

From: [Guzman, Richard](#)
To: [Andrea Sterdis](#)
Cc: [RidsNRRLIC109 Resource](#); [Danna, James](#); [Couture III, Philip \(pcoutur@entergy.com\)](#); [Mirzai, Mahvash](#)
Subject: Indian Point Unit Nos. 1, 2 and 3 - Acceptance Review Determination: Holtec Exemption Request from 10CFR50.82(a)(8)(i)(A) and 10CFR50.75(h)(1)(iv) [EPID L-2020-LLE-0010]
Date: Thursday, March 19, 2020 4:38:01 PM

Ms. Sterdis,

By letter dated February 12, 2020 ([Agencywide Documents Access and Management System](#) (ADAMS) Accession No. ML20043C539), Holtec Decommissioning International, LLC (HDI) submitted to the U.S. Nuclear Regulatory Commission (NRC) a Request for Exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) for Indian Point Nuclear Generating Unit Nos. 1, 2, and 3 (IP1, IP2, and IP3) to allow the use of a portion of the IP1, IP2, and IP3 Nuclear Decommissioning Trust (NDT) funds for management of spent fuel and site restoration activities, respectively. The submittal also requests, pursuant to 10 CFR 50.12, exemptions from 10 CFR 50.75(h)(1)(iv) to allow disbursements from the IP1, IP2, and IP3 NDT funds for spent fuel management and site restoration costs to be made without prior notice, similar to withdrawals in accordance with 10 CFR 50.82(a)(8).

These exemption requests are based on HDI's DECON Post-Shutdown Decommissioning Activities Report and Decommissioning Cost Estimate submitted to the NRC on December 19, 2019 (ADAMS Accession No. ML19354A698).

The purpose of this e-mail is to provide the results of the NRC staff's acceptance review of these exemption requests. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review for this licensing action. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in the characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your application and concluded that it provides technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the request in terms of protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this licensing request will take approximately 240 hours to complete. The NRC staff expects to complete this review by March 2021. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date (greater than a month) or significant changes in the forecasted hours (greater than 25%), the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager. These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, and unanticipated addition of scope to the review. Additional delay may occur if the submittal is provided to the NRC in advance or in

parallel with industry program initiatives or pilot applications.

Please contact me if you have any questions. A copy of this email will be made publicly available in ADAMS.

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**Rich Guzman**

Sr. PM, Division of Operating Reactor Licensing

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