



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

August 4, 2021

Pamela B. Cowan
Sr. Vice President and COO
Holtec Decommissioning International, LLC
Krishna P. Singh Campus
1 Holtec Blvd.
Camden, NJ 08104

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT NUCLEAR GENERATING STATION UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2021002, 05000247/2021002, AND 05000286/2021002

Dear Ms. Cowan:

On June 30, 2021 the U.S. Nuclear Regulatory Commission (NRC) completed an inspection under Inspection Manual Chapter 2561, "Decommissioning Power Reactor Inspection Program," at the permanently shutdown Indian Point Nuclear Generating Station Units 1, 2 and 3. A combination of on-site and remote inspection activities (in-office reviews) were performed as a consequence of the COVID-19 public health emergency (PHE) during this inspection period. The inspection examined activities conducted under your licenses as they relate to safety and compliance with the Commission's rules and regulations, and the conditions of your licenses. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records and plant walk-downs. The results of the inspection were discussed with Mr. Richard Burrone, Site Vice President on July 15, 2021, and are described in the enclosed inspection report.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of the NRC requirements occurred. A license amendment was not requested or obtained prior to implementing a change to the facility that resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety. The violation is being treated as a Non-Cited Violation (NCV), consistent with Section 2.3.2.a of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or the significance of the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region I ; and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Radioactive Waste; Decommissioning of Nuclear Facilities**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy** (Under 'Related Information'). You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

No reply to this letter is required. Please contact Katherine Warner, Senior Health Physicist at (610) 337-5389 if you have any questions regarding this matter.

Sincerely,

Anthony Dimitriadis, Chief
Decommissioning, ISFSI, and Reactor Health
Physics Branch
Division of Radiological Safety and Security

Docket Nos. 05000003, 05000247 and 05000286
License Nos. DPR-5, DPR-26 and DPR-64

cc w/encl: Distribution via ListServ

Enclosure: Inspection Report Nos. 05000003/2021002,
05000247/2021002 and 05000286/2021002
w/Attachment

HOLTEC NUCLEAR OPERATIONS, INC.,LLC, INDIAN POINT NUCLEAR GENERATING STATION UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2021002, 05000247/2021002 and 05000286/2021002, DATED August 4, 2021.

DOCUMENT NAME: https://usnrc.sharepoint.com/:w:/r/teams/Region-I-Decommissioning-Branch/_layouts/15/Doc.aspx?sourcedoc=%7B523EE7CE-4EB7-461B-8BD9-FEA22A952FA1%7D&file=2Q%202021%20Indian%20Point%20Decommissioning%20report.docx&action=default&mobileredirect=true

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U.S. NUCLEAR REGULATORY COMMISSION
REGION I

INSPECTION REPORT

Docket Nos. 05000003, 05000247, and 05000286

License Nos. DPR-5, DPR-26, and DPR-64

Report Nos. 05000003/2021002, 05000247/2021002, and 05000286/2021002

Licensee: Holtec Decommissioning International, LLC (HDI)

Facility: Indian Point Energy Center, Units 1, 2 and 3

Location: Buchanan, NY

Inspection Dates: April 1 – June 30, 2021

Inspectors: K. Warner, Senior Health Physicist
Decommissioning, ISFSI and Reactor Health Physics Branch
Division of Radiological Safety and Security

G. George, Acting Senior Resident Inspector
Reactor Project Branch 2
Division of Operating Reactor Safety

L. Parks, Risk Analyst (Training)
Risk and Technical Analysis Branch
Division of Decommissioning, Uranium Recovery, and Waste
Programs

Approved By: Anthony Dimitriadis, Chief
Decommissioning, ISFSI and Reactor Health Physics Branch
Division of Radiological Safety and Security

Enclosure

EXECUTIVE SUMMARY

Holtec Decommissioning International, LLC (HDI)
Indian Point Nuclear Generating Station Units 1, 2, and 3
NRC Inspection Report Nos. 05000003/2021002, 05000247/2021002, and 05000286/2021002

An announced decommissioning inspection was completed on June 30, 2021 at the permanently shut-down Indian Point Units 1, 2, and 3. A combination of on-site and remote inspection activities (in-office reviews) were conducted as a consequence of the COVID-19 public health emergency (PHE) during this inspection period. The inspection included a review of organization and management at the site, design changes and modifications, maintenance and surveillance, self-assessments, audits, corrective actions, spent fuel safety, and decommissioning performance and status. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs. The U.S. Nuclear Regulatory Commission's (NRC's) program for overseeing the safe operation of a shut-down nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of the NRC requirements occurred. Specifically, a license amendment was not requested or obtained prior to implementing a change to the facility that resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety. Specifically, the licensee failed to perform a 10 CFR 50.59 safety evaluation and failed to obtain a license amendment prior to implementing an adverse change to the Unit 3 primary makeup water storage tank's seismic design requirements of the Indian Point Unit 3 spent fuel pool cooling and makeup design criteria. This violation is being treated as a Non-Cited Violation (NCV), consistent with Section 2.3.2.a of the Enforcement Policy.

REPORT DETAILS

1.0 Background

IP-1 was a pressurized water reactor that was granted a 40-year Operating License in 1962 and was permanently shut-down in 1974. Pursuant to the June 19, 1980 "Commission Order Revoking Authority to Operate Facility" and the "Decommissioning Plan for Indian Point Unit No. 1," approved by the NRC in an Order, dated January 31, 1996, the reactor remains in a defueled status.

On February 8, 2017, Entergy Nuclear Operations, Inc. (Entergy) notified the NRC of its intent to permanently cease power operations at IP-2 and IP-3 by April 30, 2020 and April 30, 2021 respectively subject to operating extensions through, but not beyond 2024 and 2025 (Agencywide Documents and Access Management System (ADAMS) Accession Number: ML17044A004). On May 12, 2020, Entergy certified cessation of power operations and the permanent removal of fuel from the IP-2 reactor vessel (ADAMS Accession Number: ML20133J902). On May 11, 2021, Entergy certified cessation of power operations and permanent removal of fuel from the IP-3 reactor vessel (ADAMS Accession Number: ML21131A157). On May 13, 2021, the NRC notified Indian Point that the NRC would no longer perform its oversight activities in accordance with the Operating Reactor Assessment Program and that oversight would be conducted under the provisions outlined in IMC 2561 "Decommissioning Power reactor Inspection Program" (ADAMS Accession Number: ML21132A069). On May 28, 2021, Entergy Nuclear Operations, Inc. informed the NRC of the successful purchase and sale transaction closing of the Indian Point facilities to Holtec Decommissioning International, LLC (ADAMS Accession No. ML21147A553). On May 28, 2021, the NRC issued license amendments transferring Indian Point Unit Nos. 1, 2, and 3 facility licenses from Entergy Nuclear Operations, Inc. to Holtec Indian Point 2, LLC; Holtec Indian Point 3, LLC; and Holtec Decommissioning International, LLC (ADAMS Accession No. ML21126A004).

IP-1 and IP-2 are physically contiguous and share systems, including the integrated liquid waste system and the air handling system; and facilities, including the chemistry and health physics laboratories. IP-1 contains radioactive waste processing facilities that provide waste processing services for Units 1 and 2. Radiological effluent limits are met on an overall site basis and specific operating limits and surveillance requirements for effluent monitoring instrumentation, including stack noble gas monitoring, are discussed in the Offsite Dose Calculation Manual (ODCM).

At the time of this inspection, IP-1 was in the "SAFSTOR, No Fuel in the Spent Fuel Pool Phase" and IP-2 and IP-3 were in the "Post Operation Transition Phase" of decommissioning as described in IMC 2561. Inspection activities conducted during the inspection period under Inspection Procedure (IP) 71124.01, "Radiological Hazard Assessment and Exposure Controls" were completed as part of the Reactor Oversight Process will contribute to the completion of IP 83750, "Occupational Radiation Exposure" for calendar year 2021.

2.0 Unit 1 Safe Storage (SAFSTOR) and Units 2 and 3 Post-Operation Transition Performance and Status Review

2.1 Inspection Procedures 37801, 40801, 60801, and 71801

a. Inspection Scope

The inspectors performed on-site decommissioning inspections supplemented by in-office reviews and periodic phone calls. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs.

The inspectors assessed the implementation of IPEC's design change and plant modification processes to determine if all plant modifications were performed in accordance with all applicable regulations, technical specifications, and license conditions. The inspectors reviewed select plant modifications to determine if the changes, tests, or experiments would need NRC approval prior to implementation of the activity. The inspectors sampled and performed a review of several engineering calculations regarding spent fuel pool events and interviewed IPEC personnel focusing on the continued implementation and validity of the assumptions made in the calculations. Additionally, the inspectors reviewed design changes and license amendments to determine if the Unit 2 and 3 Technical Specifications and the IPEC Decommissioned Safety Analysis Report were updated to reflect the current design and licensing basis.

The inspectors assessed the implementation and effectiveness of IPEC's corrective action program (CAP) by reviewing the daily documentation of issues, non-conformances and conditions adverse to quality into the CAP. The inspectors attended management review committee meetings to ensure the treatment of all documented conditions were appropriate to the CAP. The inspectors reviewed a representative selection of CAP documents to determine if a sufficiently low threshold for problem identification existed, if follow-up evaluations were of sufficient quality, and if IPEC assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue.

The inspectors reviewed IPEC's programs for the safe wet storage of spent fuel. The inspectors interviewed employees and reviewed monthly SFP chemistry sample analysis for Units 2 and 3 performed in May and June 2021 to determine if chemistry parameters were within the limits of IPEC's license commitments. The inspectors performed walk-downs of the SFP and associated support systems to assess material condition, configuration control, and system operation. The inspectors toured the control room and interviewed certified fuel handlers (CFHs) to determine if SFP system instrumentation, alarms and leakage detection monitoring were adequate to assure the safe storage of spent fuel.

The inspectors reviewed the maintenance rule program and procedures including performance criteria and monitoring of systems and components that support spent fuel safety. Additionally, the inspectors reviewed the program to assess and manage the increase in risk for Units 2 and 3 during maintenance activities, in accordance with 10 CFR 50.65 (a)(4). This review included interviews of staff responsible for maintenance rule implementation. The inspectors reviewed changes to the IPEC Unit 3 systems, structures,

and components (SSCs) to determine if these SSCs necessary for spent fuel safety were correctly scoped into the maintenance rule program.

The inspectors verified that management oversight was adequate for the Post-Operation Transition phase of decommissioning for Unit 3 and that the decommissioning organization and changes to the operating unit organization's responsibilities was appropriately implemented upon Unit 3's cessation of operations. The inspectors reviewed the plans for the site's "Phase 1" organization implementation after the planned Unit 3 shutdown that occurred on April 30, 2021. Following transfer of the license to HDI on May 28, 2021, the inspectors continued to evaluate IPEC's staffing levels and training to ensure reasonable assurance of safety and security.

The inspectors performed multiple plant tours of IPEC Unit's 2 and 3 control rooms and spent fuel pool cooling and handling systems to assess in field conditions and the conduct of decommissioning activities. The inspectors attended daily decommissioning planning meetings, and met periodically with IPEC management, when available.

b. Observations and Findings

Findings

The inspectors identified a Severity Level IV, NCV of 10 CFR 50.59, "Changes, Tests, and Experiments," paragraph (c) (2) for failure to obtain a license amendment prior to implementing a proposed change. On May 13, 2021, the licensee failed to request and obtain a license amendment prior to implementing a change to the facility that resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the final safety analysis report (as updated). Specifically, the licensee failed to perform a 10 CFR 50.59 safety evaluation and failed to obtain a license amendment prior to implementing an adverse change to the Unit 3 primary makeup water storage tank's seismic design requirements of the Indian Point Unit 3 spent fuel pool cooling and makeup design criteria.

The inspectors reviewed Engineering Change 83554, "Decommissioning EC to Re-classify Unit 3 Structures, Systems, and Components," and Licensing Basis Document Change Request U3-UFSAR-2021-013. On May 12, 2021, these documents implemented a major revision to the Indian Point 3 UFSAR to reflect permanent shut-down and defueled status. The changes included implementing UFSAR changes to reflect the Decommissioned Operating License and Technical Specifications, renaming the UFSAR to Decommissioning Safety Analysis Report (DSAR), reduction of postulated design bases accidents, elimination of license renewal commitments that are no longer required, and revision of information required to support the permanent shutdown and defueled condition.

The Licensing Basis Document Change Request discussed modifying the Indian Point Unit 3 UFSAR sections 1.3.6 and 9.5.2 to change the seismic classifications of the spent fuel pool cooling loop and the primary makeup water storage tank from Seismic Category I to

Seismic Category III. Section 1.3.6, "Fuel and Radioactivity Control (Criteria 60 to 64)", described Indian Point Unit 3's compliance with General Design Criterion 61, Fuel Storage and Handling and Radioactivity Control

The licensee's 10 CFR 50.59 process documents associated with the change determined that the seismic classification change was not an adverse change to the primary makeup water storage tank's UFSAR-described design bases function. Therefore, the licensee determined that a 10 CFR 50.59 safety evaluation was not required, resulting in a change to the design bases function without requiring a license amendment. Specifically, the change was considered "not adverse" because the primary water storage tank was not required to mitigate a design basis fuel handling accident, and any accident that would result in potential exposures exceeding applicable accident exposure guidelines was no longer credible. Since the mitigative function of the primary makeup water storage tank was not credited in the fuel handling accident analysis, the primary makeup water storage tank was classified as "non-safety related" and no longer required to meet Seismic Class I.

Although the primary water storage tank is not credited to mitigate a design basis accident, the inspectors concluded that the licensee's "not adverse" determination failed to consider the primary makeup water storage tank's Seismic Class I classification as a design basis function that was required to meet the spent fuel cooling and cleanup system design requirements of the 1967 draft General Design Criteria and General Design Criterion 61, Appendix A, 10 CFR Part 50.

NEI 96-07, Section 4.3.2, provides 10 CFR 50.59 safety evaluation guidance to determine if a change to design requirements for earthquakes resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or important to safety. This sections states:

"Although this criterion allows minimal increases, licensees must still meet applicable regulatory requirements and other acceptance criteria to which they are committed (such as contained in regulatory guides and nationally recognized industry consensus standards, e.g., the ASME B&PV Code and IEEE standards). Further, departures from the design, fabrication, construction, testing and performance standards as outlined in the General Design Criteria (Appendix A to Part 50) are not compatible with a "no more than minimal increase" standard."

Using the guidance with NEI 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, as endorsed by Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," the inspectors determined that changing the primary water storage tank's seismic classification from Seismic Class I to Seismic Class III was an adverse change to the UFSAR-described design basis function to meet the applicable spent fuel pool design criteria. Therefore, a 10 CFR 50.59 safety evaluation should have been performed prior to implementation of the change.

The inspectors concluded that the change to the primary water storage tank's seismic classification was a departure from a design standard as outlined to meet General Design Criterion 61. Furthermore, the departure from the design standard was more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety. Therefore, in accordance with 10 CFR 50.59 (c)(2), the

licensee should have requested and obtained a license amendment pursuant to 10 CFR 50.90, prior to implementing the seismic classification change primary water storage tank.

Because this change resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a system important to safety previously evaluated in the UFSAR, the change required prior NRC review and approval using the license amendment process pursuant to 10 CFR 50.90. Therefore, this violation has more than minor significance. This violation has been characterized at the Severity Level IV significance in accordance with Section 6.1.d of the NRC's Enforcement Policy because the violation resulted in very low safety significance.

Because the violation has a Severity Level IV significance and has been entered into the licensee's CAP as Issue Report IP3-00014, this violation is being treated as a NCV, consistent with Section 2.3.2.a of the NRC's Enforcement Policy. The inspectors determined that the licensee had sufficient contingency plans and ample time for implementation of backup systems and determined that there was no concern of continued operation until the licensee was able to restore compliance with Seismic Class I.

Observations

The inspectors reviewed the changes in safety classification documented under engineering change EC 83554 associated with Unit 3 structures, systems and components (SSC) that no longer have a quality related function as described in the DSAR. Most of the previously classified safety-related or quality SSCs were changed in classification to be non-safety-related. The applicable Design Basis Accidents for IP-3 in the permanently defueled condition involve several hypothetical scenarios, including: a fuel handling accident (FHA) in the fuel handling building, an accidental release-recycle of waste liquid, and the accidental release of waste gas where the only SSC credited in the DSAR to prevent or mitigate the consequences of such an accident is the spent fuel pit. The spent fuel pit will remain as a safety-related structure and the spent fuel pit level indicators (required as part of the post-Fukushima FLEX order) will remain classified as augmented quality.

The inspectors reviewed a change that removed language in the Unit 3 DSAR that required Fuel Storage Building Air Filtration System (FSBAFS) to be operating during normal movement of fuel in Unit 3. License amendments removed the requirement for the FSBAFS to be operational as long as the fuel has had an 84-hour decay period. Therefore, Entergy removed the requirement for FSBAFS to be operating, but retained that it must be functional and must be capable of being manually placed into operation in the event of a FHA, if not already operating.

In EC 83554, the inspectors noted that the components necessary to remove decay heat from the spent fuel; spent fuel pool cooling, component cooling water, and service water; were all classified as non-safety-related. IPEC's procedure EN-DC-167, Classification of Structures System and Components defines "Augmented Quality Related" as

“A Non-Safety Related system, part of a system, structure and/or component shall be deemed Augmented Quality Related if it is a system, structure or component that performs a function which may have some significance to safety with respect to design criteria to which the Quality Assurance Program must be applied as applicable”

Based on this definition, the inspectors determined that the components to remove spent fuel decay heat should have been classified as “Augmented Quality Related” because the systems are required to remove decay heat of spent fuel in compliance with 10 CFR Part 50, Appendix A, General Design Criteria 61. Although the equipment was incorrectly classified, IPEC continued to apply the requirements of the HDI quality assurance program to the components. Therefore, the inspectors determined there was no violation of the quality assurance requirements of the 10 CFR Part 50, Appendix B. This Observation was captured in IPEC’s CAP as Issue Report IP3-00033.

The inspectors also reviewed the process for system abandonment and system boundary isolation for those SSCs that are no longer required. Specifically, inspectors observed a sample of the Unit 3 component cooling water system isolation to components not required for Unit 3 spent fuel pool cooling. The inspectors determined that procedural requirements were met and that the cooling to the Unit 3 spent fuel pool was maintained as required.

The inspectors determined that issues had been identified and entered into the CAP and evaluated commensurate with their safety significance. The inspectors verified that audits and self-assessments reviewed were performed by qualified individuals independent of the organization being audited and that management reviewed the audits and associated corrective actions.

The inspectors determined that IPEC had safely stored spent fuel in wet storage. The inspectors verified that the neutron-absorbing materials present in the SFP were being adequately managed and maintained, and SFP chemistry and cleanliness controls had been adequately implemented. The inspectors verified surveillance requirements for water level, area radiation and temperature of the SFP were adequate as well as alarm/detection capability and that procedures provided guidance to restore SFP water level if required. The inspectors also verified training programs were adequate and that the CFH rounds were adequate and satisfied the associated technical specification requirements for the SFP.

The inspectors observed implementation of IPEC’s “Phase 1” organization following shutdown of Unit 3 and transfer of the license to HDI. The inspectors noted that the Phase 1 organization contained all of the major groups necessary for Post-Operation Transition and that IPEC implemented a training plan to close any qualification gaps prior to implementation of the reorganization. The inspectors interviewed IPEC personnel in charge of the training program and sampled several program and functional areas to gain reasonable assurance that the site had adequately assessed training needs to ensure that the future organization did not have major functional design gaps.

The inspectors note that 10 CFR 50.65(a)(1) states, in part, “for a nuclear power plant for which the licensee has submitted the certifications specified in 50.82(a)(1) or 52.110(a)(1) of this chapter, as applicable, this section shall only apply to the extent the licensee shall monitor the performance or condition of all structures, systems, or components associated

with the storage, control, and maintenance of spent fuel in a safe condition...” The inspectors reviewed HDI’s maintenance rule basis document for Unit 3 systems following permanent shutdown and defueling operations. The inspectors noted that IPEC significantly reduced the SSCs scoped into the maintenance rule program for IP-3 after the unit shut-down. The inspectors verified that IPEC had followed the scoping criteria outlined in 10 CFR 50.65(b) and the performance criteria were acceptable for any scoped in SSCs.

In addition, the inspectors reviewed IPEC’s program to assess and manage the increase in risk for Units 2 and 3 for maintenance activities completed while in decommissioning in accordance with 10 CFR 50.65 (a)(4). On multiple occasions during the inspection period, IPEC entered periods of increased risk because of intense thunderstorms in the vicinity of the site. The inspectors determined that risk assessment and management activities instituted during these periods of increased risk were appropriate.

c. Conclusions

Based on the results of this inspection, one Severity Level IV violation of NRC requirements was identified. The licensee failed to obtain a license amendment prior to implementing a change to the facility that resulted in a more than minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the Final Safety Analysis Report (as updated). Specifically, on May 13, 2021, the licensee did not perform an appropriate 10 CFR 50.59 safety evaluation and failed to request and obtain a license amendment prior to implementing an adverse change to the Unit 3 primary makeup water storage tank’s seismic design requirements of the Indian Point Unit 3 spent fuel pool cooling and makeup design criteria. The violation is being treated as a NCV, consistent with Section 2.3.2.a of the Enforcement Policy.

4.0 Exit Meeting Summary

On July 15, 2021, the inspectors presented the inspection results to Mr. Richard Burroni, Site Vice President, and other members of HDI organization. No proprietary information was retained by the inspectors or documented in this report.

SUPPLEMENTARY INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

R. Burroni, Site Vice President (HDI)
F. Spagnuolo, Decommissioning Manager (CDI)
A. Sterdis, Vice President, Regulatory and Environmental Affairs (HDI)
M. Johnson, Regulatory Assurance Manager (CDI)
W. Wittich, Senior Licensing Specialist (CDI)
R. Fuchek, Chemistry and Radiation Manager(CDI)
C. Bohren, Operations Manager(CDI)
W. O'Brien, Radiation Protection Supervisor(CDI)
G. Delfini, Engineering Supervisor(CDI)

ITEMS OPEN, CLOSED, AND DISCUSSED

None

LIST OF DOCUMENTS REVIEWED

Engineering Changes

EC 83553, Decommissioning EC to Reclassify Unit 1 & 2 Structures, Systems, and Components, Revision 0
EC 83554, Decommissioning EC to Reclassify Unit 3 Structures, Systems, and Components, Revision 0

Procedures

2-COL-4.3.1, Spent Fuel Pit Cooling, Revision 11
2-AOP-SF-1, Loss of Spent Fuel Pit Cooling, Revision 8
2-OSP-4.3.1, Support Procedure – Spent Fuel Pit Cooling, Revision 17
2-SOP-4.3.1, Spent Fuel Pit Cooling, Revision 34
3-SOP-SFP-001, Spent Fuel Pit Cooling and Purification System Operation, Revision 29
3-SOP-SFP-002, Resin Replacement-Spent Fuel Pit Demineralizer, Revision 25
EN-DC-167, Classification of Structures, Systems, and Components, Revision 11
EN-DC-150-DP, Condition Monitoring of Maintenance Rule Structures, Revision 1
EN-DC-203, Maintenance Rule Program, Revision 4
EN-DC-204, Maintenance Rule Scope and Basis, Revision 4
DSP-RA-001, Corrective Actions Program, Revision 0
IP-SMM-OU-104, Shutdown Risk Assessment, Revision 19
EN-DC-206, Maintenance Rule (a)(1) Process, Revision 4

Condition Reports Generated from Inspection

IP2-00033
IP3-00014
IP3-00033

Miscellaneous

CD-020, Decommissioning Quality Assurance Program, Revision 01
Indian Point Energy Center Supplemental Maintenance Rule Basis Document for Unit 2 Systems
Following Permanent Shutdown and Defueled, Revision 0
Indian Point Energy Center Supplemental Maintenance Rule Basis Document for Unit 3 Systems
Following Permanent Shutdown and Defueled, Revision 0
Indian Point Unit 2 Defueled Safety Analysis Report
Indian Point Unit 3 Defueled Safety Analysis Report
IP-RPT-18-00078, IPEC Report for the Review of Accident Analysis and NRC Regulations in
Support of Decommissioning, Revision 0
IP-CALC-19-00003, Post-Permanent Shutdown Analyses of Fuel Handling, Waste Handling, and
High Integrity Container Drop Accidents for Indian Point Unit 2 and 3, Revision 0
Process Applicability Determination From, Issuance of Defueled Safety Analysis Report Unit 3,
May 13, 2021
IPN-80-77, Letter to Director of NRR from Wilderving, Power Authority of the State of New York,
Indian Point 3 Nuclear Power Plant Confirmatory Order (Interim Actions) 6-Month Responses,
August 11, 1980

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
CAP	Corrective Action Program
DSAR	Defueled Safety Analysis Report
Entergy	Entergy Nuclear Operations, Inc.
FSBAFS	Fuel Storage Building Air Filtration System
Holtec/HDI	Holtec Decommissioning International, LLC (HDI)
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IPEC	Indian Point Energy Center
IP-1	Indian Point Unit 1
IP-2	Indian Point Unit 2
IP-3	Indian Point Unit 3
NRC	Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
PHE	Public Health Emergency
QA	Quality Assurance
SAFSTOR	Safe Storage
SFP	Spent Fuel Pool
SSC	Structures, Systems, and Components
UFSAR	Updated Final Safety Analysis Report