



William Dean, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

February 11, 2015

RE: Entergy's Hazard Reevaluation Report of Pilgrim Nuclear Power Station, Plymouth, MA (License No. DPR-35)

Dear Director Dean,

We are writing to request that the NRC require Entergy to carry out an updated, accurate site survey and flood assessment at the Pilgrim Nuclear Power Station in Plymouth, Mass. (Pilgrim) before Entergy's Hazard Reevaluation Report for flooding is submitted on March 12, 2015.

On May 11, 2012 the NRC issued a letter¹ to U.S. nuclear reactor licensees, including Entergy, regarding the NRC's March 12, 2012 request for information based on recommendations of its Near-Term Task Force (NTTF) review of insights gained from the Fukushima Daiichi accident.² NTTF's Recommendation 2.1 relates to flooding hazards, the subject of this letter.

Part of the NRC's March 12, 2012 request addressed NTTF's Recommendation 2.1, and directed licensees to reevaluate flood hazards at reactor sites. The NRC's May 11th letter provided licensees with the NRC's prioritization plan and the resultant list of due dates for all for individual plants to complete these flood reevaluations.

Entergy's Hazard Reevaluation Report for flooding at Pilgrim is due March 12, 2015. Pilgrim was deemed a "category 3" licensee because of the complexity³ of its reevaluation, and it was expected to report results within three years of the NRC's request.

Entergy is expected to reevaluate all appropriate external flooding sources at the Pilgrim site, including the effects from intense precipitation, storm surges, tsunamis, etc. and apply present-day regulatory guidance and methodologies including current techniques, software, and methods used in present-day standard engineering practice to develop the flood hazard.¹

¹ NRC, 5/11/2012. ML12097A509.

² NRC, 5/12/12. ML12053A340; the NRC requested information to enable staff to determine whether plant licenses should be modified, suspended, or revoked, and to determine if there is a need to update the design basis and systems, structures, and components important to safety.

³ Examples of more complex hazard analyses include dam failures, storm surge, tsunami hazard, and large watersheds.

Specifically, Pilgrim’s Hazard Reevaluation Report should contain site information related to flood hazards including ultimate heat sinks and structures, systems, and components (SSCs) important to safety. The report should also include: 1) detailed site information (both designed and as-built), including present-day site layout, elevation of pertinent SSCs important to safety, site topography, as well as pertinent spatial and temporal data sets; 2) current design basis flood elevations for all flood causing mechanisms; 3) flood-related changes to the licensing basis and any flood protection changes (including mitigation) since license issuance; 4) changes to the watershed and local area since license issuance; 5) current licensing basis flood protection and pertinent flood mitigation features at the site; and 6) additional site details, as necessary, to assess the flood hazard.

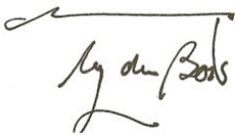
Entergy cannot comply with the NRC’s request without carrying out an updated and accurate on-site survey at Pilgrim. We request that the NRC require Entergy’s survey and flood assessment be developed prior to Entergy’s Hazard Reevaluation Report being completed. The NRC should ensure this survey uses the most updated methodology and data, as well as the most current information about sea level rise, and influences by tides, storms, waves and wind – as outlined in the NRC’s March 12, 2012 request. Otherwise, the Hazard Reevaluation Report Energy presents to the NRC on March 12, 2015 will be invalid, and the NRC will not be able to carry out “phase 2”⁴ of its hazard evaluation plan properly.

Thus far, the information and maps that Entergy has provided to your agency and the public have been misleading and inaccurate. We have concern that Entergy’s Hazard Reevaluation Report for flooding that is due on March 12, 2015 will be useless in preventing an accident due to flooding, if the information is carried over from past plans and reports and no new site-survey is completed.

Jones River Watershed Association, in conjunction with Northeastern Geospatial Research Professionals, Inc., recently developed straightforward elevation analysis of the Pilgrim site using publically available information (full report and maps are attached). The analysis and accompanying maps reveal that Energy’s plans have significant areas for concern—especially in the area of the protective jetties.

We would be happy to meet with you to discuss these concerns. We understand the NRC is holding a public meeting in Plymouth in March 2015 and we would be happy to coordinate a meeting around that, or any other time. We also ask that this topic be added to the public meeting agenda in March.

Sincerely,



Executive Director
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⁴ Phase 2: If necessary, and based upon the results of Phase 1 (reevaluation), the NRC will determine whether additional regulatory actions are necessary (e.g., update the design basis and SSCs important to safety) to protect against the updated hazards.

Attachments:

- Factsheet: NGRP Elevation Analysis Report, Key Findings and Recommendations
- Factsheet: Climate Change Impacts on Operations & Public Safety
- Elevation Analysis Report
- Shoreline Profile Sections Map
- FEMA Flood and LIDAR Elevations
- LIDAR 2ft Elevation Contours
- Surficial Geology and Monitoring Wells
- 3-D Model

CC:

Ray McKinley, Reactor Projects Branch #5 Chief, NRC

Stephen Burns, NRC Chair

Curt Spalding, EPA Region I Administrator

Dave Webster, EPA Water Permit Branch Chief

Edward Markey, U.S. Senator

Elizabeth Warren, U.S. Senator

William Keating, Congressman

Mark Beaton, Secretary, EOEEA

Martin Suuberg, Commissioner, DEP

Beth Card, Assistant Commissioner, DEP

Bruce Carlisle, Director, CZM

Stanley Rosenberg, Senate President

Dan Wolf, State Senator

Vinny deMacedo, State Senator

Matt Muratore, State Rep.

Randy Hunt, State Rep.

Thomas Calter, State Rep.

James Cantwell, State Rep.

Josh Cutler, State Rep.

Board of Selectmen, Town of Plymouth

Nuclear Matters Committee, Town of Plymouth