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January 31, 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, responses from Holtec Decommissioning International (HDI) to questions raised at the December 7, 2022 Indian Point Decommissioning Oversight Board meeting. 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

**HDI Responses to Public Comments and Questions
December 7, 2022 DOB Meeting**

[Decommissioning &
Spent Fuel
Management](#)

[Decommissioning Monitoring](#)

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The responses below were provided by Holtec Decommissioning International (HDI).

DECOMMISSIONING AND SPENT FUEL MANAGEMENT

On-Site Management

1. How long will it take to complete this casking process?

According to Holtec, all casking of spent fuel from the Unit 2 and Unit 3 spent fuel pools is currently expected to be completed in November 2023, a timeline that is subject to change.

Aging Management

2. The NRC explained that Holtec has a method to open a welded shut, multipurpose dry storage canister without utilizing a spent fuel pool or a dry transfer facility/hot cell. Can you describe that process? How can licensees open a welded shut canister in order to repackage spent fuel for permanent or even Consolidated Interim Storage?

According to Holtec, the welded lid on a Multi-Purpose Canister (MPC) is not intended to be removed. What can be removed is the bolted lid from the Hi-Storm 100S Canister which houses the MPC. This lid would be removed to transfer the MPC to a Hi-Storm canister when the MPC is ready to be transported to an eventual repository.

3. How is scratching prevented of a thin-wall (1/2" to 5/8") steel canister wall when loading into concrete cask?

According to Holtec, the concrete component of the HI-Storm 100s canister is in a self-contained annulus that allows for the insertion of the MPC when loading the Hi-Storm. The concrete in the HI-Storm does not come in contact with the MPC. The lowering of the MPC into the HI-Storm is performed by trained professionals that follow detailed procedures ensuring the correct fit-up of the MPC into the Hi-Storm. When the MPC is loaded by crane into the Hi-Storm, the load of the MPC is monitored by a Load Cell that provides the operators with the correct information that there is no "hang-up" of the MPC as it enters the Hi-Storm, thus ensuring no impact to the material condition of the MPC and that it remains in-tact. Holtec indicated they have provided a video of how the HI-Storm 100s casks are loaded on numerous tours the company has provided to stakeholders and will continue to do so as part of its public outreach.

DECOMMISSIONING MONITORING

4. Is there a decommissioning audit process by a separate entity other than the NRC?

According to Holtec, the company has a Quality Assurance Department that performs assessments of decommissioning activities. In addition, a team of Ex-Operators and current engineers review day to day activities at the site and report directly to senior level personnel at Holtec's corporate office. Their review requires that all procedures are being met as Holtec performs its activities on site.

American Nuclear Insurers participates in Holtec's monthly project status calls and performs an annual audit which verifies personnel records are in place as well as verifying the correct procedures are being used.

SECURITY AND EMERGENCY MANAGEMENT

5. What protection do casks provide against terrorist explosives and/or overhead attack?

According to Holtec, there is no civilian drone that can carry a load that would have an impact on the Hi-Storm 100S canisters. On the Holtec Website, there is a video showing impact testing on a Hi-Star Canister where following impact testing, the MPC remained in-tact. A Hi-Storm and Hi-Track are similar in design and structure. The video may be accessed at <https://holtecinternational.com/news/videos/aircraft-crash-test-on-a-scaled-model-of-a-hi-star-180-transportstorage-cask-2/>.

6. Holtec indicated that it has a security response team to protect the pads. Is the team on premise?

According to Holtec, the security response team is on premise and will remain so as long as there are canisters on site.

7. What emergency measures would be deployed during extreme flooding events?

According to Holtec, there are a number of answers to this question depending on the site area of concern. Starting at the lowest elevations of the station, Holtec's concern would be the functioning of its Service Water Pumps that are required to be in service for spent fuel pool cooling. Even during Hurricane Sandy, the rise in river water level for the worst storm seen in decades had no impact to the operation of these pumps. If it did, Holtec indicated it has procedures in place to provide the necessary back-up cooling to the pools as required. Based on Holtec's current schedule to transfer all spent fuel from the spent fuel pools to dry cask storage, these pumps will no longer be required by the end of this year.

Regarding the ISFSI Pads, they are at an elevation of 95' above the Hudson River, so even the most extreme storm will not have an effect on the canisters on the pad. In addition, Holtec indicated it built a retention pond adjacent to the ISFSI Pads that is designed to contain any storm run-off that would have a potential of affecting the canisters.

8. How often is the radiation in the air near the casks measured? If there is a leak from a cask, what alarming/warning systems are in place to alert someone? How long would it take to have the warning message received?

According to Holtec, there are detectors located along the fence lines of the ISFSI Pad monitoring conditions 24/7. A Quarterly Survey is performed in addition to a Perimeter Survey twice per week during fuel off load activities. When the Perimeter Surveys are no longer performed following offload of both pools, Holtec will review Quarterly Survey data to determine if changes are needed. The Quarterly Survey data will notify Holtec if there is a potential leak of any of the canisters. According to Holtec, there are greater than 1800 casks in service worldwide manufactured by Holtec with none that have exhibited any leaks. An aging management program is in place to confirm cask integrity.

The data from Reuter Stokes Monitors along the site perimeter would also be reviewed in case of an event.