



June 22, 2021

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

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

Subject: Supplemental Information to Support Proposed Independent Spent Fuel Storage Installation- Only Security, Training, and Qualification, Safeguards Contingency Plan

- References:
1. Letter from Andrea L. Sterdis (Holtec Decommissioning International) to U.S. Nuclear Regulatory Commission, "Proposed Independent Spent Fuel Storage Installation- Only Security, Training, and Qualification, Safeguards Contingency Plan" March 17, 2021 (ML21085A596)
  2. Letter from Andrea L. Sterdis (Holtec Decommissioning International) to U.S. Nuclear Regulatory Commission, "Physical Security Plan Revision and License Amendment Request to Incorporate Additional Independent Spent Fuel Storage Installation" April 2, 2020 (ML20141L057)
  3. Letter from U.S. Nuclear Regulatory Commission to Holtec Decommissioning International, LLC, "Issuance of Amendment to Revise the Physical Security Plan – Alternative Measures." (EPID: L-2020-LLA-0230), December 1, 2020, 2021 (ML20328A297)

By letter dated March 17, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20283A292), (Reference 1), Holtec Decommissioning International, LLC (HDI) submitted a license amendment request (LAR) seeking U.S. Nuclear Regulatory Commission (NRC) review and approval of a revision to the Pilgrim Independent Spent Fuel Storage Installation-Only Security, Training and Qualification, and Safeguards Contingency Plan Rev 0 (ISFSI-O PSP).

HDI has reviewed the March 17, 2021, submittal (Reference 1) and identified that the proposed request to approve an Alternate Measure - 4 (AM-4) for providing insider mitigation protection to meet 10 CFR 73.55 (b)(9) requirements is not required because Revision 19A to the Pilgrim Station Physical Security Plan (PSP), and its Appendix D (PSP for the new ISFSI installation), are approved (see References 2 and 3) and demonstrate compliance with 10 CFR 73.55(b)(9) for insider mitigation protection. The 10 CFR 73.55 Compliance Matrix provided in Enclosure 1, Attachment 2, to Reference 2 identifies that the new ISFSI Installation PSP, complies with 10 CFR 73.55(b)(9), and as such, an Alternative Measure for insider mitigation protection to meet



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10 CFR 73.55(b)(9) is not required. Therefore, the AM-4 alternative measure is requested to be removed from the Reference 1 submittal.

This letter contains no regulatory commitments.

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

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

Executed on June 22, 2021.

Sincerely,

Andrea L. Sterdis  
Vice President Regulatory and Environmental Affairs  
Holtec Decommissioning International, LLC

cc: NRC Regional Administrator, Region 1  
NRC NMSS Project Manager - Pilgrim Nuclear Power Station  
Director, Massachusetts Emergency Management Agency