



KATHY HOCHUL
Governor

RORY M. CHRISTIAN
Chief Executive Officer

May 1, 2025

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, Holtec's May 1, 2025 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 dark ink, appearing to read "Tom Kaczmarek". The signature is fluid and cursive, with the first name "Tom" being more prominent than the last name "Kaczmarek".

Tom Kaczmarek
Executive Director
Indian Point Decommissioning Oversight Board



Decommissioning Oversight Board

Holtec Decommissioning International (HDI)
May 1, 2025

Frank Spagnuolo
Indian Point Site Vice President



Agenda

- Safety Update
- Work completed since last DOB (December 2024)
- Work activities planned through 2025
- Training Building Cesium update
- Trust Fund Update
- NRC updates



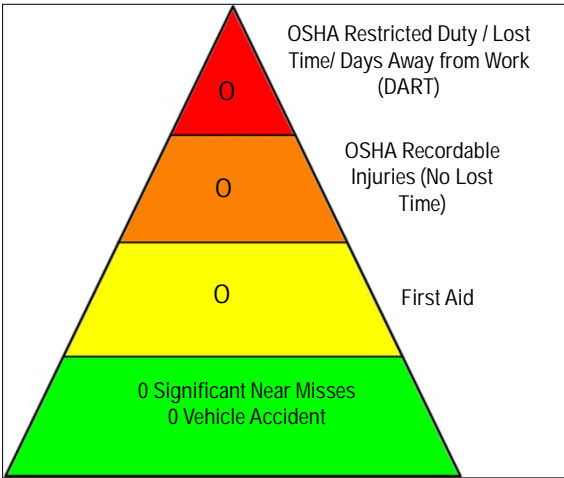
Workforce safety updates

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal Protective Equipment (PPE) is a critical component of workplace safety. It provides essential protection against various hazards, ensuring that workers are shielded from potential injuries and health risks. Understanding the importance of PPE and its proper use is vital for maintaining a safe and productive work environment.

Purpose of PPE

1. Protection from Physical Hazards
 - Head Protection, Eye and Face Protection, Hand Protection, Foot Protection
2. Protection from Chemical Hazards
 - Respiratory Protection, Skin Protection
3. Protection from Biological Hazards
 - Protective Clothing
4. Protection from Environmental Hazards
 - Hearing Protection, Thermal Protection

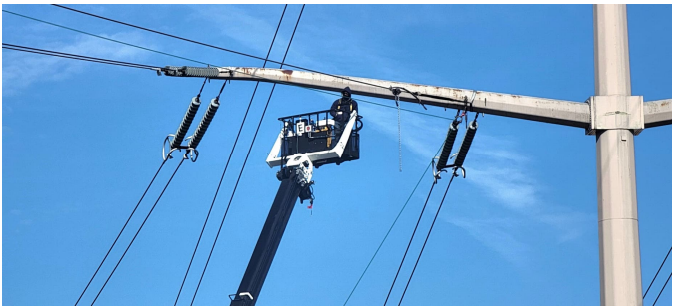
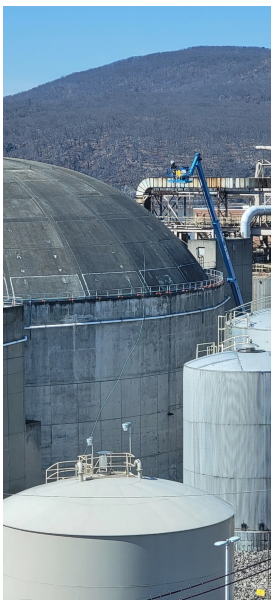
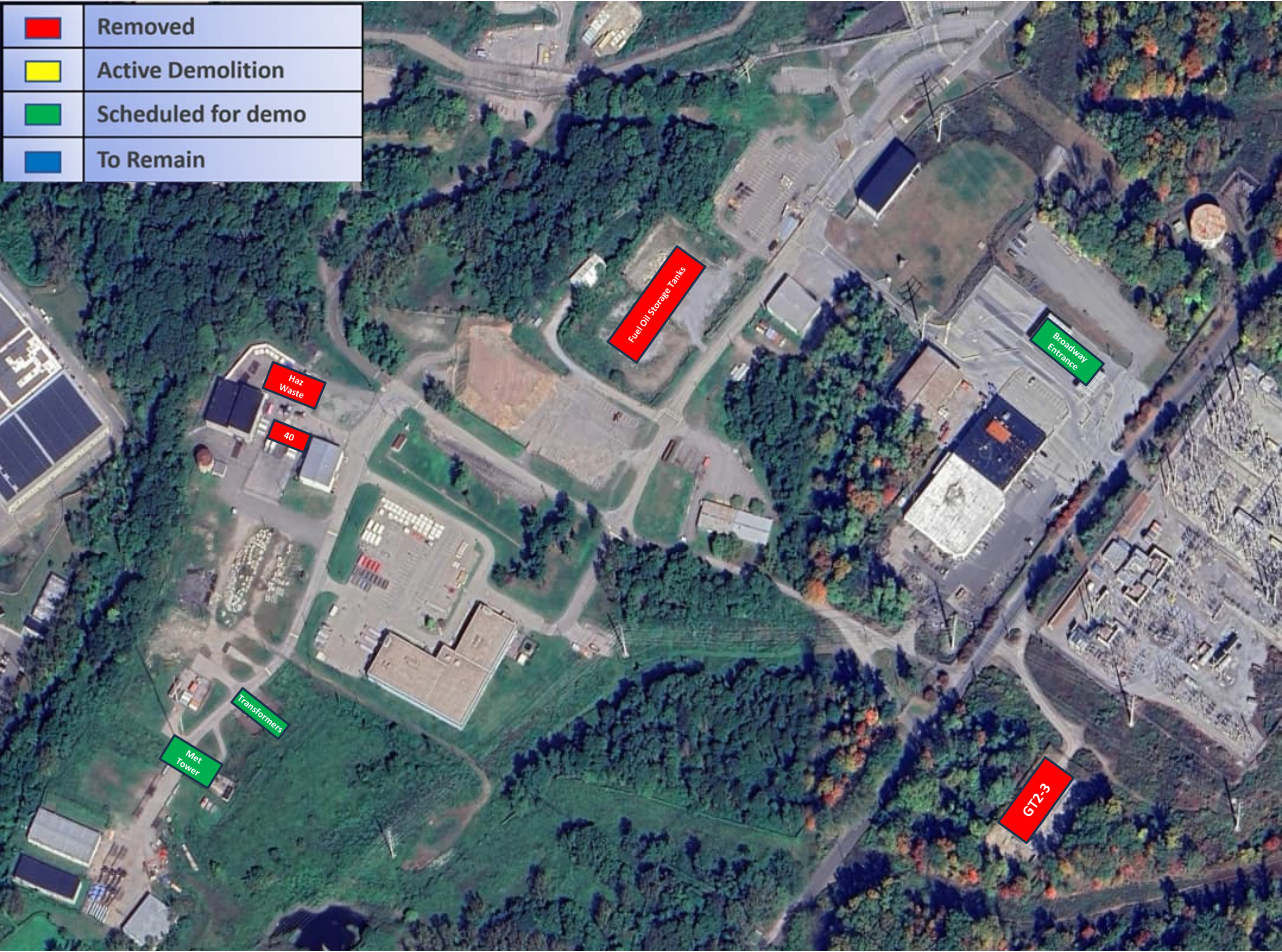


2025
<u>Dose IP1:</u>
• 1 st Quarter 2025: 3.630 Rem /3.635 Rem Goal
• Year 2025: 3.630 Rem /15.816 Rem Goal
<u>Dose IP2:</u>
• 1 st Quarter 2025: 2.779 Rem /2.936 Rem Goal
• Year 2025: 2.779 Rem /11.915 Rem Goal
<u>Dose IP3:</u>
• 1 st Quarter 2025: 6.559 Rem /6.750 Rem Goal
• Year 2025: 6.559 Rem /26.5 Rem Goal

IPEC Building Demolition

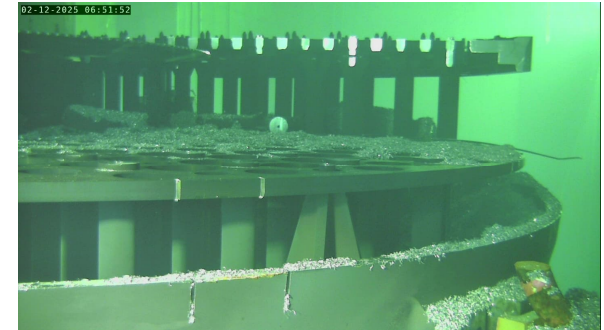
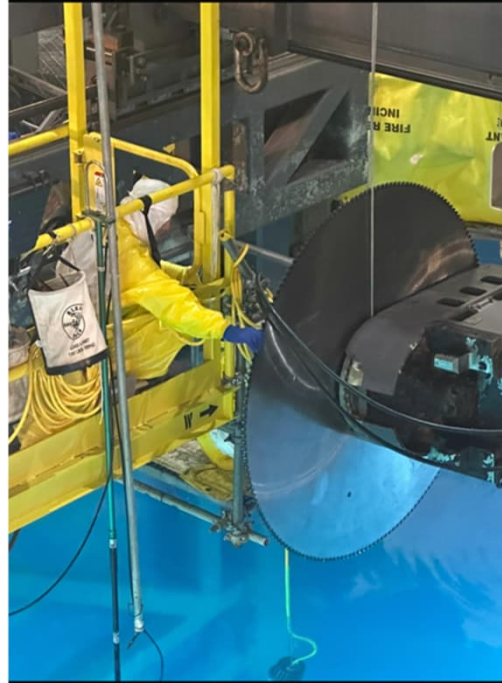


IPEC Building Demolition



Vessel Segmentation activities since last DOB

- Notable schedule change:
 - Discussed in NDT slide
- Unit 2
 - Completed upper internal segmentation – Type “A” waste
- Unit 3
 - Completed segmentation of Greater Than Class C material (GTCC)



Upper Photos: (L) Saw Blade change, (R) U3 Lower Core Plate
Lower Photo: Underwater Transfer of U2 Upper Core Plate to gantry saw cutting table

Vessel Segmentation activities through EOY

■ Unit 2

- Install Core Barrel into stand in lower cavity for segmentation – May
- Segment lower internals and load GTCC containers through EOY

■ Unit 3

- Segment and package remaining BC material and vacuum all BC chips - June

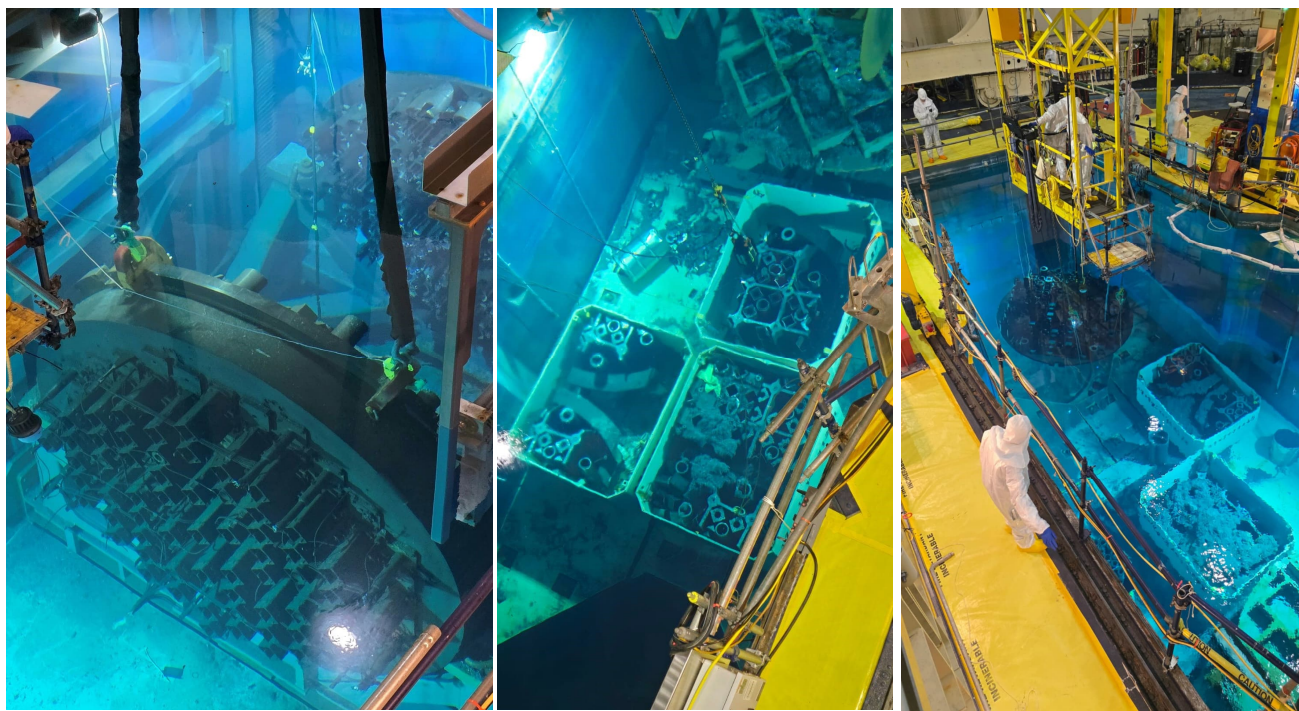
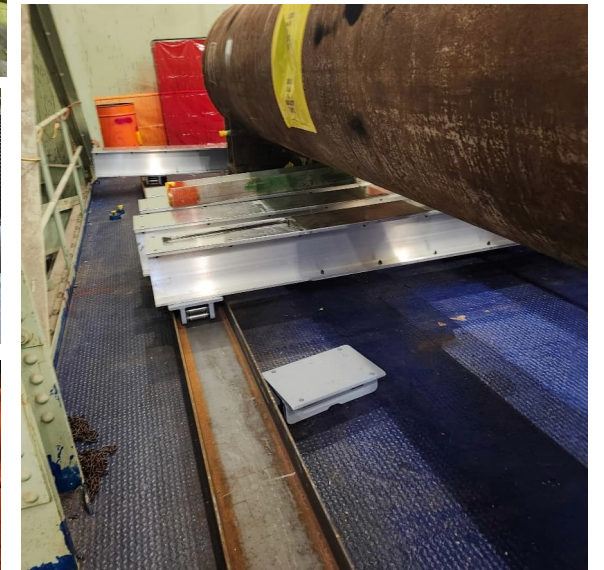
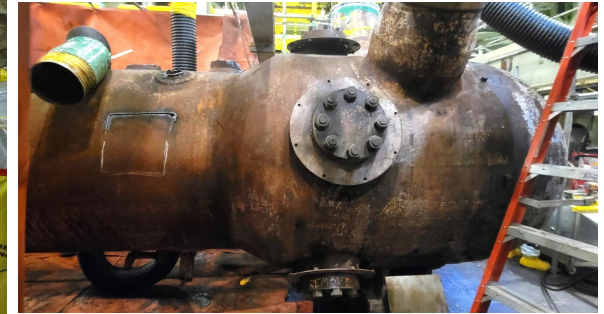
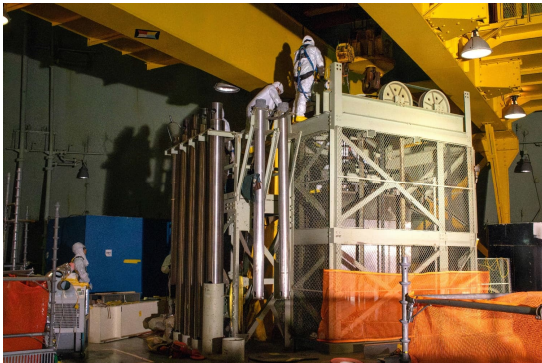


Photo: (L) U2 Upper Internals, (C) Overhead view U2 segmentation "A" waste boxes, (R) Overhead view U2 core plate movement

Unit 1 Demolition activities since last DOB

- Abatement of 13 Boiler completed – torch cut demo commenced
- Abatement on 11 Boiler Lower drum completed – wire saw segmentation commenced
- Abatement of 12 Boiler commenced in April
- Removal of U1 Head Studs complete
- Removed U1 VC Elevator



Various views of U1 Steam Generators

Unit 1 Demolition activities through EOY

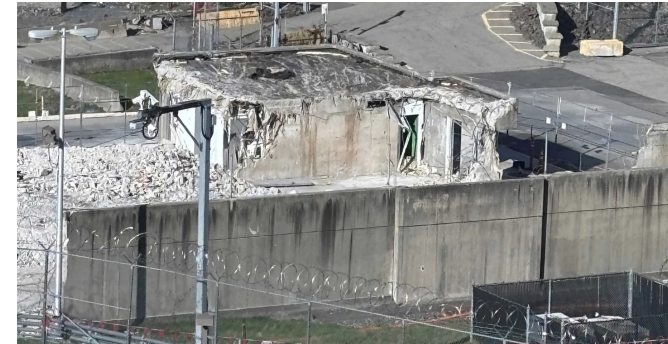
- Complete demo of 13 Boiler steam drum
- Complete 11 Boiler primary side segmentation
- Complete Abatement of 12 Boiler
- Complete demo of 12 Boiler steam drum
- Complete 13 Boiler primary side segmentation



Top: U1 Reactor head bolted and following cutting of the studs
Bottom: U1 Reactor head studs and overhead view of head on vessel

Conventional Plant Demolition activities since last DOB

- PAAF Structure demo completed
- U2 Security Building demo completed
- 345KV and 138KV Overhead and Switchyard disconnected
- U2 Main and Auxiliary Transformer demolition in progress



Top: Old Access Facility before and after
Bottom: U2 Main Transformers before and after

Conventional Plant Demolition activities through EOY

- U3 Security Building
- U3 PCE Building
- Preparation for Old Steam Generator Dismantling
- Met Tower removal
- Broadway Entrance
- U2 and U3 Main Transformer Demolition



Top (L): PCE Building
 Top (R): Unit 3 Security Building
 Bottom (L): Original Steam Generators in Mausoleum
 Bottom (R): Met Tower

NRC inspections and Reports

- 3rd Quarter report dated December 11, 2024 – listed no violations
- 4th Quarter report dated February 20, 2025– *Violation of NRC requirements occurred involving inappropriate Decommissioning Trust Fund (DTF) expenditures. However, after considering the facts and circumstances of the issue, and in consultation with the Director of the NRC's Office of Enforcement, the NRC is exercising enforcement discretion in accordance with Section 3.3 of the Enforcement Policy, "Violations Identified Because of Previous Enforcement Action." Therefore, the NRC is not pursuing any enforcement action for this violation.*
- 1st Quarter report dated April 8, 2025 – Report specifically closing out an NRC Office of Investigation (OI), listed two violations related to the same incident. Incident is security related and not made public.
 - 10 CFR 73.55(k)(5)(iii) requires armed responders shall be available at all times inside the protected area and may not be assigned other duties or responsibilities that could interfere with their assigned response duties requirement.
 - 2. 10 CFR 73.55(b)(10) states the licensee shall use the site corrective action program (CAP) to track, trend, correct and prevent recurrence of failures and deficiencies in the physical protection program.

NRC inspections and Reports

- January Inspection (1/20/2025 – 1/22/2025)
 - Plant walkdown / tours
 - Corrective Action Program annual review
- February Inspection (2/18/2025)
 - Resin Shipment
- March Inspection (3/10/2025-3/13/2025)
 - Plant walkdown / tours
 - Plant Fire Protection Program
- Next Inspection to start May 19, 2025

Training Building Property Cesium (Cs) Discovery

- Following identification of elevated Cs-137 in a soil sample, an analysis was completed in January 2025.
- Additionally, supplemental field screening activities were completed and three localized zones which exhibited elevated Cs-137 activities were identified. (EML-1, EML-2, and EML-3 in the Figure)
- The current goal for the Partial Site Release criteria is to release the area as “Indistinguishable from Background” or “no detectable concentrations of plant-related radioactivity that is distinguishable from background radioactivity”
- To meet this criteria, excavation of soil will be performed to a depth of two feet for approximately 2500 sq. ft of the areas containing EML-1, EML-2 and EML-3.
- Conservatively, the soil will be transported offsite and disposed of at our radioactive waste disposal facility. The soil removed does not meet the DOT criteria of hazardous waste based on concentration or activity.
- The remaining footprint will be recharacterized using a combination of field screening activities and soil sampling.
- Based on the results, additional excavation may be required, or Final Status Surveys (FSS) can be commenced to completed the Site Characterization activities to support Partial Site Release.



EML = Elevated Measurement Location

Decommissioning Trust Fund



The IPEC Nuclear Decommissioning Trust (NDT) fund balances as of December 31, 2024 are listed in the table:

These amounts represent the market value of the NDT fund as of December 31, 2024, net any material current income tax liability on realized gains, interest, dividends, and other income of the trust.

The trust fund amounts provided demonstrate that the IPEC decommissioning trust fund is sufficiently funded to cover costs as estimated for the license termination, spent fuel management, and site restoration activities necessary to complete safe and compliant decommissioning of the site.

Unit	NDT Fund Balance
IP1	\$661M
IP2	\$521M
IP3	\$480M

UNIT	YEAR	LICENSE TERM	SPENT FUEL MGT	SITE RESTORATION	TOTAL
1	2024	\$31M	\$0.4M	\$0.3M	\$32M
2	2024	\$31M	\$15M	\$3M	\$49M
3	2024	\$37M	\$16M	\$3M	\$56M

Decommissioning Trust Fund

Material Changes to the Decommissioning Milestone Schedules or Project Cost:

(<https://dps.ny.gov/indian-point-trust-fund-balance-reports>)

The updates to the IP3 decommissioning schedules are detailed in Enclosure 7. The updates to the cost estimates are noted in Tables 1A, 1B, and 1C, and Tables 2A, 2B, and 2C and reflect the expected cost impacts of changes to the IP3 reactor segmentation schedule.

Schedule changes are due to ongoing challenges unique to IPEC reactor segmentation and the availability of the HI-TRAN Vertical Cask Transporter (VCT).

The cost estimate adjustments account for the financial impact of cumulative delays in the reactor vessel segmentation schedule.

The two main cost drivers are:

- 1) the time required to segment the reactor internals exceeded the original estimates; and
- 2) the time needed to mobilize, demobilize, and maintain the specialized segmentation tools exceeded the original estimates.

Additionally, HDI chose to minimize worker radiation exposure during these activities, which contributed to the schedule changes.

Thank You



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