



10 CFR 50.4(b)
10 CFR 50.71(e)(4)

June 15, 2020

LC-2020-0014

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

La Crosse Boiling Water Reactor
Facility Operating License No. DPR-45
NRC Docket Nos. 50-409 and 72-046

Subject: La Crosse Boiling Water Reactor (LACBWR) Submittal of Decommissioning Plan and Post-Shutdown Decommissioning Activities Report Changes

- References: (1) LaCrosseSolutions, LLC letter, "La Crosse Boiling Water Reactor (LACBWR) Submittal of Decommissioning Plan and Post-Shutdown Decommissioning Activities Report (D-Plan/PSDAR) Changes," dated May 23, 2018
- (2) NRC Regulatory Issue Summary 2015-17, "Review and Submission of Updates to Final Safety Analysis Reports, Emergency Preparedness Documents, and Fire Protection Documents"

The La Crosse Boiling Water Reactor (LACBWR) Decommissioning Plan and Post Shutdown Decommissioning Activities Report (D-Plan/PSDAR) is recognized as the LACBWR Safety Analysis Report (SAR) equivalent as it contains the plant post-fuel accident analysis. Therefore, the D-Plan/PSDAR is subject to revisions being submitted to the NRC on a 24 month interval in accordance with 10 CFR 50.71(e)(4).

In accordance with the requirements of 10 CFR 50.4, "Written Communications," paragraph (b)(6), LaCrosseSolutions, LLC (LS) is submitting the December 2019 revision of the D-Plan/PSDAR for LACBWR. In accordance with 10 CFR 50.71(e)(4), the update is being submitted within 24 months of the previous revision which was submitted in Reference 1.

This D-Plan/PSDAR update is being provided electronically on a total replacement basis, satisfying the submittal requirements of 10 CFR 50.4(b)(6), as discussed in Reference 2.

The changes to the D-Plan/PSDAR reflect completion of decommissioning activities including the elimination of remaining plant systems. The December 2019 D-Plan/PSDAR revision includes changes made from June 2018 through May 2020.

NM5501
NM5526
NM55

Section 3 of the D-Plan/PSDAR contains the proprietary financial information LS is providing to the NRC and seeks to have withheld from public disclosure in its entirety. Therefore, this submittal contains a LS Proprietary Financial Information Affidavit pursuant to 10 CFR 2.390. The Affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). Section 3 of the D-Plan/ PSDAR is marked as "withhold from public disclosure under 10 CFR 2.390."

Attachment 1 contains a summary of the changes to the D-Plan/PSDAR. Attachment 2 contains a preflight status report identifying any noncompliance issues with the electronic submittal guidance that could not be resolved due to the source of the information being submitted. The enclosed CD contains the redacted version of the December 2019 update of the D-Plan/PSDAR and the non-public version of Section 3 of the D-Plan/ PSDAR.

As Senior Vice President of Regulatory Affairs, I certify that the information in this submittal accurately presents changes made to the D-Plan/PSDAR since the previous submittal.

There are no regulatory commitments contained in this submittal. If you have any questions regarding this letter, please contact me at (860) 462-9707.

Respectfully,



Gerard van Noordennen
Senior Vice President Regulatory Affairs

Attachments:

- 1) D-Plan/PSDAR Summary of Changes
- 2) Preflight Status Report

Enclosure: CD containing the files below

- 1) LACBWR D-Plan and PSDAR, December 2019, Public
- 2) Section 3, LACBWR D-Plan and PSDAR, December 2019, Non-Public

cc: Marlayna Doell, U.S. NRC Project Manager
Regional Administrator, U.S. NRC, Region III
La Crosse Boiling Water Reactor Service List (without enclosure)

La Crosse Boiling Water Reactor Service List

cc:

Ken Robuck
President and CEO
EnergySolutions
299 South Main Street, Suite 1700
Salt Lake City, UT 84111

John Sauger
President and Chief Nuclear Officer
Reactor D&D
EnergySolutions
121 W. Trade Street, Suite 2700
Charlotte, NC 28202

Joseph Nowak
Project Manager
LaCrosseSolutions
S4601 State Highway 35
Genoa, WI 54632-8846

Gerard van Noordennen
Senior Vice President
Regulatory Affairs
EnergySolutions
121 W. Trade Street, Suite 2700
Charlotte, NC 28202

Russ Workman
General Counsel
EnergySolutions
299 South Main Street, Suite 1700
Salt Lake City, UT 84111

Jerome Pedretti, Clerk
Town of Genoa
E860 Mundsack Road
Genoa, WI 54632

Jeffery Kitsebel
Division of Energy Regulation
Wisconsin Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

Paul Schmidt, Manager
Radiation Protection Section
Bureau of Environmental and Occupational
Health Division of Public Health
Wisconsin Department of Health Services
P.O. Box 2659
Madison, WI 53701-2659

Barbara Nick President and CEO
Dairyland Power Cooperative
3200 East Avenue South
La Crosse, WI 54602-0817

Cheryl Olson, ISFSI Manager
La Crosse Boiling Water Reactor
Dairyland Power Cooperative
S4601 State Highway 35
P.O. Box 817
Genoa, WI 54632-8846

Lane Peters
La Crosse Boiling Water Reactor
Dairyland Power Cooperative
S4601 State Highway 35
Genoa, WI 54632-8846

Thomas Zaremba
Wheeler, Van Sickle and Anderson, S.C.
44 East Mifflin Street, Suite 1000
Madison, WI 53703

Andrew J. Parrish
Wheeler, Van Sickle & Anderson, S.C.
44 E. Mifflin Street, Suite 1000
Madison, WI 53703

John E. Matthews
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue,
NW Washington, DC 20004

LaCrosseSolutions, LLC PROPRIETARY FINANCIAL INFORMATION AFFIDAVIT

Affidavit of Gerard van Noordennen, Senior Vice President Regulatory Affairs,
LaCrosseSolutions, LLC.

The non-public version of Section 3 of the D-Plan/PSDAR, provided on the enclosed CD, consists of proprietary financial information that LaCrosseSolutions, LLC considers confidential. Release of this information would cause irreparable harm to the competitive position of LaCrosseSolutions, LLC. The basis for this declaration is:

- i. This information is owned and maintained as proprietary by LaCrosseSolutions, LLC,
- ii. This information is routinely held in confidence by LaCrosseSolutions, LLC and not disclosed to the public,
- iii. This information is being requested to be held in confidence by the NRC by this petition,
- iv. This information is not available in public sources,
- v. This information would cause substantial harm to LaCrosseSolutions, LLC if it were released publicly, and
- vi. The information to be withheld is being transmitted to NRC in confidence.

I, Gerard van Noordennen, being duly sworn, state that I am the person who subscribes my name the foregoing statement, I am authorized to execute the Affidavit on behalf of LaCrosseSolutions, LLC, and that the matters and facts set forth in the statement are true to the best of my knowledge, information, and belief.

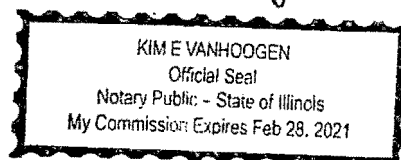
Gerard van Noordennen

Name: Gerard van Noordennen
Title: Senior Vice President Regulatory Affairs
Company: LaCrosseSolutions, LLC

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 15th of June 2020

Kim E. van Hoogen
Notary Public



ATTACHMENT 1
D-Plan/PSDAR Summary of Changes

D-Plan and PSDAR Sections	Description of Changes
Sections 1.1, 1.4, 1.5, 1.6, 4.1	These sections were revised to reflect completion of decommissioning activities (e.g., changing a verb to past tense).
Section 1.2	This Section was revised to add a discussion on License Amendment No. 75, License Amendment No. 76, and completion of Final Status Survey Reports for Phase 1 and Phase 2, Part 1. This section was also revised to identify that discussions of remaining plant systems were eliminated and to make minor editorial changes.
Section 1.3	This section was revised to eliminate discussions of components and systems and state that decommissioning was completed in September 2019.
Section 1.4	This section was revised to remove the discussion on decommissioning plans related to site structures and to add a statement identifying that the only radiologically controlled area remaining is the LACBWR Independent Spent Fuel Storage Installation (ISFSI).
Section 1.5	This section was revised to reflect remaining radiological impacts are related to ISFSI operations and to remove Subsections 1.5.1 through 1.5.4.
Section 1.6	This section was revised to reflect groundwater monitoring was completed in 2019 and that the NRC approved the termination of the groundwater monitoring program.
Section 1.7	This section was revised to clarify the D-Plan for the ISFSI is also based on information in the LACBWR LTP. It is also revised to add a paragraph explaining the plan for final status survey of the ISFSI.
Section 1.8	This section was revised to add references.
Section 4.1	This section was revised to add discussions on the accident analysis as it relates to decommissioning activities and the ISFSI. Minor editorial changes were also made.

ATTACHMENT 2
Preflight Status Report

LaCrosseSolutions
LC-2020-0014

This document serves as preflight report for the Enclosure to letter LC-2020-0014. The following file(s) did not pass pre-flight criteria or do not meet NRC criteria; however, text is word searchable with clarity/legibility of high quality.

Reference Document Name	File Name	Preflight Status	Reason
LACBWR D-Plan/PSDAR (Public version)	01 - LACBWR D-Plan and PSDAR, December 2019, Public	Failed	Document contains logos, digital photos, signatures, and scanned pages < 300 ppi, clear and legible
LACBWR D-Plan/PSDAR, Section 3 (Non-Public version)	02 - Section 3, LACBWR D-Plan and PSDAR, December 2019, Non-Public	Passed	

Enclosure

CD containing the files below:

LACBWR D-Plan and PSDAR, December 2019, Public

Section 3, LACBWR D-Plan and PSDAR, December 2019, Non-Public

