SAFEGUARDS INFORMATION



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

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

> > SOOI NMSSZG NRR NMSS

February 25, 2021

U.S. Nuclear Regulatory Commission One White Flint ATTN: Document Control Desk 11555 Rockville Pike Rockville MD 20852-2738

> 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 Alternate Measures

References:

[1] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – "Physical Security Plan Revision and License Amendment Request to Incorporate Alternate Measures," dated October 5, 2020. (ML20283A292)

- [2] Email from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – "Supplemental Information to Support Physical Security Plan Revision and License Amendment Request to Incorporate Alternate Measures," dated December 10, 2020 (ML20346A047)
- [3] US Nuclear Regulatory Commission to Holtec Decommissioning International, LLC --"Pilgrim Nuclear Power Station - Request for Additional Information Regarding the Request to Change the Physical Security Plan - Alternative Measures (EPID L-2020-LLA-0230)," dated January 15, 2021 (ML21013A523)

By letter dated October 5, 2020 (Reference 1), Holtec Decommissioning International, LLC (HDI) submitted a license application request (LAR), as supplemented on December 10, 2020 (Reference 2), seeking U.S. Nuclear Regulatory Commission (NRC) review and approval of the Pilgrim Nuclear Power Station Physical Security Plan revision and license amendment application to incorporate alternative measures. On January 15, 2021, the U.S. Nuclear Regulatory Commission (NRC) Office of Nuclear Material Safety and Safeguards (NMSS) informed HDI that additional information is needed to complete the review of the proposed PSP revision and LAR (Reference 3).

NOTE: THE ATTACHMENT TO THIS LETTER AND ENCLOSURE 3 TO THIS LETTER CONTAIN "SECURITY-RELATED INFORMATION" AND ENCLOSURES 1 AND 2 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THE ATTACHMENT AND ENCLOSURES, THIS LETTER IS DECONTROLLED.

HDI-PIL-21-025 Page 1 of 2

SAFEGUARDS INFORMATION

SAFEGUARDS INFORMATION

HOLTEC DECOMMISSIONING INTERNATIONAL

Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

The NRC requests for additional information (RAI) and the HDI responses to the RAIs are summarized in the Attachment to this letter. The information provided in the Attachment contains "Security -Related Information," to be withheld from public disclosure pursuant to 10 CFR 2.390.

The detailed HDI responses to the individual RAIs are identified in the Enclosures to this letter as described in the Attachment. The information in Enclosures 1 and 2 contain "Safeguards Information" as defined by 10 CFR 73.22 and disclosure to unauthorized individuals is prohibited by Section 147 of the Atomic Energy Act of 1954, as amended, and must be protected accordingly. The information provided in Enclosure 3 contains "Security -Related Information," to be withheld from public disclosure pursuant to 10 CFR 2.390.

Pursuant to 10 CFR 50.91, "Notice for comment; State consultation," paragraph (b), a copy of this RAI response letter, without the Attachment and Enclosures, 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.

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

Executed on February 25, 2021.

Sincerely,

Andrea Sterdis 2021 02 25 10 48 48 -000 Andrea L. Sterdis

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

Attachment:

Summary of NRC RAIs and HDI Responses (Security Related)

Enclosures:

1. Detailed HDI Responses to NRC RAIs (Safeguards)

2. Detailed Physical Barrier Report (Safeguards)

3. Site Design Changes Supporting Security Responses (Security Related)

cc: (without Attachment and Enclosures)

NRC Regional Administrator - Region I NRC NMSS Project Manager (Pilgrim Nuclear Power Station) Director, Massachusetts Emergency Management Agency

NOTE: THE ATTACHMENT TO THIS LETTER AND ENCLOSURE 3 TO THIS LETTER CONTAIN "SECURITY-RELATED INFORMATION" AND ENCLOSURES 1 AND 2 TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON SEPARATION OF THE ATTACHMENT AND ENCLOSURES, THIS LETTER IS DECONTROLLED.

HDI-PIL-21-025 Page 2 of 2

SAFEGUARDS INFORMATION

SECURITY-RELATED INFORMATION WITHHOLD UNDER 10 CFR 2.390



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104 Telephone (856) 797-0900 Fax (856) 797-0909

Attachment to HDI-PIL-21-025

Summary of NRC RAIs and HDI Responses

NOTE: THIS ATTACHMENT CONTAINS "SECURITY-RELATED INFORMATION" AND MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF THIS ATTACHMENT THIS COVER PAGE IS DECONTROLLED.

Attachment to HDI-PIL-21-025 Page 1 of 4

SECURITY-RELATED INFORMATION WITHHOLD UNDER 10 CFR 2.390