Pilgrim Decommissioning
Upcoming Milestones
Pilgrim Nuclear Decommissioning Citizens Advisory Panel Briefing
September 19, 2018
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- Summary
Safety Commitment – (Topic)

- Carry out safe operations through transitions.
- Commitment to continuing safe operations after LT
# Decommissioning Process
(10 CFR 50.82)

<table>
<thead>
<tr>
<th>NRC Requirements</th>
<th>SAFSTOR</th>
<th>DECON</th>
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</table>
| License Termination Plan required to be submitted to NRC no less than 2 years prior to requesting license termination | • Plant placed in a safe, stable condition  
• Maintained until it is decontaminated to a level that permits radiological release  
• 14 plants currently in SAFSTOR | • Equipment, structures, etc. are promptly removed or decontaminated to a level that permits radiological release  
• 6 plants currently in DECON |
| Radiological decommissioning must be completed within 60 years | |

Ref: NRC Decommissioning Presentation to Pilgrim NDCAP in October 2017
Holtec Decommissioning Strategy

Establish, Implement & Advance the Industry Decommissioning Baseline

“Fleet-Based” Approach
- Based on nuclear industry fleet model
- Drive lessons learned operating the fleet model
- Maximize standardization
- Drive technology innovation

Qualified and Experienced Personnel
- Existing Holtec nuclear-experienced personnel
- Additional nuclear plant experienced personnel
- Partner with SNC-Lavalin
- Integrate site organization at license transfer
- Industry vendors

Procedures & Processes
- Adopt NRC-approved site programs, processes and procedures
- Maintain compliance with site license & NRC regulations
- Maintain, protect & control spent nuclear fuel
- Ensure environmental & personnel protection
Benefits of Holtec Decommissioning Strategy

- Uses a qualified, experienced decommissioning team to manage and perform decommissioning and manage spent fuel, supported by incumbent Pilgrim employees
- Demonstrates sufficient decommissioning funding assurance and spent fuel management funding plan
- Accelerates the decommissioning and waste removal from site
- Targets NRC license amendment to ISFSI only within 8 years of shutdown
- Results in an earlier NRC final license termination
Holtec’s Decommissioning Timeline

SAFSTOR Timeline

- Fuel Transfer: 2019 → 2024
- SAFSTOR Dormancy & ISFSI Operations
- D&D/LT: 2062 → 2075
  - End Dry Storage: 2083
- SR: 2084

Holtec’s Planned Accelerated DECON Timeline

- Fuel Transfer: 2019
- D&D/SR: 2021 → 2027
  - Decommissioning Complete/NRC License Amended to ISFSI Only
- ISFSI Operations
- LT: 2062 → 2064
- SR: 2063

Accelerates Decommissioning from 2083 to 2027

License Termination Complete – 2063 vs. 2083 *

* Assumes DOE Fuel Pick-Up Complete in 2062

Note: Dates subject to change
## Holtec Regulatory Submittals

### Required Regulatory Submittals
- Required within 2 years of permanent shutdown:
  - **Post-Shutdown Decommissioning Activities Report (PSDAR)**
  - **Site-Specific Decommissioning Cost Estimate (DCE)**
  - **Decommissioning Environmental Impact Evaluation**
  - **Spent Fuel Management Plan Update**
  - **Exemption Request** to permit NDT funding for spent fuel management and site restoration

### Holtec Regulatory Submittals
- **License Transfer Application** (Jointly prepared and submitted with Entergy)
- Holtec’s submittals reflecting **DECON** approach:
  - **Post-Shutdown Decommissioning Activities Report (PSDAR)**
  - **Site-Specific Decommissioning Cost Estimate (DCE)**
  - **Decommissioning Environmental Impact Evaluation**
  - **Spent Fuel Management Plan Update**
  - **Exemption Request** to permit Pilgrim NDT funding for spent fuel management and site restoration
## Next Steps: Regulatory Submittal Plan

<table>
<thead>
<tr>
<th>Activity</th>
<th>Target Date</th>
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<tbody>
<tr>
<td>License Transfer Application (joint submittal with Entergy)</td>
<td>October 2018</td>
</tr>
<tr>
<td>DECON PSDAR including site-specific DCE</td>
<td>October 2018</td>
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<tr>
<td>Revised Spent Fuel Management Plan</td>
<td>October 2018</td>
</tr>
<tr>
<td>Exemption request to use NDT funds for SFM and Site Restoration</td>
<td>October 2018</td>
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<tr>
<td>Request License Transfer Application approval</td>
<td>April 2019</td>
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LTA pre-submittal meeting scheduled for September 25th
Decommissioning Planning
(Current Activities)

- Integrating plant team (Holtec, CDI and Entergy)
- Applying the Holtec Governance Plan
- Identifying Risks & Mitigations
- Normalizing Holtec & CDI Decommissioning Planning/Project Management Team(s) with Entergy employees
- Establishing DECON Detailed Baseline Schedule and Cost

Strategizing Fuel Management Strategy & ISFSI

Pre-planning/Transition → Shutdown/Defuel → Zirc Fire Risk Eliminated → Fuel on Pad → Dismantlement/Demolition → License Termination
Summary

- Planning will continue through to license transfer
- Filings covered herein as “Topics of Public Interest”
- Continued focus on safety and planning for future decommissioning milestones like:
  - Permanent shutdown/reactor permanently defueled
  - Zirc Fire risk reduction
  - Spent fuel moved from pool to pad
  - NRC License Termination (partial site release to ISFSI-only)
  - ISFSI Decommissioning/License Termination
Thank You