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Three Empire State Plaza, Albany, NY 12223-1350
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February 3, 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, updates from Holtec Decommissioning International (HDI) regarding decommissioning activity at Indian Point. Should you have any questions regarding this filing, please contact me. Thank you.

Respectfully submitted,

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
February 2, 2023**

**Rich Burroni, Site Vice President
914-254-6705**



Agenda

The agenda for this meeting will provide an update on completed activities since our last meeting on December 7, 2022. The following slides will also provide projected activities thru April 27, 2023 when the next Decommissioning Board Meeting is scheduled to take place.

The agenda is as follows:

- Dry Fuel Project
 - ISFSI Pad
 - Unit 2 Spent Fuel Pool Defuel status
 - Unit 3 Spent Fuel Pool Building / HI-Lift status
- Vessel Segmentation
 - Unit 2
 - Unit 3
- Building Demolition
- NRC Inspections and Activities
- NRC severity level 4 violations
- Industrial Safety Trend – Corrective Actions

Dry Fuel Project



The Dry Fuel Project concludes with all fuel from both spent fuel pools transferred to the Independent Spent Fuel Storage Installation (ISFSI) pads and the protected area fence, nuisance fence and vehicle barrier system required to be installed. The Dry Fuel Project is projected to be complete prior to the end of the 4th quarter 2023.

Dry Fuel Project



Independent Spent Fuel Storage Installation

ISFSI Pad

As previously noted, an additional ISFSI pad had to be constructed to accommodate all the Holtec HI-Storm 100S casks. 127 casks are needed to secure all the fuel from both the Unit 2 and Unit 3 Spent Fuel Pools. The original pad will hold 75 casks and the new pad will hold 52 casks. As reported in a previous DOB meeting, fencing and monitoring equipment have been installed such that both pads are now part of the Site Protected Area.

Since the last Oversight Board Meeting:

- Vehicle Barrier System installation (Phase 4) is being bid by independent contractors. Expect bids to be submitted shortly.
- Started removal of Condensate Storage Tank (CST)

Projected Activities through April 27, 2023:

- CST removed
- Award bid to install the Vehicle Barrier System and start construction activities

Dry Fuel Project – ISFSI Pad

ISFSI Pad
(Aerial View)

*Tank Closest to
PAD Is the CST



Dry Fuel Project

Unit 2 Spent Fuel Pool Defuel Status



To Recap – 896 fuel assemblies need to be casked at Unit 2 requiring 28 casks.

Since the last Oversight Board Meeting (Unit 2):

- Unit 2 Spent Fuel Pool off-load is complete. All 28 casks are currently located on the ISFSI Pad.

Projected activities through April 27, 2023:

- Transfer necessary equipment to Unit 3 FSB required for fuel removal
- Plan for fuel rack removal
 - Develop work orders
 - Perform preventative maintenance on equipment needed (eg. FSB Crane)
 - Fabricate Rack Lifting Device
 - Order rack containers for disposal

Dry Fuel Project – Unit 3 Spent Fuel Pool Building Activities / HI-Lift



Since the last Oversight Board Meeting (Unit 3):

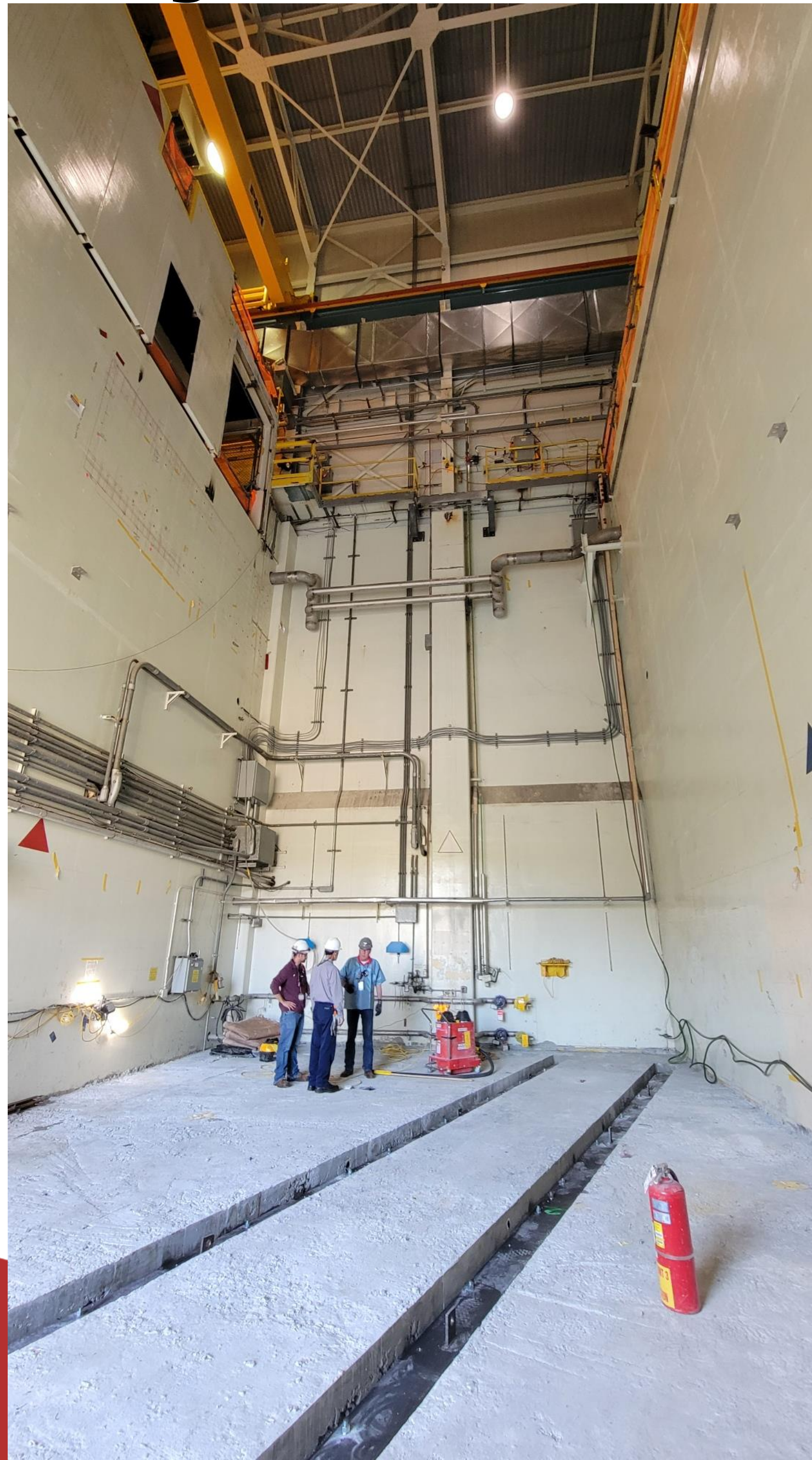
- Completed modifications to the FSB building to support HI-Lift
- Completed Factory Acceptance Testing of the HI-Lift
- Shipped and assembled Vertical Cask Transporter for Unit 3 HI-Track / HI-Storm casks
- Commenced building the HI-Lift

Projected activities through April 27, 2023:

- Complete assembling HI-Lift
- Perform Site Acceptance Test
- Finalize Procedure Development on Operation of HI-Lift
- First fuel moves currently scheduled for beginning of May (1,312 assemblies, 41 casks required)

Fuel Storage Building – Unit 3

Created opening
For HI-Lift access



Duct work required
modification



Modified walk-way



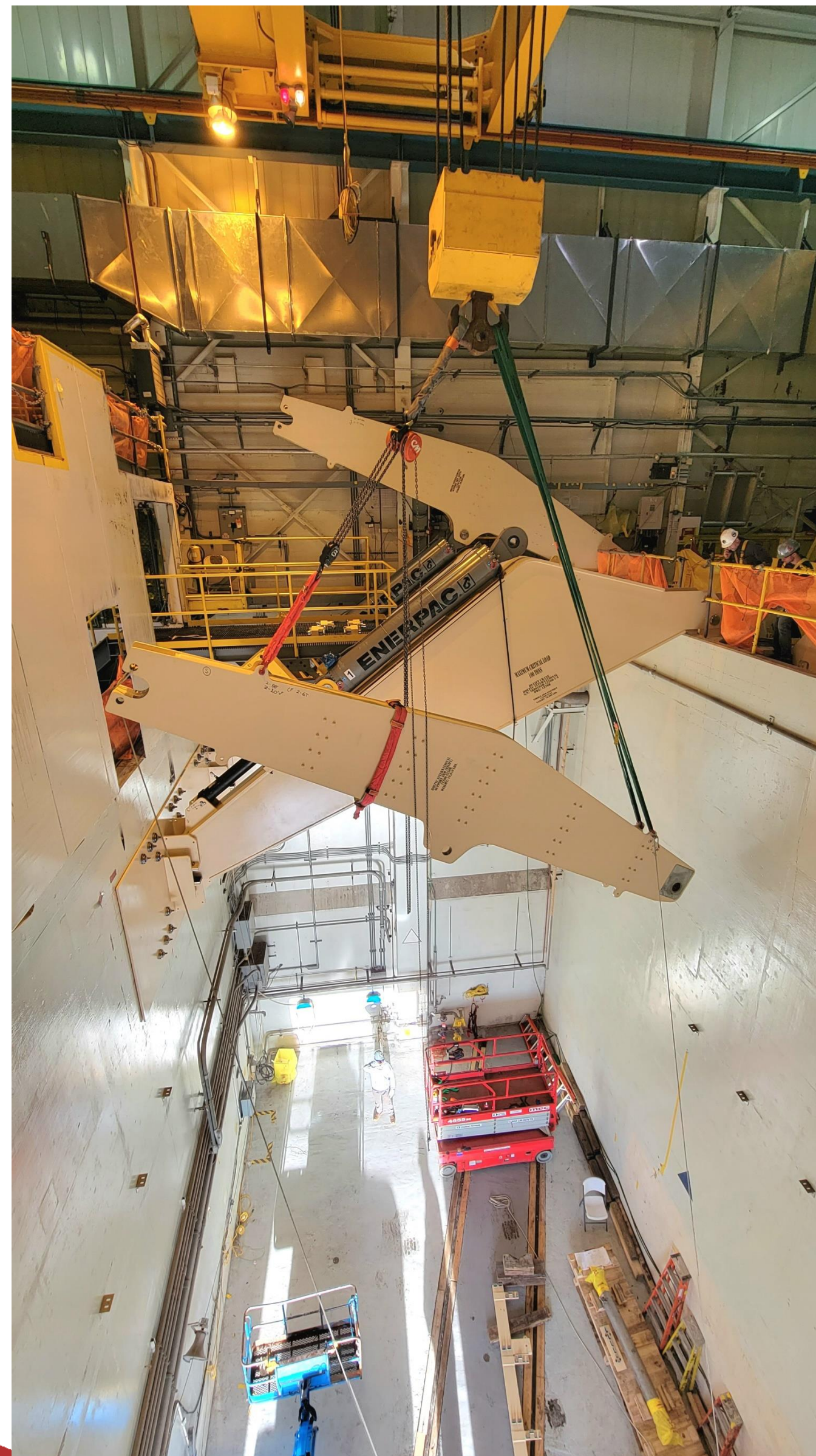
Suction piping to pool
cooling system required
modification



New floor / rail system



Fuel Storage Building – Unit 3



Fuel Storage Building – Unit 3



Vessel Segmentation – Unit 2

To Recap – the segmentation of both vessels is considered our second critical path. As scheduled, Unit 2 work will follow Unit 3 work activities.

Since the last Oversight Board Meeting (Unit 2):

- Transported Unit 3 Reactor Head to the Unit 2 Containment Building for disassembly (Space considerations in Unit 3 Containment Building)
- Commenced disassembly of Unit 3 Reactor Head (wire saw)
- Completed Cavity coating

Projected activities through April 27 (Unit 2):

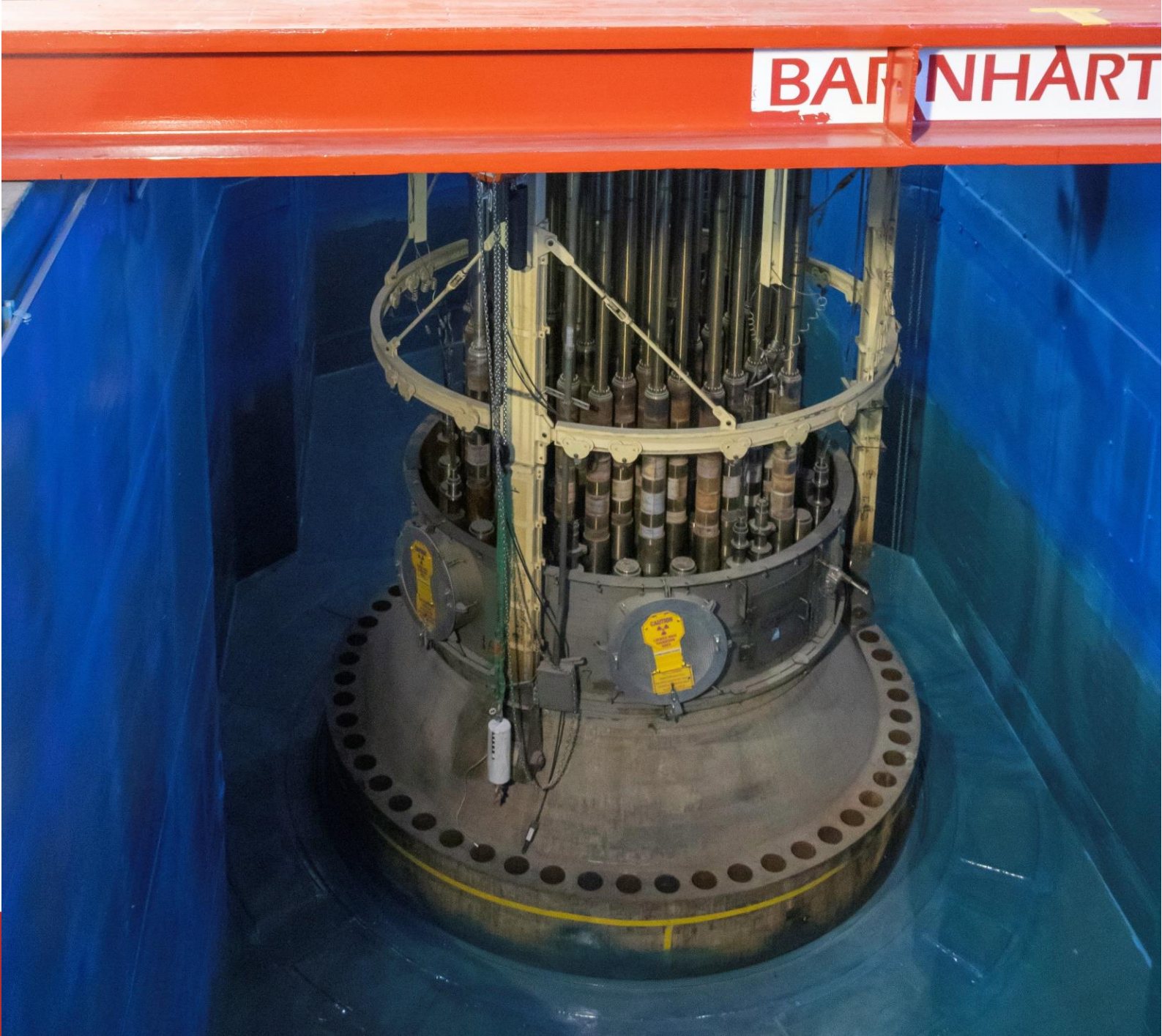
- Continue Unit 3 Reactor Head disassembly with wire saw cutting

Unit 2 Vapor Containment

Unit #3
Rx Head
in Unit 2
VC



Unit 2 Rx
Cavity
Completed
Coating



Unit 3 Reactor Head Wire Saw Cutting



Unit 3
Reactor Head

Unit 3 Wire Saw Cutting Enclosure



Vessel Segmentation – Unit 3

Since the last Oversight Board Meeting (Unit 3):

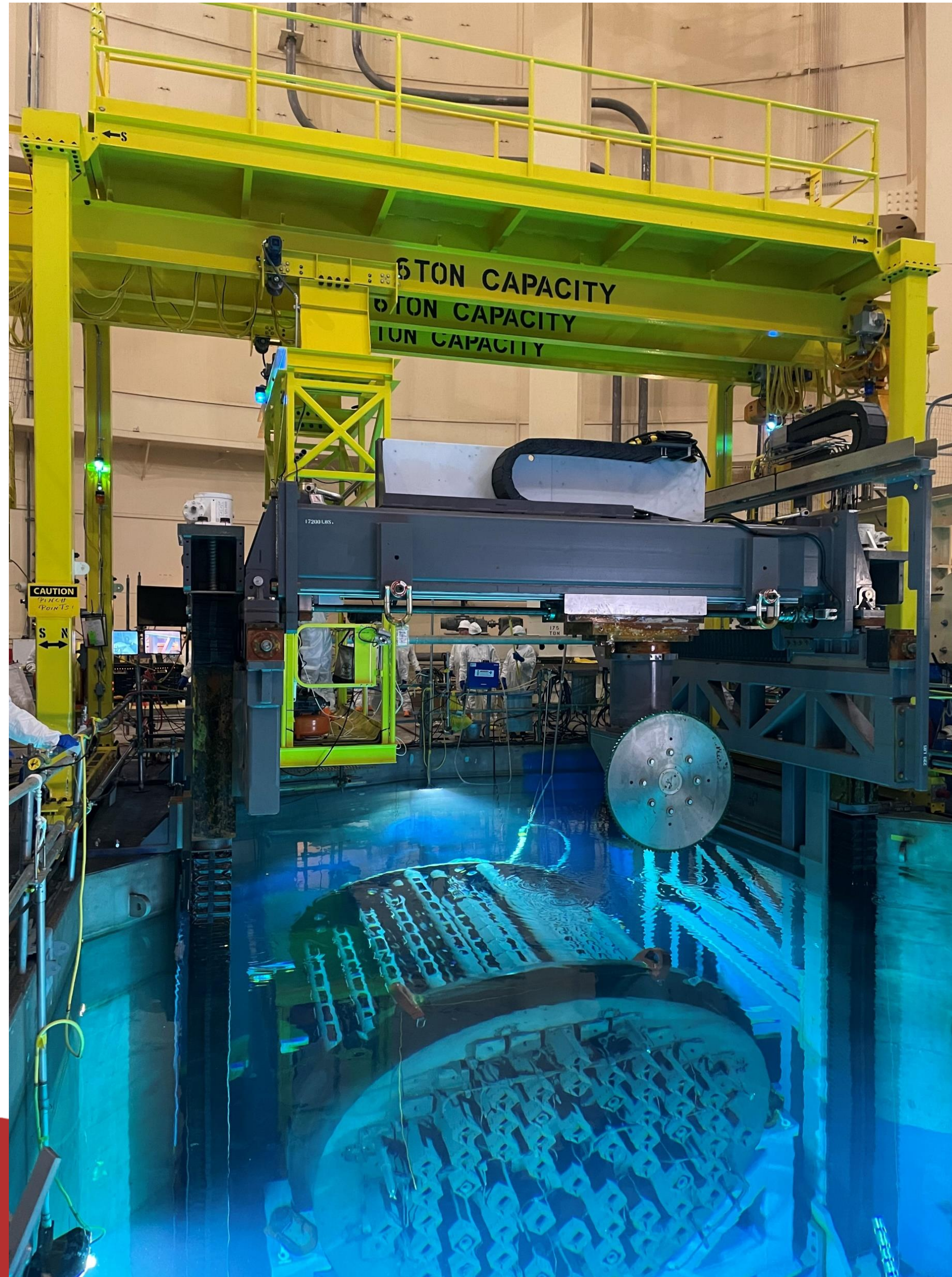
- Continue segmentation of the upper reactor vessel internals

Projected activities through April 27 (Unit 3):

- Continue segmentation of the upper reactor vessel internals

Vessel Segmentation – Unit 3

Unit #3 Reactor
Head Upper
Internals on its
side and in
Gantry Saw
cutting stand



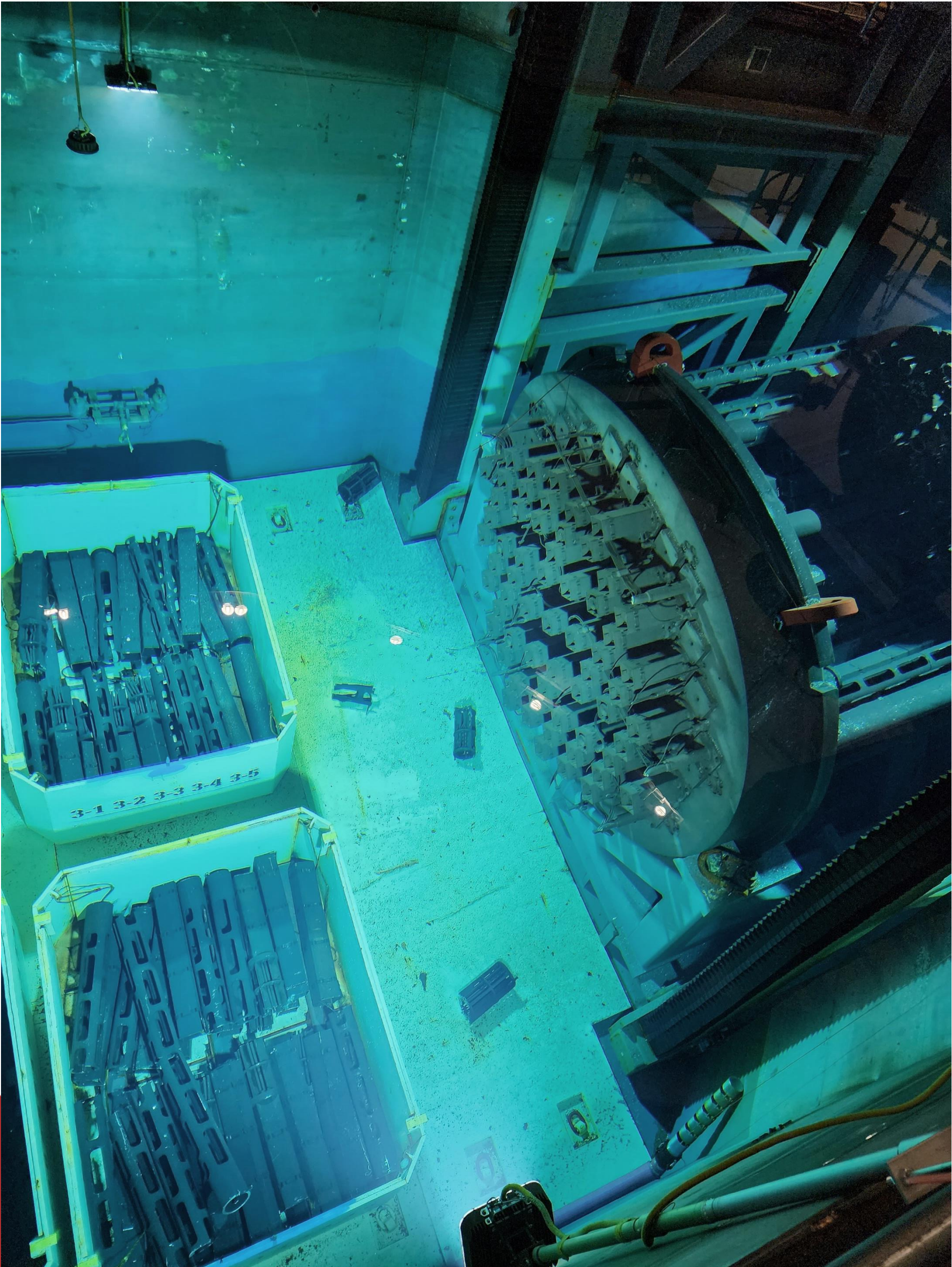
Vessel Segmentation

Section of CRDM column
segmented from Upper
Reactor Vessel Internals



Vessel Segmentation

Type "A"
waste boxes



Building Demolition

A majority of our building demolition activities since last meeting have concentrated on cleaning out various warehouses and removing equipment to be shipped to other nuclear sites. Our primary concentration has shifted to focus on our critical path activities previously presented. With that said however, we have started the following:

Since the last Oversight Board Meeting:

- Started demolition activities on the Condensate Storage Tank
- Started demolition on the steam generator steam domes

Projected demolition activities through April 27:

- Complete the CST demolition
- Complete the steam dome demolition
- Start demolition of the G.T. substation

Building Demolition

CST



Building Demolition – Steam Domes



Building Demolition – G.T. Substation



NRC Inspections and Activities



Submittal	IPEC Submittal Date	Status NRC
Exemption and LAR for Permanently Defueled Emergency Plan	12/2021	Under NRC Review
Exemption from onsite and offsite Liability and Property Damage Insurance requirements	03/2022	Under NRC Review
LAR for removal of Cyber Security Requirements	05/2022	Under NRC Review
LAR for U2 Admin TS change (support staffing for ISFSI only condition)	08/2022	Under NRC Review
IP1/IP2/IP3 ISFSI only licensing submittals	01/2023	Under NRC Review

VC Airflow – NRC SLIV



A Non-Cited Violation (NCV) is a nonrecurring, non-willful, Severity Level IV violation, equivalent to a Green Finding for operating reactors, not subject to enforcement action, as long as it is placed into the corrective action program to prevent recurrence. An SL IV NCV is the lowest level violation of very low safety significance documented in an inspection report. The NRC inspection reports docket NCVs along with the inspection activities and observations from the inspections. A Notice of Violation is different from an NCV – it is a written notice setting forth one or more violations of a legally binding requirement and normally requires a written response from the licensee and indicates some regulatory enforcement actions are required.

In the Inspection Report dated November 17, 2022, the NRC identified a NCV of very low safety significance (Severity Level IV) of Title 10 CFR 20.1406, *Minimization of Contamination*. The details of the violation are as follows:

The violation states that HDI did not have an adequate procedure or engineering controls to ensure that airflow would not escape the equipment hatch during radiological work as stated in Engineering Change EC IP-2021-0018, VC Hatch Enlargement. The Engineering Change document stated that “no air flow will travel outward of the enlarged equipment hatch area, only inward. The inspector questioned the site on the monitoring and controls in place to execute the EC.

Based on the NRC’s question, IPEC correctly entered the issue of concern into the corrective action program (documented under Inspection Report IR-IP3-00501). The following corrective actions were generated in response to the IR:

- A “smoke test” was performed at 5 different elevations of the new Equipment Hatches on both containment buildings and covered the full height of both equipment hatches. The test results indicated no outward flow and indicated either no flow or inward flow at a number of the elevation check points. This result was not consistent with the language in the EC, which stated only inward flow – the EC has been revised to reflect field conditions.
- Ventilation system filters were changed following the test results to further promote inward flow.
- Procedures were revised to provide explicit direction to close or verify closed the equipment hatch during any work activities that could potentially generate airborne radionuclides (examples being welding, construction activities and the internal transport of radioactive materials). This direction was initially provided in a station standard and now better resides in a procedure.
- The NRC inspector noted in the inspection report that “No aggressive work (cutting, grinding, etc.) was being performed at the time of the observation and inspectors noted that the air sample taken that day did not indicate any release of material”. It should be emphasized that the NRC stated *there was no release of radioactive material from containment*. Additionally, no activities were being performed at the time of the inspection that could have potentially generated airborne material or contaminants with the door open.

- Only equipment that has been surveyed as “clean” or appropriately packaged can be transported out of the containment hatch again, while no other work is being done in containment that could generate airborne radionuclides.
- Inside containment, a HEPA filter local ventilation system is employed to capture and control radionuclides and contaminants *when* work that could generate airborne radionuclides is performed, again with the hatch closed.
- Engineering controls at the equipment hatch have always included HEPA filters in the ventilation systems, Continuous Air Monitors (CAM’s), Air Sampler and surveys directly outside the equipment hatch. *At no time have radionuclides / contaminants left the building.*
- The Reuter Stokes monitors located at the site boundary have *never shown any* increase in airborne activity.
- The NCV references a different site where Reactor Vessel Segmentation activities resulted in radioactive particles in soil samples which was likely attributed to a lack of negative pressure in the Containment Building. As directed by processes and procedure, the IPEC equipment hatch is always closed during Vessel Segmentation work and the monitoring in place confirms no release.
- A discussion with NRC Region 1 Leadership was conducted on December 20th to discuss the NCV write-up in the inspection report. We acknowledge that the EC could have been more explicit on expectations for controlling the hatch; we also acknowledge that a written procedure to control the hatch is preferred to a standard.
- Lastly, it should be reinforced that *at no time* have radionuclides or contaminants left the containment building as confirmed with our site monitors. We have incorporated the corrective actions and lessons learned into our work practices and are confident that this issue has been adequately and thoroughly addressed.
- This was a good “Lesson Learned” for us - we further strengthened our defenses and made our standards more clear through the use of a procedure.

NRC Activities

- 4039.5 Inspection hours since June 1, 2021
- SLIV Violations:

* PWST Classification

* Diesel fuel adjacent to fuel handling machinery

* Fire Protection System flow test (TBD)

* Failure to perform survey, 21 Waste Hold-up Tank (TBD)

IPEC Industrial Safety Performance



Recent History

- NYS Department of Public Service's Office of Resilience and Emergency Preparedness submitted a letter to Holtec Decommissioning International (HDI) expressing concerns with the industrial safety trend at IPEC. Letter dated November 14, 2022.
- Letter sites concerns with Near Miss events, Fitness For Duty Testing, and the number of OSHA recordable injuries.
- In a letter addressed to Mr. Kevin Wisely dated December 7, 2022, HDI responds that we appreciate and share the states concern regarding the industrial safety performance at Indian Point.
- Our response acknowledges two near miss events, and three OSHA Recordable injuries (we now have a total of six).

Cause of Events

Lets be clear here that we know and acknowledge that no one comes to work wanting to get hurt, but we need to address and understand the cause of the events before we could put meaningful solutions in place. With that said, the cause of the events have been identified so far as:

- Wrong tooling used.
- Poor oversight of the task at hand.
- Body posturing – eye /hand coordination.
- Pre-existing condition of the worker.
- Material condition of the facility.
- Not meeting site standards.

IPEC Industrial Safety Performance



Corrective Actions:

- Continue with safety discussions everyday at pre-job briefs and station meetings.
- Continue with the Union led Safety Committee Meetings on a monthly bases. We want to hear from Union personnel what their issues are and resolve as needed.
- Issue station wide red or yellow memos addressing the event and distribute them site wide.
- Continue with the monthly craft Union Leadership meetings hosted by Champion so we understand what the craft union personnel need.
- Established a “coach of the week” roster. The coach will observe a pre-job brief and task to ensure site standards are adhered to – on the spot feedback , if needed, is expected to be provided.
- Established a periodic meeting with the leadership team and union personnel to reinforce standards & expectations and to discuss station events. The “coach of the week” will discuss their observations at this meeting. (Leadership & Alignment)
- Developed an expectations document to be signed by all members of the leadership team as an acknowledgement to uphold station standards and expectations.
- Perform periodic craft/labor safety walkdowns.
- Perform periodic housekeeping walkdowns – address noted deficiencies expeditiously.
- Drive material condition issues to closure – discuss daily and initiate corrective actions as required.

IPEC Industrial Safety Performance



Fitness For Duty

We have clarified expectations as to when personnel will be required to comply with Fitness For Duty (FFD) testing. It will apply, in the case of a safety situation, if a Human Performance Event was noted as a potential cause or precursor to the event.

Thank You!



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