



**Department  
of Public Service**

Three Empire State Plaza, Albany, NY 12223-1350  
www.dps.ny.gov

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April 25, 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, Holtec's April 25, 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



## **Decommissioning Oversight Board**

### **Holtec Decommissioning International (HDI)**

April 25, 2024

**Frank Spagnuolo**  
Indian Point Site Vice President

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

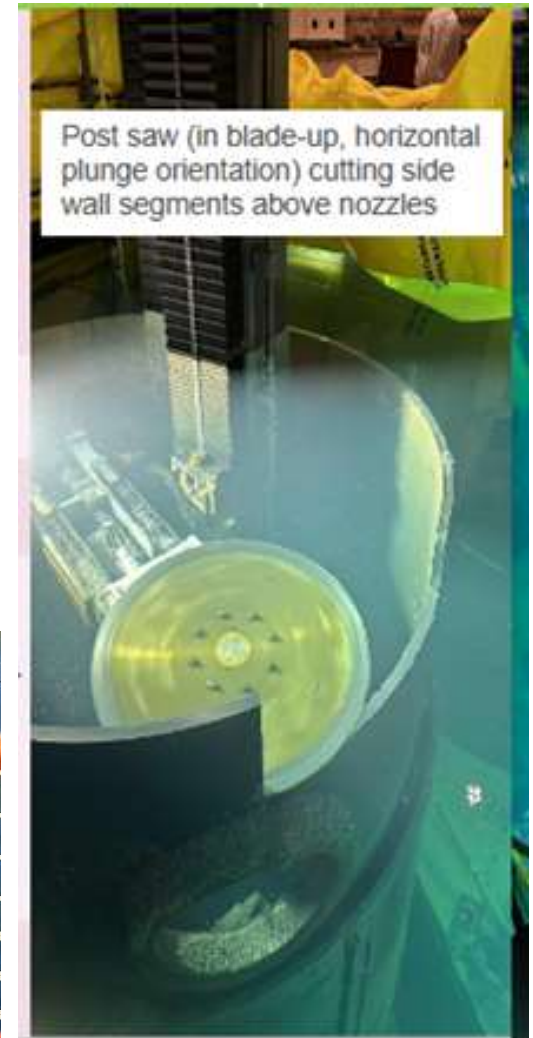
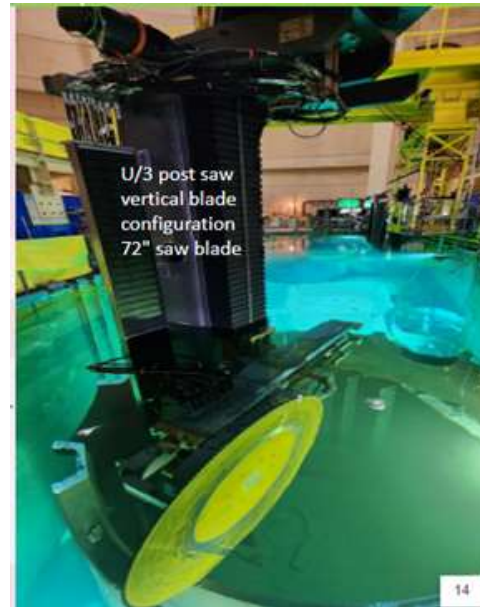


# Agenda

- **IPEC work completed since last DOB (12/6/23) and planned through the next DOB (6/13/24)**
  - **Reactor Vessel Segmentation**
  - **Unit 1 Demolition**
  - **Conventional Plant Demolition**
- **Earthquake response**
- **Pipeline & CertainTeed Update, LaFarge remediation**
- **10CFR50 Part 82, Termination of License Finance report**
- **Liquid waste discussion update**
- **NRC inspections and activities, Violations**
- **Safety Focus Update**

# Vessel Segmentation activities since last DOB

- Unit 2
  - Completed control rod drive shaft removal
  - Suspended plans to commence upper internal segmentation to perform repairs on the cavity liner
- Unit 3
  - Validated core barrel removal to the lower cavity support stand and returned to the core
  - Lower internal segmentation in progress



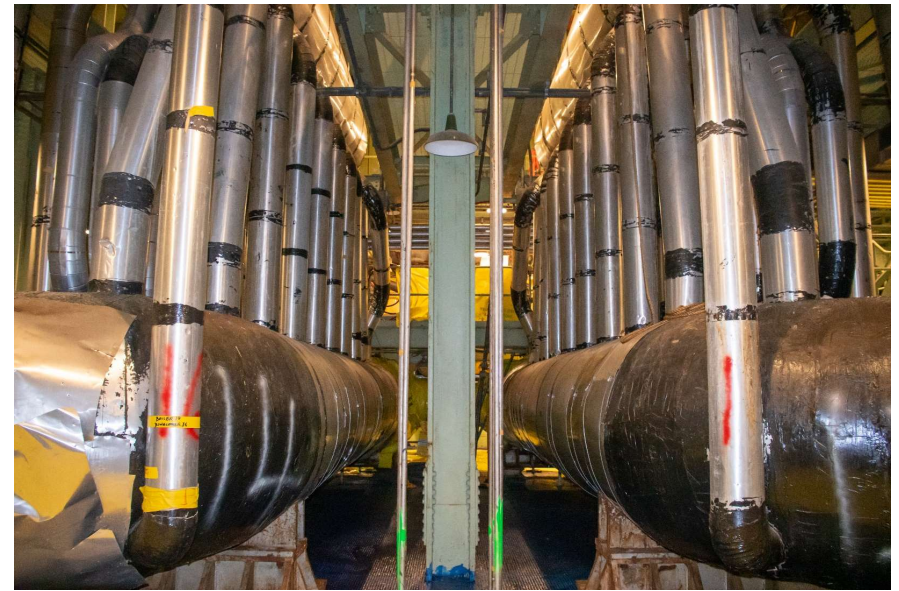
# Vessel Segmentation Activities through next DOB

- Unit 2
  - Complete liner repair, head removal and cavity flood up
  - Head segmentation will be in progress
- Unit 3
  - Lower internal segmentation continues through January



# Unit 1 Demolition activities since last DOB

- Completed cuts on 11 & 12 Coolant loops
- Completed cuts on 11 cold leg piping
- Commence cuts on 13 & 14 Coolant loops
- Asbestos tent constructed for 11 Boiler
- Completed abatement of Primary Blowdown Heat Exchangers
- Polar crane upgrade complete



# Unit 1 Demolition - Activities through next DOB

- Complete cuts on 13 & 14 Coolant loops
- Commence cuts on 12, 13 & 14 cold leg piping
- Commence abatement for 11 boiler
- Commence work to cut risers for 11 boiler



# Conventional Plant Demolition

## 2024 Goals:

- Completion of GT area demolition
- Demo of retired security equipment
- Removal of retired station batteries
  - 49 total
  - 31 removed
  - 8 planned for 2024
- Underground oil storage tanks
  - 14 total
  - 4 planned for 2024
- Continuation of equipment removal

## Activities through next DOB:

- Complete removal of U3 Feedwater heaters (FWH)
- Commence removal of U2 FWH's
- Commence removal of U3 dock components (travelling screens, circulating water pumps)





# Earthquake Response

- April 5, 2024, earthquake centered in NJ resulted in a 4.8 magnitude at the epicenter and a 3.6 magnitude near IPEC
- IPEC was seismically designed to withstand an earthquake with peak ground accelerations of 0.15g horizontal and 0.10g vertical
  - This value is based the ability to withstand a category VII earthquake on the Modified Mercalli Intensity Scale
  - The ISFSI Pads are built to this standard as well
- Although intensity and magnitude measure two different characteristics, the USGS states that category VII is the intensity you would expect at the epicenter of a 6.0 magnitude earthquake
- Plant staff were onsite and followed their procedure to walkdown all equipment and buildings, no damage was identified

# Pipeline, CertainTeed, RIWP Update

- Pond on southern property near gypsum plant access road and 42" pipeline path, is a federal wetlands area due to groundwater intrusion
- Pond is overflowing southward over the road during the winter
- TRC hydrologist –preparing report to identify possible remediation methods
- Enbridge personnel investigated – no impact to safety of pipeline
- Holtec, CertainTeed, and Enbridge are monitoring the situation and updates are provided as necessary
- IPEC Chemistry performed samples – no Radiation contamination



Parcel D Remedial Investigation Work Plan is in progress, samples obtained, wells dug, expect preliminary data May, with the final report in July

# 10CFR50 Part 82, Termination of License Finance report



- Letter dated March 29, 2024, to US NRC in accordance with the requirements of Title 10 of the Code of Federal Regulations (CFR), Part 50 Section 82, Termination of License, (10 CFR 50.82), Holtec Decommissioning International, LLC (HDI), on behalf of Indian Point Nuclear Generating Station Units 1, 2, and 3 (IPEC), submits the annual report on the status of decommissioning funding, the financial assurance report, and the status of funding for managing irradiated fuel for the period ending December 31, 2023
- The estimates provided, using the December 31, 2023, trust fund balances, indicate that IPEC has met the NRC's funding requirements
- Accordingly, HDI concludes that no further action is required to demonstrate adequate funding assurance for decommissioning the plants included in this submittal.
- NDT Fund balance as of December 31, 2023
  - IP1 \$611.8M, IP2 \$564.7M, IP3 \$648.8M
- NDT Fund balances projected at License Termination (2063)
  - IP1 \$136.7M, IP2 \$17.8M, IP3 \$36.5M
- Holtec has maintained, in accordance with the Joint Proposal, Minimum Trust Fund Balance of no less than - \$400 million for 10 years following transaction close date

# Liquid Waste Discharge Discussion Update



- Teleconference was held on November 10, 2023, with Veolia to discuss potential Tritium removal using Modular Detritation System
  - February 8, 2024, IPEC was informed *“Veolia has made a decision to move away from the Tritium issues”*
- Meeting was held at IPEC on January 24, 2024, with Plummer Management Services to review Phytoremediation process
  - Hemp is not the only product for this application, eliminating NRC regulatory concern
  - IPEC requested more information regarding footprint, equipment availability, power requirements, details for plant cycle time and water consumption rate
  - April 22, 2024, discussed requested proposal – changes to the plan include using a drip and wick system on plant sawdust, rather than growing plants and introduced electrical molecular disassociation to enhance tritium removal
- On April 18<sup>th</sup> HDI filed a legal challenge in the Southern District of New York regarding Chapter 279 of the Laws of 2023.
  - Due to the pending litigation, HDI is unable to comment further.

# NRC Inspection Activities – 3Q2023 Inspection Report



**February 22, 2024** - Received 2023 4<sup>th</sup> Quarter Exit Report with one Severity Level IV violation noted (previously discussed at DOB 12/6/2023)

- During an NRC inspection conducted between 6/12/2023, and 12/31/2023, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:
- 10 CFR 50.82(a)(8)(i) states, in part, decommissioning trust funds may be used by licensees if the withdrawals are for expenses for legitimate decommissioning activities consistent with the definition of decommissioning in § 50.2.
- 10 CFR 50.2 defines decommissioning as removing a facility or site safely from service and reducing residual radioactivity to a level that permits—
  - (1) Release of the property for unrestricted use and termination of the license; or
  - (2) Release of the property under restricted conditions and termination of the license.
- Contrary to the above, from July 21, 2021, through June 14, 2023, HDI used the Indian Point Energy Center decommissioning trust funds for expenses that were not legitimate decommissioning activities. Specifically, HDI used funds to support community outreach activities that were not related to removing the facility or site safely from service and reducing residual activity to a level that permits release of the property for either unrestricted or restricted conditions and termination of the license.

**April 17, 2024** – NRC Debriefed IPEC staff on the preliminary report that will cover the 1<sup>st</sup> Quarter 2024

- Final report expected in advance of next DOB

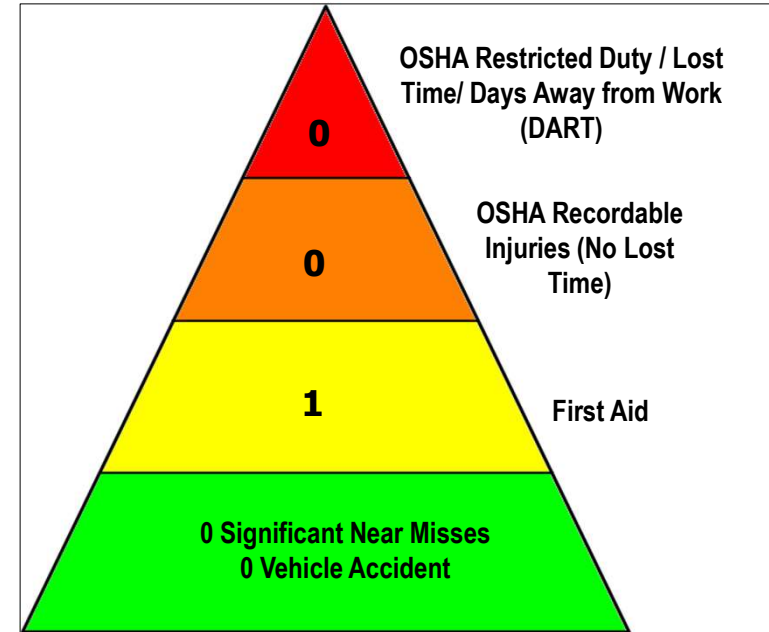
# Safety items since last meeting

Date	Issue
2/16/2024	Supplemental employee received an injury to their right hand while handling a power tool with a coworker, resulting in a First Aid.

The Decommissioning Team adopts an approach of continuous improvement for industrial safety performance. Safety initiatives include:

- Periodic performance of self-assessments
- Leadership and peer coaching program
- Fleet Peer Group and operating experience sharing
- Periodic Subject Matter evaluations

Our commitment is to ensure our workers have a safe industrial work environment and take an active role in their personnel safety and the safety of their coworkers.



<b>2024</b>	
<b><u>Dose IP1:</u></b>	<ul style="list-style-type: none"> <li>• Quarterly: 4.044 R / 4.174 R Est. (1<sup>st</sup> Qtr.)</li> <li>• Year: 4.044 R / 15.500 R Est.</li> </ul>
<b><u>Dose IP2:</u></b>	<ul style="list-style-type: none"> <li>• Quarterly: 3.166 R / 3.257 R Est. (1st Qtr.)</li> <li>• Year: 3.166 R / 32.711 R Est.</li> </ul>
<b><u>Dose IP3:</u></b>	<ul style="list-style-type: none"> <li>• Quarterly: 11.738 R / 11.974 R Est. (1st Qtr.)</li> <li>• Year: 11.738 R / 40.051 R Est.</li> </ul>

# Thank You!



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