



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713**

July 12, 2021

Docket No. 07201044

License No. DPR-35

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 - NRC INDEPENDENT SPENT  
FUEL STORAGE SECURITY INSPECTION REPORT NO. 07201044/2021401**

Dear Ms. Cowan:

On June 17, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an Independent Spent Fuel Storage Installation (ISFSI) security inspection at the Pilgrim Nuclear Power Station in Plymouth, Massachusetts. The inspection covered the licensee's physical security plan, Revisions 19A and 20, and NRC Order EA-13-132 dated July 23, 2013, "Additional Security Measures." The inspection was conducted using NRC Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations."

The enclosed inspection report documents the inspection results, which were discussed with Mr. J. Scott Thomson, Executive Director of Global Security, and other members of your staff, on June 17, 2021.

The inspection examined activities conducted under your license as they relate to security and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this 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 and enclosure 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's

P. Cowan

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Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

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

Enclosure:  
Inspection Report No. 07201044/2021401

cc w/encl:  
Brian McWilliams, Protective Services Department Section Manager  
S. Phillips, Director, Massachusetts Emergency Management Agency (MEMA)

SUBJECT: PILGRIM NUCLEAR POWER STATION ISFSI II - NRC INDEPENDENT SPENT FUEL STORAGE SECURITY INSPECTION REPORT NO. 07201044/2021401  
 DATED JULY 12, 2021

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ADAMS ACCESSION NUMBER: **ML 21187A270**

(Cover letter w/enclosure) **(Publicly Available)**

Cover Letter w/Enclosure <b>X</b> SUNSI Review	<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive					<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available
OFFICE	RI/DRSS	RI/DRSS	RI/DRSS	RI/DRSS	RI/DRSS	RI/DRSS
	JRey/JR via email	KHussar/KH via email	SMcCarver/SCM via email	DCaron/DC via email	ADimitriadis/SWilson For	FBower/fb
DATE	07/06/2021	07/06/2021	07/06/2021	07/06/2021	07/06/2021	07/12/2021

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U.S. NUCLEAR REGULATORY COMMISSION  
REGION I  
INSPECTION REPORT

Docket No. 07201044

License No. DPR-35

Report No. 07201044/2021401

Licensee: Holtec Decommissioning International, LLC

Address: 600 Rocky Hill Rd, Plymouth, MA 02360

Location Inspected: Pilgrim Nuclear Power Station Independent Spent Fuel Installation (ISFSI II)

Inspection Dates: March 1 – June 17, 2021

Inspectors: Jeremiah Rey, Physical Security Inspector  
Kenneth Hussar, Senior Physical Security Inspector  
Sammy McCarver, Physical Security Inspector  
Dana Caron, Senior Physical Security Inspector

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

Enclosure

## REPORT DETAILS

### a. Inspection Scope

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently 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) 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor-Related Greater-Than-Class-C Waste at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings." 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 portions 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.

In response to the COVID-19 Public Health Emergency declared on January 31, 2020, by the Secretary of the United States Department of Health and Human Services on the public health risks of the coronavirus Pilgrim Nuclear Power Station pursued an exemption to security officer training and requalification requirements (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML20325A341) (non-public, withheld under 10 CFR 2.390), as supplemented by e-mail dated December 10, 2020 (ADAMS Accession No. ML20345A199). In addition to these exemptions, licensees implemented additional actions or alternatives allowed in response to health concerns within existing regulatory guidance available in RG 5.75 to ensure annual Force on Force exercises were conducted as safely as possible while maintaining the requirements to simulate as closely as practicable site specific conditions and minimizing the number and effects of artificialities associated with these exercises (Part 73, Appendix B, VI.C.3).

From March 1-3, 2021, Region I conducted an onsite inspection in accordance with IP 81311 to assess Holtec's ability to implement NRC Order 13-132, Additional Security Measures (ASM's) for a second ISFSI (ISFSI II) and standalone protected area at Pilgrim Nuclear Power Station. In mid-March 2021, Holtec notified the NRC of their intent to stand-down from staffing ISFSI II until on or about June 1, 2021. As a result, this inspection was held open and continued remotely. Based on inspector availability, Region I physical security inspectors tentatively scheduled continuation of on-site inspection activities for the week of June 14, 2021. As documented in an internal email (ML21180A437), during a March 31, 2021, non-public conference call between the NRC and Holtec Pilgrim the site agreed to confirm readiness for the inspection one or two weeks before June 14, 2021. In early June 2021, Holtec notified the NRC of restaffing of

ISFSI II and readiness to demonstrate re-implementation of the ASMs for ISFSI II. Between June 14-17, 2021, the NRC conducted an onsite inspection in accordance with IP 81311 and assessed Holtec's ability to implement NRC Order 13-132, and ASM's. The results of the inspection are detailed below.

The inspectors evaluated this area by reviewing the aspects of the site physical security plan specific to ISFSI II, implementing procedures, and records; conducting interviews with responsible security personnel and plant employees; and performing walk-downs of the ISFSI II.

The inspectors: (1) reviewed the access authorization program for the ISFSI II; (2) verified and assessed the licensee's testing and maintenance program to assure the functionality and reliability of security equipment; and (3) verified that a rapid, capable response to safeguards contingency events had been appropriately developed and effectively implemented.

Inspectors conducted the following specific inspection activities and evaluated the program to determine if: (a) the access authorization program provided reasonable assurance that individuals granted unescorted access to the ISFSI II Protected Area (PA) were trustworthy and reliable and did not constitute an unreasonable risk to public health and safety; (b) procedures were in place to ensure that vehicles accessing the ISFSI II had proper authorization and were properly searched; (c) keys, locks, combinations, and associated hardware used in the ISFSI II PA were properly controlled; (d) the intrusion detection system (IDS) had the ability to detect and assess unauthorized penetration of the ISFSI II PA and adequate response capability existed; (e) alarms for the ISFSI II IDS annunciated at an alarm station which was continually staffed; (f) the ISFSI II PA was illuminated to facilitate adequate assessment of PA penetration or unauthorized activity; (g) a program was in place for testing and maintenance of the physical protection systems associated with the ISFSI II; (h) the spent fuel storage was within a PA and was protected by two barriers; (i) the vehicle barrier system satisfied the design vehicle bomb attack requirements; (j) communications had been established between onsite security forces and a designated response force or local law enforcement agency (LLEA); (k) a security organization with written procedures had been established; (l) members of the security organization were trained, equipped, qualified, and requalified to perform assigned duties; (m) the committed responders provided for an adequate armed response; (n) written response procedures were established and maintained; (o) training included ISFSI II activities; (p) safeguards events were being properly reported; (q) audits of the physical protection system were conducted; (r) signs were posted in accordance with requirements; (s) the licensee established an emergency plan; (t) the response force or LLEA had unimpeded access to the ISFSI II PA during contingency events; and (u) staffing, procedures, and resources were adequate to protect against radiological sabotage.

b. Findings

No violations were identified.

### Exit Meeting Summary

On June 17, 2021, the inspectors presented the inspection results to Mr. J. Scott Thomson, Executive Director of Global Security, 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

B. McWilliams, Protective Services Department Section Manager

**LIST OF ITEMS OPEN, CLOSED, AND DISCUSSED**

Opened

None

Opened and Closed

None

Closed

None

**INSPECTION PROCEDURES USED**

IP 81311, Physical Security Requirements for Independent Spent Fuel Storage Installations

**LIST OF DOCUMENTS REVIEWED**

Procedures

5.01-12, ICAS/OMS Alarm Station Operations, Revision 0

1.06-12, Security Patrols and Equipment Inspections, Revision 0

2.01-12, Facility Access Control, Revision 0

2.05-12, PA and VA Security Locks, Keys (Metal), and Security Related Equipment Keys,  
Revision 0

8.23-12, Protected Area Performance Testing, Revision 0

7.01-12, Security Communication, Revision 0

3.12-12, Missing Security Force Member/Security Duress Code/Signals and Alarms, Revision 0  
Safety Evaluation 2020-LLA-0070

Calculations

Calc. No. C15.0.3687, ISFSI II VBS Analysis, Revision 3

Calc. No C 15.0.3685, ISFSI CAS Building Blast Analysis, Revision 0

Condition Reports

None



Condition Reports Generated

PIL 02808

PIL 02809

PIL 02810

PIL 02811

PIL 02812