



**Department
of Public Service**

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June 13, 2024

VIA EMAIL

Hon. Michelle L. Phillips
Secretary to the Commission
3 Empire State Plaza
Albany, NY 12223-1350

Re: Matter No. 21-01188 – In the Matter of the Indian Point Closure Task Force and Indian Point Decommissioning Oversight Board.

Dear Secretary Phillips:

Please accept for filing in the above-captioned matter, the U.S. Nuclear Regulatory Commission's June 13, 2024 presentation to the Indian Point Decommissioning Oversight Board. Should you have any questions regarding this filing, please contact me. Thank you.

Respectfully submitted,

A handwritten signature in blue ink that reads "Tom Kaczmarek".

Tom Kaczmarek
Executive Director
Indian Point Decommissioning Oversight Board



**INDIAN POINT
DECOMMISSIONING OVERSIGHT BOARD
JUNE 13, 2024**

**PAUL KROHN, DIRECTOR
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY**

**ANTHONY DIMITRIADIS, CHIEF
DIRHP BRANCH**

KATHERINE WARNER, CHP, SENIOR HEALTH PHYSICIST

**RICHARD TURTIL, ACTING BRANCH CHIEF, FINANCIAL
ASSESSMENT BRANCH**

ISFSI Inspections

- Inspection Manual Chapter 2690
- Inspection procedures implemented throughout the loading campaign in 2023
- All Casks safely placed on the ISFSI pad



ISFSI CASKS

- Casks are designed to be strong and stable enough to perform their safety function
- NRC staff reviews the design and analysis of system under normal conditions and environmental conditions
- NRC staff reviews several different realistic combinations of loads.



ISFSI Cask

- Inner canister with Overpack
- Various licensed dry storage systems are available
- Indian Point uses the Holtec system



ISFSI pad storage

- ISFSI pad located on-site
- The ISFSI Pad has a dedicated full-time security force 24 hours a day, 365 days a year.



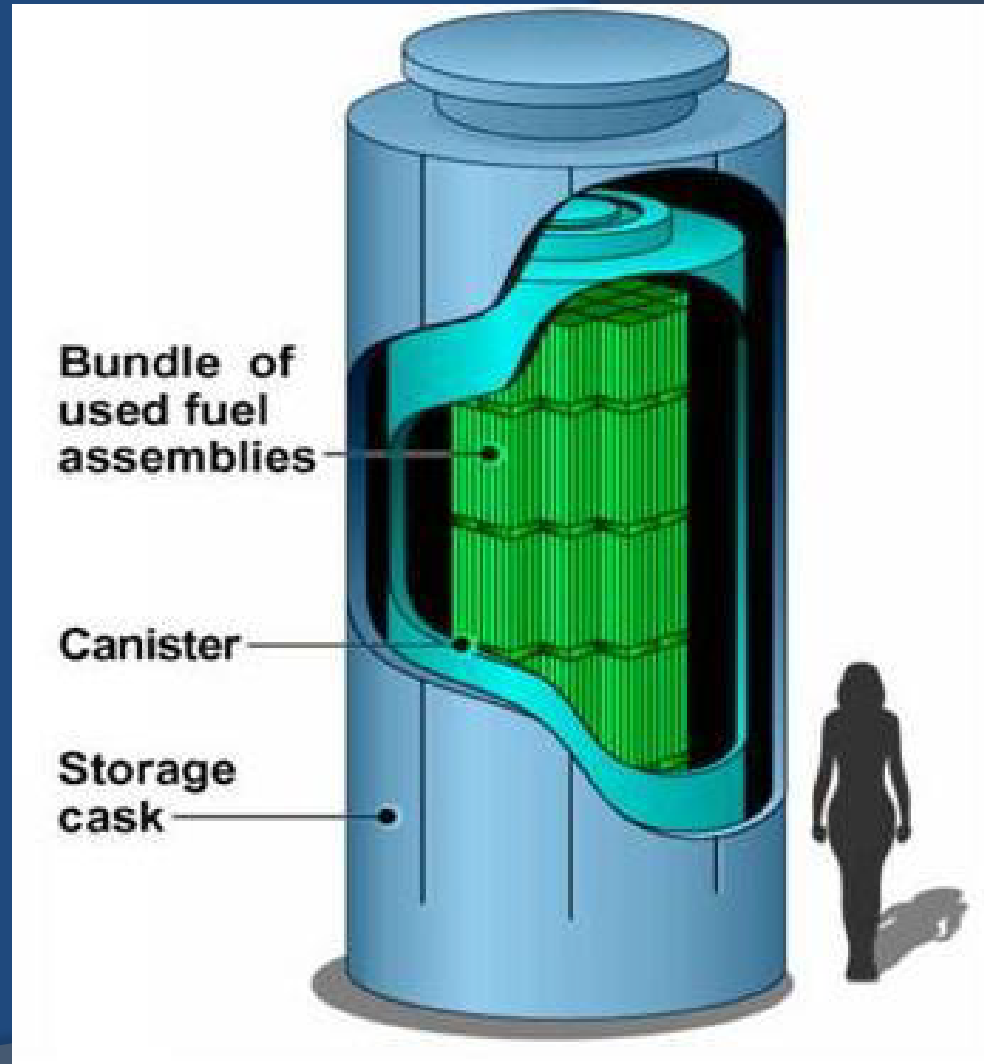
ISFSI Pad Construction

- ISFSI pad under construction detailed engineering analysis, use of heavy steel rebar and a lot of concrete.



ISFSI NRC Inspections at Indian Point

- At least 14 NRC inspections conducted since 2008 when the site began loading ISFSIs
- Inspectors are trained and qualified in ISFSI
- NRC Inspection Reports are available to the public in ADAMS



Spent Fuel moved to ISFSI Pad

- Spent Fuel moved from Spent Fuel Pool to ISFSI pad
- Total number of casks = 127
- Unit 1 = 5
- Unit 2 = 63
- Unit 3 = 59
- Plus 10-15 casks to store GTCC waste



Emergency Preparedness (EP) Requirements

- EP requirements **are not** being eliminated.
- The EP requirements are aligned to the risk to the public, which is primarily associated with the storage location of the spent fuel

Be riskSMART



Reactor Decommissioning Trust Funds (DTFs) and Recent DTF Spending Violations

Richard H. Turtill
Senior Financial Analyst
Financial Assessment Branch, NRC

Katherine Warner, CHP
Senior Health Physicist, NRC Region I

June 13, 2024

NRC Decommissioning and DTF Regulations Overview

- The intent of NRC regulations is to ensure that the decommissioning of licensed facilities will be accomplished in a safe and timely manner.
- NRC definition of "Decommission": "to remove a facility from service and reduce residual radioactivity to a level that permits... [R]elease of the property for unrestricted use and termination of the license."
- DTF funds are used for radiological decommissioning, unless otherwise authorized by exemption.

Licensee Decommissioning Funding Lifecycle

- NRC ensures the **initial certification of Financial Assurance** by the licensee prior to fuel load.
- Licensee **maintains NRC required funding throughout the life of the reactor.**
- Licensee uses one or more funding methods specified in NRC regulations.
- From initial fuel load to completed decommissioning, **ongoing monitoring of decommissioning funding is performed by the NRC.**

NRC Review of DTF Submittals

Financial Assessment Branch

- NRC's review ensures licensee decommissioning funding assurance is in place.
- Biennial reporting requirements for operating reactors; **annual reporting for decommissioning reactors.**
- 94 operating and 23 decommissioning reactors.
- Review of CY2023 Indian Point Energy Center submittal ([ML24089A117](#)) is underway.

NRC Review of DTF Submittals Inspection

- Inspection Procedure 71801, “Decommissioning Performance and Status Reviews at Permanently Shutdown Reactors”

Purpose:

- Engage with licensee on overall financial status of decommissioning.
- Identify and document in an inspection report the status, progress, and changes that potentially impact decommissioning financial assurance

NRC Review of DTF Submittals Inspection

- Severity Level IV Notice of Violation documented in the NRC inspection report issued on February 22, 2024 ([ML24017A236](#))
- HDI replied to the Notice of Violation in a letter dated March 20, 2024 ([ML24080A172](#))
- Financial Assurance inspection currently being conducted and will be documented in the publicly available 2Q2024 NRC inspection report.

Summary

- Inspections (Decommissioning and ISFSI) are intrusive, sometimes more than one inspector;
- Inspection Reports – publicly available
- Violations are processed through our Traditional Enforcement Policy
- Decommissioning Inspections continue throughout the decommissioning process
- Spent Fuel is stored safely on ISFSI pad
- Spent Fuel is inspected as long as it remains on site
- Our Website www.nrc.gov contains a lot of information

Questions?