



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

10 CFR 50.82(a)(7)

November 2, 2023

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

Indian Point Energy Center  
Provisional Operating License No. DPR-05  
Renewed Facility License No. DPR-26 and DPR-64  
NRC Docket Nos. 50-003, 50-247, 50-286 and 72-051

Subject: Notification of Changes in Schedule in accordance with 10 CFR 50.82(a)(7)

Pursuant to 10 CFR 50.82(a)(7), Holtec Decommissioning International, LLC (HDI) is notifying the U.S. Nuclear Regulatory Commission (NRC) of schedule changes from those described in the Revised Post-Shutdown Decommissioning Activities Report (PSDAR) and Revised Site-Specific Decommissioning Cost Estimate for Pilgrim Nuclear Power Station (Reference 1) and the Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3 (Reference 2).

Updates to the decommissioning schedules for Pilgrim Nuclear Site PSDAR are reflected in Enclosure 1 and updates to the decommissioning schedule for Indian Point Energy Center (IPEC) PSDAR are reflected in Enclosure 2. These changes are a result of the on-going challenges associated with the discharge of processed water at the respective sites. Previous material changes to the decommissioning milestone schedules or project cost [10 CFR 50.82(a)(7)] were reported in a letter titled, Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations submitted on March 31, 2023 (Reference 3).

### Pilgrim

On March 31, 2023 HDI submitted a National Pollution Discharge Elimination System (NPDES) permit modification for Pilgrim Nuclear Power Station Permit No. MA0003557 as instructed by the U.S. Environmental Protection Agency (EPA)<sup>1</sup>. This underlying permit was jointly issued by

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<sup>1</sup> February 17, 2022 letter from EPA to HDI stating requirement to submit a permit modification to "discharge spent fuel pool water or other water associated with decommissioning the reactor."

the State of Massachusetts, Department of Environmental Protection (Mass DEP) and the draft NPDES permit issuance is pending EPA review. Separately on July 24, 2023, Mass DEP issued a “Tentative Determination” to deny a modification to the Massachusetts Permit to Discharge Pollutants to Surface Waters for Pilgrim Nuclear Power Station and initiated a public comment process prior to EPA issuing a draft permit. This development has disrupted HDI’s initial decommissioning plan and the PSDAR decommissioning schedule for discharge of processed water from the site.

### IPEC

New York State passed new legislation (S.6893/A.7208) prohibiting the “discharge any radiological substance into the Hudson River in connection with the decommissioning of a nuclear power plant.” This legislation conflicts with the IPEC’s approved State Pollutant Discharge Elimination System (SPDES) permit (NY-0004472), currently undergoing renewal. This development has disrupted HDI’s initial decommissioning plan and the PSDAR decommissioning schedule for discharge of processed water from the site.

Holtec is evaluating all available options to address the disposition of water at both sites, including pursuing legal remedies, all of which will result in impacts to the decommissioning schedules as described in the sites’ PSDARs.

If you have any questions, or need additional information, please contact me at 856-797-0900 x3578.

Respectfully,

Jean A. Fleming  
Vice President, Licensing, Regulatory Affairs, & PSA  
Holtec International

References: 1. Letter, Holtec Decommissioning International, LLC to US NRC, “Notification of Revised Post-Shutdown Decommissioning Activities Report and Revised Site-Specific Decommissioning Cost Estimate for Pilgrim Nuclear Power Station,” November 16, 2018 (Accession No. ML18320A040)  
2. Letter, Holtec Decommissioning International, LLC to US NRC, “Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3,” December 19, 2019 (Accession No. ML19354A698)  
3. Letter, Holtec Decommissioning International, LLC to US NRC, “Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations – Holtec Decommissioning International, LLC (HDI)” March 31, 2023 (Accession No. ML23090A140)



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cc: NRC Regional Administrator - NRC Region I  
NRC Project Manager, NMSS – IPEC  
NRC Project Manager, NMSS – Pilgrim  
NRC Region 1 Lead Inspector – Pilgrim Nuclear Power Station  
NRC Region 1 Lead Inspector, Indian Point Units 1, 2 & 3  
New York State Department of Public Service  
New York State Liaison Officer Designee, NYSERDA  
New York State Department of Environmental Conservation  
Commonwealth of Massachusetts, Executive Office of Environmental Affairs  
Commonwealth of Massachusetts, Department of Public Health  
Commonwealth of Massachusetts, Department of Environmental Protection  
Commonwealth of Massachusetts, Director, Massachusetts Emergency Management Agency



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ENCLOSURE 1  
Pilgrim Nuclear Power Station  
Decommissioning Schedule Update



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Pilgrim (PSDAR/DCE/LTA issued on 11/16/2018)					
Project / Milestone	PSDAR/DCE/LTA (per project below)	DCE Annual Updates (2021)	DCE Annual Updates (2022)	50.82(a)(7) Schedule Updates (2023)	Notes
License Transfer	07/31/2019	08/26/2019	08/26/2019	08/26/2019	Complete
Zirc Fire Elimination	03/30/2020	03/31/2020	03/31/2020	03/31/2020	Complete
Fuel on Pad	11/26/2021	12/13/2021	12/13/2021	12/13/2021	Complete
Segmentation RVI	10/12/2020	10/26/2022	5/25/2023	03/01/2024*	*2023 Schedule change
Segmentation RPV	09/18/2022	12/31/2024	12/31/2028	12/31/2032*	*2023 Schedule change
Partial Site Release	01/28/2025	09/24/2027	09/24/2031	09/24/2035*	*2023 Schedule change
Fuel Shipment Begins	01/02/2030	01/02/2030	01/02/2030	01/02/2030	
Fuel Shipment Ends	12/31/2062	12/31/2062	12/31/2062	12/31/2062	
License Termination	09/07/2063	09/07/2063	09/07/2063	09/07/2063	



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ENCLOSURE 2

Indian Point Nuclear Generating Units 1, 2, and 3  
Decommissioning Schedule Update



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**Indian Point (PSDAR/DCE/LTA issued on 12/19/2019)**

Project / Milestone	PSDAR/DCE/LTA (per project below)	DCE Annual Updates (2021)	DCE Annual Updates (2022)	50.82(a)(7) Schedule Updates (2023)	Notes
License Transfer	05/31/2021	05/28/2021	05/28/2021	05/28/2021	Complete
Zirc Fire Elimination (IP3)	09/15/2022	08/01/2022	08/01/2022	08/01/2022	Complete
Fuel on Pad:					
IP1	12/11/2008	-	12/11/2008	12/11/2008	Complete
IP2	03/31/2023	03/31/2023	02/01/2023	02/01/2023	Complete
IP3	04/04/2024	10/31/2023	10/31/2023	10/16/2023	Complete
Segmentation RVI:					
IP1**	-	-	-		**IP1 RVI will be removed with the reactor vessel during RPV segmentation
IP2	12/21/2022	05/28/2024	07/18/2025	06/19/2025	
IP3	12/21/2021	11/30/2023	03/07/2024	7/31/2024	
Segmentation RPV:					
IP1	04/13/2024	11/20/2025	11/20/2027	11/20/2031*	*2023 Schedule change
IP2	06/30/2023	11/26/2024	04/29/2026	04/29/2034*	*2023 Schedule change
IP3	06/30/2022	05/37/2024	12/17/2024	12/17/2032*	*2023 Schedule change
Partial Site Release	07/09/2033	07/09/2033	07/09/2033	07/09/2041*	*2023 Schedule change
Fuel Shipment Begins:					
IP1	05/29/2046	05/29/2046	05/29/2046	05/29/2046	
IP2	01/02/2030	01/02/2030	01/02/2030	01/02/2030	
IP3	08/26/2047	08/26/2047	08/26/2047	08/26/2047	
Fuel Shipment Ends:					
IP1	08/23/2047	08/23/2047	08/23/2047	08/23/2047	
IP2	05/25/2046	05/25/2046	05/25/2046	05/25/2046	
IP3	12/30/2061	12/30/2061	12/30/2061	12/30/2061	
License Termination	09/06/2062	09/06/2062	09/06/2062	09/06/2062	