



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713**

May 3, 2021

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

**SUBJECT: PILGRIM NUCLEAR POWER STATION – SECURITY DECOMMISSIONING
INSPECTION REPORT 05000293/2021401**

Dear Ms. Cowan:

On April 20, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the permanently shut down Pilgrim Nuclear Power Station (Pilgrim). On-site inspections were performed on April 19 - 20, 2021. Additional inspection activities (in-office reviews) were conducted remotely due to the COVID-19 public health emergency (PHE) during the inspection period (April 12 – April 16, 2021). The inspection examined activities conducted under your license as they relate to security and compliance with the Nuclear Regulatory Commission's (NRC) rules and regulations and with the conditions of your license. The inspectors reviewed select procedures and records, observed activities, and interviewed site personnel. The NRC inspectors discussed the results of this inspection with Mr. John Moylan, Site Vice President, and other members of your staff.

Based on the results of the inspection, no violations were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC's Public

Document Room or from the Publicly Available Records (PARS) component of the NRC from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

No reply to this letter is required. Please contact Jeremiah Rey at 610-337-5211 if you have any questions regarding this matter.

Sincerely,

5/3/2021

X /RA/

Fred L. Bower, Chief, PSB

Signed by: Fred L. Bower

Fred L. Bower, III, Chief
Security, Emergency Preparedness and Incident
Response Branch
Division of Reactor Safety and Security

Docket No: 50-293
License No: DPR-35

Enclosure:
Inspection Report No. 05000293/2021401

cc w/encl: Distribution via LISTSERV®
B. McWilliams, Manager, Nuclear Security
S. Phillips, Director, Massachusetts Emergency Management Agency (MEMA)

SUBJECT: PILGRIM NUCLEAR POWER STATION – SECURITY DECOMMISSIONING
INSPECTION REPORT 05000293/2021401, DATED May 3, 2021

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File: <https://usnrc.sharepoint.com/teams/RIDRSPSBSEC/Shared Documents/Inspection Reports/2021 IR Draft/Pilgrim Decomm 2021401/Pilgrim 2021401.docx>

ADAMS ACCESSION NUMBER:

ML21118A061

Cover Letter Enclosure <input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
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* concurrence via email

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION I
INSPECTION REPORT**

Docket No. 05000293

License No. DPR-35

Report No. 05000293/2021401

Enterprise Identifier: I-2020-401-0067

Licensee: Holtec Decommissioning International, LLC

Location: Plymouth, MA

Location Inspected: Pilgrim Nuclear Power Station

Inspection Dates: April 12 – April 20, 2021

Inspectors: Kenneth Hussar, Senior Physical Security Inspector
Jeremiah Rey, Physical Security Inspector

Approved by: Fred L. Bower, III, Chief
Security, Emergency Preparedness and Incident Response
Branch
Division of Reactor Safety and Security

Enclosure

SUMMARY

Holtec Decommissioning International, LLC
Pilgrim Nuclear Power Station
NRC Inspection Report No. 05000293/2021401

An announced security inspection was completed on April 20, 2021, at the Pilgrim Nuclear Power Station that focused on the physical protection program. In-office reviews were conducted remotely due to the COVID-19 public health emergency (PHE) during the inspection period (April 12 – April 16, 2021) and additional onsite inspection activities were conducted on April 19 and April 20, 2021. The objective of the inspection was to determine if activities involving the physical protection program, associated with the samples inspected, provide assurance that the licensee's program is designed and implemented in a manner that protects against the design basis threat (DBT) of radiological sabotage. The U.S. Nuclear Regulatory Commission's (NRC's) oversight of the security of a shut-down nuclear power reactor is described in Inspection Procedure (IP) 81200, "Security." Additionally, for reactors that have permanently shut down and entered decommissioning, violations of regulatory requirements are evaluated using the traditional enforcement process described in the NRC's Enforcement Policy. Under traditional enforcement, violations of more than minor significance are assigned a severity level (SL) ranging from I (most significant) to IV (least significant).

Based on the results of this inspection, no violations of safety significance were identified.

REPORT DETAILS

Inspection Scope

Inspection activities were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. At the time of this inspection, approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2202 Appendix A, "Security Core Inspection Program." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

1. Access Control for Decommissioning Nuclear Power Reactors, IP 81200.02

a. Inspection Scope

The inspectors evaluated the access control program through completion of a minimum of 50% of the inspection requirements.

Access Control for Decommissioning Nuclear Power Reactors (1 Sample)

02.01 a, c - e, 02.02 c - g, i - k, 02.03 a - d, f - i, 02.05

b. Observations and Findings

No violations were identified.

c. Conclusions

The Pilgrim Nuclear Power Station access control program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

2. Security Training for Decommissioning Nuclear Power Reactors, IP 81200.07

a. Inspection Scope

The inspectors evaluated the security training program through completion of a minimum of 50% of the inspection requirements.

Security Training for Decommissioning Nuclear Power Reactors (1 Sample)

02.02 a - f, 02.03 a - c, e, 02.04 a, b, 02.05, 02.06 a - c, 02.12 a, b

b. Observations and Findings

No violation were identified.

c. Conclusions

The Pilgrim Nuclear Power Station security training program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that protects against the DBT of radiological sabotage.

Exit Meeting Summary

On April 20, 2021, the inspectors presented the inspection results to with Mr. John Moylan, Site Vice President, and other members of the licensee's staff. The inspectors verified that no proprietary information was retained by the inspectors or documented in this report.

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

J. Moylan, Site Vice President
B. McWilliams, Site Security Manager

LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED

Opened

None

Opened and Closed

None

Closed

None

INSPECTION PROCEDURES USED

IP 81200.02, Access Control for Decommissioning Nuclear Power Reactors
IP 81200.07, Security Training for Decommissioning Nuclear Power Reactors

LIST OF DOCUMENTS REVIEWED

Procedures

EN-NS-207, Security Rang Instruction, Revision 9
EN-NS-300, Security Training Program, Revision 8
EN-NS-303, Security Training Oversight Program, Revision 6
SECI-JPM-27.4, Tactical Fire Qualification Course, Revision 7
P-EN-NS-204, Protection of Unclassified Safeguards Information, Revision 15
P-EN-NS-231, Primary Access Control, Revision 2
2.01, Station Access Control, Revision 54
2.05, Protected Area and Vital Area Security Locks and Keys, Revision 30

Condition Reports

PIL-01514	PIL-01821	PIL-02219	PIL-01509	PIL-02778
PIL-01493	PIL-01878	PIL-02298	PIL-01734	PIL-02278
PIL-01583	PIL-01657	PIL-02348	PIL-01936	PIL-02286
PIL-01905	PIL-02043	PIL-02592	PIL-02006	
PIL-01782	PIL-02070	PIL-02622	PIL-02702	

Condition Reports Generated

PIL-03013