



10 CFR 50.90

July 15, 2020
3F0720-02

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

Subject: Crystal River Unit 3 – License Transfer – Insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w).

References: 1. Letter, USNRC to Duke Energy Florida, LLC, "Crystal River Unit 3 Nuclear Generating Plant – Order Approving Transfer of Licensed Authority from Duke Energy Florida, LLC to ADP CR3, LLC and draft conforming administrative license amendment (EPID L-2019-LLA-0135)," dated April 1, 2020 (ADAMS Accession Nos. ML20069A023, ML20069A024)

Dear Sir:

In accordance with the Order approving the direct transfers to ADP CR3, LLC (ADP CR3) of the Duke Energy Florida, LLC (DEF) licensed authority under Facility Operating License No. DPR 72 for the Crystal River Unit 3 Nuclear Generating Plant (CR3) (the Facility License) and the general license for the CR3 Independent Spent Fuel Storage Installation (ISFSI) (the Licenses) to possess, maintain, and decommission CR3 and the ISFSI (collectively, the CR3 Facility), dated April 1, 2020 (Reference 1), DEF, is providing documentary evidence that arrangements with both American Nuclear Insurers (ANI) and Nuclear Electric Insurance Limited (NEIL) to add ADP CR3 and ADP SF1, LLC to policies written for the Crystal River Unit 3 Nuclear Generating Plant. The policies are for the appropriate amounts of insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w), consistent with the exemptions issued for CR-3 on April 27, 2015, and March 31, 2016. This documentation is attached to this letter.

No new regulatory commitments have been made in this letter.

If you have any questions regarding this submittal, please contact Mr. Mark Van Sicklen, Licensing Lead, Nuclear Regulatory Affairs, at (352) 501-3045.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 15, 2020.

Sincerely,

Kevin A. Murray, Vice President Management and Construction

KAM/mvs

Attachment: Insurance Documentation

cc: NMSS Project Manager
Director, Office of Nuclear Reactor Regulation
Regional Administrator, Region I
State Contact

DUKE ENERGY FLORIDA, INC.

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ATTACHMENT

INSURANCE DOCUMENTATION



Jason Martinez, CPCU, ARM, ARe
Director, Underwriting

June 30, 2020

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

***Re: Duke Energy Florida, LLC, ADP CR3, LLC and ADP SF1, LLC
NRC Operating License Amendment for Crystal River Unit 3 Generating Plant***

To Whom It May Concern,

This letter replaces our letter of June 10, 2020, regarding the captioned subject matter.

This letter confirms that American Nuclear Insurers will continue to write nuclear liability insurance for the Crystal River Unit 3 Generating Plant, located in Citrus County, FL, commensurate with the effective transaction close date that the NRC adds ADP CR3, LLC and ADP SF1, LLC to the NRC operating license. The effective transaction close date is expected to be on or before October 1, 2020.

Upon the effective transaction close date, ANI will amend the below policy and certificate for the Crystal River Unit 3 Generating Plant as follows:

- a. **Facility Form Policy No. NF -0195:** ANI will amend the named insured to "Duke Energy Florida, LLC, ADP CR3, LLC and ADP SF1, LLC" in lieu of "Duke Energy Florida, LLC". ANI will also amend the operator of the facility to "ADP CR3, LLC" in lieu of "Duke Energy Florida, LLC".
- b. **Master Worker Certificate No. NW -0579:** ANI will amend the named insureds to "Duke Energy Florida, LLC, ADP CR3, LLC and ADP SF1, LLC" in lieu of "Duke Energy Florida, LLC". ANI will also amend the operator of the facility to "ADP CR3, LLC" in lieu of "Duke Energy Florida, LLC".

The commitment to add ADP CR3, LLC and ADP SF1, LLC as insureds remains valid thru December 31, 2020. In the event the license amendment occurs after this date, ANI will review the existing circumstances prior to reinstating our commitment to add these entities.

Please feel free to contact me with any questions or concerns.

Attn: Document Control

June 30, 2020

Page 2

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JM', with a horizontal line extending to the right.

Jason Martinez, CPCU, ARM, ARe
Director, Underwriting

C: Duke Energy – Tracey Leroy and Lance Burnette
Marsh – Tim Farward, Mark Webster, Jake Compton, Chip Hardie



BRUCE A. SASSI

President & Chief Executive Officer

Nuclear Electric Insurance Limited
1201 N Market St, Suite 1100
Wilmington, DE 19801

office +1 302 573 2224 mobile +1 484 639 7308
bsassi@myneil.com

June 24, 2020

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

Subject: Crystal River Unit 3 Nuclear Generating Plant
Transfer of NRC License to ADP CR3, LLC

Dear Sir:

At the request of the insured, Duke Energy Florida, LLC ("Duke"), Nuclear Electric Insurance Limited (NEIL) agrees it will:

- name ADP CR3, LLC as additional insured on policy no. P20-081 (Primary Property) upon being notified by Duke that the NRC has added ADP CR3, LLC to the license for Crystal River 3 Generating Plant
- name ADP SF1, LLC as an additional insured on policy no. P20-081 (Primary Property) upon being notified by Duke that ADP SF1, LLC has become a general licensee under 10 CFR 72.6
- endorse policy no. P20-081 (Primary Property) and update the certificate of insurance to name ADP CR3, LLC as the operator of the facility, upon being notified by Duke that the NRC has added ADP CR3, LLC to the license for Crystal River 3 Generating Plant

Please feel free to contact me should you have any questions.

Best regards,

A handwritten signature in blue ink, appearing to read "B. Sassi", is written over the printed name.

Bruce A. Sassi

President & Chief Executive Officer