



Crystal River Nuclear Plant  
15760 W. Power Line Street  
Crystal River, FL 34428

Docket 50-302  
Operating License No. DPR-72

10 CFR 50.80  
10 CFR 50.90  
10 CFR 140.92, Appendix B

April 30, 2015  
3F0415-03

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Subject: Crystal River Unit 3 – Supplemental Information Regarding Insurance for the Transference of the License and Conforming License Amendment Pursuant to 10 CFR 50.80 and 10 CFR 50.90

Reference: CR-3 to NRC, dated November 7, 2014, "Crystal River Unit 3 – Application for Order Approving Transfer of License and for Conforming License Amendment Pursuant to 10 CFR 50.80 and 10 CFR 50.90," (ADAMS Accession No. ML14321A450)

Dear Sir:

The U.S. Nuclear Regulatory Commission (NRC) is currently reviewing Duke Energy Florida's, Inc. (DEF's) November 7, 2014 request for consent to transfer to DEF the interests held by eight minority co-owners in the Crystal River Unit 3 (CR-3) Facility Operating License DPR-72. The transfer of ownership will take place pursuant to the Settlement, Release and Acquisition Agreement, dated September 26, 2014, wherein DEF will purchase the 6.52% combined ownership share in CR-3 held by these minority co-owners, leaving DEF and Seminole Electric Cooperative, Inc. as the remaining licensees for CR-3. Pursuant to 10 CFR 50.90, DEF also requested NRC approval of an administrative amendment to the CR-3 Facility Operating License (FOL) to reflect the transfers, to be issued and made effective at the time the transfers occur.

During the course of NRC's review of the license transfer request, necessary supplemental information regarding insurance has been requested by the Staff. During a telephone conference call on April 27, 2015, the NRC Staff and representatives from DEF discussed the current and future status of the CR-3 Price-Anderson Act and indemnity insurance. Specifically, the Staff requested clarification regarding: (1) how the Price-Anderson Act and indemnity insurance and onsite insurance were paid in 2014; (2) how they will be paid at the time of transfer; (3) who will be paying for insurance once the minority co-owners 6.52% interests have been transferred to DEF; and, (4) whether the DEF indemnity agreement requiring insurance for financial protection pursuant to 10 CFR 140.92, Appendix B, needs modification to reflect the license change and transference of ownership.

A DOI  
NRC

Accordingly, CR-3 hereby provides the following insurance information to supplement the November 7, 2014 request to approve the transfer of license and conforming license amendment pursuant to 10 CFR 50.80 and 10 CFR 50.90:

Offsite Price-Anderson Act Nuclear Liability Coverage

In compliance with 10 CFR 140.11(a)(4) for CR-3 nuclear liability obligations, the following CR-3 American Nuclear Insurers (ANI) Nuclear Energy Liability Insurance policies and certificates will be amended effective upon the ownership transfer to remove the minority co-owners as Additional Named Insureds:

- Facility Form (NF-0195)
- Worker Form (NW-0579)
- Secondary Financial Protection (N-0035)

Since October 2013, DEF has paid 98.3% of the premiums associated with these policies. Once the license and ownership transfers occur, DEF will continue to pay 98.3% of the premiums for these indemnity insurance policies, and the remaining co-owner, Seminole Electric Cooperative, Inc., will pay the remaining approximately 1.7% of the premiums.

Onsite Property Damage and Decontamination Coverage

In compliance with 10 CFR 50.54(w)(1), for nuclear property decontamination obligations for CR-3, the following CR-3 Nuclear Electric Insurance Limited (NEIL) Primary Property and Decontamination Liability policy will be amended effective upon the ownership transfer to remove the minority co-owners as Insureds:

- Primary Property and Decontamination Liability policy (P15-081)

In accordance with 10 CFR 50.54(w)(1), DEF carries an onsite property damage and decontamination policy for the amount of \$1.06 billion through NEIL.

Since October 2013, DEF has paid 98.3% of the premiums associated with this policy. Once the license and ownership transfers occur, DEF will continue to pay 98.3% of the premium for this indemnity insurance policy, and the remaining co-owner, Seminole Electric Cooperative, Inc., will pay the remaining approximately 1.7% of the premium.

10 CFR 140.92, Appendix B Form of indemnity agreement with licensees furnishing insurance policies as proof of financial protection

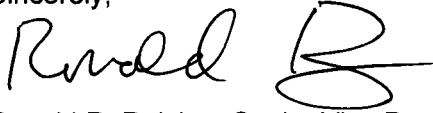
DEF has reviewed the indemnity agreement form and determined that it will need to be modified to reflect that DEF and Seminole Electric Cooperative, Ltd. are the remaining CR-3 license holders.

There are no new regulatory commitments made within this submittal.

If you have any questions regarding this submittal, please contact Mr. Phil Rose, Lead Engineer, Nuclear Regulatory Affairs, at (352) 563-4883.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 30, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald R. Reising". The signature is fluid and cursive, with a large, stylized "R" at the end.

Ronald R. Reising, Senior Vice President  
Operations Support

RRR/faw

xc: NRR Project Manager  
Regional Administrator, Region