



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 27, 2017

Ms. Pine duBois, Executive Director  
Jones River Watershed Association  
55 Landing Rd.  
Kingston, MA 02364

Dear Ms. duBois:

I am responding to your letter dated December 26, 2016,<sup>1</sup> to the U.S. Nuclear Regulatory Commission (NRC) regarding the Pilgrim Nuclear Power Station (Pilgrim). Specifically, your letter expresses concerns that the Pilgrim site and the nuclear waste storage area are at risk from flooding and storms. In your letter, you provided new aerial photographs taken of the Pilgrim site maps by Northeastern Geospatial Research Professionals (NGRP) that you indicated are recent and more accurate than those of the licensee. You requested that the NRC review the aerial photographs for potential coastal flooding and storm hazard concerns. You also urged the relocation of the nuclear waste storage area to a higher elevation, due to your concerns.

You refer to your previous letters dated January 18, 2016,<sup>2</sup> and February 29, 2016,<sup>3</sup> where you commented on the AREVA Flooding-Hazard Reevaluation Report regarding Pilgrim dated March 12, 2015,<sup>4</sup> submitted by Entergy Nuclear Operations, Inc. (Entergy, the licensee) in response to the NRC's letter dated March 12, 2012<sup>5</sup> (which was addressed to all power reactor licensees and holders of construction permits in active or deferred status). In your letters, you expressed concerns regarding Pilgrim's rainfall and sea level rise estimates provided in an analysis performed by AREVA on behalf of Entergy. In your February 29, 2016, letter, you provided updated Pilgrim site maps created by NGRP that you noted were based on more current light detection and ranging (LIDAR) information.

The NRC responded by letter dated May 4, 2016,<sup>6</sup> to your previous letters. In its May 4, 2016, letter, the NRC indicated that the NGRP maps you provided in your February 29, 2016, letter were forwarded to the appropriate NRC technical staff. Similarly, the information that you provided in your December 26, 2016, letter was also forwarded to the appropriate technical staff. The NRC staff reviewed the information you provided and determined that it does not change the NRC staff's conclusions documented in an August 4, 2016,<sup>7</sup> letter, which provides a summary of the staff's assessment of reevaluated flood-causing mechanisms.

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML17013A013

<sup>2</sup> ADAMS Package Accession No. ML16019A355

<sup>3</sup> ADAMS Accession No. ML16062A391

<sup>4</sup> ADAMS Accession No. ML15075A082

<sup>5</sup> ADAMS Accession No. ML12073A348

<sup>6</sup> ADAMS Accession No. ML16110A090

<sup>7</sup> ADAMS Package Accession No. ML16215A076

Regarding the concern expressed in your letter about future risk estimates for rainfall and sea level rise, the NRC staff recently issued a proposal to the Commission in SECY-16-0144, "Proposed Resolution of Remaining Tier 2 and 3 Recommendations Resulting from the Fukushima Dai-Ichi Accident," dated December 29, 2016,<sup>8</sup> to provide a process for continually assessing new information related to natural hazards. The process outlined in SECY-16-0144 includes augmenting existing technical coordination activities and partnering with Federal agencies such as the National Oceanic and Atmospheric Administration and the Federal Emergency Management Agency to ensure new information that could impact flood hazards at a nuclear power plant is properly assessed by the NRC, and if appropriate, additional regulatory actions are taken to ensure public health and safety. The Commission has yet to vote on the proposal.

In your December 26, 2016, letter, you also reiterated your concern regarding the storage of Pilgrim's dry spent fuel casks near the Cape Cod Bay. As indicated in the NRC letter dated May 4, 2016, the staff performed an evaluation of independent spent fuel storage installations, which is documented in SECY-15-0081, "Staff Evaluation of Applicability of Lessons Learned from the Fukushima Dai-Ichi Accident to Facilities Other than Operating Power Reactors," dated June 9, 2015.<sup>9</sup> The conservative evaluation documented in SECY-15-0081 considered scenarios for dry cask storage systems, such as those in use at Pilgrim, in either a fully submerged or partially submerged condition. The results of this evaluation concluded that adequate cooling of the spent fuel would be maintained such that no release from the dry cask storage system would occur.

I appreciate your correspondence on this matter. As always, the health and safety of the public are of paramount importance to the NRC, and we appreciate your interest in our mission. If you need additional information, please contact the Pilgrim project manager, Booma Venkataraman, at (301) 415-2934 or [Booma.Venkataraman@nrc.gov](mailto:Booma.Venkataraman@nrc.gov).

Sincerely,



Anne T. Boland, Director  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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<sup>8</sup> ADAMS Package Accession No. ML16286A586

<sup>9</sup> ADAMS Accession No. ML15050A066