

From: [MH Specter](#)
To: [Guzman, Richard](#)
Cc: [Sturzebecher, Karl](#)
Subject: [External_Sender] Re: Request for Information
Date: Wednesday, August 18, 2021 1:41:50 PM

Dear Mr. Guzman,

Thank you for sending this information. I may not be able to participate in today's meeting, however you may want to check on HDI's claim that a major part of the cost difference between IP2 and IP3 is due to the disposition of very low level wastes, Class A wastes.

Please refer to NUREG 11307, Revision 18, Exhibit A-1 where the cost for Class A wastes in Texas is quoted at \$100 per cubic foot. Page 36 of the HDI PSDAR lists 3,589,546 cubic feet of Class a wastes for IP1. This means that HDI believes that it will cost IP1 about \$358 million dollars just to get rid of Class A wastes. This seems absurd. These Class A costs must be added to the costs to take care of the Class B, C, and GTCC waste costs. Does the HDI decommissioning Cost estimates reflect these costs?

Further, if one includes IP2 and IP3, the total Class A waste disposal at IPEC comes to an astounding \$714 million dollars for what HDI identifies as soil with very low contamination.

Please also compare IP2 to IP3. Using HDI figures at \$100/ foot cubed, the IP3-IP2 cost difference comes to \$83 million, not nearly enough to explain the HDI's claimed cost difference between these two identical plants. If more realistic Class A waste volumes are presented, then this \$83 Million dollar cost figure would shrink further making the HDI explanation of the ~ \$300 million dollar difference between the two units even more questionable.

Considering that at the time that HDI submitted its PSDAR they had not conducted a radiological site survey, coming up with Class A volumes out to 6 significant figures seems laughable.

I am not aware as to why HDI would claim that IP1 has so much more Class A wastes compared to IP2. IP1, at 257 MW, only operated for 12 years while IP2, at 1020 MW, operated for 46 years. The ratio of IP2 MW-years/ IP1 MW-years is 15.2. If anything, the IP2 Class a volume should significantly exceed that of IP1, especially since IP1 was shut down in 1974 and Entergy even decontaminated the IP1 spent fuel pool.

Herschel Specter

-----Original Message-----

From: Guzman, Richard <Richard.Guzman@nrc.gov>
To: MH Specter <mhspecter@verizon.net>
Cc: Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>

Sent: Tue, Aug 10, 2021 7:42 pm
Subject: RE: Request for Information

Hello Mr. Specter,

Thank you for your comments. Please find attached documents per your request below:

- *"Copy of the staff's RAI"* (dated July 8, 2020) (ML20190A234)
- *"Copy of HDI's response to the RAI"* (dated August 8, 2020) (ML20220A666)
- *"What actions the staff took after it received HDI's RAI response"* - the staff's technical review of HDI's RAI response is found in the November 23, 2020 Safety Evaluation pages 11-17 (ML20297A333)

Thank you,

Rich Guzman

Sr. PM, Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Office: O-9C7 | Phone: (301) 415-1030
Richard.Guzman@nrc.gov

From: MH Specter <mhspecter@verizon.net>

Sent: Saturday, August 07, 2021 10:24 AM

To: Sturzebecher, Karl <Karl.Sturzebecher@nrc.gov>; Guzman, Richard <Richard.Guzman@nrc.gov>

Subject: [External_Sender] Request for Information

August 7, 2021

Gentlemen:

Questions have been raised about Holtec's PSDAR analysis which claims that Indian Point 2 can be decommissioned for \$301 million dollars less than it costs to decommission the near identical Indian Point 3 nuclear plant. As mentioned on page 12 of the staff's Safety Evaluation (SE), the NRC issued a Request for Additional Information (RAI) from Holtec about this large cost difference and received a response. A number of subjects were offered by Holtec to justify its claims and were listed in the SE in broad terms, with no dollar amounts specific to these claims in the SE. Among the subjects listed in the SE that are supposed to support Holtec's justification for this \$301 million dollar difference are the need for a crane at IP3, but not at IP2, and the difference in costs between IP2 and IP3 for reactor segmentation, dismantling, and demolition.

However, the Commission's Memorandum and Order CL1-21-01, page 40, shows that

there is no cost differential for the crane because of actions taken by Entergy, yet the crane was identified as one of the primary factors in justifying HDI's claims. As to dismantling reactor internals, WBS Code #01.02.04.05.01, both IP2 and IP3 have the same costs of \$38,350,000 according to HDI PSDAR Tables 6-1b and 6-1c. therefore, no cost difference. These and other HDI claims justifying this \$301 million dollar difference were refuted in the critique submitted to the NRC and attached here.

All the subject areas offered by HDI in its response to the staff's RAI are related to activities that would be completed by 2029 according to the PSDAR schedule. Yet the bulk of the claimed cost differential between IP2 and IP3 comes after 2029 and no explanation is provided in the SE. By that time both IP2 and IP3 would have been demolished and all that would remain is the IP2 and IP3 decommissioning trust funds. Post 2031 there is essentially no activity at the IP site, just waiting for the Department of Energy to remove the spent fuel and some related activities. Except for a small number of security guards, the site would be largely unpopulated, post 2031. This very low activity level would be so much so that HDI plans to sell the IP property around 2031. How can HDI justify the large cost difference between between IP2 and IP3 during this long time period between 2031 and 2062 when IP2 and IP3 have ceased to exist?

What happens if the IP2 decommissioning cost estimate is wrong? If the decommissioning costs of IP2, in reality, match the decommissioning costs that HDI claims are correct for IP3, the IP2 decommissioning trust fund (DTF) would become insolvent by 2031, leaving about \$298.6 million dollars in unfinished decommissioning costs. Since the DTF would be insolvent there would be no surplus money for HDI to fall back on, contrary to NRC claims that this would be a funding source by HDI for decommissioning cost shortfalls. The analysis that led to this insolvency situation can be found in the attached critique.

Accordingly, I request that you send me a copy of the staff's RAI on this subject, a copy of HDI's response to this RAI, and a copy of what actions the staff took after it received HDI's RAI response. Would you also send this material to me promptly so I can participate more fully in the upcoming virtual meeting on August 18th?

Thank you,

Herschel Specter
mhspecter@verizon.net