



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

December 17, 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 – APPLICATION FOR APPROVAL OF  
TRANSFER OF LICENSE AND CONFORMING AMENDMENT  
(EPID L-2018-LLO-0003)

Dear Mr. Sullivan:

By letter dated November 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18320A031), 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.

By letter dated November 16, 2018 (ADAMS Accession No. ML18320A040), HDI submitted a "Notification of Revised Post-Shutdown Decommissioning Activities Report and Revised Site-Specific Decommissioning Cost Estimate for Pilgrim Nuclear Power Station."

The regulation under Section 50.82(a)(4)(i) of Title 10 of the *Code of Federal Regulations* (10 CFR) states:

Prior to or within 2 years following permanent cessation of operations, the *licensee* [emphasis added] shall submit a post-shutdown decommissioning activities report (PSDAR) to the NRC, and a copy to the affected State(s). The PSDAR must contain a description of the planned decommissioning activities along with a schedule for their accomplishment, a discussion that provides the reasons for concluding that the environmental impacts associated with site-specific decommissioning activities will be bounded by appropriate previously issued environmental impact statements, and a site-specific DCE [decommissioning cost estimate], including the projected cost of managing irradiated fuel.

Pursuant to 10 CFR 50.82(a)(4)(i), ENOI, the licensee for Pilgrim, submitted the PSDAR for the SAFSTOR (deferred dismantlement) method by letter dated November 16, 2018 (ADAMS Accession No. ML18320A034).

The regulation under 10 CFR 50.82(a)(7) states:

In taking actions permitted under [10 CFR] 50.59 following submittal of the PSDAR, the *licensee* [emphasis added] shall notify the NRC, in writing and send a copy to the affected State(s), before performing any decommissioning activity inconsistent with, or making any significant schedule change from, those actions and schedules described in the PSDAR, including changes that significantly increase the decommissioning cost.

In its letter dated November 16, 2018, HDI stated, in part:

Pursuant to 10 CFR 50.82(a)(7), HDI is submitting the enclosed Revised Post-Shutdown Decommissioning Activities Report (DECON PSDAR) to notify the NRC of changes to accelerate the schedule for the prompt decommissioning of [Pilgrim] and unrestricted release of all portions of the site (excluding the ISFSI) within eight (8) years after license transfer, if the [license transfer application] is approved.


...

This DECON PSDAR is contingent upon NRC approval of the [license transfer application] LTA, completion of transfer of the licenses and asset sale closure.

Consistent with the above regulations, the NRC staff is treating the HDI PSDAR submittal dated November 16, 2018, as a supplement to the Pilgrim license transfer application dated November 16, 2018, until such time as the NRC makes a regulatory decision regarding the Pilgrim license transfer application.

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", is written over a horizontal line.

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 – APPLICATION FOR APPROVAL OF  
TRANSFER OF LICENSE AND CONFORMING AMENDMENT  
(EPID NO. L-2018-LLO-0003) DATED DECEMBER 17, 2018

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ASnyder, NMSS

**ADAMS Accession No. ML18333A240****\*via email**

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