



PO Box 303
South Harwich, MA 02664
2016 January 10

Dear NRC Inspector Rodney Clagg and Special Inspection Team,

We want to extend to you a sincere welcome as you conduct your upcoming special inspection at the Pilgrim Nuclear Power Station in Plymouth during the week of January 11, 2016. Much is at stake. With the troubled Pilgrim assessed as one of the worst operating reactors in the country, closure can't wait until 2019; operations must cease immediately.

In his public statements, Governor Baker is relying on your team to predict the "shelf life" of the reactor in order to eke out its residual worth. He is confident that shutting down Pilgrim in advance of a storm will eliminate danger. That unprecedented path, as a routine, assumes you can make the right decision at the tipping point and then you can restart the reactor without another SCRAM. As you well know, Entergy experienced multiple shutdowns due to mechanical failures during restarts, one even after the 2015 six week refueling and maintenance work. The stress and strain on the aging reactor is putting people and our environment at risk. Our belief is there is no safe "shelf life" remaining and continued operation constitutes a clear and present danger to five million people in harm's way.

In micro and incriminating detail, the most recent inspections and visits by the NRC have documented a failed and dangerous nuclear reactor. It is poorly managed. The record shows that Entergy has aggressively resisted/ignored NRC oversight. There is no reclamation or renewal, only more precipitous danger.

To have a calamity prior to the 2019 closure with what is known and documented would constitute a crime against humanity. This sounds extreme, but it would not with hindsight examination and the recrimination to follow.

These are just some of the most critical and documented weaknesses that is felt to require your utmost attention as repeated failings that threaten public safety:

Failed Electric Switchyard

Our first 2015/16 winter storm is fast approaching. There are many questions related to the recurrent switch yard performance failures during typical severe winter weather conditions.

In previous correspondence with William Maurer of Falmouth, the NRC reported that "...Entergy has taken corrective action to enhance their storm procedures...". Exactly what are these improved corrective actions?

The NRC also stated, "Entergy also has plans to make switchyard physical improvements to help improve switchyard reliability during severe winter storms." Exactly what switchyard

physical improvements have been made since last winter's failures? What switchyard physical improvements are planned but yet to accomplished?

The NRC also stated, "In the interim, Entergy's storm procedures require a plant shutdown prior to severe winter storms such as Nemo and Juno." Exactly what are weather conditions that will trigger a precautionary shutdown? Exactly what are steps Entergy and NRC are taking in their evaluation of today's storm's severity and the switchyard's ability to perform successfully?

- Are Pilgrim's winter storm precautionary shutdowns mandatory by the NRC's regulatory oversight or discretionary to be determined solely by Entergy?
- When will Pilgrim's switchyard's performance ability be improved to reliably and successfully cope with the typical severe winter weather conditions it has recurrently failed to cope with since 1978 (and possibly/probably longer)?
- Does Entergy and the NRC plan to let Pilgrim's switchyard limp along a risk of failure during severe winter weather through 60 years of SAFSTOR or spend the large amount of money required as soon as possible to make the upgrades necessary for reliable and successful performance through typical severe winter weather conditions?

It is unconscionable that the previous owner, Boston Edison, now Entergy, the NRC, FEMA and MEMA have knowingly gambled with public safety without correcting Pilgrim's well known switchyard deficiencies for decades until concerned citizens uncovered the recurrent switchyard failure pattern and history after 2015 nor'easter Juno.

Upgrading the switchyard with precautionary shutdowns until repairs were completed should have been a no brainer for everyone involved a long time ago.

Had the situation deteriorated at Pilgrim during the Juno blizzard, evacuation would have been impossible for days. This is a significant deficiency in the generic Nuclear Preparedness Planning as applied to Pilgrim. Are the NRC and Entergy just realizing that blizzards are commonplace in the Northeast and that Pilgrim's switchyard facing a NE wind tunnel has recurrently failed during severe winter conditions? How do the NRC and Entergy justify their recurrent decisions to keep rolling the dice at Pilgrim during nor'easters and severe winter weather conditions?

Safety Relief Valves (SRVS)

With a history of failure, will they operate properly in the next SCRAM? In 2010, the flawed Rockwell Target 2 stage SRVs were removed because they were prone to leaking. Entergy replaced those with Rockwell Target 3 stage which failed to operate safely in the 2015 SCRAM. Now this failed SRV series is replaced with the previously discarded 2 stage SRVS. It is troubling that Entergy left SRVs that malfunctioned during the Nemo nor'easter February 8, 2013 in service for two years only to malfunction again on January 27, 2015 during the Juno nor'easter.

CAP (Corrective Action Plan) Process

In stark language, your inspections record the process is broken. A paper exercise only. Root cause is not determined adequately. Follow up is haphazard. Disturbing findings are minimized, and as a ploy, added to a list for future, indeterminate resolution. Entergy has closed CAP without implementing recommendations. This is a clear example of the hubris by Entergy shown to the NRC which appears ineffectual in regulating your own limited standards.

Fire Watch

Insure operation of fire watch duties at Pilgrim are verified and have been conducted. The control room is vulnerable. Have all the required electrical modifications been completed to insure fire safety? Entergy was recently found to have fraudulent documentation for 11 months at their Waterford plant concerning fire watch requirements . The plant managers were not held responsible but outside contractors are blamed as the usual suspects. That Entergy has a fire watch ongoing due to lack implementation of a regulatory mandate from 1992 is disturbing. Where was the NRC oversight?

Cyber Security

Pilgrim is out of compliance on cyber security, however, the NRC gave them a lifeline extension. Are sustained and required efforts underway to meet new deadlines, or has Entergy backed off their preparations with closure in 2019. There will be severe repercussions if Pilgrim is hacked.

Security Violations

Although the specifics were undisclosed to the public, security findings comment on pervasive, multi dimension failure across diverse cross sections and disciplines. Any concrete resolution?

Meteorological Towers

Are both meteorological towers fully functioning now to track releases? Have the towers been providing continuous data for production of the annual effluent report? After all the NRC findings, the Entergy refusal to maintain the towers is unforgivable. NRC forbearance is unexplainable where a federal law has been violated.

Annunciator System

Failure of the annunciator system on a reoccurring basis not addressed.

Talent Pool Drain

With notice of closure, are key personnel in exodus as operations and skill sets are compromised. What is caliber of new staff coming to a troubled plant without specific job site experience? Will a review of the personnel status predict even more instability?

There is no safe choice left.

In his 9.3.15 letter to Entergy, Governor Baker clearly delineates that Pilgrim should meet ‘the highest safety standards and that every aspect of its operations are in compliance with all of the rules and regulations of the NRC. We cannot risk the well being of the residents of the Commonwealth’. Your own multiple inspections identify ongoing failures in meeting NRC regulations. In fact, since the increased NRC oversight in 2014, the performance of Entergy has been an ongoing downward trend with the current status as one of the worst operating nuclear reactors in the country.

Given the failing inspections and poor assessments, the aging and degraded Pilgrim reactor continues to operate in the shadow of almost 5 million citizens expecting you, as mandated, to be working in their best interest. How do you expect Entergy to follow through with NRC recommendations when they have proven time and time again not to do so? The public has no confidence in Entergy nor the NRC as long as you allow Pilgrim to operate.

Finally, as a way to gain perspective, suppose that today Pilgrim Nuclear was applying for a nuclear license as a brand new operator and this plant was reconstituted with the existing 50/60s technology, a broken switchyard, flawed SRVs, and all the other issues enumerated above. Would you in good conscience issue a license to operate? Would you allow it? Not by any stretch of the Imagination. Shut Pilgrim down now before it is too late to act.

We petition you to be objective, decisive, and bold in your review.

We can only demand and expect that your team will fulfill their obligation to ensure public health and safety by a recommendation of this Special Inspection Team to close Pilgrim immediately.

For our communities in the Commonwealth,

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cc:

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