



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

Docket 50-302
Operating License No. DPR-72

10 CFR 50.82(a)(7)

June 11, 2015
3F0615-01

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

Subject: Crystal River Unit 3 – Notification of Schedule Changes for the Post-Shutdown Decommissioning Activities Report

References: CR-3 to NRC, dated December 2, 2013, "Post-Shutdown Decommissioning Activities Report," (ADAMS Accession No. ML13340A009)

Dear Sir:

Pursuant to 10 CFR 50.82(a)(7), Duke Energy Florida, Inc. (DEF) is submitting notification that DEF is planning to perform (i) certain activities that constitute a schedule change from those actions and schedules described in the Crystal River Unit 3 (CR-3) Post-Shutdown Decommissioning Activities Report (PSDAR) and associated Site-Specific Decommissioning Cost Estimate (DCE) and (ii) certain construction activities with associated costs that were neither described in nor contemplated by the PSDAR and DCE.

Specifically, the changes are as follows:

1. The disposal of legacy waste (i.e., retired steam generators, reactor vessel closure head and hot leg piping) from the site is currently listed as Period 1, activity item 1.2.13 (*Disposal of Retired NSSS Components*) in PSDAR Attachment 1, Table C, *Crystal River Unit 3 Nuclear Generating Plant SAFSTOR Decommissioning Cost Estimate with Dry Fuel Storage*. Disposal of legacy waste was scheduled to have been completed between June 3, 2013 and July 1, 2015, but it is now being moved to Period 2a and is scheduled for completion between July 1, 2015 and August 13, 2019. This schedule change was made to provide additional time to resolve contractual issues associated with the removal of the large components from the site. Despite the schedule change, the disposal of legacy waste will still be performed prior to decontamination and dismantling (D&D), which is scheduled to commence in 2067. As a result, the delayed removal of legacy waste will have no effect on the radioactive waste volume during D&D. The occupational dose associated with this activity remains the same. This schedule change did not result in any appreciable increase in cost than what is described in the DCE.
2. The demolition of the Ready Warehouse currently listed as Period 5b, activity item 5b.1.1.3 (*Demolition of the Ready Warehouse*) in PSDAR Attachment 1, Table C, *Crystal River Unit 3 Nuclear Generating Plant SAFSTOR Decommissioning Cost Estimate with Dry Fuel Storage* was scheduled to have been completed between February 20, 2073 and August 21, 2074, but it is now scheduled to be completed in Period 2a. Performance of this activity in the earlier period was determined to be

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necessary to permit a change in the security footprint of the plant once the fuel is offloaded to the independent spent fuel storage installation (ISFSI) pad. The estimated demolition cost increased from the original estimate of \$193 thousand to approximately \$2.5 million due to changes in the method of demolition that must be used to remove the structure in the earlier period. Radiation survey of the building identified one area where drain piping from a laundry machine required remediation due to residual radioactivity. The drain piping has been removed and the building has been released for demolition with a final survey planned prior to removal of material.

3. The construction of an ISFSI is discussed in the PSDAR in footnotes to Attachment 1, Table 2, *Decommissioning Cost Summary*; Attachment 1, Table 3.3, *Spent Fuel Management Expenditures*; and Attachment 1, Table 6.1, *Decommissioning Cost Summary*. It has been determined that ISFSI security modifications, including construction of a smaller perimeter fence around the ISFSI, is needed to support the security cost assumptions in the PSDAR, resulting in higher overall ISFSI construction costs than the \$93.8 million stated in the PSDAR sections noted above. Construction costs of the ISFSI security modifications are estimated to be \$7.3 million, and, for the same reasons described in CR3's, "Update to Irradiated Fuel Management Program Pursuant to 10 CFR 50.54(bb)," dated December 3, 2013 (ADAMS Accession No. ML13340A008), such costs will not be paid for from DEF's Decommissioning Trust Fund (DTF) at this time. DEF will be responsible for the cost of the newly-identified security fence construction, and it may seek recovery of those costs in litigation or otherwise.

Based on an evaluation of the changes described above, and the current status of DTF disbursements and growth, DEF has concluded there is no significant impact to the overall cost or schedule that would jeopardize the ability of CR3 to continue to demonstrate financial assurance. The approximate \$2.3 million increase resulting from accelerating demolition of the Ready Warehouse is insignificant compared to the excess funds in the DTF, as indicated by the cash flow analysis provided as Attachment 11 to CR-3's, "Annual Decommissioning and Irradiated Fuel Management Financial Status Report for 2014," dated March 31, 2015 (ADAMS Accession No. ML15092A113). DEF remains committed to utilizing SAFSTOR with license termination completion in 2073.

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald R. Reising", with a stylized flourish at the end.

Ronald R. Reising, Senior Vice President
Operations Support

RRR/faw

xc: NRR Project Manager
Regional Administrator, Region I