



Department of Public Service

Three Empire State Plaza, Albany, NY 12223-1350
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September 21, 2023

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 Decommissioning International's September 21, 2023 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, appearing to read "Tom Kaczmarek".

Tom Kaczmarek
Executive Director
Indian Point Closure Task Force
Indian Point Decommissioning Oversight Board



Decommissioning Oversight Board

Holtec Decommissioning International, LLC (HDI)



**IPEC Decommissioning Update
September 21, 2023**

**Rich Burroni, Chief Nuclear Officer Holtec
International and Indian Point Site Vice-
President**

**Patrick O'Brien, Holtec Government Affairs and
Communications Director**



Agenda

- **Dry Fuel Project**
 - ISFSI Pad
 - Unit 2 Spent Fuel Pool status
 - Unit 3 Spent Fuel Pool status
- **Discharge Discussion**
- **Vessel Segmentation**
 - Unit 2
 - Unit 3
- **NRC Inspections and Activities**
- **Safety**

Dry Fuel Project - Independent Spent Fuel Storage Installation



ISFSI Pad – Construction of physical pad is complete

Since last Oversight Board Meeting:

- Vehicle Barrier Wall installation - In progress.
- Security Support Structure - In progress
- Additional fence line installation - In progress

Projected Activities through next IPEC Decommissioning Board Meeting on Dec. 6, 2023:

- All construction activities are complete
- Fuel on Pad Protected (FOPP) projected date is November 15, 2023

ISFSI Project



Dry Fuel Project

Unit 2 Spent Fuel Pool Defuel Status - COMPLETE



ALL Fuel and Non-Fuel Material Located in the ISFSI area

- 896 Unit 2 fuel assemblies in 28 casks.

Since the last Oversight Board Meeting:

- Spent Fuel Racks (12 total) cleaning – In progress
- Rad Surveys of Fuel Racks – In progress

Projected Activities through next IPEC Decommissioning Board Meeting on Dec. 6, 2023:

- Removal of Spent Fuel Racks from Pool

Dry Fuel Project – Unit 3 Spent Fuel Pool Defuel Status



ALL Fuel and Non-Fuel Material Located in the ISFSI area

1,024 Unit 3 Assemblies in 32 casks

Since the last Oversight Board Meeting:

- Fuel off-load in progress, 9 casks remain of the 41 total

Projected Activities through next IPEC Decommissioning Board Meeting on Dec. 6, 2023:

- Fuel off-load complete by mid-October
- Commence rack cleaning

Discharge Discussion Update



- Based on the passage of the bill (new article 30 of Environmental Conservation Law) to prevent effluent discharge to the Hudson River in connection with the decommissioning of a nuclear power plant, Holtec is reviewing available options for the disposal of radioactive effluents.
- Impact to the overall schedule is being evaluated.

Unit 2 Vessel Segmentation

Segmentation of both vessels is considered the second critical path.

Since the last Oversight Board Meeting:

- Completed Steam Generator Reactor Coolant System primary pipe preps for chemical cleaning

Projected Activities through next IPEC Decommissioning Board Meeting on Dec. 6, 2023:

- Continue with equipment set-up for segmentation activities (platforms, aux bridge, gantry saw)
- Install lower cavity floor plates, Tri-Nuc water filtration & vacuuming equipment.

Unit 3 / Unit 1 Vessel Segmentation

- **Since the last Oversight Board Meeting:**
 - Completed boxing of all Unit 3 B/C waste
 - Removed In-Core Thimble Tubes

Projected Activities through next IPEC Decommissioning Board Meeting on Dec. 6, 2023:

- Continue cutting and prepping Unit 3 RCS piping for Steam Generator chemical cleaning
- Continue preparation for Unit 3 core barrel removal in 1Q2024

NRC Inspections and Activities



Submittal	IPEC Submittal Date	Anticipated NRC Review Complete *
Exemption and LAR for Permanently Defueled Emergency Plan	12/2021	02/2023
Exemption from onsite and offsite Liability and Property Damage Insurance requirements	03/2022	02/2023
LAR for removal of Cyber Security Requirements	05/2022	02/2023
LAR for U2 Admin TS change	08/2022	02/2023
IP1/IP2/IP3 ISFSI only licensing submittals		
- ISFSI Only Eplan	11/2022	11/2023
- ISFSI Only Tech Specs	11/2022	11/2023
- ISFSI Only Security Plan	01/2023	TBD

*** Reviews are anticipated to be complete to support FOPP initiative**

Upcoming NRC Inspections:

- GTCC and 50.59 Inspection Sept 18-21, 2023
- Rad Waste Storage and Transportation Inspection October 2023
- ISFSI Inspection – continuous loading October 2-6, 2023
- Dosimetry, Unit 1 Characterization, monitoring Inspection November 13-17, 2023
- Year end Inspection close out December 11-14, 2023

NRC Inspection Activities – 2Q2023 Inspection Report



Three NRC-identified violation of inappreciable (very low) safety significance (Severity Level IV)

1. 10 CFR 50.48(f) failure to follow procedures for control of hot work and ignition sources in the Unit 2 containment building. Holtec did not ensure that transient combustibles were protected prior to and during hot work.
2. 10 CFR 20.1906(d)(2) untimely report to the NRC Headquarter Operations Center when external radiation levels exceeding the regulatory limits were identified on an incoming shipment from HDI's Oyster Creek Nuclear Generating Station. Holtec received a radioactive materials shipment on May 3, 2023, identified contact dose rates higher than the allowable limits of 200 mrem/h on two locations of the external surface of the package, secured package, then reported to NRC the next workday.
3. 10 CFR 72.146 design control measures did not ensure that appropriate quality standards were specified and included in design documents for the Hi-Lift crane. HDI staff did not initially ensure through procurement or engineering evaluations that the swing arm hydraulic counterbalance valves were qualified to change position during postulated seismic conditions. It was subsequently verified that these components met the necessary seismic requirements.

ACTIONS to RESTORE COMPLIANCE:

- Issues entered into corrective action program (1)
- Corrective actions were established to preclude recurrence (2)
- For all three violations, the NRC has stated the following: (3)
 - Since Licensee placed the deficiency into its Corrective Action program, the violations were of inappreciable (very low) safety significance, and because the violation was not willful or repetitive, those violations are being treated as Non-Cited Violations consistent with Section 2.3.2.a of the NRC Enforcement Policy

NRC Inspection Activities – Holtec International

Inspection Report 07201014/2022-201 – Choice Letter



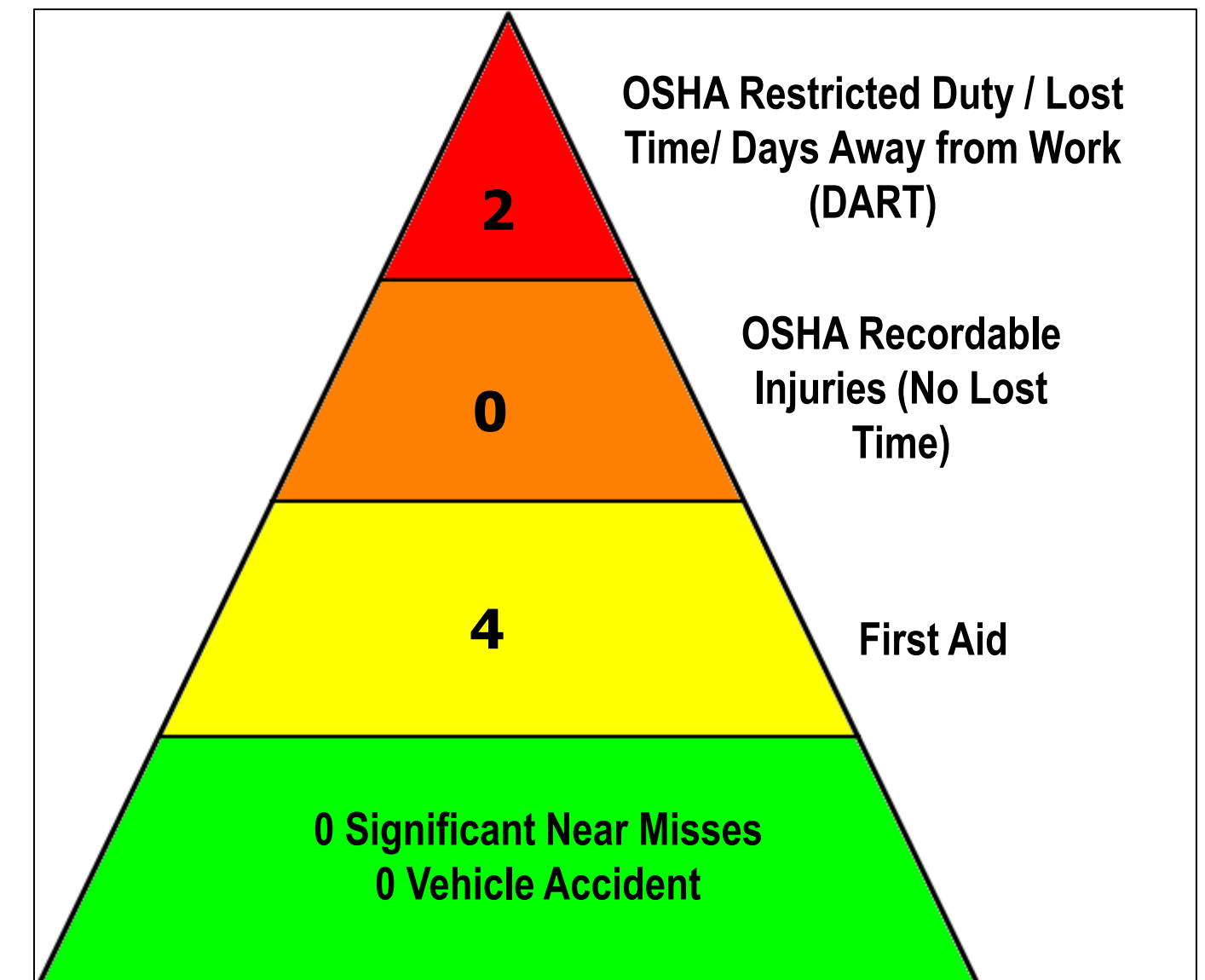
Sept 12. Letter to Holtec

1. NRC issued a choice letter in an inspection report which contains three apparent violations related to the Continuous Basket Shim (CBS) style MPCs
2. These are still classified as apparent violations because the NRC has not come to a final decision. Holtec has elected to request a pre-decisional enforcement conference (PEC) to provide the NRC staff with additional information before they make their final decision. We expect the PEC to occur in mid-October, and the NRC will issue a final decision after that point.
3. Key to note - the NRC does not consider this a safety issue, no loadings have been stopped and NRC has issued no instructions to take action on already loaded canisters.
4. Once the NRC comes to a final decision after the PEC, Holtec will take any necessary actions to bring any impacted item back into compliance should that be necessary.

Safety

Date	Issue
6/20/2023	OSHA Supplemental worker injured tip of finger while moving pipe cutting equipment in Unit 2 Containment Building
7/11/2023	OSHA Supplemental worker injured finger while working on a strand jack anchor bolt at Unit 3
7/19/2023	First Aid Supplemental worker taken offsite in an ambulance to hospital, IV was administered
7/28/2023	First Aid Supplemental worker received minor skin irritation on hand while testing concrete
8/14/2023	First Aid Security Force member twisted ankle on uneven surface
8/18/2023	First Aid Supplemental worker felt discomfort in his torso while trying to loosen a connector on a valve in Unit 1

- Trend Incident Report written to analyze data from safety incidents that occurred between January 1, 2022 through present time.
- External consultant brought in to perform Apparent Cause Evaluation.
- Multiple meetings have been held with plant staff to discuss incidents, causes, improvements needed and reinforce station standards.



2023

Dose IP2:

- Previous Week: 213 mR /256 mR Goal
- Month: 0.824 R / 1.050 R Goal (Aug..)
- Year: 37.889 R / 66.836 R Goal

Dose IP3:

- Previous Week: 6362 mR /6412 mR Goal
- Month: 37.124 R /37.969 R Goal (Aug.)
- Year: 86.788 R / 181.898 R Goal

Personnel Contamination Event (PCE)

1 PCE year to date

Thank You!



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