



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

November 26, 2024

EA-24-105

Docket No. 07201044
License No. DPR-35

Kelly Trice
President – HDI
Holtec Decommissioning International, LLC
1 Holtec Blvd., Krishna P. Singh Technology Campus
Camden, NJ 08104

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, PILGRIM
NUCLEAR POWER STATION - NRC INDEPENDENT SPENT FUEL
STORAGE SECURITY INSPECTION REPORT NO. 07201044/2024402

Dear Kelly Trice:

This letter refers to the Independent Spent Fuel Storage Installation (ISFSI) security inspection conducted on November 4 – 5, 2024, at Pilgrim Nuclear Power Station. The inspection examined activities related to the licensee's physical security plan Revision 1, and NRC Order EA-13-132 dated July 23, 2013, "Additional Security Measures." The inspection was conducted using NRC Inspection Procedure 81311, "Physical Security Requirements for Independent Spent Fuel Storage Installations." The enclosed inspection report documents the inspection results, which were discussed with John Moylan, Site Vice President, and other members of your staff, on November 5, 2024.

The inspection examined activities conducted under your license as they relate to security and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of an examination of selected procedures and representative records, observations of activities, and interviews with personnel.

Enclosure transmitted herewith contains SUNSI. When separated from enclosure, this transmittal document is decontrolled.
--

Based on the results of this inspection, one or more apparent violation(s) (AV/AVs) was (were) identified and is (are) being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The enclosed inspection report provides a description of the AV(s). In accordance with the NRC Enforcement Manual, the NRC does not discuss the number of security-related AVs that are potentially characterized above Severity Level IV.

Because we have not made a final determination, no notice of violation is being issued at this time. Please be aware that further NRC review may prompt us to modify the number and characterization of the AV(s). In addition, since your site has not been the subject of escalated enforcement actions within the last two years, and based on our understanding of your corrective actions, a civil penalty may not be warranted in accordance with Section 2.3.4 of the Enforcement Policy. The final decision will be based on you confirming on the license docket that the corrective actions previously described to the NRC staff have been or are being taken.

Before the NRC makes its enforcement decision, we are providing you an opportunity to; (1) respond to the AV(s) addressed in this inspection report in writing within 30 days of the date of this letter, or (2) request a Pre-decisional Enforcement Conference (PEC). If a PEC is held, the NRC will issue a press release to announce the time and date of the conference; however, the PEC will be closed to public observation since Security-Related Information will be discussed.

A PEC should be held within 30 days of the date of this letter. Please contact Brice Bickett, Chief, Security, Emergency Preparedness and Incident Response Branch, NRC Region I at 610-337-5312, within 10 days of the date of this letter to notify the NRC of which of the above options you choose. If you do not contact the NRC within the time specified, and an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision.

If you choose to provide a written response, it should be clearly marked as a "Response to Apparent Violation(s) in NRC Inspection Report 072001044/2024402; EA-24-105" and should include for each apparent violation(s): (1) the reason for the apparent violation or, if contested, the basis for disputing the apparent violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. Additionally, your response should be sent to the NRC's Document Control Center, with a copy mailed to Paul G. Krohn, Region I, 475 Allendale Road, Suite 102, King of Prussia, PA 19406, within 30 days of the date of this letter. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a PEC.

If you choose to request a PEC, the conference will afford you the opportunity to provide your perspective on these matters and any other information that you believe the NRC should take into consideration before making an enforcement decision. The decision to hold a PEC does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference would be conducted to obtain information to assist the NRC in making an enforcement decision. The topics discussed during the conference may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned.

K. Trice

3

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this cover letter will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

However, the enclosed report contains Security Related Information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in the enclosure will not be made available electronically for public inspection in the NRC Public Document Room or from the PARS component of NRC's ADAMS. If you choose to provide a response and Security Related Information is necessary to provide an acceptable response, please mark your entire response "Security Related Information – Withhold from Public Disclosure Under 10 CFR 2.390" in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

If you have any questions concerning this matter, please contact Brice Bickett of my staff at 610-337-5312.

Sincerely,

Paul G. Krohn, Director
Division of Radiological Safety and Security

Enclosure:
Inspection Report No. 07201044/2024402

cc w encl: (w OUO-SRI) via BOX

Brian McWilliams, Manager Site Security
Dan Gagnon, Fleet Security Director
James Piquette, Security Superintendent
Jean Fleming, Vice President Regulatory Affairs
Dawn Brantley, Acting Director,
Massachusetts Emergency Management Agency

K. Trice

4

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, PILGRIM NUCLEAR
POWER STATION - NRC INDEPENDENT SPENT FUEL STORAGE SECURITY
INSPECTION REPORT NO. 07201044/2024402 DATED NOVEMBER 26, 2024

Distribution w/encl: (w/OUO-SRI): (via E-mail)

PKrohn, DRSS
JZimmerman, DRSS
ADimitriadis, DRSS
DScrenci, PAO
NSheehan, PAO
DTiftt, SLO
KHussar, DRSS
DSchroeder, DRSS
BBickett, DRSS
DarylJohnson NSIR
JClark, NSIR
JWorosilo, DRS, RII
MZiolkowski, DRSS, RIII
DDodson, DRSS, RIV
DFurst, OE
MBurgess, NMSS
BYip, NSIR
TInverso, NSIR
DDavis, NSIR
JRey, NSIR
LCasey, EAGL
SOSB Insp Rpt Distro

File: <https://usnrc.sharepoint.com/teams/RIDRSPSBSEC/Shared Documents/Inspection Reports/2024 IR Final/Pilgrim/Pilgrim ISFSI 2024402.docx>

ADAMS ACCESSION NUMBER: **ML24331A042** (Cover letter w/o enclosure) (**Publicly Available**)

ADAMS ACCESSION NUMBER: **ML24325A115** (Cover letter w/SRI enclosure) (**Non-Publicly Available**)

Cover Letter Only X SUNSI Review	☒ Non-Sensitive ☐ Sensitive		☒ Publicly Available ☐ Non-Publicly Available			
Cover Letter w/OUO-SRI Enclosure X SUNSI Review	☐ Non-Sensitive ☒ Sensitive		☐ Publicly Available ☒ Non-Publicly Available MD 3.4 A.7			
OFFICE	RI/DRSS	RI/DRSS	RI/DRSS	RI/EAGL	RI/DRSS	RI/DRSS
NAME	DCaron	JEdwards	ADimitriadis	LCasey	DSchroeder	PKrohn
DATE	11/25/2024	11/21/2024	11/25/2024	11/21/2024	11/20/2024	11/26/2024

OFFICIAL RECORD COPY