

January 17, 2020

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

Indian Point Nuclear Generating Units 1, 2 and 3
Docket Nos. 50-3, 50-247, 50-286 and 72-051
Provisional Operating License No. DPR-5
Renewed Facility Operating License Nos. DPR-26 and DPR-64

Subject: Supplement to Application for Order Consenting to Transfers of Control of
Licenses and Approving Conforming License Amendments

Reference: Letter from ENOI to US NRC, Application for Order Consenting to Transfers of
Control of Licenses and Approving Conforming License Amendments, Indian
Point Nuclear Generating Units 1, 2 and 3, November 21, 2019 (ML19326B953)

This letter provides supplemental information in support of the NRC approval requested in the referenced letter.

In January 2020, the position of President, HDI has been abolished to remove overlapping of responsibilities in HDI's management. Please note that the Holtec International Chief Nuclear Officer (CNO) will continue to provide oversight of Holtec's nuclear activities including decommissioning. In addition, to provide clarity in communications, changes in the named executive positions as highlighted on the organization chart included in the Enclosure to this letter will trigger a notification to the NRC.

The Enclosure to this letter provides the revised pages for Figure A-1, *IPEC Combined Org Chart Depiction* and Table A-1, *Roles and Responsibilities of HDI Senior Management*, both included in Section 5, *Technical Qualifications*, of the License Transfer Application (LTA). Instructions for adding and deleting the appropriate pages to the LTA are also included in the Enclosure to this letter.

As with the original LTA, a copy of this letter is being provided to the State of New York in accordance with the requirements of 10 CFR 50.91(b)(1).



The conclusions of the no significant hazards consideration and the environmental considerations contained in the LTA are not affected by and remain applicable to this supplement.

This letter contains no new regulatory commitments.

If you have any questions, please contact me at (856) 797-0900, x3813 or via email at a.sterdis@holtec.com.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 17th day of January 2020.

Sincerely,

A handwritten signature in blue ink that reads "Andrea L. Sterdis".

Andrea L. Sterdis
Vice President, Regulatory & Environmental Affairs
Holtec Decommissioning International, LLC



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Enclosure: Update to November 21, 2019, Indian Point Units 1, 2 & 3 License Transfer Application

cc: w/ Enclosure

Regional Administrator, NRC Region I
Senior Resident Inspector, Indian Point Nuclear Generating Station Units 2 and 3
Senior Project Manager, NRC/NRR/DORL

ENCLOSURE (8 pages)

Update to November 21, 2019

Indian Point Units 1, 2 & 3 License Transfer Application

Instructions

License Transfer Application

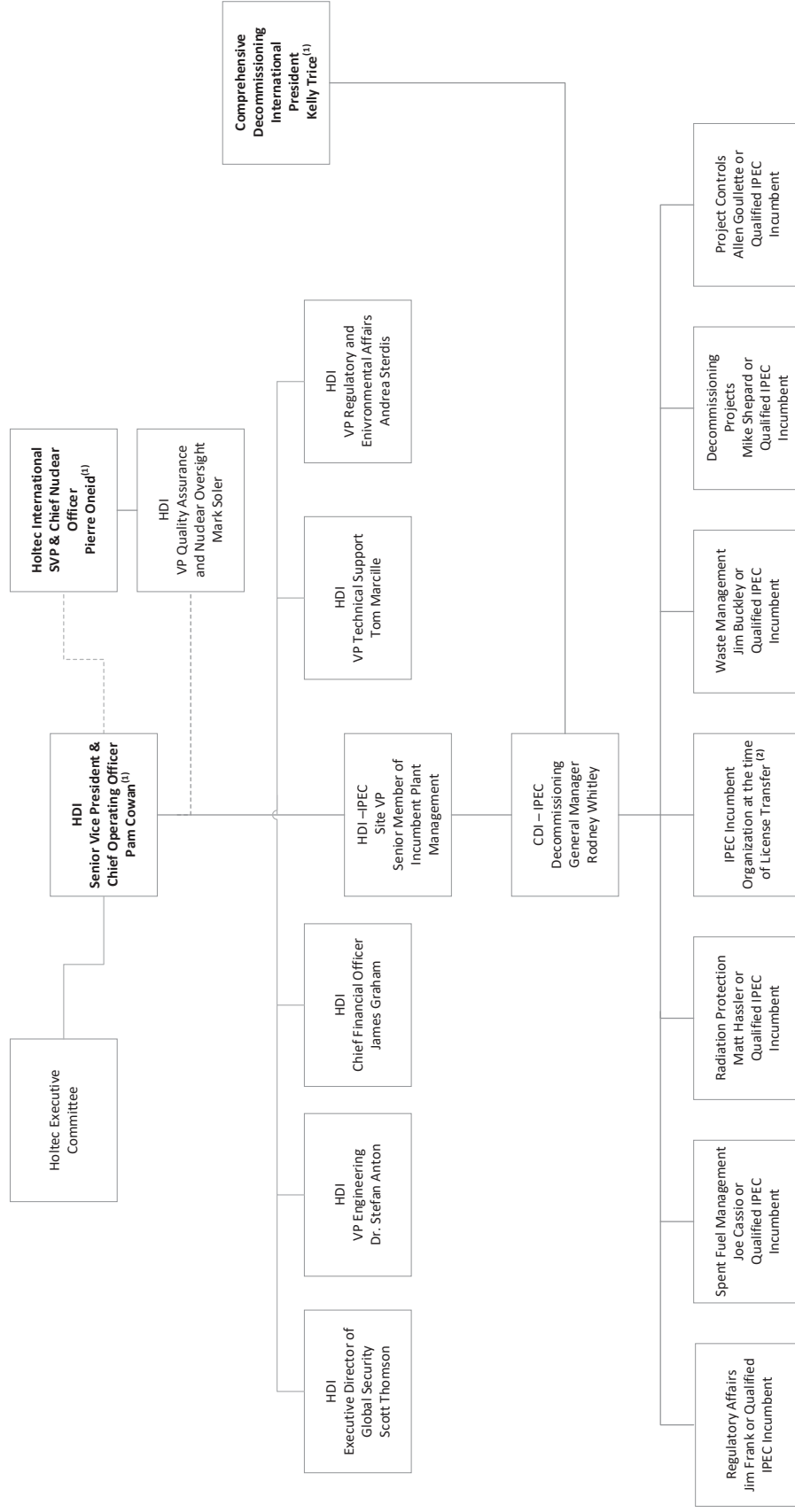
Enclosure 1, Section 5, Technical Qualifications

- Delete Figure A-1 on Page 7
- Replace with Figure A-1 dated January 2020
- Delete Pages 9-11 including Table A-1
- Replace with Pages 9-11 including revised Table A-1 dated January 2020

Enclosure 1, Attachment C, General Corporate Information

- Delete the resume for Pierre P. Oneid (3 pages)
- Replace with the revised resume for Pierre P. Oneid dated January 2020 (3 pages)

Figure A-1 IPEC Combined Org Chart Depiction



Notes:
 (1) HDI will notify the NRC of changes to the noted Executive Positions.
 (2) This box represents the planned integration into the CDI site organization of the existing IPEC Decommissioning Organization site personnel at the site during the time of transaction closing and license transfer including the Plant Operations, Emergency Planning and Security organizations.
 (3) All personnel presently named in the org chart (or to be added in the future) are subject to the requirements set forth in Holtec's Personnel Qualification Program specified in Holtec's quality assurance procedures.

HDI will ensure that the decommissioning activities are performed consistent with the essential elements of the Holtec project management approach, which has been honed through successful implementation in hundreds of Holtec safety-significant projects.

The planned HDI senior management project organization is depicted in Figure A-1. Table A-1 provides the roles and responsibilities of the HDI Senior Management personnel.

Table A-1 Roles and Responsibilities of HDI Senior Management		
Position	Role	Responsibilities
Senior Vice President and Chief Operating Officer	Oversee the safety, operation, and decommissioning of the nuclear sites maintained by HDI including oversight of the decommissioning activities performed by CDI. Provide strategic direction to the HDI organization and to the senior leadership of the nuclear sites maintained by HDI.	<ol style="list-style-type: none"> 1. Establish and maintain a strong Nuclear Safety Culture 2. Provide management direction, oversight and support to the site organization 3. Report routinely to the Executive Board 4. Assure HDI provides direction and oversight in the key sectors of fuel management and decommissioning
Vice President for the IPEC Site	Provide day-to-day onsite leadership and direction to the IPEC site to assure the safe, decommissioning maintenance and regulatory compliance of the site	<ol style="list-style-type: none"> 1. Assure compliance with the licenses including the Technical Specifications, dry storage system Certificate of Compliance, other regulatory requirements, and other regulatory commitments 2. Maintain the site's strong Nuclear Safety Culture 3. Ensure expenditures from the IPEC Decommissioning Trust Fund are legitimate 4. Interface with the Site Decommissioning General Manager to assure decommissioning activities have the appropriate resources.
Vice President Engineering	Provide engineering oversight for the decommissioning nuclear stations maintained by HDI	<ol style="list-style-type: none"> 1. Oversee engineering activities in support of spent fuel management and decommissioning. 2. Conduct routine assessments at each of the decommissioning nuclear stations maintained by HDI. 3. Provide support for resolving engineering issues.

Vice President Regulatory and Environmental Affairs	Provide licensing oversight for the decommissioning nuclear stations maintained by HDI	<ol style="list-style-type: none"> 1. Oversee and guide the development and submission of licensing, regulatory and environmental actions 2. Conduct routine assessments of the regulatory activities at each of the decommissioning nuclear stations maintained by HDI 3. Support the interface between the site and nuclear regulators while also taking a lead role on generic issues in decommissioning
Chief Financial Officer	Provide support and guidance for the prudent investment of decommissioning trust funds and assurance that funds are used for decommissioning purposes	<ol style="list-style-type: none"> 1. Establish investment policy and guidelines 2. Review investment performance 3. Assure that decommissioning expenditures are reviewed for appropriateness and reflect decommissioning activities 4. In conjunction with the VP Technical Support, evaluate the sites performance to the decommissioning cost and schedule
Vice President Quality Assurance and Nuclear Oversight	Provide quality assurance oversight for the decommissioning nuclear stations maintained by HDI	<ol style="list-style-type: none"> 1. Maintain nuclear sites' Quality programs in alignment with the HDI QA infrastructure 2. Provide routine oversight evaluations of the quality assurance function at the decommissioning nuclear stations maintained by HDI 3. Provide quality assurance oversight for the movement of fuel and the transportation of radioactive waste
Vice President Technical Support	Provide technical support in the areas of health and safety, the environment, radiation protection, and decommissioning improvements to each of the decommissioning nuclear stations maintained by HDI	<ol style="list-style-type: none"> 1. Perform routine assessments of the health and safety, environment, and radiation protection areas 2. Develop improved tools, fixtures, robotics, and processes to safely reduce the decommissioning duration and the ALARA goals for decommissioning 3. In conjunction with the VP Treasury, evaluate the sites performance to the decommissioning cost and schedule

Executive Director of Global Security	Provide support for site security and plant access for nuclear stations maintained by HDI	<ol style="list-style-type: none"> 1. Oversee and guide the safe and compliant site security, plant access and fitness-for-duty functions at the decommissioning sites. 2. Develop and execute security program modifications.
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Resumes for the individuals that hold the HDI positions described in Table A-1 are included in Attachment C of the Application.

A. Comprehensive Decommissioning International

CDI is a company jointly owned by HDI, and SNC-Lavalin Group's subsidiary, Kentz USA, Inc. CDI is majority owned by HDI. CDI was formed with the strategic goal of creating an organization with a deep pool of decommissioning knowledge and experience to perform decommissioning of nuclear power plants. CDI operates as an autonomous business entity reporting to a board consisting of executives from SNC-Lavalin and Holtec. The activities of CDI are managed by its President, who reports directly to the CDI Management Board. CDI is headquartered at the KPS Technology Campus in Camden, NJ.

Pierre P Oneid

SVP and Chief Nuclear Officer
Holtec International

Profile

Pierre Oneid has over thirty-eight years of experience in the Nuclear Industry. As Senior Vice President and Chief Nuclear Officer of Holtec International, he is responsible for the overall success of Holtec Nuclear Projects, and the Safety, Quality, on-time delivery, and productivity of Holtec Fabrication. He has been instrumental in the development and maintenance of the strong Holtec Nuclear Safety Culture. Mr. Oneid's responsibilities also include developing and implementing the Corporate Strategy and Nuclear Marketing and Sales. Mr. Oneid is the chairman of the Holtec Executive Committee.

Key Experience

- Major Projects Executive Oversight
- Structural Design
- Marketing and Sales Management

Qualifications

E.M.B.A (Executive Master of Business Administration), 1998
QUEENS UNIVERSITY, Kingston, Canada

Bachelor of Applied Science, Mechanical Engineering with Management Option, 1981
UNIVERSITY OF OTTAWA, Ottawa, Canada

Civil Engineering Surveying, Marketing Management, French Courses

Conceptual Selling, Strategic Selling, and Professional Selling One and Two Programs

Past Registered Professional Engineer, Province of Ontario (PEO)

American Nuclear Society member since 2004

Professional Associations

NEI Nuclear Strategic Initiative Advisory Committee (NSAIC) member since 1999

NEI Nuclear Supplier Advisory Committee member since 2009

SONGS Executive Oversight Board

Experience

Mr. Oneid joined Holtec International in 2005 holding the position of Senior Vice President and Chief Nuclear Officer. Under his leadership, Holtec's U.S. market share increased from 22% to 62%.

During his tenure at Holtec his responsibilities have expanded to include the following roles:

- Executive for Heat Transfer Division
- Chairman of Executive Committee

Mr. Oneid also previously held the positions of Chief Governance Officer and Holtec SMR, LLC President.

Since the formation of Holtec Decommissioning International (HDI) through December 31, 2019, Mr. Oneid served as the HDI President, overseeing the operations and maintenance of the Holtec Decommissioning Fleet. He currently serves as a member of the Comprehensive Decommissioning International (CDI) Board of Directors.

Prior to joining Holtec International in 2005, he served as Vice President and Director of Global Marketing and Sales for Shaw/Stone & Webster Nuclear Division. His responsibilities also included Major Projects Executive Oversight for clients such as TVA, Exelon and Entergy. His twenty-four years career with Shaw/Stone and Webster spanned two major fields within the company.

Mr. Oneid has extensive experience in project management executive oversight. He has held positions on both the SONGS and Vermont Yankee Executive Oversight Boards. Mr. Oneid has twelve years of Marketing Management in charge of Business Development of engineering, construction and consulting in the power/energy markets totaling over \$5 billion in sales. During this time, his roles and responsibilities were to apply technical knowledge and understanding of the power industry with effective business development strategies to achieve and maintain new business, identify potential clients while maintaining current clients, helping them understand their needs and screen opportunities. He also provided strategic and management input to proposals and projects, lead sales and marketing efforts for international and domestic projects, establishing project-teaming agreements and help develop strategic alliances. Mr. Oneid was instrumental in leading contract negotiations and expediting resolutions of open items, being held responsible for "closing the deal." He assessed new business opportunity risks and developed risk mitigation strategies, ensuring that budgets and schedules are established and followed. Mr. Oneid worked with the appropriate Business Sectors to develop winning strategies and managed Client-Stone & Webster interface at all levels. He was instrumental in providing feedback to appropriate business sectors and executive management regarding trends and competitive pressures, always sure to maintain the pulse of Client satisfaction on on-going projects. Additionally, Mr. Oneid was able to develop long-term strategies to achieve business success and provide executive oversight for major nuclear and non-nuclear Projects.

In twelve years of professional engineering experience in mechanical and structural design, Mr. Oneid held senior engineering responsibility, performing efficient and cost reduction designs utilizing engineering judgment, as well as developed and implemented simplified procedures for engineering design changes, prepared design development reviews for Safety Evaluation Reports and is an expert in troubleshooting piping failures during start-up and testing and quick response to design changes requested by operations. As Group Leader, he was responsible for system acceptance and reconciliation reviews - N5 Program and managed the Snubber Reduction Program for a nuclear utility also serving on the Snubber Nuclear Utility Group (SNUG). At Stone & Webster in 1981, his assignments included one year in the Canadian head-office, Toronto, Canada as well as a year in the operation center, Cherry Hill, New Jersey. He spent two years in field assignment in Baton Rouge, Louisiana and a five in Oswego, New York. In addition, he worked three years in the client's headquarters, Syracuse, New York and twelve years in Cherry Hill, New Jersey office. Mr. Oneid joined Raytheon Engineers & Constructors, Inc. for five months in 2000 as Vice President of Global Nuclear Marketing & Sales.

Mr. Oneid's many years in power plant experience include nuclear and non-nuclear systems at several stations, such as Beaver Valley Nuclear Station - Unit 2, Duquesne Power and Light Company (May 1981 - July 1982), River Bend Nuclear Station - Unit 1, Gulf States Utilities (Aug 1983 - July 1985) and Nine Mile Point Nuclear Station - Unit 2, Niagara Mohawk Power Corporation (Aug 1985 - Dec 1992).

Project Experience

Mr. Oneid's project experience included Executive Oversight for the Maintenance & Modifications Project for Exelon Nuclear, Entergy Nuclear as well as the successful completion of 240MW Simple Cycle Power Plant for Indianapolis Power & Light and DTE Energy Services. He established General Services Agreements with major Nuclear utilities as well as developed and implemented winning strategy for \$820 Million maintenance and modifications contract for TVA Fleet and Restart services for Browns Ferry Unit #1. Adding to his accomplishments, he also developed and implemented winning strategies to leverage existing nuclear maintenance work to include engineering in nuclear, fossil and T&D divisions for TVA and for the \$120 million maintenance contract for ComEd in Chicago, 1998. The strategy included teaming with a local partner. He formulated and implemented winning strategy for a \$500 million maintenance and modification contract with Exelon to cover their entire Nuclear fleet (17 units), 2001, developed and implemented winning marketing strategy for \$15 Million Engineering contract with ComEd including opening an office for Stone & Webster in the Chicago area, developed and implemented winning strategy for an EPC contract for 720MW Combined Cycle Power Plant for AES of Virginia and developed and implemented winning strategy for an EPC contract for 240MW Simple Cycle Power Plant for IPL of Indiana and DTE Energy Services of Michigan. He also managed technical teams for the N-5 Program at River Bend Nuclear Station and the Snubber Reduction Program for Nine Mile Point #2.

Mr. Oneid's power plant experience includes nuclear and non-nuclear systems at several plants, such as Beaver Valley Nuclear Station - Unit 2, Duquesne Power and Light Company (May 1981 – July 1982), River Bend Nuclear Station - Unit 1, Gulf States Utilities (Aug 1983 - July 1985), Nine Mile Point Nuclear Station - Unit 2, Niagara Mohawk Power Corporation (Aug 1985 – Dec 1992) and he was responsible for Pipe Stress Analysis, Pipe Support Design, N5 Program, entire systems Hydro Engineering Reviews, Trouble shooting of piping failures.

Technical Paper

"Preventing Stress Corrosion Cracking of Spent Nuclear Fuel Dry Storage Canisters," June 2019, with Lloyd Hackel, et al.