



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION				
David Noyes (HDI), et. al. (see below)		11/15/2022	<input type="checkbox"/> E-MAIL				
E-MAIL ADDRESS		TELEPHONE NUMBER	<input checked="" type="checkbox"/> TELEPHONE	<input type="checkbox"/> INCOMING			
MS Teams Call Link Sent by NRC		Teams Call		<input checked="" type="checkbox"/> OUTGOING			
ORGANIZATION Holtec Decommissioning International (HDI), Pilgrim Nuclear Power Station (PNPS) Independent Spent Fuel Storage Installation (ISFSI)		DOCKET NUMBER(S) 72-1044					
LICENSE NAME AND NUMBER(S) Pilgrim Nuclear Power Station (ISFSI) Renewed Operating License No. DPR-35		MAIL CONTROL NUMBER(S) EPID No: L-2022-LLE-0028					
SUBJECT Clarification call with HDI regarding its August 29, 2022 (ML22241A112) exemption request regarding annual radioactive effluents reporting requirements for PNPS ISFSI							
SUMMARY AND ACTION REQUIRED (IF ANY) SUMMARY On November 15, 2022, as part of the acceptance review process, the NRC staff held a call with HDI to provide clarifications on the staff's draft request for supplemental information (D-RSI) pertaining to the August 29, 2022 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22241A112) exemption request from HDI regarding PNPS ISFSI. The NRC staff had previously provided the D-RSI questions to HDI personnel for information on November 4, 2022 via email (see attached). No NRC staff decision, neither technical nor regulatory in nature, was made at the call. As a result of the call, HDI indicated that the draft questions were clear, and that it plans to provide supplemental information supporting its August 29, 2022 exemption request. Because HDI stated that it will provide relevant supplemental information, on its own initiative, supporting its exemption request, the NRC staff indicated that a formal RSI will not be sent. PARTICIPANTS NRC/NMSS: Tilda Liu HDI/Pilgrim: Dave Noyes, Francis McGinnis, Laura Hageman, Bill Noval NOTE HDI has reviewed and commented on this conversation record.							
NAME OF PERSON DOCUMENTING CONVERSATION Tilda Liu, NMSS/DFM/STLB							
SIGNATURE AND DATE							
Add 1 Continuation Page		Delete 1 Continuation Page					

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

Pilgrim Nuclear Power Station (ISFSI)
Renewed Operating License No. DPR-35

MAIL CONTROL NUMBER(S)

EPID No: L-2022-LLE-0028

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

Draft Request for Supplemental Information**August 29, 2022, Exemption Request from Holtec Decommissioning International, LLC.****Related to Radioactive Effluent Reporting Requirements****Pilgrim Nuclear Power Station Independent Spent Fuel Storage Installation**

November 4, 2022

By letter dated August 29, 2022 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML22241A112), Holtec Decommissioning International, LLC, (HDI) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for an exemption from Title 10 of the Code of Federal Regulations (10 CFR) 72.212 (a)(2), (b)(2), (b)(3), (b)(4), (B)(5)(i), (b)(11), and 72.214 for Pilgrim Nuclear Power Station (PNPS or Pilgrim) Independent Spent Fuel Storage Installation (ISFSI) Annual Radioactive Effluent Release Report (ARERR). The staff has identified the following questions as part of the screening process for acceptance review.

D-RSI 1

The NRC staff notes that HDI is requesting the timing of Pilgrim ISFSI ARERR submittal to be aligned with the timing of the overall site ARERR under 10 CFR 50 requirements. Given that Pilgrim is in active decommissioning status, discuss how the timing of Pilgrim ISFSI ARERR reporting requirements be addressed when Pilgrim's decommissioning activities are complete, and its 10 CFR 50 reactor license terminated in the foreseeable future.

D-RSI 2

The exemption request states that PNPS Defueled Safety Analysis (DSAR), Appendix B, Section B-5.6.3, "Radioactive Effluent Release Report," provides licensing basis requirements for reporting quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. Provide corresponding PNPS Technical Specifications (TS) for the same requirements, including the relevant TS section citation related to ARERR reporting requirements.

D-RSI 3

List relevant PNPS plant procedure(s) related to the reporting of ARERR for the overall Pilgrim site and ISFSI, respectively.

Docket No. 72-71
License No. NPF-43
EPID No. L-2021-LLE-0037

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