

~~SAFEGUARDS INFORMATION~~



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

Telephone (856) 797-0900

Fax (856) 797-0909

10 CFR 50.90
10 CFR 50.54(p)
10 CFR 73.55(r)

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

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

Subject: Supplemental Information to Support PSP Revision and LAR request

- Reference:
- [1] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – "Physical Security Plan Revision and License Amendment Request to Incorporate Additional Independent Spent Fuel Storage Installation", dated April 2, 2020 (ML201136A038)
 - [2] Letter from Holtec Decommissioning International, LLC to U.S. Nuclear Regulatory Commission – "Response to NRC Request for Clarifying Information", dated April 22, 2020 (ML20122A055)
 - [3] US Nuclear Regulatory Commission – "Issuance of Order (EA-13-132) for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Pilgrim Nuclear Power Station Independent Spent Fuel Storage Installation," dated July 23, 2013 (ML13199A208)

Dear Sir or Madam:

On April 2, 2020, Holtec Decommissioning International, LLC (HDI) requested NRC approval of a revision to the Physical Security Plan (PSP) and a License Amendment Request (LAR) to address the security requirements for an additional Independent Spent Fuel Storage Installation (ISFSI) at the Pilgrim Nuclear Power Station (PNPS) site (Reference 1). On April 22, 2020, HDI submitted clarifying information to support the PSP revision and LAR request (Reference 2). Follow-up Security reviews of these submittals determined that an additional security order compliance matrix for NRC Order EA-13-132 (Reference 3) is needed to supplement the proposed PSP revision and LAR request.

The Attachment to this letter provides the NRC Order EA-13-132 compliance matrix summary for the new ISFSI II cask storage pad. The Attachment contains "Safeguards Information" and is required to be protected accordingly.

NOTE: THE ATTACHMENT TO THIS LETTER CONTAINS "~~SAFEGUARDS INFORMATION~~". THE ATTACHMENT MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF THE ATTACHMENT, THIS LETTER IS DECONTROLLED"

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Security reviews performed to prepare the Attached EA-13-132 compliance matrix revealed that NRC Orders EA-02-026, EA-03-086 and EA-06-037 are not necessary to support NRC review of the PSP and LAR request for the ISFSI II cask storage pad. NRC Order EA-02-026 is not required because the order requirements were either rescinded or were subsequently incorporated into Security and Emergency Planning regulations. In addition, the design basis threat and adversary characteristic requirements identified in NRC Orders EA-03-086 and EA-06-037 that are applicable to the new ISFSI cask storage pad, are identified on the compliance matrix for NRC Order EA-13-132.

Pursuant to 10 CFR 50.91, "Notice for public comment; State consultation", paragraph (b), a copy of this clarification response, with the attachment is being provided to the Commonwealth of Massachusetts, Emergency Management Agency.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3813.

I declare under the penalty of perjury that the forgoing is true and correct.

Executed on June 15, 2020.

Sincerely,

Andrea L.
Sterdis

Digitally signed by Andrea L. Sterdis
DN: cn=Andrea L. Sterdis, c=US,
o=HDI, ou=Holtec
Decommissioning International,
email=andrea.sterdis@holtec.com
Date: 2020.06.15 12:25:55 -0400

Andrea L. Sterdis
Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachment - Order EA-13-132 Security Order Compliance Matrix (Safeguards) (40 pages)

cc: (without attachment)
NRC Regional Administrator for Region I
NRC NMSS Project Manager (Pilgrim Nuclear Power Station)
Director, Massachusetts Emergency Management Agency

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Attachment to Letter No.: HDI-PIL-20-039

Order EA-13-132 Security Order Compliance Matrix
(40 total pages including cover page)

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Attachment 1to HDI-PIL-20-039

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