



## Accelerated Decommissioning Partners, LLC

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10 CFR 50.80

10 CFR 50.90

10 CFR 72.50

December 26, 2019

3F1219-01

United States Nuclear Regulatory Commission

Washington, D.C. 20555-001

ATTN: John B. Hickman, Project Manager

Reactor Decommissioning Branch

Division of Decommissioning, Uranium Recovery, and Waste Programs

Office of Nuclear Material Safety and Safeguards

**Subject:** Supplemental Information in Support of Crystal River Unit 3 (CR3)– Revised Post Shutdown Decommissioning Activities Report and Decommissioning Cost Estimate

- References:**
- (1) Letter, Duke Energy Florida, LLC to USNRC, "Crystal River Unit 3 – Site Specific Decommissioning Cost Estimate", dated June 27, 2018 (ADAMS Accession No. ML18178A181)
  - (2) Letter, Duke Energy Florida, LLC to USNRC, "Application for Order Consenting to Direct Transfer of Control of Licenses and Approving Conforming License Amendment", dated June 14, 2019 (ADAMS Accession No. ML19170A194)
  - (3) Letter, ADP CR3, LLC (ADP), "Notification of Revised Post-Shutdown Decommissioning Activities Report", dated June 26, 2019 (ADAMS Accession No. ML19177A080)

Dear Mr. Hickman:

ADP CR3, LLC (ADP) submits the following Supplemental Information in support of the review of the Revised Post Shutdown Decommissioning Activities Report identified in Reference (3). This Supplemental Information provides additional detail regarding the decommissioning cost estimate associated with radioactive waste provided in both Reference (2) and Reference (3).

ADP estimated the radioactive waste volumes for the Crystal River Unit 3 Plant based on data from the TLG 2018 Decommissioning Cost Estimate (DCE) provided in Reference (1). Through its review of plant conditions, material takeoff calculations and available documentation, including groundwater monitoring data, the historical site assessment and drawings, ADP increased the total volume of radioactive waste by nearly 80%. This substantial increase in waste volume will accommodate ADP's planned deconstruction methodology that focuses on lowering dose to workers by removing material for disposal after reduced surface decontamination time than originally assumed in Reference (1). This method will generate added low activity waste volume that will be disposed of in the Waste Control Specialists LLC's (WCS) exempt waste cell at the WCS facility.

There is also a reduction in Class A waste compared to the TLG estimate that is accomplished by low activity Class A material being disposed of in the WCS exempt cell. ADP utilized the WCS Waste Acceptance Criteria (WAC) for Exempt Low Activity Waste (LAW) and Class A waste for determining the classification of CR3 radiological waste. TLG has not historically considered the WCS exempt cell for disposal as it is a relatively new cell (initial waste acceptance in 2015). This reclassification has resulted in a lower overall cost for radioactive waste disposal compared to TLG's estimate.

It should be noted that the above ADP approach is entirely consistent with the approach applied at Vermont Yankee by NorthStar. To date NorthStar has shipped over 3,000 tons of waste to WCS with the percentage meeting the exempt WAC exceeding our calculated volumes of exempt classification since some waste expected to be Class A was classified as exempt, while all waste expected to be exempt has been accepted as such.

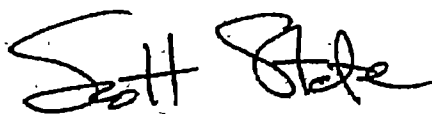
The table below provides a detailed comparison of the ADP vs TLG estimated waste volumes. All disposal costing in our estimate is directly derived from these volumes and contracted rates committed to by WCS for the duration of the CR3 decommissioning project.

Waste Class	UOM	TLG 2018 DCE	ADP
Process/Exempt	CF	279,214	810,869
Class A	CF	187,369	29,674
Class B	CF	1,252	800
Class C	CF	642	800
GTCC	CF	1,654	1,650
Total Waste Volume		470,131	843,793

ADP notes that although volumes are "estimated," the unit costs used for each category of waste in the total cost estimate are fixed, because the unit cost rates have been contracted and committed.

ADP appreciates the opportunity to provide this information, and we look forward to further discussions.

Sincerely,



**Scott E. State, P.E.**  
Chief Executive Officer

Docket 50-302  
Docket 72-1035  
Operating License DPR-72