

From: [Andrea Sterdis](#)
To: [Snyder, Amy](#)
Cc: [Dave Noyes](#)
Subject: [External_Sender] Supplemental Information to Support Physical Security Plan Revision and License Amendment Request to Incorporate Alternate Measures
Date: Thursday, December 10, 2020 4:51:26 PM

December 10, 2020
HDI-PIL-20-096
10 CFR 50.90
10 CFR 50.54(p)

Attn: NRC NMSS Project Manager - Pilgrim Nuclear Power Station

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

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Subject: Supplemental Information to Support Physical Security Plan Revision and License Amendment Request to Incorporate Alternate Measures

- References:
1. Letter from Andrea L. Sterdis (Holtec Decommissioning International) to U.S. Nuclear Regulatory Commission, "Physical Security Plan Revision and License Amendment Request to Incorporate Alternate Measures" October 5, 2020 (ML20283A292)
 2. Letter from U.S. Nuclear Regulatory Commission to Holtec Decommissioning International, LLC, "Pilgrim Nuclear Power Station – Supplemental Information Needed for Acceptance of Requested Licensing Action Re: Amendment Request (EPID L-2020-LLA-0230)", November 18, 2020 (ML20322A277)

By letter dated October 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20283A292), Holtec Decommissioning International, LLC (HDI) submitted a license amendment request (LAR) seeking U.S. Nuclear Regulatory Commission (NRC) review and approval of Revision 20 to the Pilgrim Nuclear Power Station, Physical Security Plan (PSP) and a license amendment application to incorporate alternative measures.

The NRC staff reviewed the request and has determined that that additional information is needed to ensure that the licensee submittal is complete. By letter dated November 18, 2020 (Reference 2), the NRC specifically requested that a licensee commitment be provided to identify a date when all technical evaluations that demonstrate the alternative measures meet 10 CFR 73.55(r) requirements will be completed. The NRC requested that this commitment be provided to the NRC by December 10, 2020.

The attachment to this letter provides a regulatory commitment to complete remaining technical evaluations demonstrating alternative measures meet 10 CFR 73.55(r) requirements.

Should you have any questions or require further information, please contact me at (856) 797-0900, x3813.

Respectfully,

Andrea L. Sterdis

Andrea L. Sterdis
 Vice President Regulatory and Environmental Affairs
 Holtec Decommissioning International (HDI)

**Attachment to
 HDI-PIL-20-096**

Regulatory Commitments

The following table identifies those actions committed by Holtec Decommissioning International, LLC (HDI).

Any other statements in this submittal are provided for information purposes and are not considered regulatory commitments.

Commitment	Type (Check One)		Scheduled Completion Date
	One Time Action	Continuing Compliance	
Complete remaining Technical Evaluations Demonstrating Alternative Measures Meet 10 CFR 73.55(r) Requirements. Evaluations addressing the following are required: <ul style="list-style-type: none"> • Water Barrier clarification - 10 CFR 73.55(e)(10) • Various Barrier additions and modifications - 10 CFR 73.55(d) • Vehicle Barrier Analysis - 10 CFR 73.55(e)(10) • Defensive Strategy - 10 CFR 73.55(k) • Target Set - 10 CFR 73.55(f) • Pathways - 10 CFR 73.55(i)(5) • Safety/Security Interface – 10 CFR 73.58 • Security Organization - 10 CFR 73.55 (d) and (k) 	X		2/25/21

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