



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 2, 2021

Mr. David Lochbaum  
865 Traditions Drive  
Chattanooga, TN 37415

SUBJECT: RESPONSE TO QUESTIONS FROM DAVID LOCHBAUM REGARDING U.S. NUCLEAR REGULATORY COMMISSION INSPECTION REPORT NO. 05000293/2020002 & 2020003, HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, PILGRIM NUCLEAR POWER STATION, PLYMOUTH, MASSACHUSETTS

Dear Mr. Lochbaum:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I want to thank you for your August 5, 2021, letter (Agencywide Documents Access and Management System [ADAMS] Accession Number ML21230A248) to me regarding the NRC inspections that took place between April 21, 2020 and September 30, 2020, at the permanently shut down Pilgrim Nuclear Power Station (PNPS) in Plymouth Massachusetts. In your letter, you specifically requested written answers to your four questions. Please see the attached enclosure which includes a detailed response to each question.

Regarding the subject inspection at PNPS (ADAMS Accession No. ML20335A009), NRC conducted inspections that included examination of activities conducted under the license held by Holtec Decommissioning International, LLC (HDI). The inspection consisted of observations by the inspectors, interviews with site personnel, and a review of procedures and records as they relate to the compliance with the Commission's rules and regulations and the conditions of the license. The inspection included a review of the casks in use at Pilgrim.

Holtec Decommissioning International, LLC is permitted to use any spent fuel storage cask in the list of approved spent fuel storage casks, under Part 72 of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 214. The approved list in 10 CFR 72.214 includes certificate of compliance (CoC) No. 1014, Amendment No. 12. Although the expiration date has passed for CoC No. 1014, Amendment No. 12, this CoC is considered to be in timely renewal, because the CoC holder (Holtec International) submitted a renewal application for CoC No. 1014 "not less than 30 days before the expiration date of the CoC," which is in compliance with 10 CFR 72.240(b). This regulation, 10 CFR 72.240(b), also states, "When an applicant has submitted a timely application for renewal, the existing CoC will not expire until the renewal has been determined by the NRC." Therefore, the CoC No. 1014, Amendment No. 12 is not expired until the NRC completes its review of Holtec's renewal application. The NRC anticipates this review will be completed in the Spring of 2022. In the interim, NRC inspectors will continue to monitor and inspect the licensed activities at PNPS to provide reasonable assurance of adequate protection of public health and safety.

I appreciate your continued interest in these matters. If you have any questions, need additional information, or would like to further discuss, please contact John McKirgan of my staff at 301-415-5722 or [john.mckirgan@nrc.gov](mailto:john.mckirgan@nrc.gov).

Sincerely,



Signed by Lubinski, John  
on 09/02/21

John W. Lubinski, Director  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:  
Q&As

RESPONSE TO QUESTIONS FROM DAVID LOCHBAUM REGARDING NRC INSPECTION REPORT NO. 05000293/2020002 & 2020003, HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, PILGRIM NUCLEAR POWER STATION, PLYMOUTH, MASSACHUSETTS DATE September 2, 2021

DISTRIBUTION:

- RidsEdoMailCenterResource, OEDO
- RidsRgn1MailCenterResource, RGN I
- RidsNmssOdResource, NMSS

**ADAMS Accession No.: ML21230A289; Ltr ML21230A291**

OFFICE	NMSS/DFM/STLB	R-I/DNMS/DIRHB	NMSS/DFM/STLB	NMSS/DFM/STLB
NAME	CJacobs <i>CJ</i>	ADimitriadis JNicholson for <i>JN</i>	CJacobs <i>CJ</i>	JMcKirgan <i>JM</i>
DATE	Aug 18, 2021	Aug 20, 2021	Aug 20, 2021	Aug 24, 2021
OFFICE	NMSS/DFM	NMSS/MSST/MSTB	NMSS	
NAME	SHelton <i>SH</i>	TBrockington CGoode for <i>CG</i>	JLubinski <i>JL</i>	
DATE	Aug 30, 2021	Sep 2, 2021	Sep 2, 2021	

**OFFICIAL RECORD COPY**