

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket Nos. 50-293 & 72-1044 LT

Entergy Corporation

Pilgrim Nuclear Power Station

License Transfer Agreement Application

**PILGRIM WATCH MOTION TO SUPPLEMENT ITS FEBRUARY 20, 2019 MOTION
TO INTERVENE AND REQUEST FOR HEARING, ITS APRIL 1, 2019 REPLY TO
PETITIONERS, AND ITS MAY 3, 2019 MOTION TO SUPPLEMENT**

Pursuant to 10 C.F.R. § 2.323, Pilgrim Watch moves further to supplement its Motion to Intervene and Request for Hearing filed February 20, 2019, its Reply to Petitioners filed April 1, 2019, and its Motion to Supplement filed May 3, 2019 with new and significant information regarding Holtec’s delay in work schedule. The new and significant information upon which this motion is based is dated November 14, 2019, and this motion is filed within the period after the occurrence or circumstance from which the motion arises required by 10.C.F.R §§ 2.323(2) and 2.1017.

Specifically, Pilgrim Watch asks to supplement the record by adding a slide presentation made by Holtec International (“Holtec” and Comprehensive Decommissioning International (“CDI”) to the Pilgrim Nuclear Decommissioning Citizens Advisory Panel (“NDCAP”) on November 14, 2019 (Exhibit A). For comparison and convenience, relevant extracts from the

Holtec Decommissioning International PSDAR and Decommissioning Cost Estimate filed with the NRC on November 16, 2018 are attached as Exhibit B.¹

Contention 1 of Pilgrim Watch's Motion to Intervene to Intervene says:

The Applicant's LTA does not provide the required financial assurance. It does not show that either HDI or Holtec Pilgrim is financially responsible, or that either has or has access to adequate funds for decommissioning. Neither does the LTA provide any reasonable assurance that Holtec Pilgrim and HDI have, or will have, the financial resources required to deal with environmental impacts that would place the public health, safety, and the environment at risk.

Pilgrim Watch's Motion to Intervene lists many reasons that the LTA does not provide the required financial assurance, including that "Holtec fails adequately to consider delays in the work schedule leading to increased costs for overhead and project management." (Motion to Intervene, pp. 21, 63). Time is money.

This supplement provides additional facts that support Contention 1. In particular, Holtec's and CDI's recent Presentation shows that their planned decommissioning already has both slipped at least 2-3 years, and once decommissioning begins, has increased in duration.²

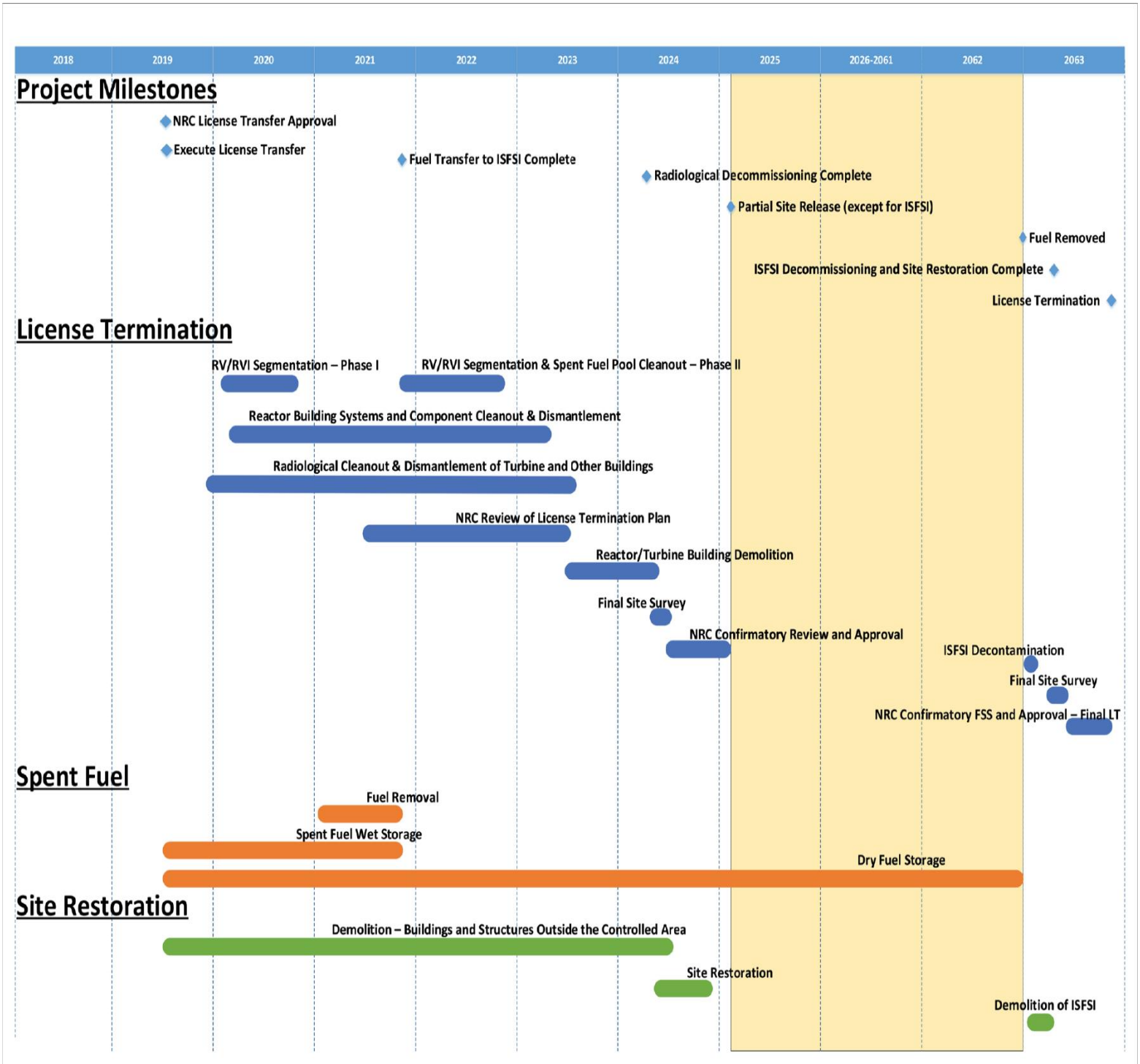
For the convenience of the Commission and Atomic Safety Licensing Board, we have set out below Figure 3-1 PNPS Decommissioning Schedule slide 4 from page 17 of Holtec's November 16, 2018 PSDAR and slide 4 from Holtec's and CDI's November 14, 2019 (almost exactly one year later) Presentation.

¹ Holtec's November 16, 2018 PSDAR is already part of the record. See Pilgrim Watch's and the Commonwealth's Motions to Intervene, Applicants' responses to these Motions, and Pilgrim Watch's and the Commonwealth's Replies to Applicants' Response.

² As the Commission and Atomic Safety Licensing Board know, Holtec's stated plan is to have CDI (a joint venture of Holtec International and SNC-Lavalin) perform the decommissioning work.

November 16, 2018 PSDAR

Figure 3-1 PNPS Decommissioning Schedule

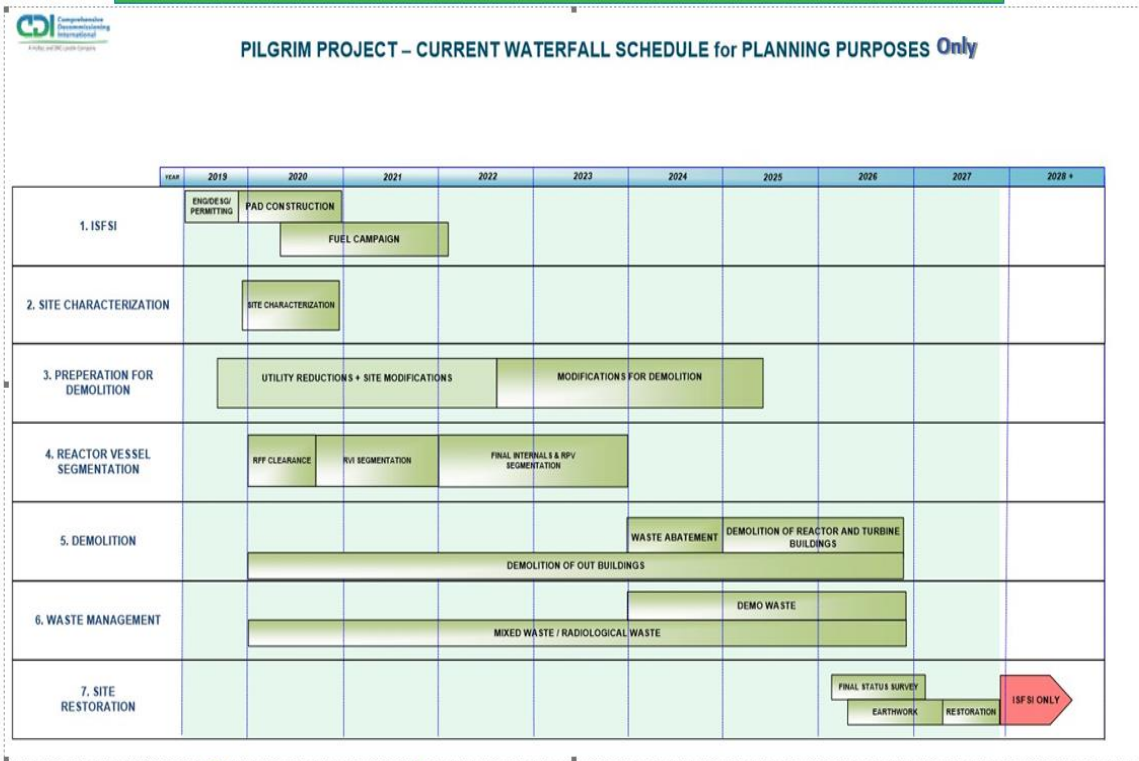


November 14, 2019 NDCAP Presentation

Slide 4



Project Overview



As these documents show, Holtec and CDI are already experiencing a delay in their decommissioning scheduling. For example, the demolition of out buildings is now projected to end 2026 rather than in 2024, site restoration is in 2027 rather than 2024, and the final status survey is in 2026-27 rather than in 2024. Holtec and CDI also now expect that it will take longer than originally predicted to accomplish various aspects of decommissioning, e.g., demolition is expected to take 7 years rather the 4 ½ - 5, the lengths of time required for reactor segmentation and site restoration have doubled, and reactor segmentation will take 4 rather than about 2 years.

This new information shows that decommissioning activities will start later and last longer than Holtec's 2018 PSDAR assumed and is material to the outcome of this proceeding. The changes in the timing and duration of decommissioning plainly impact on whether the current licensees (Holtec-Pilgrim and Holtec Decommissioning International are financially responsible, whether either has or has access to adequate funds,³ and whether the license transfer application

³ Holtec Pilgrim and HDI are limited liability corporations, and their only source of funds for decommissioning is Pilgrim's existing decommissioning trust fund. (Pilgrim Watch Petition to Intervene and Hearing Request ("Pilgrim Watch Petition"), pp. 16-19); Pilgrim Watch Motion Under C.F.R §2.323 To Stay Staff Order of August 22, 2019 Granting Exemption ("Pilgrim Watch Motion to Stay"), pp.6-8) .

Their parent company, Holtec International, has isolated itself from financial responsibility (Pilgrim Watch Motion to Stay, p. 7) and has refused either to provide a parental company guarantee or to agree to use any spent fuel management costs recovered from DOE to replenish the DTF. (Pilgrim Watch Petition, pp. 17-18); Pilgrim Watch Motion to Stay, pp. 6-7, 29).

The NRC does not have the authority to require a parent company to pay for the decommissioning expenses of its subsidiary-licensee, except to the extent the parent may voluntarily agree to do so. (Questions and Answers on Decommissioning Financial Assurance, ML111950031; Pilgrim Watch Motion to Stay, pp, 7, 19-20); Pilgrim Watch Reply to Applicants' Answer Opposing Pilgrim Watch Petition for Leave to Intervene and Hearing Request ("Pilgrim Watch Petition Reply"), pp. 4-7).

Pilgrim Watch and the Commonwealth of Massachusetts have already shown that that the DTF does not provide the necessary funds, particularly in view of the NRC's decision to allow about half of it to be spent on costs that do not meet the NRC's definition of decommissioning. See, e.g., Pilgrim Watch Petition, pp 19-82; Pilgrim Watch Petition Reply, pp. 7-17; Pilgrim Watch Motion to Stay, pp. 8-29); Co; Commonwealth of Massachusetts Petition for Leave to Intervene and Hearing Request, pp. 2-3, 15-33.

should be granted or denied. *In the Matter of Dominion Nuclear Connecticut, Inc.*, ASLBP No. 04-824-01-LR July 28, 2004, p. 7. At hearing, Pilgrim Watch will demonstrate the additional deficiencies in Holtec's PSDAR and DCE and that these new facts provide further evidence that Holtec has not proved the required financial assurance.

This Motion is timely. The new information became available on November 14, 2019. Pursuant to 10 C.F.R §§ 2., this Motion is being filed on Monday November 25, 2019 as required by 10.C.F.R §§ 2.323(2) and 2.1017.

Pilgrim Watch conferred with the Applicants on November 25, 2019. Counsel for the Applicants indicated that they oppose this Motion. Pilgrim Watch also conferred with the Commonwealth. The Commonwealth replied that it supports Pilgrim Watch's motion.

Pilgrim Watch requests that the Commission grant this Motion and consider this new information in connection with its consideration of the Pilgrim Watch's pending Petition and Reply.

Date: November 25, 2019

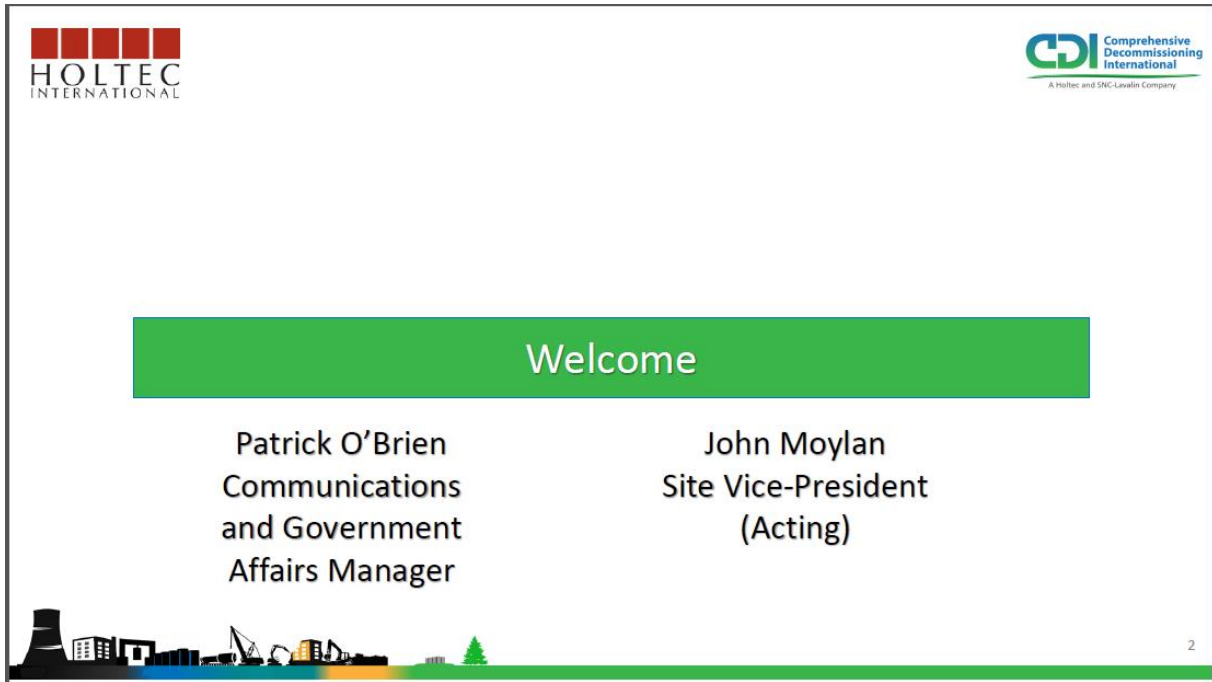
Signed (electronically) by

Mary Lampert
Pilgrim Watch, director
148 Washington Street
Duxbury, MA 02332
Tel. 781.934.0389
Email: mary.lampert@comcast.net

James Lampert
148 Washington Street
Duxbury, MA 02332
Tel. 781.934.0389
Email: james.lampert@comcast.net

Exhibit A

Slide Presentation, Holtec International (“Holtec” and Comprehensive Decommissioning International (“CDI”) to the Pilgrim Nuclear Decommissioning Citizens Advisory Panel (“NDCAP”), November 14, 2019



Slide 2 features the Holtec International logo (four red squares above the text 'HOLTEC INTERNATIONAL') in the top left and the CDI logo (green 'CDI' text above 'Comprehensive Decommissioning International' and 'A Holtec and SNC-Lavalin Company') in the top right. A green horizontal bar in the center contains the word 'Welcome' in white. Below this bar, two columns of text are centered: 'Patrick O'Brien Communications and Government Affairs Manager' on the left and 'John Moylan Site Vice-President (Acting)' on the right. At the bottom, there is a decorative graphic of a nuclear power plant with a cooling tower, buildings, and a crane, set against a green ground line. The number '2' is in the bottom right corner.

HOLTEC INTERNATIONAL

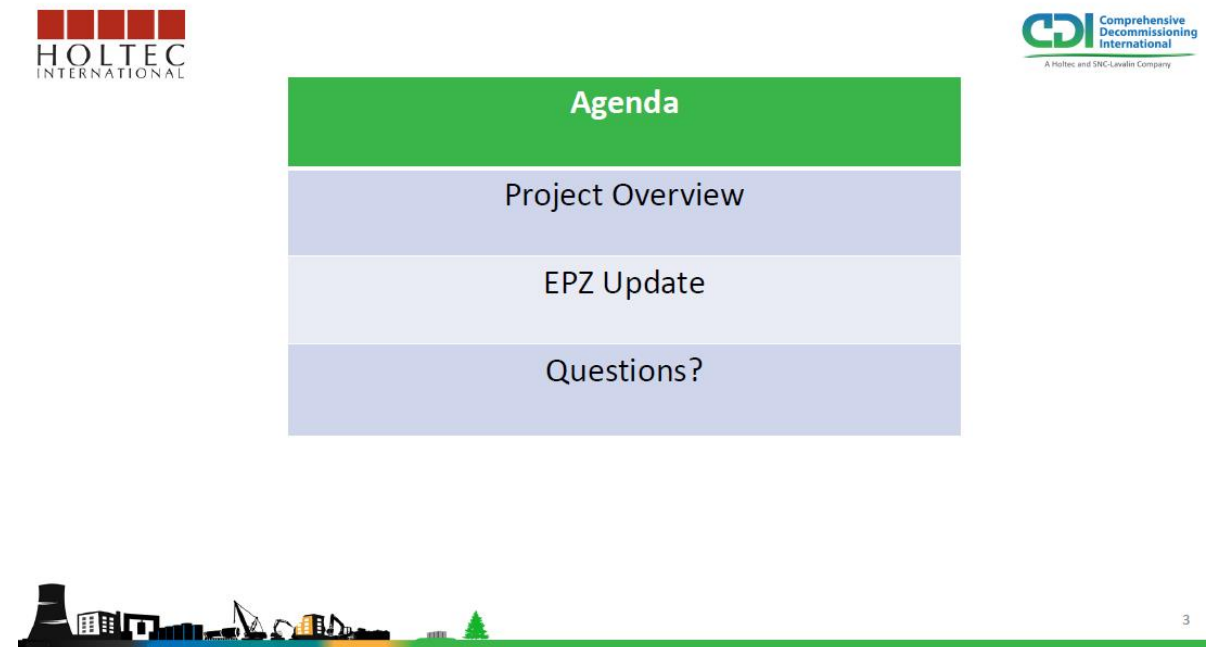
CDI Comprehensive Decommissioning International
A Holtec and SNC-Lavalin Company

Welcome

Patrick O'Brien
Communications and Government
Affairs Manager

John Moylan
Site Vice-President
(Acting)

2



Slide 3 features the Holtec International logo in the top left and the CDI logo in the top right. A green horizontal bar at the top of the central content area contains the word 'Agenda' in white. Below this bar are three light blue horizontal bars, each containing a line of text: 'Project Overview', 'EPZ Update', and 'Questions?'. At the bottom, there is a decorative graphic of a nuclear power plant with a cooling tower, buildings, and a crane, set against a green ground line. The number '3' is in the bottom right corner.

HOLTEC INTERNATIONAL

CDI Comprehensive Decommissioning International
A Holtec and SNC-Lavalin Company

Agenda

Project Overview

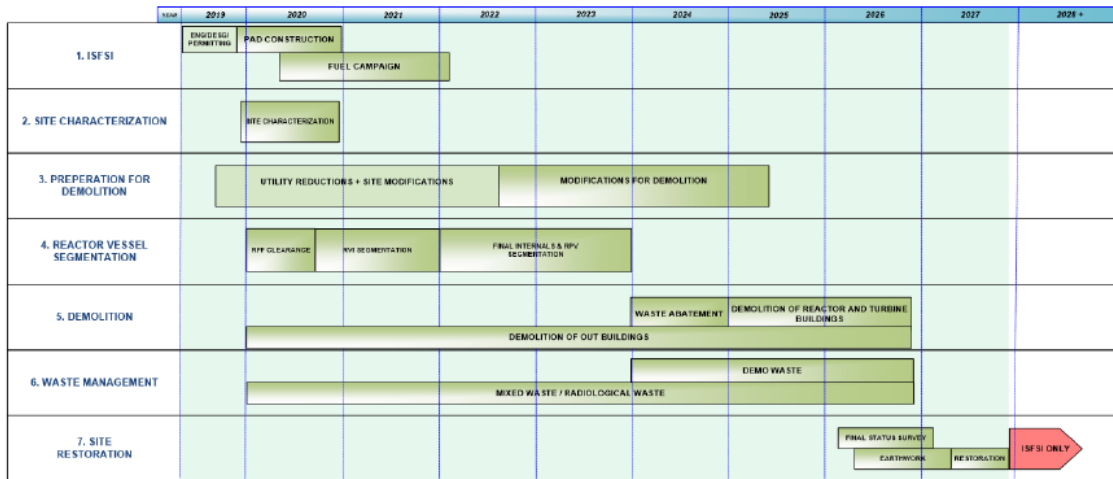
EPZ Update

Questions?

3

Project Overview

PILGRIM PROJECT – CURRENT WATERFALL SCHEDULE for PLANNING PURPOSES Only



Project Overview - ISFSI

Time Frame: 2019 - 2022, 2027-Fuel Removal from Site

- Design, Engineering, Permitting: 2019
- Pad Construction: Fall 2019 - Summer 2020
- Fuel Movement: Spring 2020 - Early 2022
- Begin ISFSI Only Operation: Late 2027



Time Frame: 2019 - 2020

- Bid in Process
- Site Characterization Study: December 2019 - December 2020



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Time Frame: 2019 - 2023

- Procure and secure tooling: 2019 - 2020
- Prepare refuel floor for work: 2020
- Initial reactor vessel internals segmentation: 2020 - 2021
- Additional reactor vessel internal and reactor pressure vessel segmentation: 2022 - 2024



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Project Overview – Demolition

Time Frame: 2020 - late 2026

- Demolition of out buildings: 2020 - 2026
- Waste abatement: 2024
- Demolition of reactor and turbine building: 2025 - 2026



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Project Overview – Demolition Waste Generation & Shipment

Time Frame: 2020 - 2026

- Demolition Waste: 2024 - 2026
- Radiological Waste: 2020 - 2026



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Time Frame: 2026 - 2027*

- Final Survey: 2026 - 2027
- Earthwork: mid-2026 - mid-2027
- Final restoration: 2027

*Final site restoration standards yet to be finalized



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EPZ Update



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- NRC issued exemption to reduce EPZ to site boundary on Nov. 4
- Continue to work on agreements for 2020 with communities
- Plymouth agreement finalized in Sept 2019
- Agreed with Taunton on Nov. 13 for final e-plan grant
- Have met with Bridgewater, Kingston, Marshfield
- Meeting next week with Carver, Duxbury, Braintree to be scheduled
- Successful final EPZ Siren Test conducted today



Exhibit B

Extracts from

**Holtec Decommissioning International PSDAR, and DECON Site-Specific
Decommissioning Cost Estimate**

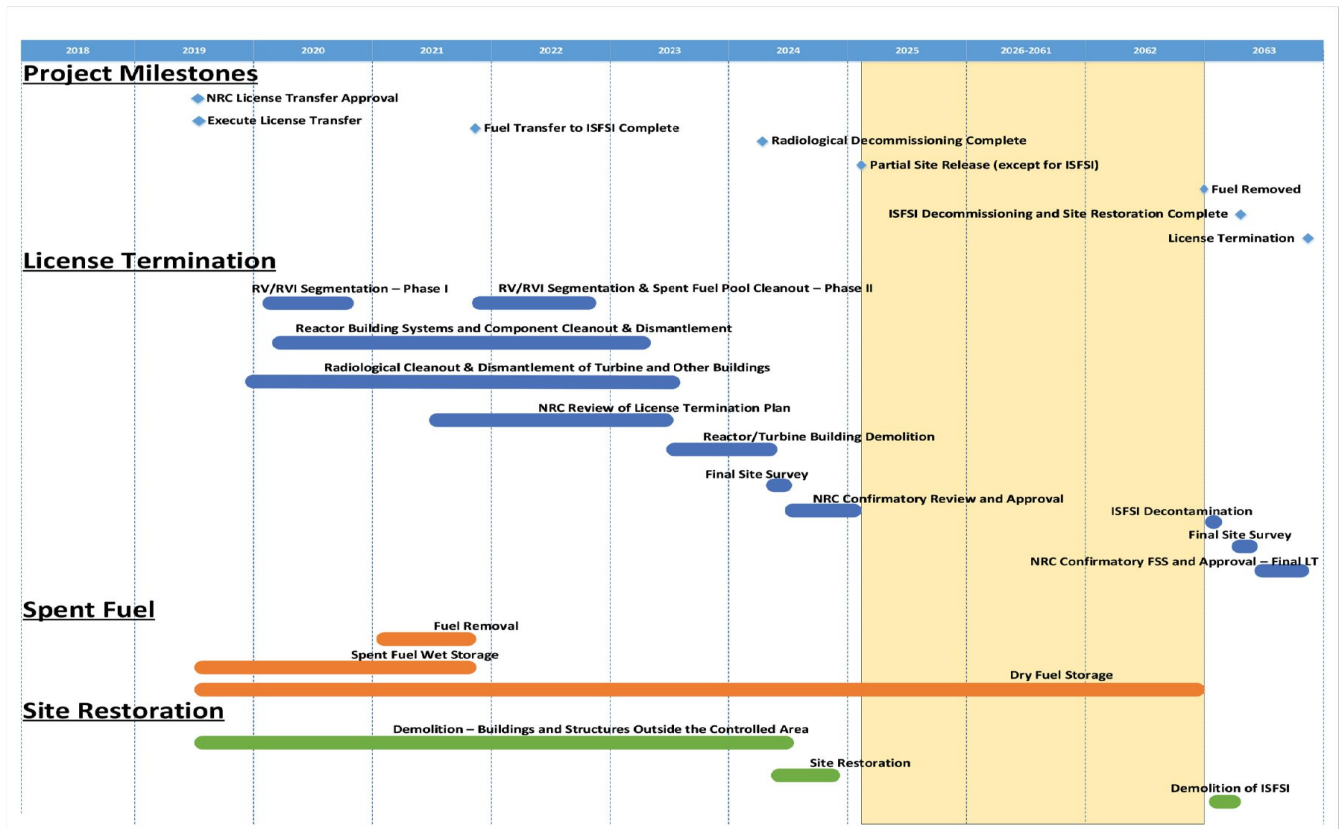
Both filed November 16, 2018

**Pilgrim Nuclear Power Station
DECON Post-Shutdown Decommissioning Activities Report**

3 SCHEDULE OF PLANNED DECOMMISSIONING ACTIVITIES

3.1 Pilgrim Decommissioning Schedule

Figure 3-1 PNPS Decommissioning Schedule, provides a project timeline that presents the high-level project schedule and milestones for decommissioning, including spent fuel storage and licensing. The schedule provided herein assumes that the equity sale closure and license transfer are executed on July 31, 2019, and ends following ISFSI decommissioning and final license termination. The dates for license transfer and closing on the equity sale agreement are targeted to occur by the end of 2019.



Pilgrim Nuclear Power Station

DECON Site-Specific Decommissioning Cost Estimate

Table 2-1 Decommissioning Periods and WBS Elements

Period	WBS Element	Start and End Dates ¹
1. Pre-Decommissioning Planning and Preparation	01.02.01 Pre-decommissioning actions	5/7/2018 - 12/15/2020
2. Plant Deactivation	01.02.02 Facility Shutdown Activities	5/31/2019 - 11/26/2021
3. Safe Storage Operations	01.02.10 Fuel and Nuclear Material	9/23/2018 - 11/26/2021
4. Dismantlement	01.02.04 Dismantling Activities Within the Radiological Controlled Area	9/23/2018 - 1/28/2025
	01.02.05 Waste Processing, Storage and Disposal	3/4/2019 - 1/27/2025
	01.02.07 Conventional Dismantling, Demolition, and Site Restoration	9/23/2018 - 3/5/2025
5. Ongoing ISFSI Operations	01.02.10 Fuel and Nuclear Material	11/26/2021 - 9/7/2063
Program Management	01.02.06 Site Infrastructure and Operation	5/31/2019 - 1/27/2025
	01.02.08 Project Management, Engineering and Support	9/23/2018 - 1/27/2025
	01.02.11 Miscellaneous Expenditures	8/1/2019 - 1/27/2025

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CERTIFICATION OF SERVICE

Pursuant to 10 C.F.R. § 2.305, I certify that copies of Pilgrim Watch's Motion to Supplement Its Motion to Intervene and Request for Hearing has been served upon the Electronic Information Exchange, the NRC's e-filing system, in the above-captioned proceeding, on November 25, 2019.

Date: November 25, 2019

Signed (electronically) by

Mary Lampert
Pilgrim Watch, director
148 Washington Street
Duxbury, MA 02332
Tel. 781.934.0389
Email: mary.lampert@comcast.net