

# PUBLIC SUBMISSION

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**Docket:** NRC-2018-0279

Pilgrim Nuclear Power Station; Consideration of Approval of Transfer of License and Conforming Amendment

**Comment On:** NRC-2018-0279-0001

Pilgrim Nuclear Power Station; Consideration of Approval of Transfer of License and Conforming Amendment

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## Submitter Information

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## General Comment

Holtec International recently received violations for inadequate design control and incorrect implementation of the 10 CFR 72.48 rule. Two of these violations are being considered for escalated enforcement. During the pre-decisional enforcement conference held on January 9, 2019 Holtec's presentation was an attempt to insult, deceive and confuse the NRC, displayed a lack of understanding of the seriousness of the violations, and demonstrated a dismissive, cavalier attitude toward regulatory compliance. In addition, the completeness and accuracy of information presented is questionable. Holtec has demonstrated that they would be unable to fulfil their obligation to faithfully comply with all of the NRC's regulations as a Part 50 licensee and their Quality Assurance and training programs have significant programmatic deficiencies in their implementation. No action should be taken on this license transfer request until these violations are finally dispositioned and any investigation of the completeness and truthfulness of the written and oral information from the 1/9/19 PEC has been completed by the NRC.