

REQUEST FOR ADDITIONAL INFORMATION RELATED TO
LICENSE AMENDMENT REQUEST TO REVISE THE EMERGENCY PLAN AND
EMERGENCY ACTION LEVEL SCHEME
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC
INDIAN POINT ENERGY CENTER
DOCKET NOS. 50-003, 50-247 AND 50-286

By letter dated December 22, 2021, as supplemented by letter dated February 4, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21356B704 and ML22035A121, respectively)), Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Indian Point 2, LLC (IP1 and IP2) and Holtec Indian Point 3, LLC (IP3), collectively referred to as Indian Point Energy Center (IPEC), requests an amendment to Provisional Operating License No. DPR-5 for IP1, Renewed Facility License No. DPR-26 for IP2, and Renewed Facility Operating License No. DPR-64 for IP3. The requested license amendments would revise the IPEC Emergency Plan and Emergency Action Level (EAL) scheme for the permanently shutdown and defueled condition at IPEC.

The NRC staff is reviewing the license amendment requests and has determined that additional information is required to complete its review. Below is the request for additional information (RAI).

RAI 1.

Requirement:

- 10 CFR 50.47(b)(4), as proposed to be exempted, states, in part: "A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee...."
- 10 CFR Part 50, Appendix E, Section B, states, in part: "The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification...."
- Associated guidance in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (FEMA-REP-1)," as modified by NSIR/DPR/ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants," Evaluation Criterion D.2, states: "The initiating conditions shall include all postulated accidents for the nuclear facility."

Issue: Enclosure, "Description and Evaluation of Proposed Changes," Section 3.2.3, "Accidental Release of Waste Gas," states, in part:

The analysis concludes that without crediting any mitigating systems or the Plant Auxiliary Building (PAB) ventilation system, the calculated TEDE to the Control Room is less than the limit set forth in 10 CFR 50.67 and the whole-body dose

value of 500 millirem (mrem) at the EAB. The dose consequences from a waste gas tank decay tank rupture are less than the dose consequences following an FHA and meet the applicable radiological dose criteria at the Control Room, EAB, and Low Population Zone (LPZ) (Reference 14).

Additionally, Section 2.1, "Permanently Defueled Facility," of Attachment 2, "Permanently Defueled Emergency Action Level Technical Bases Document," states in part,

HDI has confirmed that the source term and motive force available in the permanently defueled condition are insufficient to warrant classifications of a Site Area Emergency or General Emergency.

However, the NRC staff reviewed the letter dated April 28, 2020, "Indian Point Nuclear Generating Unit No. 2 - Issuance of Amendment No. 294 Re: Permanently Defueled Technical Specifications (EPID L-2019-LLA-0079)" (ADAMS Accession No. ML20081J402), and it states in part,

The calculated radiological consequences following a waste gas decay tank rupture without credit for any mitigating systems or the primary auxiliary building ventilation system post shutdown are as follows:

- Control Room – Whole Body Dose 0.77 rem – under limit of 5 rem;
- EAB – Whole Body Dose 0.30 rem – under limit of 0.5 rem, and
- LPZ – Whole Body Dose 0.11 rem – under limit of 0.5 rem.

Both of these documents reference the same calculation, "Calculation IP-CALC-19-00003."

Request: Describe how the elimination of the requirements for a Site Area Emergency, as well as associated emergency action levels, are justified based on the whole body dose at the Exclusion Area Boundary from this accident.

RAI 2.

Requirement:

- 10 CFR 50.47(b)(1), as proposed to be exempted, requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(2) requires that the on-shift facility licensee has adequate staffing to provide initial facility accident response in key functional areas is maintained at all times and timely augmentation of response capabilities is available.
- Associated guidance in NUREG-0654, as modified by NSIR/DPR/ISG-02, Evaluation Criterion B.1 states that each licensee shall specify the onsite emergency organization of plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement.

Issue: Attachment 1, "Permanently Defueled Emergency Plan," Section A, "Assignment of Responsibility," states, in part:

When an off-normal, natural phenomenon, or accident event becomes apparent, the Shift Manager shall assess the condition; make an emergency declaration, if appropriate; and assume the position of Emergency Director, with the overall

responsibility to direct and control the emergency response. The Emergency Director does not have concurrent duties which conflict with these responsibilities.

However, Attachment 1, Section B.1.1, "Normal Plant Organization," identifies one (1) Shift Manager assigned to each unit (IP2 and IP3).

Request: Describe how the Shift Managers would assume the Emergency Director duties for a site event vs. a unit specific event, and where is this direction/instruction documented.

RAI 3.

Requirement:

- 10 CFR 50.47(b)(5), as proposed to be exempted, requires, in part that procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and followup messages to response organizations has been established.
- Associated guidance in NUREG-0654, as modified by NSIR/DPR/ISG-02, Evaluation Criterion E.4 requires, in part, that the licensee, in coordination with State and local organizations, shall establish the contents of the emergency messages to be sent from the nuclear facility.

Issue: Attachment 1 Section E.1.1, "Initial Notification," states, in part:

The initial emergency message will include the following information, if it is known and appropriate: [a list is provided]

Request: Describe if the content of the initial, as well as subsequent emergency messages, have been coordinated and agreed upon with the applicable State and local organizations.

RAI 4.

Requirement:

- 10 CFR 50.47(b)(9), as proposed to be exempted, requires, in part that adequate methods, systems, and equipment for assessing and monitoring actual or potential consequences of a radiological emergency condition are in use.
- Associated guidance in NUREG-0654, as modified by NSIR/DPR/ISG-02, Evaluation Criterion I.2 requires, onsite capability and resources to provide initial values and continuing assessment throughout the course of an accident shall include radiation monitors.

Issue: Attachment 1 Section I.2, "Dose Assessment," states, in part:

Dose assessment is the responsibility of the Emergency Director and is initially performed by qualified on-shift personnel.

Request: What position on-shift is designated to perform initial dose assessment and is this a 24 hour per day, 7 days a week position?