



KPS Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

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December 19, 2022

James Chow, Deputy Director
Enforcement and Compliance Assurance Division
United States Environmental Protection Agency
Region 1
5 Post Office Square Suite 100
Boston, Massachusetts 02109-3912

Dear Deputy Director Chow:

On December 6, 2022, we received your letter, via email, regarding the National Pollutant Discharge Elimination System (NPDES) permit for Pilgrim Nuclear Power Station (PNPS) (NPDES Permit No. MA0003557) and potential noncompliance by Holtec Decommissioning International, LLC (“Holtec”) relating to wastewater discharges from decommissioning activities. This letter is being provided to reiterate and affirm Holtec’s intention to conduct all wastewater discharges in compliance with the NPDES permit and all applicable laws.

As you are aware, on October 17, 2022, Holtec met in Boston with the Environmental Protection Agency (EPA) Region 1 office staff to discuss the PNPS NPDES permit. The meeting provided an opportunity for Holtec to gain a better understanding of EPA’s position regarding the current permit language as it relates to certain wastewater discharges associated with decommissioning activities. At the meeting, we also discussed the process to modify the NPDES permit, as well as the State’s Surface Water Discharge Permit, and the timeline associated with that process. Based on these discussions, Holtec determined that it would pursue a modification to the existing NPDES permit to appropriately address such discharges. Holtec representatives stated this intention publicly at the November 28, 2022, Nuclear Decommissioning Citizens Advisory Panel (NDCAP) meeting.

Unfortunately, during this same NDCAP meeting, some statements made by Holtec representatives were misconstrued to imply that Holtec is contemplating intentional noncompliance with the Clean Water Act. This is not true. Please be assured that we will only discharge when in full compliance with all state and federal regulations and permitted requirements.

With respect to EPA’s requirement for a 90-day notice prior to unauthorized discharge, Holtec again reiterates its position that no such unauthorized discharges are planned. To the extent that



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unforeseen circumstances arise in the future, Holtec will endeavor to fully comply with any notification requirement specified in the NPDES permit and/or under applicable law.

With respect to the specific request of the letter, Holtec offers the following information:

- I. Currently, Holtec does not have any planned discharges. The on-site water remains in use to support reactor dismantlement activities through the 1st quarter of 2023.
- II. The sources of the on-site water volumes are the spent fuel pool, reactor cavity/dryer separator pit, and the torus. All water volumes will be independently processed and then combined to form a single water volume for final processing/treatment prior to discharge through PNPS' Radwaste Effluent. In the attached figure, the Radwaste Effluent is comingled with permitted Outfall 001. For reference, this figure was provided to the EPA during the drafting period of the current permit.

We remain committed to safely decommissioning the site and continue to actively resolve this water matter within our permitted and licensed activities.

Thank you for your time. We appreciate your interest in the project and ensuring safe, efficient decommissioning coupled with fact-based communication and transparency.

Very truly yours,

A handwritten signature in blue ink that reads "Kelly Trice". The signature is written in a cursive style and is enclosed in a light blue rectangular box.

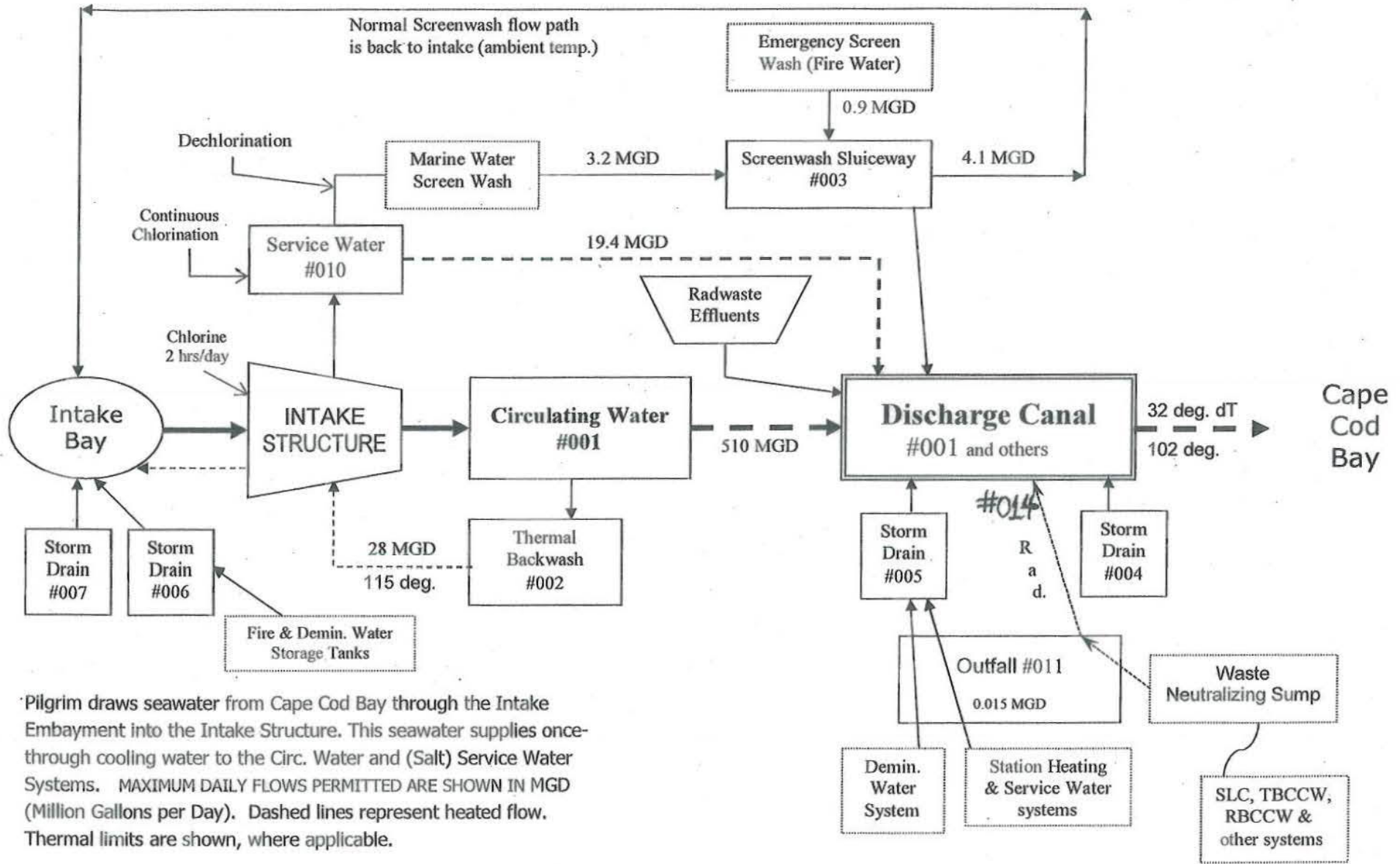
Kelly Trice, President
Holtec Decommissioning International, LLC

cc: David Turin, EPA Enforcement Officer
Jeff Kopf, EPA Attorney
John Moylan, Holtec Pilgrim Site, Vice-President
Patrick O'Brien, Holtec International, Director Government Affairs & Communications
Jean Flemming, Holtec International, VP of Licensing, Regulatory Affairs and PSA
Jason Day, Holtec Decommissioning International, General Counsel

FIGURE 4

WATER FLOW DIAGRAM
 PILGRIM NUCLEAR POWER STATION
 PLYMOUTH, MA

This diagram shows the basic elements related to NPDES Permit outfalls for Pilgrim Station



Pilgrim draws seawater from Cape Cod Bay through the Intake Embayment into the Intake Structure. This seawater supplies once-through cooling water to the Circ. Water and (Salt) Service Water Systems. MAXIMUM DAILY FLOWS PERMITTED ARE SHOWN IN MGD (Million Gallons per Day). Dashed lines represent heated flow. Thermal limits are shown, where applicable.