



Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360
Tel 508-830-8899

Brian R. Sullivan
Site Vice President

10 CFR 50.80
10 CFR 50.90
10 CFR 72.50

2.19.051

August 22, 2019

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

Subject: Notification of Expected Date of Transfer of Ownership of Nuclear Unit to
Holtec Pilgrim, LLC; Notification of Satisfactory Documentary Evidence of
Insurance; and Notification of Receipt of all Required Regulatory Approvals

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

In accordance with Section III of the Order issued in Reference 1, we are informing the Director of the Office of Nuclear Reactor Regulation and the Director of Nuclear Material Safety and Safeguards of the upcoming indirect transfer of the Pilgrim Nuclear Power Station (PNPS) Renewed Facility Operating License No. DPR-35 and the generally licensed Pilgrim Independent Spent Fuel Storage Installation to Holtec, and the direct transfer of ENOI's operating authority to Holtec Decommissioning International, LLC. The closing of the transfer is expected to occur on August 26, 2019.

Additionally, as discussed in Reference 2, Holtec Pilgrim, LLC (Holtec Pilgrim) and Holtec Decommissioning International, LLC (HDI) have obtained nuclear liability insurance for Pilgrim Nuclear Power Station from American Nuclear Insurers (ANI). A copy of Reference 2 is provided as Enclosure 1. As discussed in Reference 3, Holtec Pilgrim and HDI have also obtained nuclear property insurance for Pilgrim Nuclear Power Station from Nuclear Electric Insurance Limited (NEIL). A copy of Reference 3 is provided as Enclosure 2. These documents provide evidence that the appropriate insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w) of the Commission's regulations have been obtained.

Furthermore, Holtec Pilgrim and HDI have entered into a decommissioning operator services agreement that provides for HDI to act as the agent for Holtec Pilgrim and for Holtec Pilgrim to pay HDI's costs of post shutdown operations, including decommissioning and spent fuel management costs. This satisfies the associated regulatory commitment included in Reference 4.

Finally, as indicated in Reference 4, Entergy Nuclear Generation Company will be converted to a Massachusetts limited liability corporation prior to the transaction closing. This conversion will become effective on August 22, 2019. This satisfies the regulatory commitment included in footnote 1 of Reference 4.

Following license transfer, HDI will assume responsibility for all ongoing NRC regulatory actions and reviews currently underway for Pilgrim Nuclear Power Station. HDI respectfully requests NRC continuation of these regulatory actions and reviews.

All required regulatory approvals for the transfer of these licenses have been obtained.

This letter contains no new regulatory commitments.

We will keep the U.S. Nuclear Regulatory Commission informed of any developments that have an impact on the schedule of closing the transfer of these licenses.

If you have any questions, please contact Andrea L. Sterdis, Vice President Regulatory and Environmental Affairs (HDI) at 856-797-0900, x3813 or Philip Couture, Manager, Fleet Licensing Programs (ENOI) at 601-368-5102.

Respectfully,


Brian R. Sullivan
Pamela B. Cowan
Sr. Vice President & Chief Operating Officer
Holtec Decommissioning International, LLC

Digitally signed by Pam Cowan
DN: cn=Pam Cowan, o=Holtec
International, ou=Holtec
International, email=p.cowan@holtec.com,
c=US
Date: 2019.08.22 16:46:03
+0400

BRS/pm

- Enclosures:
- 1) Letter from Jason Martinez ANI to NRC Document Control Desk dated July 25, 2019, regarding Nuclear Liability Insurance for Pilgrim Nuclear Power Station
 - 2) Letter from NEIL to NRC, "Entergy Corporation – License Transfer to Holtec Pilgrim, LLC," dated August 19, 2019

- References:
- 1) NRC Letter to ENOI, "Order Approving Direct and Indirect Transfer of License and Conforming License Amendment" (EPID L-2018-LLO-0003)(ML19170A101), dated August 22, 2019
 - 2) Letter from ANI to NRC, "Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC NRC Operating License Transfer for Pilgrim Nuclear Power Station," dated July 25, 2019
 - 3) Letter from NEIL to NRC, "Entergy Corporation – License Transfer to Holtec Pilgrim, LLC," dated August 19, 2019
 - 4) Letter ENOI to NRC, "Application for Order Consenting to Direct and Indirect Transfers of Control of Licenses and Approving Conforming License Amendment; and Request for Exemption from 10 CFR 50.82(a)(8)(i)(A)," (ML18320A031), dated November 16, 2018

cc: NRC Director – Nuclear Reactor Regulation
NRC Director – Nuclear Material Safety and Safeguards
NRC Region I Administrator
NRC Senior Resident Inspector – Pilgrim Nuclear Power Station
NRC Project Manager – Pilgrim Nuclear Power Station

Enclosure 1

2.19.051

**Letter from Jason Martinez ANI to NRC Document Control Desk dated July 25, 2019,
regarding Nuclear Liability Insurance for Pilgrim Nuclear Power Station**



Jason Martinez, CPCU, ARM, ARe
Director, Underwriting

July 25, 2019

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

***Re: Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC
NRC Operating License Transfer for Pilgrim Nuclear Power Station***

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for the Pilgrim Nuclear Power Station, located in Plymouth, MA, upon the transfer of the NRC operating license from Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc. to Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC.

Effective as of the transaction close date, which is expected to be on or before August 1, 2019, ANI will amend the policy and certificates for the Pilgrim Nuclear Power Station as follows:

- a. **Facility Form Policy No. NF -0188:** ANI will amend the named insured to "Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc."
- b. **Master Worker Certificate No. NW -0573:** ANI will amend the named insureds to "Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc."
- c. **SFP Certificate No. N -0031:** ANI will amend the named insureds to "Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Generation Company and Entergy Nuclear Operations, Inc."
- d. **SFP Certificate No. N -0031:** ANI will add Holtec Pilgrim, LLC and Holtec Decommissioning International, LLC to the Bond for payment of retrospective premiums. The SFP certificate period will be amended per the effective NRC license transfer date.

Attn: Document Control

July 25, 2019

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The commitment to write insurance for Pilgrim Nuclear Power Station remains valid thru December 31, 2019. In the event the license transfer occurs after this date, ANI will review the existing circumstances prior to reinstating our commitment to provide insurance.

Please feel free to contact me with any questions or concerns.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JM', with a horizontal line extending to the right.

Jason Martinez, CPCU, ARM, ARe
Director, Underwriting

C: Holtec – Pam Cowan, Andrea Sterdis, and Jason Day
Conner Strong & Buckelew – Frank Proctor
Entergy – Ron Rispoli & Megin Murphy
Stephens – Tricia Brazil

Enclosure 2

2.19.051

**Letter from NEIL to NRC, "Entergy Corporation – License Transfer to Holtec Pilgrim, LLC,"
dated August 19, 2019**

Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

office + 302 888 3000 fax + 302 888 3007

August 19, 2019

Mr. Eric Olvera
U.S. Nuclear Regulatory Commission
OWFN – 07C2A
Washington, DC 20555-001

Re: Entergy Corporation – License Transfer to Holtec Pilgrim, LLC

Dear Mr. Olvera:

This letter confirms that Nuclear Electric Insurance Limited will write a Nuclear Liability and Decontamination Insurance Policy for Holtec Pilgrim, LLC as the owner of 100% of the Pilgrim Nuclear Power Station. A Nuclear Liability and Decontamination Insurance Policy will be effective upon close of the transfer of the facility license to own the plant from Entergy Corporation.

The combined limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write Nuclear Liability and Decontamination Insurance Policy for Holtec Pilgrim, LLC for a twelve-month policy period remains valid through August 26, 2019. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,



Michael W. Kolodner, CPCU, ARM, Are
Vice President – Underwriting

MWK/jdo

cc: Frank Proctor (Conner Strong)
John Oehler (NEIL)
Kate Fowler (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)