

From: [Parrott, Jack](#)
To: [Gerard P. Van Noordennen](#)
Cc: kwrobuck@energysolutions.com; [Russ G. Workman](#); [Stenger, Daniel F.](#); [Wachutka, Jeremy](#); [Watson, Bruce](#)
Subject: ES indirect license transfer request
Date: Thursday, April 14, 2022 5:22:00 PM
Attachments:

Mr. Van Noordennen,

Along with the ZNPS pending license transfer addressed in your RAI response of March 30, 2022 (ADAMS accession # ML22091A275), there also a pending license transfer for La Crosse that is similar to the situation of ZNPS's pending license transfer.

Since EnergySolutions requested that the approval of the transfer of control of the ZNPS licenses be subject to a condition that would provide that if EnergySolutions does not indirectly hold the licenses for ZNPS and the general license for the ZNPS ISFSI at the time of closing of the indirect license transfer, then these licenses shall not be transferred as part of the indirect license transfer.

To efficiently deal with the La Crosse situation it may be appropriate to condition the indirect license transfer order with respect to La Crosse in the same way that EnergySolutions proposed conditioning the order for ZNPS. With that in mind, the proposed conditions for the EnergySolutions indirect license transfer order are below. Please let us know if EnergySolutions has any objections to the proposed language of these conditions:

- 1) The NRC staff's approval of the license transfer is subject to the Commission's authority to rescind, modify, or condition the approved transfer based on the outcome of any post-effectiveness hearing on the license transfer application.
- 2) If EnergySolutions does not indirectly hold Facility Operating License Nos. DPR-39 and DPR-48 for ZNPS, Units 1 and 2, respectively, and the general license for the ZNPS ISFSI, at the time of the closing of the proposed indirect license transfer, then the ZNPS licenses shall not be transferred as part of the indirect license transfer.
- 3) If EnergySolutions does not indirectly hold Possession Only License No. DPR-45 for LACBWR, and the general license for the LACBWR ISFSI, at the time of the closing of the proposed indirect license transfer, then the LACBWR licenses shall not be transferred as part of the indirect license transfer.
- 4) If EnergySolutions does not indirectly hold Renewed Facility

Operating License No. DPR-43 for KPS, and the general license for the KPS ISFSI, at the time of the closing of the proposed indirect license transfer, then the KPS licenses shall not be transferred as part of the indirect license transfer.

Thanks,

Jack D. Parrott
Senior Project Manager
US Nuclear Regulatory Commission
301-415-6634

