

Attachments:

1. Response to Request for Additional Information – Exemption from the Requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50, Entergy Nuclear Operations, Inc., Pilgrim Nuclear Power Station
2. Calculation No. PNPS-EC-81416-M1418, Adiabatic Heatup Analysis for Drained Spent Fuel Pool.

cc: NRC Region I Regional Administrator  
NRC Senior Resident Inspector – Pilgrim  
NRC Project Manager – Pilgrim  
Massachusetts Emergency Management Agency, Planning, Preparedness and Nuclear Section Chief  
Massachusetts Department of Public Health, Director, Radiation Control Program