



EA-17-132/153

December 31, 2019

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

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

Subject: Holtec Decommissioning International (HDI) Response to Confirmatory Order  
EA-17-132/EA-17-153

- References:
- [1] Entergy Operations, Inc./Entergy Nuclear Operations Inc. (Entergy) letter to U. S. Nuclear Regulatory Commission (NRC), "Entergy Response to Confirmatory Order EA-17-132/EA-17-153, Element K – 2019 Summary," dated December 30, 2019
  - [2] Entergy Operations, Inc./Entergy Nuclear Operations Inc. (Entergy) letter to U. S. Nuclear Regulatory Commission (NRC), "Entergy Response to Confirmatory Order EA-17-132/EA-17-153," dated March 21, 2019 (ADAMS Accession No. ML19081A270)

In a letter dated December 30, 2019 (Reference 1), Entergy Operations, Inc./Entergy Nuclear Operations Inc. (Entergy) provided the 2019 Summary of actions taken to address Confirmatory Order EA-17-132/EA-17-153. Holtec Decommissioning International, LLC (HDI) is providing additional information for the Pilgrim Nuclear Power Station (PNPS).

A review identified that the scheduled completion dates for the two actions stated in Reference 2 needed to be changed. HDI became aware of a gap in addressing the communication action on December 5, 2019. A revision of commitments is provided in Enclosure 1 to this letter. The revision provides 90 days from the date of notification for the communication to be documented. A time frame comparable to Entergy's response in Reference 2 was selected for the survey of integrity messaging. HDI understands the importance of addressing acts of willful misconduct and the need for integrity among the workforce. HDI will continue to coordinate with Entergy to ensure the future actions outlined in the Order are met.



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Should you have any questions or require further information, please contact me at (856) 797-0900, x3813.

Respectfully,

A handwritten signature in blue ink that reads "Andrea Sterdis".

Andrea Sterdis  
HDI VP Regulatory and Environmental Affairs  
Holtec Decommissioning International, LLC

Enclosure 1: List of Regulatory Commitments

cc: NRC Region I Regional Administrator  
NRC NRR Project Manager (Pilgrim Nuclear Power Station)  
NRC NMSS Project Manager (Pilgrim Nuclear Power Station)

Enclosure 1  
List of Regulatory Commitments

## LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by HDI in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

<b>Commitment</b>	<b>One-Time Action</b>	<b>Scheduled Completion Date</b>
HDI will utilize the Entergy Tier 2 Communication process to ensure that the one remaining semiannual integrity communication is delivered in a timely manner. HDI will record the receipt and acknowledgement of these communications for future traceability.	X	March 4, 2020
Element D of the Confirmatory Order requires Entergy to identify specific criteria necessary to perform annual effectiveness reviews. HDI will conduct a survey to ensure the integrity message has been received and understood. HDI will modify its corrective actions, as needed, based on the results of the effectiveness reviews.	X	April 26, 2020