



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

December 19, 2018

Mr. Brian R. 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 – ACCEPTANCE OF REQUESTED LICENSING ACTION RE: APPLICATION FOR ORDER CONSENTING TO DIRECT AND INDIRECT TRANSFERS OF CONTROL OF LICENSES AND APPROVING CONFORMING LICENSE AMENDMENT, AND REQUEST FOR EXEMPTION FROM 10 CFR 50.82(a)(8)(i)(A) (EPID L-2018-LLO-0003 AND L-2018-LLE-0020)**

Dear Mr. Sullivan:

By letter dated November 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18320A031), as supplemented by letter dated November 16, 2018 (ADAMS Accession ML18320A040), Entergy Nuclear Operations, Inc. (ENOI), on behalf of itself and Entergy Nuclear Generation Company (ENGCO) (to be known as Holtec Pilgrim, LLC), Holtec International (Holtec), and Holtec Decommissioning International, LLC (HDI) (together, "Applicants"), requested that the U.S. Nuclear Regulatory Commission (NRC) consent to: (1) the indirect transfer of control of the Renewed Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station (Pilgrim), as well as the general license for the Pilgrim Independent Spent Fuel Storage Installation (ISFSI) (collectively the "Licenses"), to Holtec; and (2) the direct transfer of ENOI's operating authority (i.e., its authority to conduct licensed activities at Pilgrim) to HDI. In addition, the Applicants requested that the NRC approve a conforming administrative amendment to the Licenses to reflect the proposed direct transfer of the Licenses from ENOI to HDI; a planned name change for ENGCO from ENGCO to Holtec Pilgrim, LLC; and deletion of certain license conditions to reflect satisfaction and termination of all ENGCO obligations after the license transfer and equity sale. In addition, HDI submitted an exemption request, as an enclosure to the letter dated November 16, 2018, to allow HDI to use of a portion of the nuclear decommissioning trust for spent fuel management and site restoration costs.

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this license transfer and exemption request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Sections 50.80 and 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), license transfer applications should include as much of the technical and financial qualifications information described in 10 CFR 50.33 and 50.34, and an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

In NUREG-1100, Volume 34, Revision 1, "Congressional Budget Justification Fiscal Year 2019," dated February 28, 2018 (ADAMS Accession No. ML18023B460), the target percentage of licensing actions completed in 1 year or less is 95 percent, and the target percentage of licensing actions completed in 2 years or less is 100 percent. For your information, the Vermont Yankee license transfer application was submitted in February 2017, and the NRC approved the Vermont Yankee license transfer application in October 2018, which is 20 months. The Applicants requested that the NRC complete its review of the Pilgrim license transfer application by May 31, 2019, which is approximately 6.5 months.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 380 hours to complete. The NRC staff expects to complete this review in approximately 12 months, which is December 2019. The NRC staff will endeavor to complete its review in 7 months, which is July 2019. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

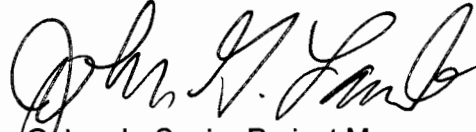
These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities.

B. Sullivan

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If you have any questions, please contact me at 301-415-3100 or via e-mail at [John.Lamb@nrc.gov](mailto:John.Lamb@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

John G. Lamb, Senior Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-293 and 72-1044

cc: Listserv

SUBJECT: PILGRIM NUCLEAR POWER STATION – ACCEPTANCE OF REQUESTED LICENSING ACTION RE: APPLICATION FOR ORDER CONSENTING TO DIRECT AND INDIRECT TRANSFERS OF CONTROL OF LICENSES AND APPROVING CONFORMING LICENSE AMENDMENT, AND REQUEST FOR EXEMPTION FROM 10 CFR 50.82(a)(8)(i)(A) (EPID. L-2018-LLO-0003 AND L-2018-LLE-0020) DATED DECEMBER 19, 2018

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**ADAMS Accession No.: ML18333A009****\*via email**

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LA*	NRR/DIRS/IRAB/BC*
NAME	JLamb	JBurkhardt	GBowman
DATE	11/29/2018	11/29/2018	12/11/2018
OFFICE	NMSS/DUWP/RDB/BC*	NRR/DORL/LSPB/BC	NRR/DORL/LSPB/PM
NAME	JParrot for BWatson	DBroaddus	JLamb
DATE	12/12/2018	12/18/2018	12/19/2018

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