



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

October 28, 2019

Ms. Pamela B. Cowan
Senior Vice President
and Chief Operating Officer
Holtec Decommissioning International, LLC
Krishna P. Singh Technology Campus
1 Holtec Blvd.
Camden NJ 08104

SUBJECT: PILGRIM NUCLEAR POWER STATION – REVIEW OF POST-SHUTDOWN
DECOMMISSIONING ACTIVITIES REPORT (EPID L-2018-LLL-0031)

Dear Ms. Cowan:

The purpose of this letter is to inform you that the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff has completed its review of the post-shutdown decommissioning activities report (PSDAR) for Pilgrim Nuclear Power Station (Pilgrim) and finds that it contains the information required by Section 50.82(a)(4)(i) of Title 10 of the *Code of Federal Regulations* (10 CFR).

10 CFR 50.82(a)(4)(i) 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.

By letter dated November 16, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18320A034), as supplemented by letter dated January 9, 2019 (ADAMS Accession No. ML19015A020), Entergy Nuclear Operations, Inc. (ENOI), the licensee at the time for Pilgrim, submitted to the NRC the PSDAR (ENOI PSDAR), including the site-specific DCE, for Pilgrim, pursuant to 10 CFR 50.82(a)(4)(i).

10 CFR 50.82(a)(5) states:

Licensees shall not perform any major decommissioning activities, as defined in [10 CFR] 50.2, until 90 days after the NRC has received the licensee's PSDAR submittal and until certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel, as required under [10 CFR] 50.82(a)(1), have been submitted.

By letter dated June 10, 2019 (ADAMS Accession No. ML19161A033), ENOI submitted to the NRC a certification in accordance with 10 CFR 50.82(a)(1), stating that Pilgrim permanently ceased power operations on May 31, 2019, and that as of June 9, 2019, all fuel had been permanently removed from the Pilgrim reactor vessel and placed in the Pilgrim spent fuel pool. Accordingly, pursuant to 10 CFR 50.82(a)(2), the Pilgrim renewed facility operating license no longer authorizes operation of the reactor or emplacement or retention of fuel in the reactor vessel. Further, consistent with 10 CFR 50.82(a)(5), 90 days had passed before any major decommissioning activities were performed.

By letter dated November 16, 2018 (ADAMS Accession No. ML18320A031), ENOI, on behalf of itself and Entergy Nuclear Generation Company (ENGEC) (to be known as Holtec Pilgrim, LLC), Holtec International (Holtec), and Holtec Decommissioning International, LLC (HDI) (together, "Applicants"), requested that the NRC consent to: (1) the direct transfer of control of Renewed Facility Operating License No. DPR-35 for Pilgrim, as well as the general license for the Pilgrim Independent Spent Fuel Storage Installation (ISFSI) (collectively the "Licenses"), from ENOI to HDI; and (2) the indirect transfer of the Licenses to Holtec. 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 ENGEC from ENGEC to Holtec Pilgrim, LLC; and deletion of certain license conditions to reflect satisfaction and termination of all ENGEC 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" (HDI Revised PSDAR). However, given that the NRC had not yet made a decision on the Pilgrim license transfer application, on December 17, 2018 (ADAMS Accession No. ML18333A240), the NRC staff stated that the HDI Revised PSDAR submittal dated November 16, 2018, would be treated as a supplement to the license transfer application, until such time as the NRC makes a regulatory decision regarding the Pilgrim license transfer application.

Consistent with 10 CFR 50.82(a)(4)(ii), the public was offered opportunities to comment on the ENOI PSDAR as well as on the HDI Revised PSDAR. A notice of receipt of the ENOI PSDAR was published in the *Federal Register* on December 21, 2018 (83 FR 65760). The NRC staff requested that all comments be submitted by March 21, 2019. Comments that were submitted electronically can be viewed at www.regulations.gov, by searching on Docket ID NRC-2018-0286 and selecting "Open Docket Folder." Because the HDI Revised PSDAR was considered a supplement to the Pilgrim license transfer application, the NRC staff received public comments on the HDI Revised PSDAR as part of the license transfer application. On January 31, 2019, the NRC staff published in the *Federal Register* (84 FR 816) a notice of receipt of the Pilgrim license transfer application, including the HDI Revised PSDAR. This notice included an opportunity for comment and an opportunity to request a hearing on the license transfer application. The NRC staff requested that all comments be submitted by March 4, 2019. Comments that were submitted electronically can be viewed at www.regulations.gov, by searching on Docket ID NRC-2018-0279 and selecting "Open Docket Folder."

Additionally, pursuant to 10 CFR 50.82(a)(4)(ii), the NRC staff held a public meeting at Hotel 1620 in Plymouth, Massachusetts, on January 15, 2019, to describe the decommissioning process, receive comments, and answer questions regarding both the ENOI PSDAR and the HDI Revised PSDAR. A summary of the meeting, dated January 30, 2019, can be found at ADAMS Accession No. ML19017A173. Public questions and comments on both PSDARs and

other areas related to the site's decommissioning, including the NRC staff's responses, are available for review in the transcript of the meeting (ADAMS Accession No. ML19031B825).

10 CFR 50.82(a)(7) states:

In taking actions permitted under [10 CFR] 50.59 following submittal of the PSDAR, the licensee 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.

By Order dated August 22, 2019 (ADAMS Accession No. ML19170A265), the NRC approved the direct and indirect transfers requested in the November 16, 2018, Pilgrim license transfer application. On August 26, 2019, ENOI informed the NRC that the transaction closed on August 26, 2019 (ADAMS Accession No. ML19239A037). On August 27, 2019 (ADAMS Accession No. ML19235A050), the NRC issued Amendment No. 249 to Renewed Facility Operating License No. DPR-35 for Pilgrim. Accordingly, HDI is now the licensed operator for decommissioning at Pilgrim and Holtec Pilgrim, LLC is now the licensed owner of the site (hereinafter HDI and Holtec Pilgrim, LLC are collectively referred to as the licensee). As such, pursuant to 10 CFR 50.82(a)(7), the NRC recognizes the HDI Revised PSDAR as Pilgrim's current PSDAR.

The purposes of a PSDAR and DCE are to: (1) inform the public of the licensees' planned decommissioning activities, (2) assist in the scheduling of NRC resources necessary for the appropriate oversight activities, (3) ensure that the licensee has considered all of the costs of the planned decommissioning activities and has considered the funding for the decommissioning process, and (4) ensure that the environmental impacts of the planned decommissioning activities are bounded by those considered in existing environmental impact statements.

Pursuant to 10 CFR 50.82(a)(4)(i), 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, including the projected cost of managing irradiated fuel. Additionally, pursuant to 10 CFR 50.82(a)(3), decommissioning is to be completed within 60 years of permanent cessation of operations. The regulations do not require the NRC to approve a licensee's submitted PSDAR.

Public comments from the meeting and in response to the *Federal Register* notices (83 FR 65760 and 84 FR 816) generally fell into two categories: (1) questions and comments that are within the regulatory purview of the NRC staff's review of a PSDAR, and, thus, were considered by the NRC staff during its review, and (2) questions and comments that, upon review, were found to be outside the regulatory authority of the NRC, or were not relevant to the review performed by the NRC staff (i.e., whether the licensee's PSDAR meets the requirements of 10 CFR 50.82(a)(4)(i)) and, thus, were not considered.

The public questions and comments that the NRC staff considered during its review of both the ENOI PSDAR and the HDI Revised PSDAR are summarized below. Details of the specific questions or comments can be found in the documents referenced above.

- Questions or comments about the use of decommissioning trust fund (DTF) resources for expenses other than those defined in 10 CFR 50.2, as well as comments about the NRC being certain that there will be enough funds to decommission Pilgrim and manage spent fuel until it is removed by the U.S. Department of Energy.
- Questions or comments about maintaining an offsite emergency plan until all spent fuel is placed in dry casks.
- Questions or comments about whether onsite dry cask storage canisters are safe, robust, and above the flood line.
- Questions or comments about moving the spent fuel to a permanent repository.
- Questions or comments about the decontamination of Pilgrim under the DECON method of decommissioning (i.e., immediate dismantling), as opposed to the SAFSTOR method of decommissioning (i.e., deferred dismantling).
- Questions or comments about the content of the Generic Environmental Impact Statement and Supplemental Environmental Impact Statement for Pilgrim.

Public comments or questions that, upon review, were found to be outside of the NRC's regulatory purview or outside the scope of the NRC staff's review of a PSDAR, as defined in 10 CFR 50.82(a)(4)(i), are summarized below.

- Questions or comments about whether the current dry cask storage canisters can be monitored, inspected, or repaired.
- Questions or comments about the need for a decommissioning citizen oversight panel.
- Questions or comments about aging management issues associated with concrete and spent fuel casks.
- Questions or comments about how the armed security force will maintain the security for the site; specifically, the ISFSI.
- Questions or comments about cybersecurity.
- Questions or comments about grid stability or grid diversity.

The NRC staff's review process of a PSDAR does not require a response to each of the comments submitted. However, the NRC staff identified a number of similar in-scope comments that pertained to the same topic. Generic responses related to some of the topics are addressed below.

- With respect to license transfer comments, the NRC staff notes that consistent with 10 CFR 50.80, after appropriate notice to interested persons, the Commission will

approve the transfer if it determines that the proposed transferee is qualified to be the holder of the license and that transfer of the license is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto.

- With respect to decommissioning funding and expense comments, the NRC staff notes that regulations require licensees in decommissioning to annually report on the status of funds put aside to cover the cost of decommissioning. Such financial assurance status reports must include additional financial assurance to cover any shortfalls. The NRC staff independently analyzes these reports to determine whether the agency has reasonable assurance that the licensees are providing sufficient funding to complete radiological decommissioning.
- With respect to decommissioning methodology comments, the NRC staff notes that the decommissioning approach that HDI selected for Pilgrim is the DECON method.

Under the DECON method, after the plant is permanently shut down and defueled, the equipment, structures, and portions of the facility and site that contain radioactive contaminants are promptly removed or decontaminated to a level that permits termination of the license shortly after cessation of operations

The NRC has strict rules governing nuclear power plant decommissioning, involving cleanup of radioactively contaminated plant systems and structures, and removal of the radioactive fuel. These requirements protect workers and the public during the entire decommissioning process and the public after the license is terminated.

In addition, 10 CFR 50.82(a)(3) requires decommissioning to be completed within 60 years of permanent cessation of operations

- With respect to comments related to concerns about the safety of the plant during decommissioning, the NRC staff notes that the NRC maintains inspection activities at decommissioning power plants in accordance with Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program" (ADAMS Accession No. ML17348A400).

The objectives of IMC 2561 are:

- To obtain information through direct observation and verification of licensee activities to determine whether the power reactor is being decommissioned safely, that spent fuel is safely and securely stored onsite or transferred to another licensed location, and that site operations and license termination activities are in conformance with applicable regulatory requirements, the facility licensing basis, licensee commitments, and management controls;
- To verify that (1) the licensee's procedures, processes, and programs for post-operational transition, decommissioning, and license termination are adequate; (2) necessary programs continue from the period of operation into decommissioning in accordance with the applicable regulatory requirements; and (3) the safety culture established during reactor operations is maintained. These decommissioning programs are assessed by inspection of four functional areas:

plant status; modifications, maintenance, and surveillances; problem identification and resolution; and radiation protection;

- To identify declining trends in performance and perform inspections to verify that the licensee has resolved the issue(s) before performance declines below an acceptable level; and
 - To provide for effective allocation of resources for the inspection of nuclear power reactors following permanent cessation of operations.
- With respect to comments related to the funding of offsite emergency preparedness, the NRC staff notes that there is no NRC requirement for a licensee to provide funding to a State and that this is considered a matter between each individual licensee and State.
 - With respect to ISFSI comments, the NRC staff notes that the NRC has authorized the storage of spent nuclear fuel at an ISFSI under a general license for Pilgrim. The general license authorizes the licensee to store spent fuel in NRC-approved casks at Pilgrim.

The licensee is required to perform evaluations of Pilgrim to demonstrate that the site is adequate for storing spent fuel in dry casks. These evaluations must show that the cask Certificate of Compliance conditions and technical specifications can be met, including analysis of earthquake events and tornado missiles. The licensee must also review its security program, emergency plan, quality assurance program, training program, and radiation protection program, and make any necessary changes to incorporate the ISFSI at its reactor site.

An NRC-approved cask is one that has undergone a technical review of its safety aspects and been found to be adequate to store spent fuel at a site that has been evaluated by the licensee to meet all of the NRC's requirements in 10 CFR Part 72.

The NRC issues a Certificate of Compliance for a cask design to a cask vendor if the review of the design finds that it is technically adequate. The cask certificate is valid for up to 40 years from the date of issuance.

- With respect to long-term environmental monitoring comments, the NRC staff notes that the radiological environmental monitoring program that was in place at Pilgrim will continue after permanent shut down. The program will be modified to appropriately monitor the types of releases that may occur during decommissioning and to monitor results at appropriate intervals. Not all measurements will be made on a continuous basis. The licensee uses the results of the environmental monitoring program to calculate the dose to the public. The licensee follows a procedure that is in the licensee's "Offsite Dose Calculation Manual."

The NRC staff reviewed the HDI Revised PSDAR and DCE against the requirements in 10 CFR 50.82(a). In addition, the NRC staff used the guidance in Regulatory Guide (RG) 1.185, Revision 1, "Standard Format and Content for Post-Shutdown Decommissioning Activities

Report,” dated June 2013 (ADAMS Accession No. ML13140A038), in conducting its review and concludes the following:

1. Section 2 of the HDI Revised PSDAR, “Description of Planned Decommissioning Activities,” and the DCE provide the applicable information identified in Section C.1 of RG 1.185, Revision 1. The NRC staff’s review found that the licensee adequately described the activities associated with the major periods or milestones related to the decommissioning, as required by 10 CFR 50.82(a)(4)(i) and consistent with RG 1.185, Revision 1. As described in NUREG/CR-6174, “Revised Analyses of Decommissioning for the Reference Boiling Water Reactor Power Station,” dated July 1996 (ADAMS Accession No. ML14008A186), these periods include Pre-Decommissioning Planning and Preparation, Plant Deactivation, Safe Storage Operations, and Dismantlement.
2. Section 3 of the HDI Revised PSDAR, “Schedule of Planned Decommissioning Activities,” and the DCE provide the estimated dates for initiation and completion of major decommissioning activities, as required by 10 CFR 50.82(a)(4)(i) and consistent with Section C.2 of RG 1.185, Revision 1. The NRC staff finds that the schedule for decommissioning activities is adequate to achieve Pilgrim license termination within 60 years of permanent cessation of operations, as required by 10 CFR 50.82(a)(3).
3. Section 4 of the HDI Revised PSDAR, “Estimate of Expected Decommissioning and Spent Fuel Management Costs,” and the DCE provide an estimate of the expected decommissioning costs for Pilgrim. In the ENOI PSDAR, ENOI reported a DTF balance of \$1,051,722,466 as of October 31, 2018. In the March 28, 2019, decommissioning funding status report for Pilgrim (ADAMS Accession No. ML19087A318), ENOI reported an updated DTF balance of approximately \$1.028 billion as of December 31, 2018, and approximately \$1.043 billion as of February 28, 2019. The trustee for the DTF is the Bank of New York Mellon. In the March 28, 2019, report, ENOI also reported that the 10 CFR 50.75(c) minimum formula amount for Pilgrim as of December 31, 2018, was \$633,267,558. Using the formula in 10 CFR 50.75(c) and the methodology provided in NUREG-1713, “Standard Review Plan for Decommissioning Cost Estimates for Nuclear Power Reactors,” dated December 2004 (ADAMS Accession No. ML043510113), and NUREG-1307, Revision 17, “Report on Waste Burial Charges: Changes in Decommissioning Waste Disposal Costs at Low-Level Waste Burial Facilities,” dated February 2019 (ADAMS Accession No. ML19037A405), the NRC staff independently confirmed the minimum formula amount to be \$633,267,558.

In its evaluation of HDI’s site-specific DCE, the NRC staff noted that the DCE relies on estimated Pilgrim site-specific radiological decommissioning costs of \$592,553,000, which is lower than the 10 CFR 50.75(c) minimum formula amount of \$633,267,558. By letter dated July 29, 2019 (ADAMS Accession No. ML19210E470), HDI provided justification for using a total site-specific radiological decommissioning cost estimate value that is less than the minimum formula amount. Overall, according to HDI, using the DECON decommissioning approach, the estimated radiological decommissioning cost of Pilgrim is approximately \$593 million (in 2018 dollars), the estimated spent fuel management cost is approximately \$501 million (in 2018 dollars), and the estimated site restoration cost of Pilgrim is approximately \$40 million (in 2018 dollars).

As discussed in the safety evaluation report (ADAMS Accession No. ML19170A250) supporting the August 22, 2019 license transfer Order, during its review, the NRC staff compared the Pilgrim site-specific radiological decommissioning costs with the estimated

activities of the four periods associated with the DECON decommissioning method as outlined in NUREG/CR-6174. The NRC staff concluded that HDI's method for developing the Pilgrim site-specific radiological decommissioning cost estimate, as compared to NUREG/CR-6174, was reasonable.

As part of its review of the HDI Revised PSDAR, the NRC staff reviewed the cost estimates against the guidance in RG 1.185, Revision 1, Section C.3 and found that HDI's site-specific DCE and spent fuel management estimate for Pilgrim are reasonable, are described consistent with the guidance in RG 1.185, Revision 1, provide sufficient details associated with the funding mechanisms, and meet the requirements of 10 CFR 50.82(a)(4)(i).

As required by 10 CFR 50.82(a)(7), HDI must notify the NRC in writing and send a copy to the Commonwealth of Massachusetts before performing any decommissioning activity inconsistent with, or making any significant schedule change from, the planned decommissioning activities and schedules described in the HDI Revised PSDAR, including changes that significantly increase the decommissioning costs. As required, HDI will verify that the decommissioning activities meet the requirements of 10 CFR 50.82(a)(6)(i) through 10 CFR 50.82(a)(6)(iii) or seek appropriate regulatory approval if needed. Finally, consistent with 10 CFR 50.82(a)(8), HDI will annually submit to the NRC financial assurance status reports, which, among other things, must include additional financial assurance to cover any shortfalls.

4. Section 5 of the HDI Revised PSDAR, "Environmental Impacts," provides a discussion of the potential environmental impacts associated with the planned Pilgrim decommissioning activities, as required by 10 CFR 50.82(a)(4)(i) and consistent with Section C.4 of RG 1.185, Revision 1. The HDI Revised PSDAR includes a comparison of the potential environmental impacts from the planned Pilgrim decommissioning activities with impacts from similar activities provided in NUREG-0586, Supplement 1, "Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities," November 2002, Volumes 1 and 2 (ADAMS Accession Nos. ML023470327 and ML023500228, respectively) (Decommissioning GEIS). A licensee in decommissioning is required to address the environmental impacts associated with site-specific decommissioning activities in both its PSDAR per 10 CFR 50.82(a)(4)(i) and before performing the decommissioning activities per 10 CFR 50.82(a)(6).

The environmental impacts associated with decommissioning activities are generically evaluated in the Decommissioning GEIS. The Decommissioning GEIS provides the significance of these decommissioning environmental impacts (i.e., SMALL, MODERATE, or LARGE) and the applicability of these impacts (i.e., generic or site-specific). For environmental impacts that the Decommissioning GEIS classifies as generic, these impacts are bounded by the generic evaluation in the Decommissioning GEIS and a licensee can rely on the information in the Decommissioning GEIS as a basis for meeting the decommissioning environmental requirement. For environmental impacts that the Decommissioning GEIS classifies as site-specific, or for decommissioning activities that could exceed the generic environmental impacts analyzed by the Decommissioning GEIS, the licensee cannot rely on the Decommissioning GEIS. The Decommissioning GEIS identifies threatened and endangered species and environmental justice as environmental impacts that must be evaluated on a site-specific basis.

In the HDI Revised PSDAR, HDI provided a summary of the reasons for reaching the conclusion that the environmental impacts of decommissioning Pilgrim are bounded by the Decommissioning GEIS and by NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 29, Regarding Pilgrim Nuclear Power Station," July 2007 (ADAMS Accession No. ML071990020) (SEIS). HDI also stated that when evaluating whether the impacts in previously issued environmental impact statements were bounding, information from the evaluation provided in the ENOI PSDAR was considered.

Additionally, as discussed in HDI Revised PSDAR Section 5.1.7, HDI conducted a site-specific assessment for threatened and endangered species for Pilgrim. Based on this evaluation, HDI does not anticipate that the planned decommissioning activities at Pilgrim would encroach on the habitat of any State or Federally-listed terrestrial species. However, in the future, when Pilgrim decommissioning activities, such as demolition or disturbance of land areas, that could affect a protected species have been finally determined and scheduled, HDI will update the site-specific assessment of environmental impacts to protected species in the HDI Revised PSDAR. HDI also recognized that, although Pilgrim is a typical mid-20th century light-water reactor, it may be of historic interest at the State or local level. However, the licensee stated that there has been no Historic American Buildings Survey or Historic American Engineering Record documentation of Pilgrim and no requests from the Massachusetts Historical Commission or other agencies to conduct this survey or documentation.

The incremental environmental impacts associated with decommissioning activities resulting from continued plant operation during the renewal term are discussed in the SEIS. The SEIS includes a determination of whether the analysis of the environmental issue could be applied to all plants and whether additional mitigation measures would be warranted. Issues are assigned a Category 1 or a Category 2 designation. As stated in the SEIS, Category 1 issues are those that meet all of the following criteria: (1) the environmental impacts associated with the issue have been determined to apply either to all plants or, for some issues, to plants having a specific type of cooling system or other specified plant or site characteristics; (2) a single significance level (i.e., SMALL, MODERATE, or LARGE) has been assigned to the impacts (except for collective offsite radiological impacts from the fuel cycle and from high-level waste and spent fuel disposal); and (3) mitigation of adverse impacts associated with the issue has been considered in the analysis, and it has been determined that additional plant-specific mitigation measures are likely not to be sufficiently beneficial to warrant implementation.

For issues that meet Category 1 criteria, no additional plant-specific analysis is required unless new and significant information is identified.

Category 2 issues are those that do not meet one or more of the criteria for Category 1, and, therefore, additional plant-specific review of these issues is required. There are no Category 2 issues related to decommissioning in the SEIS.

In the SEIS, the NRC staff found that:

Decommissioning would have some short-term socioeconomic impacts. The impacts would not be increased by delaying decommissioning until the end of a 20-year relicense period, but they might be decreased by population and economic growth.

Therefore, the NRC staff concluded that there would be no socioeconomic impacts associated with decommissioning following the license renewal term beyond those described in the Decommissioning GEIS.

In the HDI Revised PSDAR, HDI stated that:

Decommissioning of [Pilgrim] is expected to result in negative socioeconomic impacts. As [Pilgrim] ceases operation and transitions through the phases of decommissioning, an overall decrease in plant staff will occur. The lost wages of plant staff will result in decreases in revenues available to support the local economy and local tax authorities. Some laid-off workers may relocate, thus potentially impacting the local cost of housing and availability of public services.

Section 4.3.12 of the Decommissioning GEIS evaluates changes in workforce and population, changes in local tax revenues, and changes in public services. The evaluation also examines large plants located in rural areas that permanently shut down early and select the DECON option. The Decommissioning GEIS determined that this situation was the likeliest to have negative impacts. Therefore, HDI concludes that the socioeconomic impacts of Pilgrim's decommissioning activities are bounded by the analysis presented in the Decommissioning GEIS.

After reviewing this information, the NRC staff finds that the potential environmental impacts associated with the Pilgrim decommissioning activities are bounded by the previously issued Decommissioning GEIS and SEIS, are described consistent with the guidance in RG 1.185, and meet the requirements of 10 CFR 50.82(a)(4)(i).

Based on this review, the NRC staff finds that the HDI Revised PSDAR contains the information required by NRC regulation 10 CFR 50.82(a)(4)(i). As required by 10 CFR 50.82(a)(7), HDI will notify the NRC in writing and send a copy to the Commonwealth of Massachusetts before performing any decommissioning activity inconsistent with, or making any significant schedule change from, the planned decommissioning activities and schedules described in the HDI Revised PSDAR, including changes that significantly increase the decommissioning costs. As required, HDI will verify that the decommissioning activities meet the requirements of 10 CFR 50.82(a)(6)(i) through 10 CFR 50.82(a)(6)(iii) or will seek appropriate regulatory approval if needed.

In accordance with 10 CFR Part 2, "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this letter, please contact me at 301-415-2855 or by e-mail at Scott.Wall@nrc.gov.

Sincerely,

/RA/

Scott P. Wall, Senior Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-293

cc: Listserv

SUBJECT: PILGRIM NUCLEAR POWER STATION – REVIEW OF POST-SHUTDOWN
 DECOMMISSIONING ACTIVITIES REPORT (EPID L-2018-LLL-0031) DATED
 OCTOBER 28, 2019

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ADAMS Accession No. ML19224A540

***via memo **via email**

OFFICE	NRR/DORL/LPL3/PM	NRR/DORL/LSPB/LA**	NRR/DLP/PFPB/BC **
NAME	SWall	JBurkhardt	FMiller
DATE	8/15/19	8/15/19	8/20/19
OFFICE	NRR/DMLR/MENB/BC(A) **	OGC – NLO **	NMSS/DUWP/RDB/BC**
NAME	JRikhoff	JWachutka	BWatson
DATE	8/22/19	10/23/19	8/20/19
OFFICE	NRR/DORL/LPL3/BC	NRR/DORL/LPL3/PM	
NAME	NSalgado	SWall	
DATE	10/28/19	10/28/19	

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