



10 CFR 50.90

10 CFR 50.36

May 28, 2021

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

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

Subject: Supplemental Information to Correct License Amendment Request to Revise Pilgrim Nuclear Power Station Permanently Defueled Technical Specifications to Reflect Permanent Removal of Spent Fuel from the Spent Fuel Pool

References:

1. Letter from Holtec Decommissioning International, LLC (HDI) to US NRC, "License Amendment Request to Revise Pilgrim Nuclear Power Station Permanently Defueled Technical Specifications to Reflect Permanent Removal of Spent Fuel from the Spent Fuel Pool," March 17, 2021 (ML21076A404)
2. US Nuclear Regulatory Commission to Holtec Decommissioning International, LLC - "Holtec Decommissioning International – Review and Acceptance of the Holtec Decommissioning International Fleet Decommissioning Quality Assurance Program, (EPID L-2020-DP3-000)" January 12, 2020 (ML21011A106)

By letter dated March 17, 2021 (Reference 1) Holtec Decommissioning International, LLC, (HDI) submitted a License Amendment Request (LAR) for Pilgrim Nuclear Power Station (PNPS). The proposed amendment requested revision of Facility License (FL) and the Technical Specifications (TS) to reflect removal of all spent nuclear fuel from the spent fuel pool (SFP) and its transfer to dry cask storage within a site controlled Independent Spent Fuel Storage Installation (ISFSI).

Recent review and discussion with the NRC Project Manager for Pilgrim Station, identified a concern relative to site reliance on the HDI Fleet Decommissioning Quality Assurance Program (DQAP), that was previously approved on January 12, 2021 (Reference 2).

This letter confirms that future Pilgrim Station activities involving quality assurance requirements will be conducted and controlled in accordance with the Fleet DQAP as opposed to the superseded Site Quality Assurance Program Manual (QAPM).

Attachment 1 to this letter, identifies specific Reference 1 submittal changes that are needed to identify that the HDI Fleet DQAP is the effective quality assurance manual for the station and will be utilized to ensure required activities meet quality assurance program requirements.



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HDI has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the previously stated bases in Reference 1 for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this submittal.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 28, 2021.

Sincerely,

**Andrea
Sterdis**

Digitally signed by Andrea Sterdis
DN: cn=Andrea Sterdis, c=US,
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Andrea L. Sterdis

HDI Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

Attachment 1. LAR Submittal Revisions to Identify Site Reliance on the HDI Fleet DQAP

cc:

USNRC Regional Administrator, Region I

USNRC Project Manager, NMSS – Pilgrim Nuclear Power Station

USNRC Region I, Lead Inspector – Pilgrim Nuclear Power Station

Director, Massachusetts Emergency Management Agency



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HDI-PIL-21-061
Attachment 1
LAR Submittal Revisions
to Identify Site Reliance on the HDI Fleet DQAP
(3 total pages including cover page)

SUMMARY

By letter dated March 17, 2021 (Reference 1) Holtec Decommissioning International, LLC, (HDI) submitted a License Amendment Request (LAR) for Pilgrim Nuclear Power Station (PNPS). The proposed amendment requested revision of Facility License (FL) and the Technical Specifications (TS) to reflect removal of all spent nuclear fuel from the spent fuel pool (SFP) and its transfer to dry cask storage within a site controlled Independent Spent Fuel Storage Installation (ISFSI).

Discussion with the NRC Project Manager for Pilgrim Station indicates concern relative to future reliance on the HDI Fleet Decommissioning Quality Assurance Program (DQAP), that was approved on January 12, 2021 (Reference 2).

The following information is identified in order to ensure that our LAR request identifies site reliance on the HDI Fleet Decommissioning Quality Assurance Program (DQAP) requirements for activities that involve quality assurance after approval of the proposed LAR.

Ref 1 - Enclosure 1, Section 1.0 Summary Description, (end of 1st para, pg 3):

"The proposed changes include recognition of the approved HDI Decommissioning Quality Assurance Plan (DQAP) and relocation of existing TS Administrative Controls from Technical Specifications (TS) to the Defueled Safety Analysis Report (DSAR)."

Change:

No change required.

Ref 1 – Enclosure 1, Section 3.0, License Condition 3.C – Records , (2nd para, pg 7)

"PNPS identifies specific record keeping requirements in Section 17.0 of the Quality Assurance Program Manual (QAPM) and in Section 5.5 of the Site DSAR. Both documents are maintained for Site decommissioning purposes as required per 10 CFR Part 50 regulatory requirements."

Change:

"PNPS identifies specific record keeping requirements in Section 17.0 of the Decommissioning Quality Assurance Program (DQAP) and"

Ref 1 –Enclosure 1, Section 3.0, TS 5.2.1, "Onsite and Offsite Organizations" (first bul, pg 19)

"• TS 5.2.1.(b), reference to "plant manager" will be revised to "manager responsible for overall operational activities" in order to conform to the description of the corresponding management position in Section A, "Management," of the existing QAPM."

Change :

"in order to conform to the description of the corresponding management position in Section 1.3 of the Fleet DQAP."

Ref 1 – Enclosure 1, Section 3.0, TS Section 5.3, "Facility Staff Qualifications" , (1st para, pg 21)

"The proposed change is to delete TS 5.3.1 from the TS and to relocate the requirements to the DSAR."

Change:

"The proposed change is to delete TS 5.3.1 from the TS and to relocate the requirements to the DSAR with the exception that referenced "Quality Assurance Program Manual" will be revised to identify the "Decommissioning Quality Assurance Program" when relocated.

Ref 1 – Enclosure 1, Section 4.2 - No Significant Hazards Determination, Question 2, (1st para, pg 32)

"2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?"

Response: No.

The proposed changes eliminate the operational requirements and certain design requirements associated with the storage of the spent fuel in the SFP and relocate certain administrative controls to the Quality Assurance Program Manual or other licensee-controlled process."

Change:

"....and relocate certain administrative controls to the Decommissioning Quality Assurance Program or other licensee-controlled process."

Ref 1 Enclosure 1, Attachment 3, Technical Specification Administrative Controls Relocated to the DSAR, Section B.5.3.1 (pg 3)

"B. 5.3 - Facility Staff Qualifications

B-5.3.1 Facility Staff Qualifications

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM)."

Change:

..... comparable positions with exceptions specified in the Decommissioning Quality Assurance Program.