



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

November 1, 2018

EA-17-086

Mr. Brian Sullivan
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

**SUBJECT: PILGRIM NUCLEAR POWER STATION – CONFIRMATORY ACTION LETTER
(EA-17-086) FOLLOW-UP INSPECTION REPORT 05000293/2018012**

Dear Mr. Sullivan:

On September 14, 2018, the U.S. Nuclear Regulatory Commission (NRC) completed an on-site team inspection at Pilgrim Nuclear Power Station (PNPS). The NRC inspectors discussed the results of this inspection with you and other members of your staff during an onsite debrief on September 14, 2018, and via teleconference exit on October 17, 2018. The results of this inspection are documented in the enclosed report.

The NRC inspection team reviewed PNPS's progress in implementing the actions from the PNPS Recovery Plan that were committed to in the Confirmatory Action Letter (CAL) dated August 2, 2017 (NRC's Agencywide Documents Access and Management System (ADAMS) Accession No. ML17214A088) (EA-17-086). Specifically, for this inspection the team reviewed the adequacy of the corrective actions PNPS completed to address 45 individual CAL items in the Corrective Action Program, Operations Standards and Site Leadership, Risk Recognition and Decision Making, Procedure Quality, Engineering Programs, Equipment Reliability, and Work Management Area Action Plans. The team also reviewed site performance to determine whether the actions completed for these plans, in aggregate, achieved the safety performance improvement objectives stated in the PNPS Recovery Plan for those seven Area Action Plans. Finally, the team conducted a targeted site safety culture assessment to properly assess individual CAL items with actions tied to safety culture and gather preliminary information for the final CAL follow-up inspection.

The team determined that all 45 individual CAL items reviewed and the 7 associated Area Action Plans were adequately completed and effective in achieving the associated PNPS Recovery Plan performance improvement objectives. As a result, the 45 CAL items and the Area Action Plans for Corrective Action Program, Operations Standards and Site Leadership, Risk Recognition and Decision Making, Procedure Quality, Engineering Programs, Equipment Reliability, and Work Management are closed.

No findings or violations of NRC requirements were identified during this inspection.

In accordance with the guidance in Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," PNPS will remain within the Multiple/Repetitive Degraded Cornerstone column of the NRC's Reactor Oversight Process Action Matrix pending completion of all actions needed to close the CAL. To review the remaining CAL actions and Area Action Plans, the NRC currently plans to complete one additional quarterly CAL follow-up inspection in addition to the four already completed. The NRC staff will assess the effectiveness of Entergy's implementation of these corrective actions and evaluate whether the safety performance of PNPS has demonstrated sustained improvement warranting transition of PNPS out of Column 4 in accordance with Inspection Manual Chapter 0305, Section 10.02d, paragraph 7. The final on-site CAL follow-up inspection is currently scheduled to be completed in December 2018, and the report documenting the results of that inspection to be issued shortly thereafter.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Anthony Dimitriadis, Chief
Reactor Projects Branch 5
Division of Reactor Projects

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

Enclosure:
Inspection Report 05000293/2018012
w/Attachment: Confirmatory Action
Letter Item Status

cc w/encl: Distribution via ListServ

SUBJECT: PILGRIM NUCLEAR POWER STATION – CONFIRMATORY ACTION LETTER
(EA-17-086) FOLLOW-UP INSPECTION REPORT 05000293/2018012 DATED
NOVEMBER 1, 2018

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Number: 50-293

License Number: DPR-35

Report Number: 05000293/2018012

Enterprise Identifier: I-2018-012-0014

Licensee: Entergy Nuclear Operations, Inc. (Entergy)

Facility: Pilgrim Nuclear Power Station (PNPS)

Location: Plymouth, MA

Inspection Dates: 09/10/2018 – 09/14/2018

Team Lead: S. Rutenkroger, PhD, Senior Resident Inspector

Inspectors: L. Cline Jr., Senior Project Engineer
Z. Hollcraft, Senior Resident Inspector
J. Krafty, Senior Resident Inspector
M. Keefe-Forsyth, Human Factors Specialist
S. Morrow, Human Factors Engineer
J. Dolecki, Resident Inspector
M. Hardgrove, Project Engineer
C. Roettgen, Resident Inspector
C. Safouri, Project Engineer

Approved By: Anthony Dimitriadis, Chief
Reactor Projects Branch 5
Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring Entergy's performance at PNPS by conducting the fourth confirmatory action letter (CAL) follow-up inspection in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

The team reviewed 45 of the 156 items that Entergy committed to complete in the PNPS CAL (EA-17-086). The items reviewed were associated with the Corrective Action Program (CAP), Operations Standards and Site Leadership (OPS), Risk Recognition and Decision Making (RRDM), Procedure Quality (PQ), Engineering Programs (EP), Equipment Reliability (ER), and Work Management (WM) Area Action Plans. The team determined that all 45 individual CAL items reviewed and the associated Area Action Plans were adequately completed and effective in achieving the associated PNPS Recovery Plan performance improvement objectives. As a result, the 45 CAL items and these 7 Area Action Plans are closed.

No findings or more-than-minor violations were identified.

Additional Tracking Items

Type	Issue number	Title	Report Section	Status
CAL	EA-17-086	PNPS Confirmatory Action letter	Inspection Results 92702	Discussed

INSPECTION SCOPES

This inspection was conducted using the appropriate portions of the applicable inspection procedure in effect at the beginning of the inspection unless otherwise noted. Currently approved inspection procedures with their attached revision histories are located on the NRC website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess Entergy's performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT, AND ABNORMAL

92702 – Follow-up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, Confirmatory Orders, and Alternative Dispute Resolution Confirmatory Orders

The inspectors reviewed the status of the corrective actions that Entergy had reported complete for 45 of the 156 items listed on Enclosure 2 of the PNPS CAL (EA-17-086) (ADAMS Accession No. ML17214A088). The inspectors also conducted a targeted safety culture assessment to review the current status of PNPS corrective actions intended to improve site safety culture in these areas.

All 45 items reviewed for this inspection are identified in the Confirmatory Action Letter Item Status summary table included as an Attachment to this report. The inspectors also reviewed the status of the Area Action Plans associated with these 45 items, which in accordance with Enclosure 2 of the PNPS CAL included the CAP, OPS, RRDM, PQ, EP, ER, and WM Area Action Plans. Entergy had reported these seven Area Action Plans were complete and effective.

The inspectors evaluated these items to determine if:

- (1) CAL item corrective actions were completed in a timely manner consistent with their safety significance.
- (2) Area Action Plans were effective at addressing the performance issues identified in the CAL.
- (3) CAL performance metrics were appropriate and accurate.
- (4) Closure of each CAL item and Area Action Plan was completed in accordance with established PNPS procedural guidance.
- (5) PNPS corrected NRC-identified problems in PNPS implementation of actions taken for PQ-1.1 and PQ-5.2 (see NRC Inspection Report (IR) 05000293/2017010 (ADAMS Accession No. ML18032A463)), and the adverse impact of these problems on the effectiveness of the PQ Area Action Plan.
- (6) PNPS safety culture actions to date had caused a sustained positive change in safety culture, specifically related to the CAP (see NRC IR 05000293/2018011 (ADAMS Accession No. ML18282A039)) and RRDM Area Action Plans.

During this review, the inspectors completed the following specific activities:

- (1) Reviewed Entergy's closure packages for each of the CAL action items.
- (2) Reviewed Entergy's closure reports for each of the Area Action Plans.

- (3) Reviewed Entergy's interim and final effectiveness reviews and self-assessments completed for the Area Action Plans.
- (4) Reviewed Entergy's performance indicators and recovery metrics for the Area Action Plans through August 2018.
- (5) Overall, conducted 72 individual interviews, 8 focus group panel discussions, and multiple as-needed follow-up discussions with 117 PNPS staff, supervisors, managers, and directors from Plant Operations, Engineering, Maintenance, Production, Training, Security, Human Resources, Regulatory and Performance Improvement, Chemistry, Radiation Protection, and Recovery (including contract personnel such as Subject Matter Experts and Mentors in operations, corrective actions, and risk decision making).
- (6) Reviewed Organizational Health Index survey results, Nuclear Safety Culture Leadership Team and Monitoring Panel meeting minutes, Nuclear Safety Culture Advocate reports, and CAP subject matter expert assessment reports from 2016 through 2018.
- (7) Performed numerous walk-downs and independent field observations of the conduct of operations, in-progress training, and maintenance planning.
- (8) Observed site meetings associated with engineering reviews, work planning (multiple T-weeks), and daily/weekly production.
- (9) Reviewed procedures, procedure change requests and revisions, training presentations, case study presentations, training attendance records, critical decision making documents, what it looks like (WILL) sheets, backlog status reports, self-assessments, operating crew training performance and feedback records, final written and simulator examinations, operating crew event critiques, individual targeted performance improvement plans, coaching feedback records, work planning man-hour estimates, timesheets, critical and non-critical corrective and deficient backlog records, critical preventive maintenance deferred (and/or in grace) records, single-point and aging vulnerability assessments and records, and work orders.

INSPECTION RESULTS

Observation	92702
<p><u>CAL Items Closed</u> The team closed all of the following 45 CAL items (a narrative description of each item is listed in Enclosure 1 to the PNPS CAL (ADAMS Accession No. ML17214A088):</p> <ul style="list-style-type: none"> • Corrective Action Program (CAP) – 1.3 and 1.8 • Operations Standards and Site Leadership (OPS) – 1.1, 1.2, 1.4, 1.6, 1.7, 2.2, 3.1, 3.2, 4.1, 4.2, and 5.3 • Risk Recognition and Decision Making (RRDM) – 1.1, 1.2, 1.3, 2.1, 3.1, 3.2, 3.3, 4.8, and 4.9 • Procedure Quality (PQ) – 1.1 and 5.2 • Engineering Programs (EP) – 1.2, 2.1, 2.2, 2.3, 2.4, 3.1, and 4.1 • Equipment Reliability (ER) – 1.3, 2.1, 2.2, 3.1, 3.2, and 3.3 • Work Management (WM) – 1.1, 1.2, 1.3, 2.1, 2.2, 3.1, 3.3, and 4.2 <p><u>CAL Area Action Plan Summary Review</u> The inspectors concluded that the individual CAL items described above and the associated Area Action Plans were adequately completed and effective in achieving the associated performance improvement objectives described in the PNPS Recovery Plan.</p>	

Therefore, the following Area Action Plans listed in Enclosure 2 to the PNPS CAL are closed based on the reviews completed during this inspection:

- Operations Standards and Site Leadership (OPS)
- Risk Recognition and Decision Making (RRDM)
- Engineering Programs (EP)
- Equipment Reliability (ER)
- Work Management (WM)

Actions associated with the PQ and CAP Area Action Plans were reviewed during previous inspections and these Area Action Plans were held open because additional action and review was required as documented in NRC IR 05000293/2017010 (ADAMS Accession No. ML18032A463) and NRC IR 05000293/2018011 (ADAMS Accession No. ML18282A039). The basis for closure for these two Area Action Plans, considering the problems described in these reports, is described below:

- PQ Area Action Plan:
The inspectors determined that PNPS's WILL sheet revisions, PQ training presentation, and extent of condition corrective actions adequately corrected the problems the inspectors previously identified with PNPS implementation of PQ-1.1 and PQ-5.2 per NRC IR 05000293/2017010. Combined with the adequate completion of the other PQ Area Action Plan CAL items per NRC IR 05000293/2017010, the inspectors concluded that the PQ Area Action Plan was adequately completed and effective in achieving the associated performance improvement objectives described in the PNPS Recovery Plan.
- CAP Area Action Plan:
The inspectors concluded that based on the adequate completion of the CAP Area Action Plan CAL items documented in NRC IR 05000293/2018011 (ADAMS Accession No. ML18282A039)) and the results of safety culture assessment activities conducted during the onsite week of this inspection (described below), the CAP Area Action Plan was adequately completed and effective in achieving the associated performance improvement objectives described in the PNPS Recovery Plan.

Targeted Safety Culture Assessment

The inspectors conducted interviews and focus groups with 72 staff, first line supervisors, and managers, which represented about 14% of the workforce. The eight focus groups conducted were representative of the major departments at PNPS, including maintenance, operations, security, and engineering. The focus group discussions and interviews conducted as part of the scope of this inspection focused on the traits of a positive safety culture, with emphasis on leadership safety values and actions, problem identification and resolution, decision making, and work processes. Insights were also gathered by reviewing various subject matter expert reports, contractor-conducted surveys, and PNPS nuclear safety culture monitoring panel meeting minutes.

During the focus groups, PNPS staff indicated work management process changes had improved interdepartmental coordination and communication and had increased the recognition of the risk impact of planned work activities; while CAP changes had improved feedback to staff who initiate condition reports, increased the focus on taking timely action to correct safety concerns, and increased accountability at all levels of the organization for completing corrective actions.

The results of the focus group discussions indicated that most PNPS staff believe management places an appropriate level of emphasis on safety and makes conservative decisions that appropriately consider risk. PNPS staff also stated that they feel free to raise safety concerns without fear of retaliation and believe management would support stopping work to resolve safety concerns.

Based on the targeted scope of this assessment and the employee perceptions communicated during the interviews and focus groups, the inspectors noted a marked improvement in safety culture since the previous round of focus groups and interviews conducted in February 2017 and confirmed a sustained positive change in safety culture.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On September 14, 2018, the inspectors presented a debrief of the CAL follow-up inspection results to Mr. Brian Sullivan, Site Vice President and other members of PNPS staff.
- On October 17, 2018, inspectors conducted a telephonic exit meeting and presented the final results for the CAL follow-up inspection items documented in this report to Mr. Brian Sullivan, Site Vice President and other members of PNPS staff.

DOCUMENTS REVIEWEDCAL Item Closure Packages

CAP-1.3	RRDM-1.3	EP-4.1
CAP-1.8	RRDM-2.1	ER-1.3
OPS-1.1	RRDM-3.1	ER-2.1
OPS-1.2	RRDM-3.2	ER-2.2
OPS-1.4	RRDM-3.3	ER-3.1
OPS-1.6	RRDM-4.8	ER-3.2
OPS-1.7	RRDM-4.9	ER-3.3
OPS-2.2	PQ-1.1	WM-1.1
OPS-3.1	PQ-5.2	WM-1.2
OPS-3.2	EP-1.2	WM-1.3
OPS-4.1	EP-2.1	WM-2.1
OPS-4.2	EP-2.2	WM-2.2
OPS-5.3	EP-2.3	WM-3.1
RRDM-1.1	EP-2.4	WM-3.3
RRDM-1.2	EP-3.1	WM-4.2

Procedures

- 1.13.2, Vendor and Technical Information Review, Revision 1
- 1.3.142, Critical Decision Process, Revision 7
- 1.3.142, Critical Decision Process, Revision 8
- 1.3.142, PNPS Risk Review and Disposition, Revision 6
- 1.3.145, PNPS Recovery Procedure, Revision 3
- 1.3.145, PNPS Recovery Procedure, Revision 4
- 1.3.145, PNPS Recovery Procedure, Revision 5
- 1.3.34, Operations Administration Policies and Processes, Revision 162
- 1.4.80, PNPS Monthly Performance Review Meeting, Revision 0
- 2.1.14, Station Power Changes, Revision 120
- 3.M.3-47, Load Shed Relay Operational/Functional Test - Critical Maintenance, Revision 94
- 3.M.3-47.1, "A" Train Functional Test of Individual Load Shed Components - Critical Maintenance, Revision 41
- 3.M.3-47.2, "B" Train Functional Test of Individual Load Shed Components - Critical Maintenance, Revision 38
- 3.M.3-61.3, Emergency Diesel Generator Quarterly Preventative Maintenance – Critical Maintenance, Revision 32
- 3.M.4-14.2, Salt Service Water Pumps: Routine Maintenance, Revision 69
- 3.M.4-9, Inspection of the Drywell and Suppression Chamber, Revision 22
- 8.5.2.13, RHR Keepfill Valve Leak Test, Revision 8
- 8.9.8.4, 125 Vdc Station 650 Primary Battery Acceptance, Performance, or Service Test – Critical Maintenance, Revision 13
- 8.C.40, Seasonal Weather Surveillance, Revision 38
- 8.C.40, Seasonal Weather Surveillance, Revision 42
- 8.E.24, Heating, Ventilation, and Air Conditioning (HVAC) System "Q" Instrument Calibration and Functional Test, Revision 15
- 8.E.24, Heating, Ventilation, and Air Conditioning (HVAC) System "Q" Instrument Calibration and Functional Test, Revision 15
- 8.F.38.1, Diesel Generator Instrumentation Calibration and Functional Test – Critical Maintenance, Revision 47
- 8.I.11.3, Residual Heat Removal A Loop Valve Cold Shutdown Operability, Revision 10

8.M.2-2.10.12, HPCI High Water Trip Logic, Revision 22
 8.M.2-2.10.8.6, Diesel Generator "B" Initiation by Loss of Offsite Power Logic – Critical Maintenance, Revision 53
 EN-DC-329, Engineering Programs Control and Oversight, Revision 6
 EN-DC-351, Inservice Inspection Program, Revision 3
 EN-FAP-DC-003, Fleet Engineering Morning Call, Revision 16
 EN-FAP-OM-016, Performance Management Processes and Practices, Revision 9
 EN-FAP-OM-021, Critical Decision Procedure, Revision 6
 EN-FAP-OM-023, Entergy Nuclear Change Management, Revision 7
 EN-FAP-WM-002, Critical Evolutions, Revision 5
 EN-FAP-WM-011, Work Planning Standard, Revision 4
 EN-OP-115, Conduct of Operations, Revision 25
 EN-OP-116, Infrequently Performed Tests or Evolutions, Revision 14
 EN-OP-117, Operations Assessment Resources, Revision 14
 EN-WM-100, Work Request (WR) Generation, Screening and Classification, Revision 14
 EN-WM-101, Online Work Management Process, Revision 16
 EN-WM-104, On Line Risk Assessment, Revision 18

Audits/Self Assessments/Surveillances

CR-PNP-2016-09147 CA09, Project Plan for: Preventive Maintenance Program Improvements, Revision 1, 6/2017
 CR-PNP-2016-2054 CA-88, Final Effectiveness Review of Decision Making / Risk Recognition for July 2017 to April 2018, 05/18
 LO-PNPLO-2016-00039 CA-01, Pre-NRC Preventive Maintenance Program Implementation Self-Assessment, 12/16/2016
 LO-PNPLO-2016-0031, Perform Assessment of Core Business Expectations Execution, 6/16/2016
 LO-PNPLO-2016-0093, Snapshot Assessment Core Business Staffing, Man Hours, 9/28/2016
 LO-PNPLO-2018-0035, Focused Self-Assessment - Pre-NRC / Engineering Programs AAP
 LO-PNPLO-PNP-2016-00002 CA-21, Decision Making / Risk Recognition Fundamental Problem Area, CR-PNP-2016-2054 Effectiveness Review for January 2017 to July 2017, 8/25/17
 Pilgrim Periodic Maintenance Effectiveness Assessment, A Requirement of 10CFR50.65 (a)(3), Operating Cycle 21
 Pre-NRC / Risk Recognition & Decision-Making (RRDM) AAP Self-Assessment Report, 7/16/18

Condition Reports

CR-PNP-2014-01990	CR-PNP-2017-02785	CR-PNP-2017-12230
CR-PNP-2016-02054	CR-PNP-2017-05075	CR-PNP-2017-12299
CR-PNP-2016-02056	CR-PNP-2017-05861	CR-PNP-2018-00800
CR-PNP-2016-02057	CR-PNP-2017-09271	CR-PNP-2018-01734
CR-PNP-2016-02061	CR-PNP-2017-11505	CR-PNP-2018-02195
CR-PNP-2016-07115	CR-PNP-2017-11506	CR-PNP-2018-03017
CR-PNP-2016-07486	CR-PNP-2017-11989	CR-PNP-2018-03230
CR-PNP-2016-08957	CR-PNP-2017-12124*	CR-PNP-2018-03392
CR-PNP-2016-09147	CR-PNP-2017-12160	CR-PNP-2018-03531
CR-PNP-2016-09805	CR-PNP-2017-12166	CR-PNP-2018-03711
CR-PNP-2016-09844	CR-PNP-2017-12188	CR-PNP-2018-03881*
CR-PNP-2016-10130	CR-PNP-2017-12193	CR-PNP-2018-03943*
CR-PNP-2016-10148	CR-PNP-2017-12194	CR-PNP-2018-04204
CR-PNP-2017-00403	CR-PNP-2017-12212	CR-PNP-2018-04234

CR-PNP-2018-05156	CR-PNP-2018-06998	CR-PNP-2018-07299*
CR-PNP-2018-05401	CR-PNP-2018-07211*	CR-PNP-2018-07305*
CR-PNP-2018-05752	CR-PNP-2018-07234*	CR-PNP-2018-07311*
CR-PNP-2018-05887	CR-PNP-2018-07245*	CR-PNP-2018-07314*
CR-PNP-2018-05893	CR-PNP-2018-07257*	CR-PNP-2018-07337*
CR-PNP-2018-06160	CR-PNP-2018-07262*	CR-PNP-2018-07339*
CR-PNP-2018-06216	CR-PNP-2018-07262*	CR-PNP-2018-07340*
CR-PNP-2018-06309	CR-PNP-2018-07266*	CR-PNP-2018-07428*
CR-PNP-2018-06922	CR-PNP-2018-07271*	CR-PNP-2018-07493*
CR-PNP-2018-06964	CR-PNP-2018-07286*	

Work Orders

00013084	00466738	00485527	52649098
00092887	00466738	00490635	52649105
00259360	00467103	00490636	52653058
00286314	00467210	00490727	52653058
00313485	00468499	00490730	52662931
00313485	00468499	00490732	52662931
00329669	00471446	00490733	52664405
00329669	00473476	00490734	52676925
00403797	00474060	00491994	52696125
00403797	00475406	00491994	52696125
00412785	00475817	00496992	52696239
00427869	00475818	00497735	52696239
00443044	00475836	00504777	52711773
00443925	00477494	00507282	52790888
00448923	00479744	51531885	52800356
00459539	00479744	52374132	52814878
00461042	00484413	52580453	

Miscellaneous

2016 General Supervisor Training Plan
 2017 General Supervisor Training Plan
 2018 General Supervisor Training Plan
 Backlog Estimate Spreadsheet and Estimate Scope Summary Sheet
 Comprehensive Recovery Plan (CRP) Equipment Reliability Area Action Plan Closure Report,
 8/10/2018
 CR-PNP-2016-2061, Supervisor Workload Analysis Time Estimates for Recurring and Non-
 Recurring Tasks, 9/29/2016
 EC-73073, Marotta Scientific Controls Pressure Reducer Valves, Revision 3
 EC-72119, Evaluation of Acceptability of Level Selector Switch 640-302
 Entergy 3/16/2017 Fleet Memo, 3/16/2017
 Entergy Employee Handbook Achieving and Sustaining Excellence, 4/2018
 GBM22591, ABB Induced Voltage Test April 2017 Entergy Three Phase Transformer, Revision 1
 GSU Transformer Test Report, 5/2015 and 4/2017
 INPO 15-011, Principles for Excellence in Integrated Risk Management, Revision 0
 LO-PNPLO-2015-0020
 LO-PNPLO-2015-0097
 LO-PNPLO-2016-0002
 LO-PNPLO-2017-0009
 LO-PNPLO-2018-0034

LO-PNPLO-2018-0034
 LO-PNPLO-2018-0049
 Maintenance Backlog Performance Indicator May 2017 through August 2018
 Mentor Report of 01/15/18 to 02/15/18
 Mentor Report of 02/16/18 to 03/31/18
 Mentor Report of 04/01/18 to 05/15/18
 Mentor Report of 05/16/18 to 06/30/18
 Mentor Report of 09/24/16
 Mentor Report of 10/7/16
 Mentor Report of 11/30/16
 Mentor Report of April 2017
 Mentor Report of July 2017
 Mentor Report of May 2017
 Observation Database, March through August 2018
 OFM Meeting Observation 05/30/17
 One-on-One Spreadsheets, January through July 2018
 PCBT-ADM-PROCTECHREV2018, Procedure Quality Technical Review
 PDCR 81-38, HPCI/RCIC Self-Contained Type Pressure Regulating Valves, 10/14/1981
 Performance indicators for Scope Survival, Schedule Completion, and Critical Preventive
 Maintenance September 2017 through August 2018
 Pilgrim NSP Organization Chart, 9/12/2016
 Pilgrim Nuclear Power Plant Work Order Backlog, 8/28/2018
 Pilgrim Nuclear Power Station Comprehensive Recovery Plan, Revision 0
 Pilgrim Nuclear Safety Culture Performance Improvement Risk Recognition, Decision Making
 and Corrective Action Program, 9/9/2018
 PLP-ESPP-RISK2016, PNP 1.3.142 Risk Review & Disposition, Revision 1
 PLP-SUPC-DECISION RISK, Risk Recognition and Decision Making Leadership Training
 (2017) and Instructor Documents
 PM 50079951, 8.C.40 (Sec 8.1) Cold Weather Surv, 2017
 PM 50079953, 8.C.40 (Sec 8.3) Warm Weather Surv, 2017
 PNP-ENG-All, Email, "Engineering Document NE16-007, Assignment of Corrective Actions,"
 6/13/2016
 PNPS 95003 Recovery Metrics, 7/2018
 Procedure Quality Briefing Sheet, December 19, 2017, CR-2017, 21117, CA 6
 Q2-2017, Program Health Report, Pilgrim Nuclear Station, AOV (KPI) – Air Operated Valve
 Program
 Q2-2017, Program Health Report, Pilgrim Nuclear Station, APP-J (KPI) – Containment Leakage
 Rate and Testing Program (Appendix J)
 Q2-2017, Program Health Report, Pilgrim Nuclear Station, FAC – Flow Accelerated Corrosion
 Program
 Q2-2017, Program Health Report, Pilgrim Nuclear Station, ISI - Inservice Inspection Program
 (ASME Section XI)
 Q2-2017, Program Health Report, Pilgrim Nuclear Station, MOV (KPI) – Motor Operated Valve
 Program
 Q2-2018, Program Health Report, Pilgrim Nuclear Station, EQ (KPI) – Equipment Qualification
 Program
 Q2-2018, Program Health Report, Pilgrim Nuclear Station, ISI - Inservice Testing Program
 Q4-2017, Program Health Report, Pilgrim Nuclear Station, BPT (KPI) – Buried Piping and Tank
 Program
 Risk to generation work orders week of 2/26/2018
 Roster of Entergy Maintenance technicians 10/2017 and 9/2018

Scope Survival, Scope Completion, Critical PMs deferred, late, and in second half of grace,
January through August 2018
SEP-ISI-PNPS-002, PNPS Fifth Ten-Year Interval Inservice Inspection (ISI/IWE) Program Plan,
Revision 5
SES-2010-09, Simulator Scenario, Revision 4
SES-2014-03, Simulator Scenario, Revision 3
Supply and Demand Model for Maintenance Technicians, 2016 through 2018
SUT CCVT PM Evaluation, September 13, 2018
Targeted Performance Improvement Plans for 14 Managers and Supervisors
Technical Conscience Mentor Weekly Summary Report, Week Ending 2/2/2018
Technical Conscience Mentor Weekly Summary Report, Week Ending 2/9/2018
Technical Conscience Mentor Weekly Summary Report, Week Ending 8/11/2017
Technical Conscience Mentor Weekly Summary Report, Week Ending 8/4/2017
Template for 0705 Engineering Manager Meeting Agenda
Timesheets for contract technicians for the week of August 13, 2018
WT-WTPNP-2016-0207

Confirmatory Action Letter Item Status

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
1	Nuclear Safety Culture	NSC-1.1		
2	Nuclear Safety Culture	NSC-1.2		
3	Nuclear Safety Culture	NSC-1.3		
4	Nuclear Safety Culture	NSC-1.4		
5	Nuclear Safety Culture	NSC-1.5		
6	Nuclear Safety Culture	NSC-1.6		
7	Nuclear Safety Culture	NSC-1.7		
8	Nuclear Safety Culture	NSC-1.8		
9	Nuclear Safety Culture	NSC-1.10		
10	Nuclear Safety Culture	NSC-2.2		
11	Nuclear Safety Culture	NSC-2.3		
12	Nuclear Safety Culture	NSC-3.1		
13	Nuclear Safety Culture	NSC-3.2		
14	Nuclear Safety Culture	NSC-3.3		
15	Nuclear Safety Culture	NSC-3.4		
16	Nuclear Safety Culture	NSC-3.5		
17	Nuclear Safety Culture	NSC-3.6		
18	Nuclear Safety Culture	NSC-3.7		
19	Nuclear Safety Culture	NSC-3.8		
20	Nuclear Safety Culture	NSC-4.1		
21	Nuclear Safety Culture	NSC-4.2		
22	Nuclear Safety Culture	NSC-5.1		
23	Nuclear Safety Culture	NSC-5.2		
24	Nuclear Safety Culture	NSC-5.3		
25	Nuclear Safety Culture	NSC-5.4		
26	Nuclear Safety Culture	NSC-6.1		
27	Nuclear Safety Culture	NSC-7.1		
28	Nuclear Safety Culture	NSC-8.1		
29	Nuclear Safety Culture	NSC-8.6		
30	Nuclear Safety Culture	NSC-8.8		
31	Nuclear Safety Culture	NSC-8.9		
32	Nuclear Safety Culture	NSC-8.10		
33	Nuclear Safety Culture	NSC-8.21		
34	Nuclear Safety Culture	NSC-8.22		
35	Nuclear Safety Culture	NSC-8.25		
36	Nuclear Safety Culture	NSC-8.26		
37	Nuclear Safety Culture	NSC-8.27		
38	Nuclear Safety Culture	NSC-8.28		
39	Nuclear Safety Culture	NSC-8.29		
40	Corrective Action Program	CAP-1.1	05000293/2017010	Y
41	Corrective Action Program	CAP-1.2	05000293/2018011	Y

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
42	Corrective Action Program	CAP-1.3	Reviewed - 05000293/2018011 And 05000293/2018012	Y
43	Corrective Action Program	CAP-1.4	05000293/2018011	Y
44	Corrective Action Program	CAP-1.5	05000293/2018011	Y
45	Corrective Action Program	CAP-1.7	05000293/2018011	Y
46	Corrective Action Program	CAP-1.8	Reviewed - 05000293/2018011 And 05000293/2018012	Y
47	Corrective Action Program	CAP-1.9	05000293/2018011	Y
48	Corrective Action Program	CAP-1.10	05000293/2018011	Y
49	Corrective Action Program	CAP-1.11	05000293/2018011	Y
50	Corrective Action Program	CAP-2.1	05000293/2018011	Y
51	Corrective Action Program	CAP-2.2	05000293/2018011	Y
52	Corrective Action Program	CAP-2.3	05000293/2018011	Y
53	Corrective Action Program	CAP-3.1	05000293/2018011	Y
54	Corrective Action Program	CAP-3.2	05000293/2018011	Y
55	Corrective Action Program	CAP-4.2	05000293/2018011	Y
56	Corrective Action Program	CAP-4.3	05000293/2018011	Y
57	Procedure Use and Adherence	PUA-1.1	05000293/2017010	Y
58	Procedure Use and Adherence	PUA-1.2	05000293/2017010	Y
59	Procedure Use and Adherence	PUA-1.3	05000293/2017010	Y
60	Procedure Use and Adherence	PUA-1.4	05000293/2017010	Y
61	Procedure Use and Adherence	PUA-1.6	05000293/2018011	Y
62	Procedure Use and Adherence	PUA-2.2	05000293/2018011	Y
63	Procedure Use and Adherence	PUA-2.3	05000293/2018011	Y
64	Procedure Use and Adherence	PUA-2.4	05000293/2018011	Y
65	Procedure Use and Adherence	PUA-2.5	05000293/2018011	Y
66	Procedure Use and Adherence	PUA-3.1	05000293/2018011	Y
67	Procedure Use and Adherence	PUA-3.2	05000293/2018011	Y
68	Procedure Use and Adherence	PUA-3.3	05000293/2018011	Y
69	Procedure Use and Adherence	PUA-3.4	05000293/2018011	Y

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
70	Procedure Use and Adherence	PUA-4.1	05000293/2018011	Y
71	Procedure Use and Adherence	PUA-4.2	Reviewed - 05000293/2018011	N
72	Procedure Use and Adherence	PUA-4.3	05000293/2018011	Y
73	Procedure Use and Adherence	PUA-5.1	05000293/2018011	Y
74	Procedure Use and Adherence	PUA-5.2	05000293/2018011	Y
75	Procedure Use and Adherence	PUA-5.7	05000293/2018011	Y
76	Procedure Use and Adherence	PUA-5.8	05000293/2018011	Y
77	Procedure Use and Adherence	PUA-5.9	05000293/2018011	Y
78	Operability Determinations and Functionality Assessments	ODFA-1.1	05000293/2017010	Y
79	Operability Determinations and Functionality Assessments	ODFA-1.2	05000293/2018010	Y
80	Operability Determinations and Functionality Assessments	ODFA-1.3	05000293/2018010	Y
81	Operability Determinations and Functionality Assessments	ODFA-1.4	05000293/2018010	Y
82	Operability Determinations and Functionality Assessments	ODFA-1.5	05000293/2018010	Y
83	Operability Determinations and Functionality Assessments	ODFA-1.6	05000293/2018010	Y
84	Operability Determinations and Functionality Assessments	ODFA-2.2	05000293/2018010	Y
85	Operability Determinations and Functionality Assessments	ODFA-3.1	05000293/2018010	Y
86	Operability Determinations and Functionality Assessments	ODFA-5.1	05000293/2018010	Y

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87	Operability Determinations and Functionality Assessments	ODFA-5.2	05000293/2018010	Y
88	Operability Determinations and Functionality Assessments	ODFA-5.3	05000293/2018010	Y
89	Operability Determinations and Functionality Assessments	ODFA-5.4	05000293/2018010	Y
90	Operability Determinations and Functionality Assessments	ODFA-5.5	05000293/2018010	Y
91	Operability Determinations and Functionality Assessments	ODFA-5.6	05000293/2018010	Y
92	Operability Determinations and Functionality Assessments	ODFA-5.7	05000293/2018010	Y
93	Operability Determinations and Functionality Assessments	ODFA-5.8	05000293/2018010	Y
94	Operations Department Standards and Leadership	OPS-1.1	05000293/2018012	Y
95	Operations Department Standards and Leadership	OPS-1.2	05000293/2018012	Y
96	Operations Department Standards and Leadership	OPS-1.4	05000293/2018012	Y
97	Operations Department Standards and Leadership	OPS-1.6	05000293/2018012	Y
98	Operations Department Standards and Leadership	OPS-1.7	05000293/2018012	Y
99	Operations Department Standards and Leadership	OPS-2.2	05000293/2018012	Y
100	Operations Department Standards and Leadership	OPS-3.1	05000293/2018012	Y
101	Operations Department Standards and Leadership	OPS-3.2	05000293/2018012	Y
102	Operations Department Standards and Leadership	OPS-4.1	05000293/2018012	Y
103	Operations Department Standards and Leadership	OPS-4.2	05000293/2018012	Y
104	Risk Recognition and Decision Making	RRDM-1.1	05000293/2018012	Y

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105	Risk Recognition and Decision Making	RRDM-1.2	05000293/2018012	Y
106	Risk Recognition and Decision Making	RRDM-1.3	05000293/2018012	Y
107	Risk Recognition and Decision Making	RRDM-2.1	05000293/2018012	Y
108	Risk Recognition and Decision Making	RRDM-3.1	05000293/2018012	Y
109	Risk Recognition and Decision Making	RRDM-3.2	05000293/2018012	Y
110	Risk Recognition and Decision Making	RRDM-3.3	05000293/2018012	Y
111	Risk Recognition and Decision Making	RRDM-4.3	05000293/2018012	Y
112	Risk Recognition and Decision Making	RRDM-4.8	05000293/2018012	Y
113	Risk Recognition and Decision Making	RRDM-4.9	05000293/2018012	Y
114	Procedure Quality	PQ-1.1	Reviewed - 05000293/2017010 And 05000293/2018012	Y
115	Procedure Quality	PQ-2.1	05000293/2017010	Y
116	Procedure Quality	PQ-2.2	05000293/2017010	Y
117	Procedure Quality	PQ-3.1	05000293/2017010	Y
118	Procedure Quality	PQ-3.2	05000293/2017010	Y
119	Procedure Quality	PQ-3.3	05000293/2017010	Y
120	Procedure Quality	PQ-5.1	05000293/2017010	Y
121	Procedure Quality	PQ-5.2	Reviewed - 05000293/2017010 And 05000293/2018012	Y
122	SRV White Finding	SRV-1.1	05000293/2018010	Y
123	SRV White Finding	SRV-1.2	05000293/2018010	Y
124	SRV White Finding	SRV-1.3	05000293/2017010	Y
125	SRV White Finding	SRV-2.1	05000293/2017010	Y
126	SRV White Finding	SRV-3.1	05000293/2018010	Y
127	SRV White Finding	SRV-3.2	05000293/2018010	Y
128	SRV White Finding	SRV-3.3	05000293/2018010	Y
129	SRV White Finding	SRV-3.4	05000293/2018010	Y
130	SRV White Finding	SRV-4.1	05000293/2018010	Y
131	SRV White Finding	SRV-5.1	05000293/2018010	Y
132	SRV White Finding	SRV-5.2	05000293/2018010	Y
133	Engineering Programs	EP-1.1	05000293/2017010	Y
134	Engineering Programs	EP-1.2	05000293/2018012	Y
135	Engineering Programs	EP-2.1	05000293/2018012	Y
136	Engineering Programs	EP-2.2	05000293/2018012	Y
137	Engineering Programs	EP-2.3	05000293/2018012	Y

Line Item	Area Action Plan	CAL Item	Inspection Report Number	Closed
138	Engineering Programs	EP-2.4	05000293/2018012	Y
139	Engineering Programs	EP-3.1	05000293/2018012	Y
140	Engineering Programs	EP-4.1	05000293/2018012	Y
141	Equipment Reliability	ER-1.1	05000293/2017010	Y
142	Equipment Reliability	ER-1.2	05000293/2017010	Y
143	Equipment Reliability	ER-1.3	05000293/2018012	Y
144	Equipment Reliability	ER-2.1	05000293/2018012	Y
145	Equipment Reliability	ER-2.2	05000293/2018012	Y
146	Equipment Reliability	ER-3.1	05000293/2018012	Y
147	Equipment Reliability	ER-3.2	05000293/2018012	Y
148	Equipment Reliability	ER-3.3	05000293/2018012	Y
149	Work Management	WM-1.1	05000293/2018012	Y
150	Work Management	WM-1.2	05000293/2018012	Y
151	Work Management	WM-1.3	05000293/2018012	Y
152	Work Management	WM-2.1	05000293/2018012	Y
153	Work Management	WM-2.2	05000293/2018012	Y
154	Work Management	WM-3.1	05000293/2018012	Y
155	Work Management	WM-3.3	05000293/2018012	Y
156	Work Management	WM-4.2	05000293/2018012	Y