



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

July 12, 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 05000293/2021402**

Dear Ms. Cowan:

On June 17, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the permanently shut down Pilgrim Nuclear Power Station. On-site inspections were performed June 14 - 17, 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. J. Scott Thomson, Executive Director of Global Security, 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).

P. Cowan

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No reply to this letter is required. Please contact Sammy McCarver at 610-337-5382 if you have any questions regarding this matter.

Sincerely,

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

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

Enclosure:  
Inspection Report No. 05000293/2021402

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B. McWilliams, Manager, Nuclear Security  
S. Phillips, Director, Massachusetts Emergency Management Agency (MEMA)

SUBJECT: PILGRIM NUCLEAR POWER STATION SECURITY DECOMMISSIONING  
INSPECTION REPORT 05000293/2021402, DATED July 12, 2021

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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. 05000293/2021402

Enterprise Identifier: I-2021-402-0070

Licensee: Holtec Decommissioning International, LLC

Location: Plymouth, MA

Location Inspected: Pilgrim Nuclear Power Station

Inspection Dates: June 14– June 17, 2021

Inspectors: Dana Caron, Senior Physical Security Inspector  
Ken Hussar, Senior Physical Security Inspector  
Sammy McCarver, Physical Security Inspector

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

Enclosure

## **SUMMARY**

Holtec Decommissioning International, LLC  
Pilgrim Nuclear Power Station  
NRC Inspection Report No. 05000293/2021402

This report covers an announced security decommissioning program core inspection of the physical protection program at the permanently shut down Pilgrim Nuclear Power Station performed June 14 – 17, 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.

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).

1. Protective Strategy Evaluation and Performance Evaluation Program Decommissioning Nuclear Power Reactors, IP 81200.05

#### **a. Inspection Scope**

The inspectors evaluated the protective strategy and performance evaluation program through completion of a minimum of 50% of the inspection requirements.

#### **Protective Strategy Evaluation and Performance Evaluation Program Decommissioning Nuclear Power Reactors (2 Samples)**

02.01 a - i, k - n, 02.02 a - h, k - v, 02.03, 02.04 g, h, k, 02.05

b. Observations and Findings

No violations were identified.

c. Conclusions

The Pilgrim Nuclear Power Station protective strategy evaluation and performance evaluation 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 Plan Changes for Decommissioning Nuclear Power Reactors, IP 81200.09

a. Inspection Scope

The inspectors evaluated the security plan change(s) through completion of the following inspection requirements.

Security Plan Changes for Decommissioning Nuclear Power Reactors (1 Sample)

The opportunity to apply this procedure was not available because the licensee did not conduct activity covered by this IP. Specifically, the licensee has not initiated a physical security plan change in accordance with 10 CFR 50.54(p)(2) since the last baseline inspection. Security Plan Revision 20 remains in effect.

b. Observations and Findings

No violations were identified.

c. Conclusions

Because the Pilgrim Nuclear Power Station did not implement a physical security plan change using the 50.54(p)(2) process there was not an adverse impact to the licensee's ability to detect, assess, interdict, and neutralize an adversary force to protect against the design basis threat of radiological sabotage, or a site-specific vulnerability.

3. Review of Decommissioning Reactor Target Sets, IP 81200.14

a. Inspection Scope

The inspectors evaluated the security target set program through completion of the following elements.

Review of Decommissioning Reactor Target Sets (1 Sample)

02.02 (a-e), 02.03, 02.04 (a, b)

b. Observations and Findings

No violations were identified.

c. Conclusions

The Pilgrim Nuclear Power Station target set program was in accordance with requirements, was appropriately developed, and was being effectively implemented in a manner that informs the physical security program for protection against the DBT of radiological sabotage.

Exit Meeting Summary

On June 17, 2021, the inspectors presented the inspection results to with 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

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 81200.05, Protective Strategy Evaluation and Performance Evaluation Program  
Decommissioning Nuclear Power Reactors  
IP 81200.09, Security Plan Changes for Decommissioning Nuclear Power Reactors  
IP 81200.14, Review of Decommissioning Reactor Target Sets

**LIST OF DOCUMENTS REVIEWED**

Procedures

P-EN-NS-306, Development and Maintenance of Target Sets, Revision 5  
3.01, Heightened Awareness, Credible Threat, Valid Credible or Hostile Action on Pilgrim  
Nuclear Power Station, Revision 22

Miscellaneous

Pilgrim Nuclear power Station Physical Security, Training and Qualification, Safeguards  
Contingency Plan, and Independent Spent Fuel Storage Installation II Plan, Revision 20

Calculations

HI-2200216, Pilgrim Nuclear Power Station Blast Analysis, Revision 0

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