

Pilgrim NDCAP Update



March 28, 2022

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Pilgrim Update Greater-than-Class C (GTCC) Waste

- Loaded all Greater-than-Class C **Non-Fuel Waste Containers** (NFWC)
- Moved the Three (3) GTCC NFWCs to the Spent Fuel Pad by mid-March
- All Greater than Class C waste has been removed from the Reactor and placed into storage







Pilgrim Update-Demolition

- Operations and Maintenance Bldg.
- Emergent asbestos work completed in late February
- Demo completed in early March





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Demolition cont.

- More than 50% of outbuilding
 square footage
 has been
 demolished (Red)
- Additional 2022
 Demo projected
 (Blue)
- Two-story Butler
 Building

 (Abatement
 complete)
- Old Admin (Abatement complete)
- TCF





Opportunities and Innovations at Pilgrim

Fuel Campaign

 Designed tool to allow a dropped, damaged fuel bundle at Pilgrim to be retrieved and safely stored, first in industry

Strategic Demolition and Tooling

- ✓ Use of diamond-wire cutting tools to reduce dust/debris
- ✓ Plasma cutting of Control rod guide tubes under 75' of water
- ✓ Reactor segmentation tooling
- ✓ Installation of Pahl finger cranes

Waste Management

- Waste reduction, minimization Pilgrim Riser Tube crushing
- Waste staging and storage
- Optimized loading and packaging
- Free release, decontamination, and separation of waste streams

Risk Reduction

- Control Rod Guide Tubes underwater cutting
- ✓ Reduced exposure to workers
- Eliminated industrial hazard from material handling
- Use of decay heat from Pilgrim spent fuel pool to heat buildings significantly reducing Pilgrims carbon footprint.























CRGT being positively controlled, segmented ~75' underwater with plasma cutting tool, and removed for further waste separation (B/C vs A)

Pilgrim Update-Waste Management

- Radioactive Waste Shipments –
 Completed in 2022
- 1 x CRDM Filter Shielded Container (Class C) Part 37 source reduction
- 6 x DAW shipments (8 x 20' C Vans)
- 3 x DAW shipment (6 blade guide boxes)
- Radioactive Waste Shipments -Planned 2022
- Dry Active Wastes (DAW)
- Reactor Vessel Internals Type A containers
- Spent Resins & Tri Nuke Filters in Cask Shipments
- Spent Fuel Racks
- Building Demolition Debris







February

Totals YTD

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)22)	Weight (lbs)	Vol (cubic feet)
	116,420	6,305 ft3
	69,980	4,660 ft3
	186,400 lbs	10,965 ft3

Regulatory Affairs

- Revised Environmental Site Assessment Work Plan submitted February and can be viewed on our website. This was done within the 30 days required by the Settlement Agreemen https://holtecinternational.com/wp-content/uploads/2022/03/Final-Revised-ESA-Work-Plan 25-Feb-2022rev1.pdf
- Annual NRC update for Pilgrim to be submitted by 3/31, will be shared with state as required by Settlement Agreement and public link to NRC submittal will be shared with NDCAP
- Barge/Waste Management Update response to AG The Waste Management Plan has been submitted to Commonwealth of Massachusetts parties required by the agreement. No comments have been received. On the Barge study our assessment of the use of low-level waste shipments via barge determined that these are currently not feasible due to uncertainty and work necessary to restore the facility barge berth.
- Received approval last week from DEP of the WP68 that will allow for leech pit removal to provide the screening plantings to progress forward



Liquid Radiological Waste Disposal

- The process water is still being used for shielding radiological work activities
- The original source and total volume of water to be ultimately disposed of has not changed
- Efforts continue to validate assumptions with respect to process and quality
- All three options for disposal remain viable based on analysis to date and regulatory requirements
 - There are still no plans for radiological waste discharge in calendar 2022





NRC Chairman Visit

Chairman Chris Hanson visited Pilgrim on March 16 for a tour and decommissioning update





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CDI-HDI Transition

- In December 2021 HDI exercised its termination for convenience rights under the Decommissioning General Contractor Agreement with CDI. Effective January 19th, HDI performs all activities previously performed by CDI at all our sites, including managing and performing decommissioning and spent fuel management activities.
- Decommissioning resources and technical capabilities remain intact.
- The migration of resources from CDI to HDI is not expected to impact project costs or decommissioning schedules at any of the Holtec sites. Further, decommissioning trust fund financial assurances remain unaffected by this transition.
- HDI, as the licensee, remains primarily accountable for regulatory licensing and compliance, the outcome of site investigations, responses to NRC requests for information, etc. This change presents an opportunity to streamline and enhance HDI's organizational infrastructure.

