



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

August 11, 2022

Mr. Kelly Trice
President
Holtec Decommissioning International, LLC
Krishna P. Singh Technology Campus
1 Holtec Boulevard
Camden, NJ 08104

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, OYSTER CREEK
NUCLEAR GENERATING STATION – NRC INSPECTION REPORT NO.
05000219/2022001

Dear Mr. Trice:

On June 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection under Inspection Manual Chapter 2561, "Decommissioning Power Reactor Inspection Program," at the permanently shut down Oyster Creek Nuclear Generating Station (Oyster Creek). On-site inspections were performed on February 1, 2022, April 5-7, 2022, April 28, 2022, and May 25, 2022. Additional inspection activities (in office reviews) were conducted remotely as a consequence of the COVID-19 public health emergency (PHE) during the inspection period. The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of plant walk-downs by the inspectors, interviews with site personnel, and a review of procedures and records. The results of this inspection were discussed with Mr. Jeffrey Dostal Site Vice President, and other members of your staff on July 28, 2022, and are described in the enclosed report.

Within the scope of this inspection, no violations of more than minor safety significance were identified.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter and 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 Storm Veunephachan of my staff at 610-337-5366 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 No: 05000219
License No: DPR-16

Enclosure: Inspection Report 05000219/2022001
w/Attachment

cc w/encl: Distribution via ListServ

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, OYSTER CREEK
NUCLEAR GENERATING STATION – NRC INSPECTION REPORT NO.
05000219/2022001 DATED AUGUST 11, 2022

Distribution:

S. Veunephachan

E. Andrews

A. Dimitriadis

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SUNSI Review Complete: EAndrews

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OFFICE	DRSS/RI	DRSS/RI	DRSS/RI	
NAME	E.Andrews	SVeunephachan	ADimitriadis	
DATE	7/19 /22	7/28/22	08/11/2022	

U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 050-00219

License No: DPR-16

Report No: 05000219/2022001

Licensee: Holtec Decommissioning International, LLC

Facility: Oyster Creek Nuclear Generating Station

Location: Forked River, New Jersey

Dates: January 1, 2022 – June 30, 2022

Inspectors: E. Andrews, Technical Assistant
B. DeBoer, Senior Health Physicist
N. Eckhoff, Health Physicist
O. Masnyk Bailey, Health Physicist
A. Taverna, Health Physicist
S. Veunephachan, Health Physicist

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
Oyster Creek Nuclear Generating Station
NRC Inspection Report No. 05000219/2022001

An announced decommissioning inspection was completed at the permanently shutdown Oyster Creek Nuclear Generating Station (Oyster Creek) on June 30, 2022. Specific topical on-site inspections were conducted on February 2, April 5-7, 2022, April 28, 2022, and May 25, 2022. Additional inspection activities were conducted remotely during the inspection period as a consequence of the COVID-19 public health emergency (PHE). The inspection included a review of safety reviews, design changes and modifications at permanently shutdown reactors; problem identification and resolution at permanently shutdown reactors; fire protection at permanently shutdown reactors; decommissioning performance and status reviews; and solid radioactive waste management and transportation of radioactive materials. 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 (NRCs) program for overseeing the safe decommissioning 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, no violations of more than minor safety significance were identified.

REPORT DETAILS

1.0 Background

On September 25, 2018, Oyster Creek certified the permanent removal of fuel from the reactor vessel [Agencywide Document Access and Management System (ADAMS) Accession No. ML18268A258]. This met the requirements of Title 10 or the *Code of Federal Regulations* (10 CFR) 50.82(a)(1)(i) and 50.82(a)(1)(ii). On October 1, 2018, the NRC notified Oyster Creek that the Operating Reactor Assessment Program had ceased and that implementation of the Decommissioning Power Reactor Inspection Program would begin on October 1, 2018 (ADAMS Accession No. ML18274A221). On July 1, 2019, an amended license was issued transferring the license from Exelon Generation Co., LLC to Holtec Decommissioning International, LLC (ADAMS Accession No. ML19164A157). Oyster Creek is currently in the “Actively Decommissioning, No Fuel in the Spent Fuel Pool” phase of decommissioning as described in IMC 2561.

2.0 Active Decommissioning Performance and Status Review

2.1 Inspection Procedures 37801, 40801, 64704, 71801, 86750

a. Inspection Scope

The inspectors performed on-site decommissioning inspections on February 1, 2022, April 5-7, 2022, April 28, 2022, and May 25, 2022, supplemented by in-office reviews and periodic phone calls during the inspection period. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walk-downs.

The inspectors conducted document reviews and interviews with plant personnel to determine if Holtec implemented procedures and processes in accordance with the regulations and guidance associated with 10 CFR 50.59, “Changes, tests and experiments” and to determine if changes made by Oyster Creek under 10 CFR 50.59 required prior NRC approval.

The inspectors assessed the implementation and effectiveness of Oyster Creek’s corrective action program (CAP) by reviewing a sampling of issues, non-conformances, and conditions adverse to quality in 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 Oyster Creek assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue. The inspectors evaluated the effectiveness of the licensee’s management oversight and quality assurance assessments of Oyster Creek activities in accordance with the decommissioning quality assurance program (DQAP).

The inspectors reviewed the status of the fire protection program to determine if the program was maintained in a state of operational readiness and whether changes made to the program continued to meet commitments, the NRC requirements, and had not negatively impacted the overall state of the program. The inspectors reviewed the Oyster Creek fire protection program and incipient fire brigade training. Additionally, the inspector performed a walkdown of the firefighting equipment storage areas, active plant detection and suppression systems, and fire barriers to ensure material condition was

maintained, and observed contractor staff perform the annual fire extinguisher inspection.

The inspectors attended select management meetings, including station oversight committee and management review committee meetings. Inspectors reviewed documentation and met with Oyster Creek management and discussed staffing, status of decommissioning and upcoming activities, among other topics to verify whether the licensee had conducted activities in accordance with regulatory and license requirements. The inspectors performed several plant walkdowns to assess field conditions and decommissioning activities by assessing material condition of structures, systems, and components, housekeeping, system configurations, and worker level of knowledge or procedure use and adherence. These walkdowns included new radwaste, old rad waste, and various areas in the reactor building. The inspectors observed select pre-job briefs and associated work activities, including replacement of the post indicator valve, radiological surveying of material for disposal, segmenting of the reactor vessel head, and packaging of fuel racks from the spent fuel pool.

The inspectors observed activities, interviewed personnel, performed walkdowns, and reviewed documentation to verify the effectiveness of the licensee's programs for the handling, storage, and transportation of licensed radioactive material and waste. The review included records of the shipment packaging, surveying, labeling, marking, placarding, vehicle checks, and emergency instructions to ensure compliance with the applicable NRC and Department of Transportation regulations. The inspectors observed two shipments of the segmented reactor head vessel leave the site.

b. Observations and Findings

The inspectors determined that the reviewed 10 CFR 50.59 screenings and evaluations had been properly performed. The inspectors determined that selected changes under 10 CFR 50.59 did not require prior NRC approval and safety reviews were performed for design changes and modifications in accordance with applicable regulatory requirements, license conditions and the Decommissioning Safety Analysis Report.

The inspectors determined that issues had been identified, entered into the CAP, and evaluated commensurate with their safety significance through document review, interviews, and observation of several management review committee meetings. The inspectors determined that Oyster Creek had performed activities described in the DQAP as appropriate. The inspectors verified that audits and self-assessments were performed by qualified individuals, and management reviewed the audits and associated corrective actions.

The inspectors verified that the fire protection program was maintained in accordance with NRC requirements and the fire protection plan. The inspectors reviewed the updated fire protection plan and reviewed a sample of the fire protection program implementation procedures and verified compliance with the current fire protection program, ensured that they reflected the current decommissioning status of the facility, and verified they were implemented, as appropriate.

The inspectors noted that during this inspection period, the site continued decommissioning and dismantlement activities in the new radwaste building, continued reactor vessel segmentation, and completed cleanup of the spent fuel pool. The

inspectors noted that for the areas of the plant toured, the material condition and housekeeping was adequate. The inspectors noted through plant tours, document reviews, and observations of activities that Oyster Creek conducted activities in accordance with the regulatory requirements. The inspectors noted that workers were knowledgeable of and adhered to plant procedures and work plans, and pre-job briefings were thorough and highlighted specific safety concerns. The inspectors determined site staffing was adequate and personnel qualifications and training were up to date. The inspectors determined that the maintenance backlog was minimal, manageable, and that items important to safety were appropriately prioritized and tracked.

The inspectors verified solid radioactive waste was adequately stored, monitored, and that inventories were up to date. The inspectors verified that radioactive waste shipping paperwork was properly completed, and Oyster Creek personnel were knowledgeable of their duties and responsibilities. The inspectors determined radioactive waste shipped for disposal at land disposal facilities was properly classified, described, packaged, marked, and labeled, and was in proper condition for transportation.

c. Conclusions

Based on the results of this inspection, no violations of more than minor safety significance were identified.

3.0 Exit Meeting

On July 28, 2022, the inspectors presented the inspection results to Mr. Jeffrey Dostal Site Vice President, and other members of the Oyster Creek staff who acknowledged the inspection results. No proprietary information was retained by the inspectors or documented in this report.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Oyster Creek Personnel

J. Dostal, HDI Oyster Creek Site Vice President
L. Berlinski, Oversight Assessor
A. Farenga, Senior Radiation Protection Specialist
R. Fitts, Corrective Action Process Manager
M. Hassler, Decommissioning Manager
S. Johnson, Site Licensing Manager
K. Leonard, Waste Removal Manager
J. Sisak, Decommissioning Facility Manager
H. Tritt, Site Engineering Manager
K. Wolf, Radiation Protection, Chemistry, and Environmental Manager
T. Prosser, Oyster Creek Fire Marshall

ITEMS OPENED, CLOSED, AND DISCUSSED

None

PARTIAL LIST OF DOCUMENTS REVIEWED

Condition Reports

OYS-02385 OYS-02386 OYS-02387 OYS-02390 OYS-02409 OYS-02416
OYS-02420 OYS-02427 OYS-02460 OYS-02482

Miscellaneous

21-607, Micro-ALARA Plan for Clean UF Tank, SL-T-3A and 3B Tanks
22-907, ALARA Plan for Spent Fuel Rack Removal and Shipping,
DMRC Package, dated February 2, 2022
OC-2021-EC-0004, Reactor Bldg 23' Elevation detector replacement, Revision 1
NRW Survey Plan
Manifest No. OC-22-1031, shipped April 28 2022

Procedures

LS-AA-104, Exelon 50.59 Review Process, Revision 11
LS-DC-106, Safety Review Committee, Revision 0
OP-DC-201-007, Rev. 1, Fire Protection System Impairment Control
Oyster Creek Generating Station Procedure 101.2, Rev. 79, Oyster Creek Site Fire Protection Program

Radiological Surveys

RB1-21-3442, Reactor Building -19-Torus Room, dated December 15, 2021
RBE-21-3444, CRD Pump Room, RK04 and A&C Core Spray, dated December 16, 2021
RBF-21-3439, RBEDT Room and B & D Core Spray Pumps, dated December 15, 2021
QQQ-21-2797, Diesel Generation Building Pre-Demo MARSSIM, dated September 23, 2021
OCGS Radiological Survey No. T02-22-1353
OCGS Radiological Survey No. T02-22-1360
OCGS Radiological Survey No. YLA-22-850
OCGS Radiological Survey No. YLA-22-865
OCGS Radiological Survey No. YLA-22-897
OCGS Radiological Survey No. YLA-22-928
OCGS Radiological Survey No. YLA-22-940

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
CAP	Corrective Action Program
10 CFR	<i>Code of Federal Regulations</i>
DQAP	Decommissioning Quality Assurance Program
HDI	Holtec Decommissioning International, LLC
IMC	Inspection Manual Chapter
NRC	U.S. Nuclear Regulatory Commission
Oyster Creek	Oyster Creek Nuclear Generating Station
PHE	Public Health Emergency