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10 CFR 50.90
10 CFR 50.54(p)
10 CFR 73.55(r)

June 25, 2020

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Pilgrim Nuclear Power Station
Renewed Facility License No. DPR-35
NRC Docket Nos. 50-293 and 72-1044

Subject: Response to NRC Request for Information on Physical Security Plan Revision and License Amendment Request to Incorporate Additional Independent Spent Fuel Storage Installation

- References:**
- [1] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – “Physical Security Plan Revision and License Amendment Request to Incorporate Additional Independent Spent Fuel Storage Installation,” dated April 2, 2020. (ML20136A038)
 - [2] US Nuclear Regulatory Commission to Holtec Decommissioning International, LLC – “Pilgrim Nuclear Power Station – Acceptance of Requested License Action RE – Physical Security Plan Revision and License Amendment Request to Incorporate Additional Independent Spent Fuel Storage Installation With Requests for Additional Information (EPD: L-2020-LLA-0070) dated May 26, 2020 (ML20142A242)
 - [3] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – “Notification of Revised Post-Shutdown Decommissioning Activities Report and Revised Site-Specific Decommissioning Cost Estimate for Pilgrim Nuclear Power station,” dated November 16, 2018 (ML18320A040)
 - [4] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – “Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations,” dated March 31, 2020 (ML20091M858)

Dear Sir or Madam:

On April 2, 2020, Holtec Decommissioning International, LLC (HDI) submitted a proposed revision to the Physical Security Plan and License Amendment Request (LAR) to incorporate an additional Independent Spent Fuel Storage Installation at the Pilgrim Nuclear Power Station (PNPS) site (Reference 1). On May 26, 2020, the U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Material Safety and Safeguards (NMSS) identified that the NRC Staff has completed its acceptance review of the license amendment request

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(LAR) to determine if enough technical information in scope and depth was provided to allow the NRC staff to complete its detailed technical review (Reference 2).

Reference 2 identified the NRC has determined that the proposed LAR provides technical information in enough detail to enable the NRC staff to initiate a 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. Reference 2 also identified that the NRC has initiated technical reviews and has determined that additional information related to the following documents is necessary to complete its detailed technical reviews: 1) HDI's Post Shutdown Decommissioning Activities Report; 2) HDI's environmental evaluation, and 3) HDI's Physical Security Plan. In support of an effective review, the NRC identified three requests for additional information (RAIs).

The specific RAIs and the associated HDI responses to the RAIs are summarized in the Attachment to this letter.

RAI #1 requested clarification of HDI schedule information submitted after the Site Post Shutdown Decommissioning Activities Report (PSDAR) which was submitted in November 2018 (References 3 and 4). RAI #2 requested an HDI assessment as to why a categorical exclusion from 10 CFR 51.22(c)(12) is applicable to the proposed licensing proceeding. RAI #3 requested an entire copy of the PSP mark-up, including Appendix D, which was submitted to address the new ISFSI II cask storage pad security requirements.

Enclosure 2 to this letter provides the proposed PSP markup that was requested in RAI #3. This enclosure contains "Safeguards Information" as defined by 10 CFR 73.22 and its disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended, and must be protected accordingly.

Pursuant to 10 CFR 50.91, "Notice for comment; State consultation," paragraph (b), a copy of this RAI response, with the attachment but without Enclosure 2, is being provided to the Commonwealth of Massachusetts, Emergency Management Agency.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3813.

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I declare under the penalty of perjury that the forgoing is true and correct.

Executed on June 25, 2020.

Sincerely,

Andrea L.

Sterdis

Andrea L. Sterdis

Digitally signed by Andrea L. Sterdis
DN: cn=Andrea L. Sterdis, c=US,
o=HDI, ou=Holtec
Decommissioning International,
email=andrea.sterdis@holtec.com
Date: 2020.06.25 14:14:30 -0400

HDI Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachment

Summary of NRC RAIs and HDI Responses (Uncontrolled)

Enclosure

1. Environmental Review of EC 81419 and EC 81420 (Uncontrolled)
2. PNPS Pilgrim Physical Security, Training & Qualification and Safeguards Contingency Plan, Revision 18A (Safeguards Information)

cc: (without Enclosure 2)
NRC Regional Administrator - Region I
NRC NMSS Project Manager (Pilgrim Nuclear Power Station)
Director, Massachusetts Emergency Management Agency

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Attachment to HDI-PIL-20-047

Summary of NRC RAIs and HDI Responses (Uncontrolled)



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Summary of NRC RAIs and HDI Response

A Nuclear Regulatory Commission (NRC) request for additional information (RAI) regarding a license amendment request to revise the Pilgrim Nuclear Power Station (PNPS) License Condition 3.G for Physical Protection and a Physical Security Plan revision was received by Holtec Decommissioning International, LLC (HDI) via NRC letter dated May 26, 2020. HDI response to the RAIs are provided below.

NRC Request #1

On page 3 of 5 of the April 2, 2020, submittal cover letter (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20136A038), Holtec Decommissioning International, LLC (HDI) stated the following:

“As discussed in the HDI Revised PSDAR (Post Shutdown Decommissioning Activities Report); existing ISFSI (Independent Spent Fuel Storage Installation) pad space and dry cask loading limitations require the construction of additional ISFSI capacity. The construction of the Pilgrim (Pilgrim Nuclear Power Station) ISFSI II will provide this additional capacity to support storage of the remaining spent fuel stored in the SFP (spent fuel pool) and must be completed in order to support the schedule provided in the HDI Revised PSDAR.”

According to the March 31, 2020, “Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations” submittal (ADAMS Accession No. ML20091M858), it appears that HDI modified its Pilgrim decommissioning schedule and some of its major milestones from the HDI Revised PSDAR, dated November 18, 2018 (ADAMS Accession No. ML18320A040). However, HDI refers to the schedule in HDI’s Revised PSDAR in HDI’s April 2, 2020, amendment application cover letter instead of the updated decommissioning schedule presented in its March 31, 2020, submittal. Please clarify how the Enclosure 2, Figure 1, “Holtec Decommissioning International Pilgrim Nuclear Power Station Decommissioning Schedule Timeline,” of the March 31, 2020, submittal applies to the April 2, 2020, submittal and HDI’s Revised PSDAR for the Pilgrim.

HDI Response to RAI #1:

On March 31, 2020, pursuant to NRC regulations, HDI submitted the HDI Fleet Annual Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations (ADAMS Accession No. ML20091M858). Enclosure 2 of this report includes the annual status of decommissioning funding, status of funding for managing irradiated fuel, and the financial assurance report for Pilgrim Nuclear Power Station (Pilgrim). In addition, Enclosure 2 of this submittal provided an updated schedule that reflects the current decommissioning plan for Pilgrim. Figure 1 to Enclosure 2 provided a schedule revised from the schedule provided in the November 16, 2018 Revised Post-Shutdown Decommissioning Activities Report (PSDAR) (ADAMS Accession No. ML18320A040). As indicated in Enclosure 2, the schedule revisions were evaluated and are not significant as defined in 10 CFR 50.82 (a)(7).



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The schedule (and high-level milestones) included in Figure 1 of Enclosure 2 to the HDI annual report, represent HDI's current schedule at Pilgrim including the current completion schedule for construction and operation of the ISFSI II cask storage pad and for the start of the Phase 2 spent fuel cask loading campaign. These project milestones are coordinated and consistent with the requested February 2, 2021 approval date identified in the HDI Physical Security Plan (PSP) license amendment request and PSP revision request submitted on April 2, 2020 (ADAMS Accession No. ML20136A038).

NRC Request #2

On page 3 of 5 of the April 2, 2020, submittal cover letter, HDI stated the following:

"Furthermore, HDI has evaluated this proposed license amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR (Title 10 of the Code of Federal *Regulations*) 51.21 and has concluded, pursuant to 10 CFR 51.22(b), that no environmental impact statement or environment assessment need be prepared in connection with the proposed amendment."

Additionally, in Section 4, "Environmental Considerations," of Attachment 1 to the HDI's cover letter, HDI specified that HDI has "determined that it [the proposed license amendment] meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(12)." HDI has explained that "modifications associated with this proposed amendment include lighting, intruder detection systems, protected area boundary fencing, access control systems, telecommunications equipment, a vehicle barrier system, and a central alarm station" and that "activities associated with the proposed amendment do not involve any significant construction impacts." HDI, however, has not provided in its application the bases and supporting information for concluding that 10 CFR 51.22(c)(12) is applicable. Please provide HDI's assessment with rationale as to why a categorical exclusion applies to this proposed licensing proceeding and supporting information.

The information the NRC staff uses to conduct and inform its environmental reviews must be publicly available, as appropriate. Therefore, please ensure that the information included in response to this request for additional information can be made publicly available. This information is needed to allow NRC staff compliance with the National Environmental Policy Act of 1969 and 10 CFR Part 51, Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions.

HDI Response to RA #2:

10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review", Sub part (c)(12) identifies the following categorical exclusion criteria:

Issuance of an amendment to a license under parts 50, 52, 60, 61, 63, 70, 72, or 75 of this chapter relating solely to safeguards matters (i.e., protection against sabotage or loss or diversion of special nuclear material) or issuance of an approval of a safeguards plan submitted under parts 50, 52, 70, 72, and 73 of this chapter, provided that the amendment or approval does not involve any significant construction impacts. These amendments and approvals are confined to:



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(ii) modifications to systems used for security and/or materials accountability.

HDI has assessed the proposed license amendment and security plan change against the criteria identified in 10 CFR 51.22(c)(12). The proposed license amendment will be issued under 10 CFR 50 and is related solely to issuance and approval of a safeguards plan submitted under part 73 of this chapter. The proposed license amendment and security plan changes do not involve any significant construction impacts and are confined to modifications to systems used for security and/or materials accountability. As such, the license amendment and security plan change result in minimal ground disturbance and meet the criteria for exclusion from 10 CFR 51.22(c)(12).

The proposed security plan requires the establishment of a protected area (PA) around the ISFSI II cask storage pad and modification of the existing site PA in the location where the existing site PA connects to the ISFSI II haul path. Site modifications EC 81419 and EC 81420 were implemented to establish the security provisions needed to support the operation of the new and revised protected areas. Environmental review of these security modifications was performed using the site procedure that evaluates environmental impact. The environmental review performed is provided in Enclosure 1 to this letter.

The environmental review identified the referenced ECs add additional capability necessary to support operation of protected area controls as well as modification of security fencing and vehicle barriers on previously disturbed land areas (i.e., no excavation in previously undisturbed areas). EC 81420 added a 53 kva back-up diesel generator and fuel tank to support operation of the new ISFSI II cask storage pad protected area. The environmental impact of adding a backup diesel generator was assessed and determined not to have a significant effect on the environment based on the small size of the generator, low running hours expected, low sulfur diesel fuel used, and the secondary containment provided to capture potential fuel tank leakage.

NRC Request #3

On page 1 of 5 of the April 2, 2020, submittal cover letter, HDI stated that it "...requests approval of the enclosed Pilgrim Nuclear Power Station (PNPS) Physical Security Plan (PSP) revision ..." HDI submitted, as enclosure 1, the description of PNPS Physical Security Plan Changes - (Security Related Information) and as enclosure 2, the proposed changes to the PNPS Security Plan including Appendix D (Safeguards, Information) as opposed to the proposed PSP revision. Per the NRC License No. DPR-35, Provision 3. G., Physical Protection:

"The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contain Safeguards Information protected under 10 CFR 73.21, is entitled: "Pilgrim Nuclear Power Station Physical Security, Training and Qualification, and Safeguards Contingency Plan, Revision 0" submitted by letter dated October 13, 2004, as supplemented by letter dated May 15, 2006."

The NRC staff will review the submittal with the proposed changes but also must review the



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entire PSP in total to ensure that certain other areas of the PSP are compatible with the proposed changes. This is needed due to the complexity of your submittal and your proposed PSP strategy of phasing in the new ISFSI II. Because changes to the Pilgrim PSP were made under 10 CFR 50.54(p)(2) since 2006 that did not require NRC approval, those changes were not submitted to the NRC. In order for staff to complete its technical review of this amendment application, the NRC staff requests that HDI submit a copy of the entire PSP. Further, if any changes to the PSP are made in the future under 10 CFR 50.54(p)(2), between now and the completion of the technical review for this amendment application review, the NRC staff request that the changes be submitted for the same reason as stated above for the purpose of this amendment application review. Such submittals, if there are any, may impact the proposed review schedule.

HDI Response to RAI #3:

HDI has reviewed the RAI request and is submitting a full copy of the proposed PSP. Enclosure 2 to this letter provides a "Safeguards Information" copy of the proposed PSP, including Appendix D, which addresses the security requirements applicable to operation and use of the new ISFSI II cask storage pad.



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Enclosure 1 to HDI-PIL-20-047

Environmental Review of EC 81419 and EC 81420 (Uncontrolled)



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		INFORMATIONAL USE		
Environmental Reviews and Evaluations				

ATTACHMENT 9.1 **SITE ACTIVITY REVIEW FORM (TYPICAL)**
SHEET 1 of 1 EC 81419 – PA Modification for Haul Path ; EC 81420 – ISPSI II Protected Area (PA)

Check Appropriate Box(es) for Activity Being Performed:
 (Attachment 9.4 provides a brief description of the screening regulatory basis for the activities listed below.)

1. Land disturbance equal to or greater than one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds).
2. Any land disturbance of undisturbed surface or subsurface land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds). *Note: Activity will take place on previously disturbed land areas (i.e. Secondary Access/IS Parking Lot and existing beach field). One exception is a small portion (approximately 900 sq. ft.) of vehicle barrier system. However, this consists of the placement of a concrete barrier on grade (i.e. no excavation for subsurface foundation required) and thus screens out per regulatory basis outlined in Attachment 9.4.*
3. For Vermont Yankee only, land disturbance involving previously disturbed land that is less than one acre.
4. Dredging activities in a lake, river, pond, ditches or stream.
5. Changing the amount of thermal heat being discharged to the river or lake (i.e., associated with once through and closed cycle cooling wastewater discharges).
6. Changing the concentration or quantity of chemicals being discharged to the river, lake, or air (i.e., associated with wastewater and air emission discharges).
7. Using new or different chemicals, which could potentially be discharged and that are currently not authorized for use by the state regulatory agency (i.e., associated with wastewater discharges).
8. Changing the design or operation of the intake or discharge structures (i.e., increase water withdrawal flow at intake structure or discharge flow at discharge structure).
9. Modifying the design or operation of the cooling tower that will change water or air flow characteristics.
10. Modifying the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge (i.e., associated with wastewater discharges).
11. Modifying existing stationary fuel burning equipment that could potentially result in an increase of air emissions (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene).
12. Installing or removing stationary fuel burning equipment or using portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene). *[Addition of backup diesel generator]*
13. Installing or using equipment that will result in an air emission discharge (i.e., ozone, VOC, particulates, sulfur dioxide, carbon monoxide, nitrogen oxide). *[Addition of backup diesel generator]*
14. Installing or modifying a stationary or mobile tank (i.e., fuel oil, gasoline, kerosene, propane, butane, sulfuric acid). *[Diesel fuel tank associated with backup diesel generator]*
15. Using or storing oils or chemicals in containers >55 gallons that could be directly released into the environment.
16. Burying or placing any solid wastes in the site area that may affect runoff, surface water, or groundwater.
17. Generates a new hazardous waste stream or increases an existing hazardous waste stream.

Prepared By: Dominick Fucito Date: 06/05/2020

Approved By: Mark Lawson Date: 6/25/2020

NOTE: Completed form must be reviewed and approved by Chemistry Manager or designee prior to starting the activity.
 EN-EV-115 REV 7



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Environmental Reviews and Evaluations				

ATTACHMENT 9.2 ENVIRONMENTAL REVIEW FORM (TYPICAL)
SHEET 1 of 1

1. Facility: PNPS ISFSI II
2. Document Number: EC 81419 (PA Modification for Haul Path/ EC 81420 ISFSI II Protected Area)
3. ER Number: EC(s) 81419, 81420
4. Activity Reviewed: Attachment 9.1 Items 12, 13, 14
5. Complete Screening Below (as applicable to each site):

Reference	Within Scope	Modification/Revision/ Approval Needed
Section 2.0[1] References	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[2] References	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Section 2.0[4] References (ANO)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[5] References (GGNS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[6] References (IP2)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[7] References (IP3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[8] References (JAF)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[13] References (PLP)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[9] References (PNPS)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Section 2.0[10] References (RBS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[11] References (VYNPS)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No
Section 2.0[12] References (W3)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No

6. If within scope, attach cited reference(s) and appropriate section(s) along with a brief discussion: See NRC, EPA websites and HDIDOC for cited references; see Attachment 9.3 for brief discussion.
7. If a modification, revision or approval is needed, attach a brief discussion: See Att.9.3 for discussion.
8. Prepared By: Dominick Fucito  Date: 06/05/2020

* NOTE: For land disturbance activities involving excavation and/or backfilling or grading of undisturbed surface or subsurface land areas, unless otherwise directed by the Chemistry Manager or designee, the construction supervisor must be informed to immediately stop work activities should archaeological, historical or other cultural resources be uncovered during excavation, and to notify the Chemistry Manager or designee. In the event that an unanticipated discovery is made, the Chemistry Manager or designee is to notify the State Historic Preservation Officer and consult with the agency in conducting an assessment of the discovery to determine if additional work is needed.

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Environmental Reviews and Evaluations				

ATTACHMENT 9.3 ENVIRONMENTAL EVALUATION FORM (TYPICAL)
SHEET 1 of 1 EC 81418 - PA Modification for Haul Path ; EC 81420 - ISFSI II Protected Area (PA)

1. Document Evaluated: EC 81418: PA Modification for Haul Path/ EC 81420: ISFSI II Protected Area
2. Description of proposed change (attach additional sheets if needed): <i>EC 81418: Modification of existing PA and SOCA fences to allow passage of new ISFSI II haul path road.</i> <i>EC 81420: Installation of ISFSI II Protected Area (PA) Security features (Central Alarm Station Building, fences, microwaves, cameras, vehicle barrier system)</i>
3. Analysis of environmental impact (attach additional sheets if needed): <i>PNPS References 2.0[9] are not impacted by this activity. Items 12, 13, 14 are checked to reflect installation of a 53 kva backup diesel generator to supply emergency power to the ISFSI II facility in the event that the normal power supply is interrupted.</i> <i>Notation has been included in EC 81420 to utilize ASTM D975 or EN 590 Ultra Low Sulfur Diesel (ULSD) with sulfur content <15 mg/kg (15 ppm) to minimize environmental impacts, and to ensure that the new diesel generator is added to the site air emission permits prior to turnover.</i>
4. If applicable, alternatives for reducing environmental impact (attach additional sheets if needed): <i>Operation of the backup diesel generator will only be required upon the loss of the normal power supply, typically no more than 1-2 events per calendar year with typical duration of 24 hours per event. As noted above, use of ULSD fuel will be employed to minimize environmental impacts. In addition, the diesel fuel tank includes secondary containment to capture diesel fuel in the event of a leak in the primary tank.</i>
5. Summary of basis for conclusions (attach additional sheets if needed): <i>The addition of a diesel generator to the site will have no significant effect on the environment. This conclusion is based on the relatively small size of the generator, anticipated low running hours per calendar year, use of ULSD fuel and fuel tank with secondary containment.</i>
6. Significant Adverse Environmental Impact Exists: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7. References: (attach additional sheets if needed): None

TOT. PGS	PREPARER	DATE	REVIEWER	DATE
		6/24/20	Mark Lawson <small>Digitally signed by Mark Lawson DN: cn=Mark Lawson, c=US, email=mark@holtec.com, serial=1000 Date: 2020.06.24 06:27:40 -0400</small>	6/25/2020

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Enclosure 2 to HDI-PIL-20-047

**PNPS Pilgrim Physical Security, Training & Qualification and Safeguards
Contingency Plan, Revision 18A
(Safeguards Information)**

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Enclosure 2 to HDI-PIL-20-047

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