

Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

> 10 CFR 50.90 10 CFR 50.54(p)

January 29, 2021

ATTN: Document Control Desk U.S. Nuclear Regulatory Commission Two White Flint North 11545 Rockville Pike Rockville, MD 20852-2738

> **Oyster Creek Nuclear Generating Station** Renewed Facility Operating License No. DPR-16 Docket Nos. 50-219 and 72-15

Subject:

Oyster Creek Nuclear Generating Station ISFSI Only Security Plan, Training Qualification Plan, Safeguards Contingency Plan Supplemental Information

References:

- 1) Letter, Holtec Decommissioning International, LLC to US NRC, "Oyster Creek Nuclear Generating Station ISFSI Only Security Plan, Training Qualification Plan, Safeguards Contingency Plan" December 8, 2020 (ML20345A249)
- 2) Letter, US NRC to Holtec Decommissioning International, LLC, "Oyster Creek Nuclear Generating Station Request For Approval of Independent Spent Fuel Storage Installation Only Physical Security Plan - Acceptance Review (L-2020-LLA-0267)." December 21, 2020 (ML20353A200)

By letter dated December 8, 2020 (Reference 1), Holtec Decommissioning International, LLC (HDI) submitted a License Amendment Request (LAR) for approval of the proposed Oyster Creek Nuclear Generating Station ISFSI Only Security Plan. On December 21, 2020, HDI received a letter from the US Nuclear Regulatory Commission (NRC), documenting their Acceptance Review (Reference 2). Reference 2 also provided two Requests for Supplemental Information (RSIs).

The purpose of this letter is to provide the supplemental information requested by the NRC RSIs.

SDD1 NMSSZ4 NRR NMSS

NOTE: THE ENCLOSURES TO THIS LETTER CONTAIN "SAFEGUARDS INFORMATION" AND "SECURITY RELATED INFORMATION". THE ENCLOSURES MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF THE ENCLOSURES, THIS LETTER AND ITS ATTACHMENTS ARE DECONTROLLED."

HDI-OC-21-002 Page 1 of 4

SAFEGUARDS INFORMATION



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The NRC staff requested that HDI provide the following information:

- 1) The OCNGS ISFSI PSP does not address how this PSP will meet the requirements of NRC Order EA-02-104. This information is needed to meet the requirements of NRC Order EA-02-104.
- 2) The OCNGS PSP contains figures and diagrams of the Oyster Creek ISFSI layout that are blurred. This information is needed to determine compliance with 10 CFR 73.55(a)-(r), and NRC Order EA-02-104.

This letter provides a revised version of the Oyster Creek ISFSI Only Physical Security Plan (PSP) LAR package submitted in Reference 1 including all Attachments and Enclosures. The Attachments and Enclosures have been revised to address the information requested in the RSIs. In addition, four new Enclosures are contained in this submittal with supplemental information to address the RSIs.

Attachments (Attachments 1-5 are all uncontrolled documents)

- 1. Evaluation of Proposed Changes
- 2. Proposed Operating License Change (Mark-Ups)
- 3. Proposed Operating License Change (Clean copy)
- 4. Site Maps Depicting the layout of the ISFSI
- 5. Kontek CAS description

Enclosures (Enclosures 1-8 are either Safety Related Information or Safeguards Information and must be controlled accordingly. Enclosures 5 through 8 (*), have been added to what was provided in the original LAR.) Enclosures 1-3 have been modified where appropriate to address the NRC RSIs.

- ISFSI Only Security Plan, Training and Qualification Plan, Safeguards Contingency Plan (SGI)
- 2. Programmatic Assumptions for ISFSI Only (SGI)
- 3. Alternative Measures (includes attachments (SGI))
- 4. Compliance Matrix (SRI)
- 5. General Description of Security Features of OCNGS ISFSI Only Security Plan (SRI)*
- 6. Executive Summary of Proposed Changes (SRI)*
- 7. Blast Calculations (SGI)*
- 8. Memorandums of Understanding with local law enforcement (SGI)*

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HDI-OC-21-002 Page 2 of 4



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The HDI responses to the NRC RSIs provided in Reference 2 are as follows:

RSI 1 HDI Response:

The LAR package has been revised as provided in the Attachments and Enclosures to address the requirements of EA-02-104. The detailed compliance with the requirements is directly addressed in Enclosures 5 and 6. The other Attachments and Enclosures have been revised where necessary to support the compliance with the order.

RSI 2 HDI Response:

Figures and Diagrams in the Attachments and Enclosures have been revised to improve quality and clarity where needed. In addition, the Tables in the Kontek CAS description provided in Attachment 5 are reproduced in Enclosure 7 to provide additional clarity.

To support the schedule for transition of Oyster Creek ISFSI only status, HDI has requested NRC approval of this proposed LAR by July 2021. HDI has also requested an implementation period of 30 days following HDI's submittal of written notification to the NRC that the remaining spent fuel assemblies have been transferred from the spent fuel pool to the ISFSI. In addition, this license amendment will not be implemented if there is a requirement to return spent fuel from the ISFSI to the spent fuel pool.

This letter contains no new regulatory commitments.

If you have any questions or need further information, please contact me at (856) 797-0900, ext. 3813.

I declare under the penalty of perjury that the forgoing is true and correct.

Executed on January 29, 2021.

Sincerely,

Andrea Sterdis igitally signed by Andrea Sterdis N. cn=Andrea Sterdis, c=US, =Holjec Decommissioning stemational, cu=HDI, ntst=ta.sterdis@hollec.com

Andrea L. Sterdis

HDI Vice President, Regulatory and Environmental Affairs

Holtec Decommissioning International, LLC

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HDI-OC-21-002 Page 3 of 4

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- 8. Memorandums of Understanding with local law enforcement (SGI)

cc: (without Enclosures)

USNRC Regional Administrator, Region I
USNRC Project Manager, NMSS - Oyster Creek Nuclear Generating Station
USNRC Region I, Lead Inspector - Oyster Creek Nuclear Generating Station
Assistant Commissioner, Air Quality, Energy and Sustainability, NJ DEP
Assistant Director Radiation Protection Element, NJ Bureau of Nuclear Engineering

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HDI-OC-21-002 Page 4 of 4

SAFEGUARDS INFORMATION



Docket Nos.: 50-219 and 72-15

Attachment 1 To HDI Letter HDI-OC-21-002

Evaluation of Proposed Changes

Request for Approval of the Oyster Creek Nuclear Generating Station ISFSI Security Plan, Training and

Qualification Plan, and Safeguards Contingency Plan and Change to the Security License Condition

- 1.0 Summary Description
- 2.0 Detailed Description
- 3.0 Proposed Changes
- 4.0 Technical Evaluation
- 5.0 Regulatory Review
 - 5.1 Applicable Regulatory Requirements / Criteria
 - 5.2 No Significant Hazards Consideration Determination
 - 5.3 Environmental considerations
 - 5.4 Precedent and Conclusion
- 6.0 References



Docket Nos.: 50-219 and 72-15

1.0 SUMMARY DESCRIPTION

In accordance with the provisions of 10 CFR 50.4 and 50.90, Holtec Decommissioning International (HDI) is requesting an amendment to Oyster Creek Generating Station (to be referred to as Oyster Creek) Operating License (OL) Physical Protection License Condition 2.C.(4). The proposed license amendment would document the approval of the Oyster Creek Nuclear Generating Station ISFSI Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (the Plan) provided as Enclosure 1.

2.0 DETAILED DESCRIPTION

On September 25, 2018, pursuant to 10 CFR 50.82(a)(1)(ii) and 10 CFR 50.4(b)(9), Exelon provided certification to the NRC that all fuel had been permanently removed from the Oyster Creek reactor vessel and placed in the spent fuel pool (SPF) (Reference 1). Therefore, pursuant to 10 CFR:50.82(a)(2), the 10 CFR Part 50 license for Oyster Creek no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel. Currently, spent fuel is stored in the SFP-and the Independent Spent Fuel Storage Installation (ISFSI).

Holtec Decommissioning International (HDI) became the license operator of Oyster Creek after the NRC issued the "Order Approving Transfer of the Oyster Creek Nuclear Generating Station and Conforming License Amendment," dated June 20, 2019 (Reference 2.) HDI notified the NRC with the "Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations," dated March 31, 2020 (Reference 3) that the schedule to relocate all spent fuel from the SFP the ISFSI pad would be by November 4, 2021.

The current Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan (existing Security Plan) at Oyster Creek contains requirements that provide appropriate protection for the safe storage of spent fuel in the SFP as well as the ISFSI. As such, the existing Security Plan provides a level of protection in excess of that required after all the spent fuel is transferred to the ISFSI. The proposed Plan reflects the future site configuration where all the remaining spent fuel in the spent fuel pool has been moved to the ISFSI and that there is no requirement to return spent fuel to the spent fuel pool. Transfer of fuel from the SFP to the ISFSI supports the decommissioning of Oyster Creek, which involves the eventual dismantlement of the SFP and other remaining plant structures. Therefore, the proposed Plan will supersede the existing Security Plan after the remaining spent fuel in the spent fuel pool has been moved to the ISFSI.

Additional enclosures to this letter contain Security Related Information (SRI) or Safeguards Information (SGI) that support the License change and proposed Security Plan approval.



Docket Nos.: 50-219 and 72-15

3.0 PROPOSED CHANGE

The proposed amendment would modify the Oyster Creek OL by referencing 10 CFR 72.212(b)(9), removing requirements for 10 CFR 73.55 and replacing the plan name.

Existing License Condition 2.C.(4)

Holtec Decommissioning International shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, submitted by letter dated May 17, 2006, is entitled: "Oyster Creek Nuclear Generating Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Revision 5." The set contains Safeguards Information protected under 10 CFR 73.21.

Proposed License Condition 2.C.(4)

Holtec Decommissioning International shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled; "Oyster Creek Nuclear Generating Station ISFSI Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, (Revision 0)", approved (date of amendment approval).



Docket Nos.: 50-219 and 72-15

4.0 TECHNICAL EVALUATION

The Plan

The Plan addresses the protection of material on site that is licensed by the Oyster Creek Operating License. That includes the ISFSI as well as other special nuclear material on site, with the exception of material subject to the requirements of 10 CFR 37, "Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material." Oyster Creek has a general licensed ISFSI with security requirements in 10 CFR 72.212(b)(9). These security requirements also provide an appropriate level of protection for the other special nuclear material on site. The Plan reflects the configuration of Oyster Creek with the remaining spent fuel in the spent fuel pool moved to the ISFSI and no requirement to return spent fuel to the spent fuel pool. The security functions for an ISFSI are to detect threats, assess those threats and call for assistance from the local law enforcement agency (LLEA).

10 CFR 72.212(b)(9) requires licensees to comply with 10 CFR 73.55, with six (6) additional conditions and exceptions. Therefore, the Plan was based on the NRC endorsed template for Operating Nuclear Plants, NEI 03-12, Revision 7, and modified to incorporate the six (6) additional conditions and exceptions. In addition, other requirements are not applicable for an ISFSI such as certain sections of the design basis threat, cyber security, target sets, 10 CFR 26, and portions of the insider mitigation program, and therefore are not included in the Plan.

Pursuant to 10 CFR 73.55(r), eight (8) alternative measures have been incorporated into the Plan. These alternative measures address the replacement of the Secondary Alarm Station (SAS) with an off-site Remote Monitoring Station (RMS), searches, vital areas, illumination, suspension of security measures, Reduction of contingency OJT, owner controlled area Monitoring and Physical Fitness Test removal. Evaluations of these alternative measures are provided in Enclosure 3.

General licensed ISFSI requirements are not clearly defined in the Code of Federal Regulations. Oyster Creek has taken a methodical approach to integrating 10 CFR 72.212(b)(9) requirements with various other Code of Federal Regulation requirements. The Plan complies with these requirements except where alternative measures have been requested. The Plan protects against the design basis threat of radiological sabotage and ensures the health and safety of the public.



Docket Nos.: 50-219 and 72-15

5.0 REGULATORY EVALUATION

5.1 APPLICABLE REGULATORY REQUIREMENTS / CRITERIA

Pursuant to 10 Code of Federal Regulations (CFR) 50.54(p) and 10 CFR 50.90, Holtec Decommissioning International, LLC (HDI) is requesting approval of proposed Oyster Creek Physical Security Plan (the Plan) and an amendment for a conforming change to Oyster Creek Renewed Facility License Condition 2.C.(4). In accordance with 10 CFR 72.212(b)(9), the proposed Plan is required to protect spent fuel against the design basis threat of radiological sabotage in accordance with the same provisions set forth in the physical security requirements of 10 CFR 73.55 with certain conditions and exceptions as specified in the regulation. This submittal includes requests for alternative measures pursuant to 10 CFR 73.55(r), 10 CFR 50.90 and 10 CFR 50.54 that support the proposed Plan.

5.2 SIGNIFICANT HAZARDS CONSIDERATION

The proposed Plan addresses the physical protection of material on site that is licensed under the Oyster Creek Renewed Facility License, as well as the general license for the Oyster Creek ISFSI. The Plan reflects the configuration of Oyster Creek with all the spent nuclear fuel stored at the ISFSI. The 10 CFR Part 50 license for Oyster Creek no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel.

HDI has evaluated the proposed amendment to determine if a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Response: No.

The irradiated fuel at Oyster Creek is currently stored in the SFP and at the Independent Spent Fuel Storage Installation (ISFSI). In this condition, the number of credible accidents/transients is significantly smaller than for a plant authorized to operate the reactor or emplace or retain fuel in the reactor vessel. Accidents/transients that are no longer applicable in a permanently defueled condition have been deleted from the Oyster Creek Updated Safety Analysis Report (USAR) Chapter 14. The remaining USAR Chapter 14 accident is the Fuel Handling Accident (FHA) and is described in Chapter 6 of the Decommissioning Safety Analysis Report (DSAR). However, as previously discussed, the Plan reflects the future site configuration that assumes all the remaining spent fuel in the SFP has been moved to the ISFSI. Therefore, the FHA is no longer credible after the spent fuel pool is no longer storing spent fuel.



Docket Nos.: 50-219 and 72-15

No change is being made to conditions of storage of fuel in the General Licensed ISFSI systems.

The proposed license amendment has no effect on plant systems, structures, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed amendment would not increase the likelihood of the malfunction of any plant SSC. Therefore, the proposed amendment does not involve a significant increase in the probability of a previously evaluated accident.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Response: No.

The proposed amendment does not involve any physical alteration of any facility SSCs or Cask System components required to mitigate or prevent any accident previously evaluated, and does not have a significant effect on the capability of any facility SSC or Cask System component to perform its design functions.

Minor modifications are associated with this proposed license amendment (e.g., wiring changes in security equipment, the addition of telecommunications equipment, and software changes to the security computer system.) The proposed license amendment would not physically change any SSCs involved in the mitigation of any postulated accident. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed amendment does not create the possibility of a new failure mode associated with any equipment or personnel failures. The credible events for the ISFSI remain unchanged.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

Response: No.

Pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for Oyster Creek no longer

authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel, therefore, the occurrence of any postulated accidents associated with an operating nuclear reactor is no longer credible.

After all fuel is removed from the pool and safely stored in dry casks in either ISFSI pad location, a postulated fuel handling accident is no longer credible in this

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Docket Nos.: 50-219 and 72-15

configuration. The proposed amendment does not involve a significant change in any facility SSC or Cask System component's design, configuration, or operation. Therefore, the modifications associated with this proposed amendment do not significantly affect the capability or manner in which facility SSCs or Cask System components perform their safety functions, or the safety margins associated with their design and function.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, HDI concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.3 ENVIRONMENTAL CONSIDERATION

HDI has evaluated this proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, and determined that it meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(12). The proposed amendment is being submitted under the provisions of 10 CFR Part 50 for approval of a safeguards plan and changes to the PNPS Renewed Facility License, and in accordance with 10 CFR Part 72.

Activities associated with the proposed amendment do not involve any significant construction impacts, and are consistent with the plan for future reduction in the security area that focuses primarily on the storage for spent fuel, described in NUREG-0586, "Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities," as a general activity expected to occur during decommissioning. The proposed amendment is confined to (i) organizational and procedural matters; (ii) modifications to systems used for security; and (iii) administrative changes. The proposed amendment also addresses security organizational changes and describes procedural and other administrative changes.

Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment or impact statement is not required to be prepared in connection with the proposed amendment.



Docket Nos.: 50-219 and 72-15

5.4 PRECEDENT and CONCLUSION

Many nuclear power plants have transitioned to ISFSI only Security Plans and updated their License Condition. Oyster Creek is requesting a security plan change that is similar to approved ISFSI Only Security Plans.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes, (2) activities consistent with the approved changes will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 REFERENCES

- 1. Exelon Letter to NRC, "Certification of Permanent Removal of Fuel from the Reactor Vessel for Oyster Creek Nuclear Generating Station," September 25, 2018 (ML18268A258)
- Letter from US NRC to Exelon Generation Company, LLC, "Order Approving Transfer of the Oyster Creek Nuclear Generating Station and Conforming License Amendment," June 20, 2019 (ML19095A458)
- 3. Letter, Holtec Decommissioning International, LLC to US NRC, "Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations," March 31, 2020 (ML20091M858)



Docket Nos.: 50-219 and 72-15

Attachment 2

To HDI Letter HDI-OC-21-002

License Condition Revision for Security Plan Requirements

Proposed Facility Operating License Change (Mark-Up)

OCNGS Operating License Page 3



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Docket Nos.: 50-219 and 72-15

- 3 -

- (4) Holtec Decommissioning International pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any byproduct, source, or special nuclear materials as sealed neutron sources that were used for reactor startup, sealed sources that were used for calibration of reactor instrumentation and are used in radiation monitoring equipment, and as fission detectors in amounts as required;
- (5) Holtec Decommissioning international pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct, source, or special nuclear materials without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) Hottec Decommissioning international pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate such byproduct, source, or special nuclear materials that were produced by the operation of the facility.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect and is subject to the additional conditions specified or incorporated below:
 - (1) DELETED
 - (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 295, are hereby incorporated in the license. Holtec Decommissioning International shall possess, maintain, and decommission the facility in accordance with the Permanently Defueled Technical Specifications (PDTS).

- (3) DELETED
- (4) Hottec Decommissioning International shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 40 CFR 73.55 (51 FR 27817 and 27822), and the authority of 10 CFR 50.90 and 10 CFR 50.64(p). The combined set of plans¹, cubmitted by letter dated May 17, 2006, is entitled: "Oyster Crock Nuclear Generating Station Security Plan, Training-and Qualification Plan, and Safeguards Contingency Plan, Revision 5."

 The set contains Safeguards Information protected under 10 CFR 73.21.

Renewed License No. DPR-16 Amendment No. 298

The Training and Qualification Plan and Safeguards Centingency Plan are Appendices to the Security Plan.



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Docket Nos.: 50-219 and 72-15

add following to C. (4):

10 CFR 72.212(b)(9) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21 is entitled; "Oyster Creek ISFSI Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, (Revision 0)", approved (date of amendment approval).



Docket Nos.: 50-219 and 72-15

Attachment 3

To HDI Letter HDI-OC-21-002

License Condition Revision for Security Plan Requirements

Proposed Facility Operating License Change (Retyped)

OCNGS Operating License Page 3



Docket Nos.: 50-219 and 72-15

- 3 -

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- (5) Holtec Decommissioning International pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use in amounts as required any byproduct, source, or special nuclear materials without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) Holtec Decommissioning International pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate such byproduct, source, or special nuclear materials that were produced by the operation of the facility.
- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth, in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules; regulations, and orders of the Commission now or hereafter in effect and is subject to the additional conditions specified or incorporated below:
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- (3) DELETED
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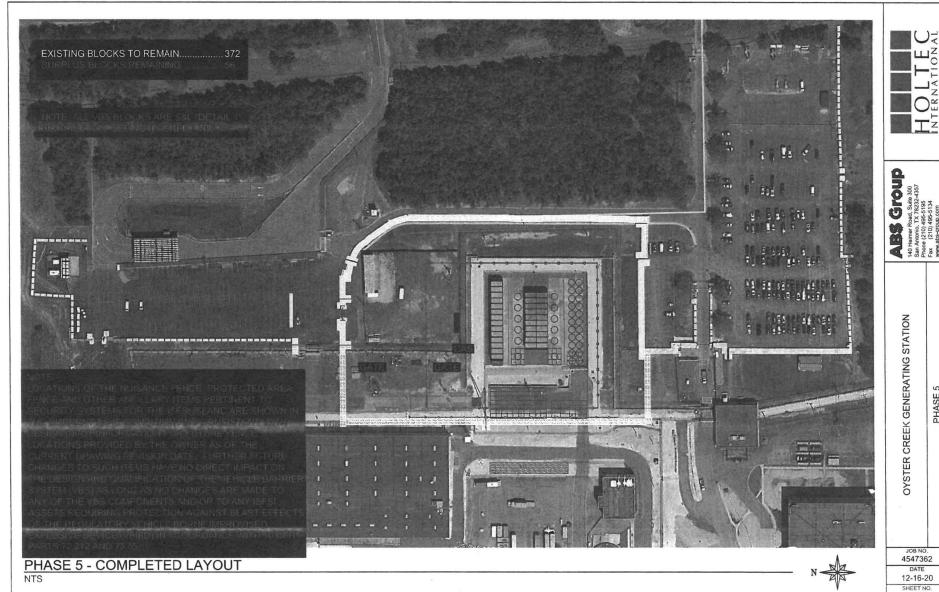
Renewed License No. DPR-16 Amendment No. 298

Docket Nos.: 50-219 and 72-15

Attachment 4

To HDI Letter HDI-OC-21-002

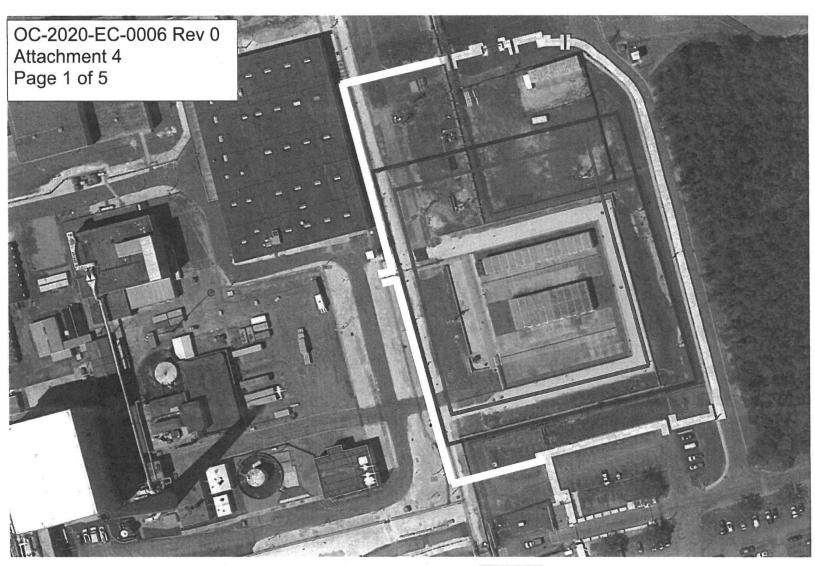
Site Maps Depicting the layout of the ISFSI



REVISION #1 - 01-26-21

VB5

HDI-OC-21-002 Attachement 4, Page 2 of 3



New PAF

New Nuisance



Security Building

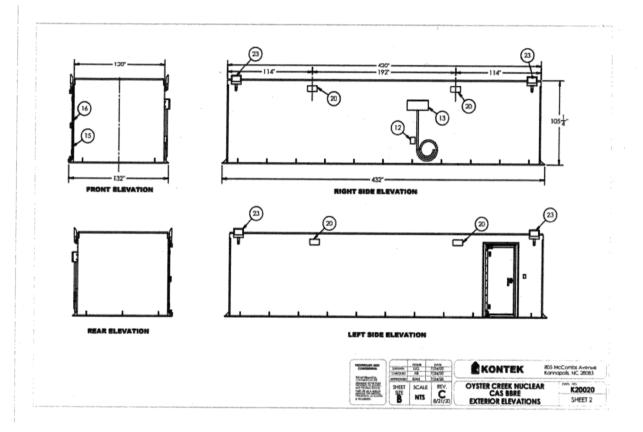
Docket Nos.: 50-219 and 72-15

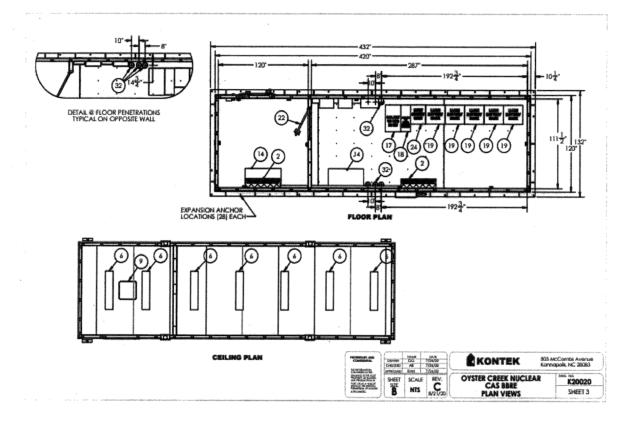
Attachment 5 To HDI Letter HDI-OC-21-002

Kontek CAS description

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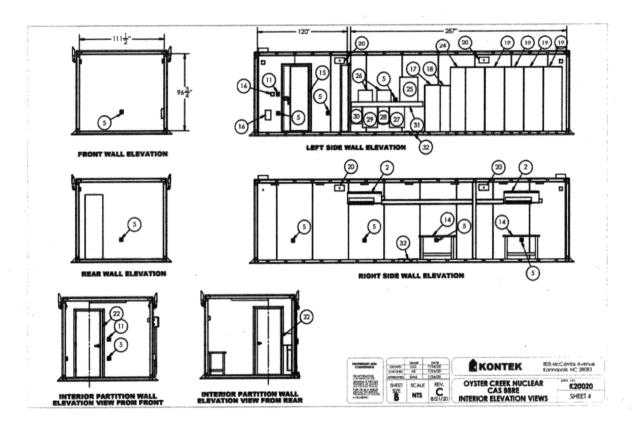
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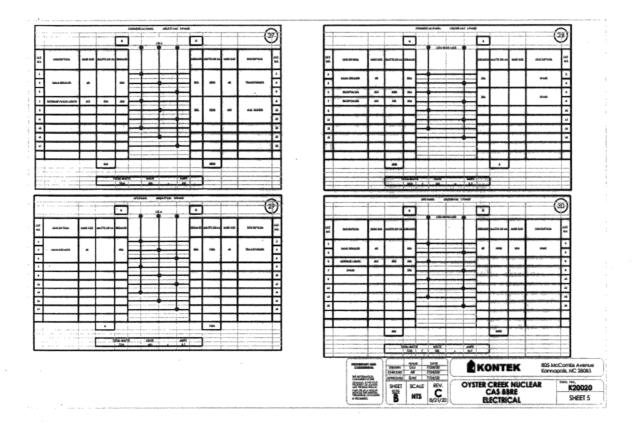
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ITEM LIST					
(TEM #	QTV.	DISCRIPTION	PART INFO.	SHOWS	
1				7	
2	2	HYAC, 3.5 FDM SPLIT SYSTEM HEAT FUMP, 240V AC (INTERIOR LIVIT) 38,000 BTU/H WALL MOUNTED UNIT EACH SOCIAL	ARTSURISH, MSZ-FHIRNAZ or EQUAL	Y.	
3	1	BOVAC, 3 TON MARTI-ZONE HEAT PUMP SPUT SYSTEM, 240VAC (EXTERIOR UNIT) SHIPPED LOGIS FOR FIELD INSTALLATION	METSURISHE, MRZ-ACREMANZZ or ECQUAL	N	
4	AS RED'D	Seé E.RICTION BOX WITH BLANK COVER			
5		DUPLEX RECEPTACIE, 35A 135VAC		Y	
ř.	7	INTERIOR LIGHT FORTURE, 4FT LED WITH WHAP AND LING LENS, SURFACE MOUNT		Y.	
7	1	HEATER THERMACISTAT		. Y	
1	2	A/C THERMOSTAT		Y	
D	1	CHILING MOUNTED HEATER, SKW 480/3-PHASE WITH MILETI DIRECTION DIFFUSER	REZIVOR BCS-S-AKITE	Y	
30		ANTI-FATIGUE FLEXORING	MEARWELL SERIES 562	. Y	
11	1	LIGHT SWITCH, JOA SPST, 120VAC, INTERIOR CHUNGUIGHTS		Y	
12	1	HVAC DISCONNECT SWITCH		Y	
12	1	HVAC CIPENING BALLISTIC SHIPLO		Υ	
34	2	DESE, 24" D.X. 48" W., ACKLETABLE HST. 28.5"-42"	1	1 7	
15	1	ROTOSTEEL DOOR, SO CALAP, CUSTOM FARRICATED LATCH, CUSTOM PAYOT MINCE, "BEST" CHINCER, ARD HYDRAUUC CLOSER		4	
16	-	MAGLICIC WITH REID & KEYPAD, EXIT BUTTON, 12VID POWER SUPPLY WITH BATTERY BACKUP		Y	
17	1	UPS 20W 480V	GALAXY VS MODEL GYSUPSZERGS	4	
18	1	MAINTENANCE BYPASS	GALANY VS MODEL OVSEPSLIENG	Y	
19		LITHRUM KIN BATTERY CARNIET	LIBS MC/950.A.	- T	
30	4	LIFTING SLING ACCESS PORT, 11" WIDE N.S" INGN OPENING WITH BOLT ON BALLISTIC COVER	Control Control	Y	
21	1	SERVICE ENTRANCE BALLISTIC SIRELD		. 4	
22	+	ECRINTERIOR DOOR		Y	
	-	DEPONITORIES DOOR LED FLOOD UGHTS, 150W (400W/METAL HALIDE EQLIVALENT) 277VAC	REPOSED GRADE RG-SISONETS	- v	
28	4	BATTERY DISCONNECT CABRET	ENTRA-BACK - DAS 400A DESCONMENT	- +	
	-	MANUAL MANSFER SWITCH, CIPOT 200A NON-PLSED	SQUARE-D REZIAN OF BOUAL	Y	
25	1 2	TRANSFORMER, 480 - 125/200VAC	SOLIANE-O RIST OF ECUAL	Y	
-	-	PAMELBOARD, (UPS) 125A RATED WITH KOA MAUN BREAKER, 18 SPACE, 486/277VAC	SOLIARE-D MATERIALIC ON EQUAL	+	
27		PARELBOARD, (UPS) 1254 RATED WITH 504 MAIN BYEAKER, 38 SPACE, 486/2774/4C LOAD CENTER (UPS) 1254 MAIN ILIUS, 125/288/AC, 6065, 1-PRASE, 26 SPACE	SICKLARE-ID ACCOUNTS LIZERG OF DOLLAL	1 7	
28		PARKERCARD, (NON-UPS) 125A RATED WITH 60A MAIN BREAKER, 18 SPACE	SOLIARE-D MYF4LBLIC OR EQUAL	- t v	
29		LOAD CENTER (NON-UPS) 1254 MAIN LUCS, 120/200/AC, 8092, 1-PHASE, 36 SPACE	SOLIANE-D RODINE 125PG OR FOLIAL	· ·	
30	1		EDOS O ROSSEE DA GONEGO	-	
31	1	SHE WITH WAY WITH SCREW COVER		- + +	
. 22		e" PIPE SLEEVE THREFELDOR FOR ELECTRICAL & DATA ACCESS			
32				_	
.14					
35	-				
26	-				
37				_	
35					
29	-				
-		Control of the Contro		_	
-					





Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

Docket Nos.: 50-219 and 72-15

Enclosure 3 To HDI Letter HDI-OC-21-002

Alternative Measures

AM#	# of Pages	
1.	7	
2.	· 5	
3.	4	
4.	3	
5.	4	
6.	4	
7.	15	
8.	8	

NOTE: THE ENCLOSURES TO THIS LETTRER CONTAIN "SAFEGUARDS INFORMATION', AND "SECURITY RELATED INFORMATION'. THE ENCLOSURES MUST BE PROTECTED ACCORDINGLY. UPON REMOVAL OF THE ENCLOSURES, THIS LETTER AND ITS ATTACHMENTS ARE DECONTROLLED."

HDI-OC-21-002 Enclosure 3



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

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Enclosure 4 To HDI Letter HDI-OC-21-002

Compliance Matrix

<u>Review</u>	# of Pages
10 CFR 73.55	40
Appendix B	23 .
Appendix C	9 .
Alternative Measur	es 1

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HDI-OC-21-002 Enclosure 3



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

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Enclosure 5 To HDI Letter HDI-OC-21-002

General Description of Security Features of OCNGS ISFSI Only Security Plan (SRI)

25 Pages

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HDI-OC-21-002 Enclosure 5



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

Docket Nos.: 50-219 and 72-15

Enclosure 6 To HDI Letter HDI-OC-21-002

Executive Summary of Proposed Changes (SRI)
21 Pages

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HDI-OC-21-002 Enclosure 6



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

Docket Nos.: 50-219 and 72-15

Enclosure 7 To HDI Letter HDI-OC-21-002

Blast Calculations (SGI)

<u>Review</u>	# of Pages
ABS	384
Kontex	58

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HDI-OC-21-002 Enclosure 7



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900 Fax (856) 797-0909

Docket Nos.: 50-219 and 72-15

Attachment 1 to Enclosure 7
To HDI Letter HDI-OC-21-002
Updated ISFSIO Map

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HDI-OC-21-002 Attachment 1 to Enclosure 7