



February 2, 2015

Dear NRC Commissioners:

The blizzard "Juno" hit the East Coast and Plymouth, Massachusetts on Monday, January 26, 2015 and increased in intensity until it finally wound down on Wednesday, January 28th. This storm underlined many of the risks and problems associated with Entergy's Pilgrim Nuclear Power Station (Pilgrim). Pilgrim was forced to shut down on January 27th due to the loss of offsite power and according to the PRELIMINARY NOTIFICATION OF EVENT OR UNUSUAL OCCURRENCE (PNO-I-15-001), this scram with complications also included three additional failures:

1. The High Pressure Coolant Injection System had to be secured due to failure of the gland seal motor.
2. The station diesel air compressor failed to start.
3. One of the four safety relief valves could not be operated manually from the control room.

Pilgrim lost offsite power during the storm, requiring a switch to diesel powered back-up generators. Pilgrim also experienced problems sending outgoing power to the grid. From what we understand, the transmission lines that deliver power from Pilgrim to the grid froze during the storm and "arcing" occurred in Pilgrim's switchyard. While the cause of the arcing is still unclear, we do know that storm conditions especially wind-driven salt water could have been a factor.

We also question whether Pilgrim exceeded its "Design Basis" for flooding if storm-force waves and floodwater impacted the site during high tide. There were three high tide events during the storm, the worst of which occurred around 4:30AM, only a half-hour after Pilgrim shut down. This raises questions to whether flooding or waves impacted the switchyard, causing the arcing problem to occur. In addition to these problems, Pilgrim's High Pressure Coolant Injection (HPCI) system was also declared inoperable around 9:45AM on January 27th.

All of the problems experienced by Pilgrim during Juno coincide with your agency's recent decision to continue to rank Pilgrim in a degraded cornerstone category. In 2014 Pilgrim was placed in this category due to a variety of problems and unplanned shutdowns in 2013. Earlier this week on January 26th, your agency issued a new report stating that Pilgrim has "not provided the assurance level to fully meet all of the inspection objectives and have correspondingly determined that Pilgrim will remain in the Degraded Cornerstone of the Action Matrix by the assignment of two parallel White PI inspection findings." Even after a year of additional federal scrutiny and thousands of hours of inspection by NRC staff, Entergy still has not fixed the problems at Pilgrim and the plant remains one of the worst performers in the nation.

In that report, Pilgrim's switchyard and transmission system are identified as vulnerable to harsh weather, especially winter storms. Pilgrim had already experienced similar problems during past storms and Energy has yet to adequately address the problems. Given this, the NRC should have required Pilgrim to shut down as a preventive measure as Winter Storm Juno was forecast to hit the Plymouth area. On Monday, January 26th, five organizations representing thousands of citizens called for Pilgrim to be closed during the storm as a proactive measure, yet it was the storm itself that caused the scram and complications. While the NRC has already determined in the recent report that Entergy had not completed required corrective actions, this event proves the company is not above avoiding necessary updates for safety.

Had there been a need for implementing the emergency response plans, the Town of Plymouth and surrounding area roads were impassable with drifting snow several feet deep. It would have been impossible for any evacuation in these conditions.

Juno also highlighted problems with Entergy's proposed FLEX plan. This plan would require workers or the Plymouth fire department to drive along the shore, set up a portable pump and hose on the shoreline to pull water from Cape Cod Bay to manually cool the reactor and spent fuel pool in a station blackout event. Juno brought hurricane force wind gusts, heavy snow, white out conditions, frigid temperatures and very rough surf impacting the Pilgrim site. We don't believe Pilgrim's FLEX plan would have worked in an emergency situation during the storm let alone putting the lives of the flex plan operators at risk. Was the flex plan practiced during those conditions on January 27th?

If Pilgrim is allowed to come back online, it's clear that Entergy needs to be fully accountable to the public and produce an accurate and updated assessment of Pilgrim's risks to extreme weather conditions including intense wind, storm surge, very heavy snow and blizzard conditions.

The NRC should require Pilgrim to carry out this assessment immediately. We ask that you consider Jones River Watershed Association's Elevation Analysis (<http://jonesriver.org/pilgrim-elevation-analysis>) recently developed in conjunction with Northeastern Geospatial Research Professionals, Inc. The elevation analysis maps that were produced clearly show that our concerns are valid related to flooding and storm impacts on the Pilgrim site. It's important for the NRC to bear in mind that, while Juno was intense, it was not the worse storm or conditions capable of impacting our area. For example extreme high tides did not occur during the storm and Juno's high winds were gusts rather than sustained winds. If these conditions had occurred, it would likely have resulted in a far worse outcome for Pilgrim.

With all the problems that have plagued the Pilgrim facility over the years and especially the most current event this past week, we are urging the NRC to keep the Pilgrim reactor shut down and to strongly consider your mandate for public health and safety by not allowing this reactor to restart.

Thus, the undersigned groups request that the NRC not allow Pilgrim to restart since public safety cannot be assured.

Thank you,

Cape Downwinders/Pilgrim Coalition/Cape Cod Bay Watch/Concerned Neighbors of Plymouth

