

**Submittal from Mike Fortini to the NDCAP
April 26, 2018**

As requested I have reviewed of the following documents:

- Regulatory Analysis for Regulatory Basis - dated January 2018 (Comments primarily focused on Section 4.4 - Role of External Stakeholders in Decommissioning)
- Regulatory Improvements for Power Reactors Transitioning to Decommissioning - dated November 20,2017 (Comments primarily focused on Section 5 - Stakeholder Involvement)

I adopted a different approach during my review as my Recommendations are focused on what I believe is required of the Licensee (Entergy) to promote a safety culture and support a productive and ongoing dialogue with the Stakeholders. Certainly Plymouth Residents as well as the Nuclear Decommissioning Advisory Panel (NDCAP) are, if not the most, two of the most critical Stakeholders associated with the Pilgrim Nuclear Plant Decommissioning Process.

Finding

The NRC in these documents recommends that the Licensee involved in Decommissioning Activities form a local community committee or other Advisory organizations.

Recommendation

In order to provide ongoing accurate and concise updates to the Stakeholders (NDCAP and others) a Site resident, experienced, professional, fully empowered Entergy Project Management/Project Controls, Engineering and Quality Control/Assurance Team, with clearly defined point of contact Management Roles, must be assigned for the entire Decommissioning duration. An Detailed Organization Chart should be provide by Entergy which identifies the role of each Key Site Manger as well as who they report to in Entergy Corporate. (Example: QA/QC Site Manager should not report to a Site Manger, but to the Corporate Chief Nuclear Officer.)

Recommendation

Due to likely turnover of support personnel it is imperative that ongoing Training and periodic Audits be conducted by the Quality Team to ensure the latest processes and procedures are being followed by all personnel. This must be given utmost priority to ensure a safe work environment for site personnel and the public.

Recommendation

A Lesson Learned document should be developed before Decommissioning commences based on Lessons Learned from other Plants which have or are being decommissioned. This is a living document which, to be effective, needs to be reviewed and updated during regularly scheduled meetings. An Entergy Manager needs to be assigned the overall responsibility for this document and to interface with and update Stakeholders of any issues as appropriate.

Recommendation

A Risk Register which lists all known/potential risks needs to be developed along with the actions required to mitigate them if they materialize. This should be a living document which should be reviewed and updated during a weekly meeting conducted by the responsible assigned Entergy Manager and the Site Team. Meetings should be conducted with Stakeholders as required when risks, which may have potential impact on the public, are identified.

Recommendation

An Overall Level 1 Schedule and a detailed Level 3 Schedule (Primavera or another robust scheduling Tool) should be developed which includes all Decommissioning Activities/Milestones and which has the capability to provide Schedule summary data to the various Stakeholders. In concert with the Schedule an Action Item Log is typically developed to track the progress/completion of critical path activities. A Project Controls Manager should be assigned to oversee and lead the update meetings and interface with Stakeholders.

General Comments:

Maintaining Plant Design Control Throughout Decommissioning

- A Nuclear Plant cannot go operational until the Plant as constructed has been verified against the Design Base Documents. As physical changes are made over the operating life of the Plant, these Design Base Documents must be updated to reflect the Plant as it is configured to continue operation. A Change Management Program must be in place to ensure continuous update of the Design Base Documents and physical Plant configuration throughout the Decommissioning Phase.

Dry Cask Concerns

- Ocean Dynamics are certainly factors in determining the location of Dry Casks for long term spent fuel storage. I offer, however, that equally important are Seismic Interaction concerns. The Safety Related Structures at a Nuclear Plant are Seismically Analyzed and Constructed. Not all Structures contain Safety Related equipment and therefore, are not typically required to meet the same Seismic Construction requirements. Therefore, I trust that Entergy is identifying any potential Seismic Interactions from these Structures/Buildings with the Dry Casks when determining the final location of all future Dry Casks.

Respectfully submitted, am available to discuss further if required.

Regards,

Mike Fortini