UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415

May 21, 2024

EA-24-037

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

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT ENERGY CENTER UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2024005, 05000247/2024005, 05000286/2024005, 07200051/2024001, AND NOTICE OF VIOLATION

Dear Kelly Trice:

On March 31, 2024, 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 Indian Point Energy Center Units 1, 2 and 3 (IPEC). 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 Frank Spagnuolo, Site Vice President, and other members of your staff on April 17, 2024, and are described in the enclosed inspection report.

Based on the results of this inspection, two violations of NRC requirements of no or relatively inappreciable (very low) safety significance (Severity Level IV) are documented in this report. For one of these violations, because of the significance and because the issue was entered into your corrective action program, the NRC is treating the violation as a Non-Cited Violation (NCV), consistent with section 2.3.2.a of the Enforcement Policy. If you contest the subject or severity of the NCV, you should provide a response within 30 days of the date of this letter, with the basis for your denial(s), 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, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

The second violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation involved Holtec’s failure to ensure that Holtec agreements were free of any provisions, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.7(f), that would restrict or otherwise discourage employees from participating in protected activities as defined in 10 CFR 50.7(a)(1). This violation meets the criteria in section 2.3.2.a of the NRC Enforcement Policy to disposition it as an NCV. However, the NRC is issuing a Notice because the issue involves employee protection requirements and a potentially widespread extent of condition, given that the offending language appears to be

ingrained in corporate documents that are likely used at all Holtec Decommissioning International (HDI) sites. The Notice requires a response from HDI that describes a comprehensive corrective action plan and a review of extent of condition at IPEC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

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. EDT, Monday through Friday (except federal holidays).

Please contact Katherine Warner of my staff at (610) 337-5389 if you have any questions regarding this matter.

Sincerely,

ANTHONY DIMITRIADIS

Digitally signed by ANTHONY DIMITRIADIS
Date: 2024.05.21 09:47:11 -04'00'

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

Docket Nos. 05000003, 05000247, 05000286, and 07200051
License Nos. DPR-5, DPR-26, and DPR-64

cc w/encl: Distribution via ListServ

Enclosure: Notice of Violation
Inspection Report Nos. 05000003/2024005, 05000247/2024005, 05000286/2024005, and 07200051/2024001 w/Attachment

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT ENERGY CENTER UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2024005, 05000247/2024005, 05000286/2024005, 07200051/2024001 AND NOTICE OF VIOLATION DATED MAY 21, 2024

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NOTICE OF VIOLATION

Holtec Decommissioning International
Indian Point Energy Center

Docket Nos. 05000003,
05000247, and 05000286

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

EA-2024-037

During an NRC inspection conducted between January 1, 2024, and March 31, 2024, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 50.7(f) states in part: "No agreement affecting the compensation, terms, conditions, or privileges of employment, including an agreement to settle a complaint filed by an employee with the Department of Labor pursuant to section 211 of the Energy Reorganization Act of 1974, as amended, may contain any provision which would prohibit, restrict, or otherwise discourage an employee from participating in protected activity as defined in paragraph (a)(1) of this section, including, but not limited to, providing information to the NRC or to his or her employer on potential violations or other matters within NRC's regulatory responsibilities."

Contrary to the above, Holtec agreements contained language that would restrict or otherwise discourage Holtec employees from participating in protected activities as evidenced by the following examples:

1. Between July 2022 and December 2023, at least seven Holtec employees signed a Utility Workers Union of America (UWUA) separation and release agreement containing language that would restrict or discourage employees from participating in protected activities. Specifically, the agreements contain a general release of rights and claims under "[a]ny federal statute," without sufficiently clear language indicating that employees retain their rights to engage in activities protected under section 211 of the Energy Reorganization Act. The agreements also contain language prohibiting employees from voluntarily acting as a witness for any party in a matter adverse to Holtec and requiring employees to inform Holtec of "all subpoenas, correspondence, telephone calls, requests for information, inquiries or other contacts" received from third parties, including government agencies.

2. As of January 2021, and May 2022, respectively, Holtec's Conditions of Employment forms, 11HR and 11HR-HSI, restrict or otherwise discourage Holtec/Holtec Security International (HSI) employees from providing information voluntarily to the NRC on potential violations or other matters within NRC's regulatory responsibilities. Specifically, the Conditions of Employment forms state, in part, that "[y]ou agree that you will not, during or after your employment with [Holtec/HSI], (i) disclose or allow the publication of, in whole or in part, any [Holtec/HSI] and Holtec International's Confidential Information to any person, firm, corporation, association, or other entity for any reason or purpose whatsoever unless authorized in writing to do so by [Holtec/HSI]." These forms concern the terms and Conditions of Employment with Holtec/HSI, and as stated in the documents, constitute "binding and enforceable" agreements between Holtec/HSI and its employees.

This is a Severity Level IV violation (NRC Enforcement Policy section 6.10).

Pursuant to the provisions of 10 CFR 2.201, HDI is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region I, 475 Allendale Road, Suite 102, King of Prussia, PA 19406-1415, and a copy to the Chief of the Decommissioning, ISFSI and Reactor Health Physics Branch, Region I within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; EA-24-037" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Additionally, please provide a review of extent of condition of restrictive or otherwise discouraging language in IPEC agreements. Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued requiring information as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 21 day of May 2024

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

INSPECTION REPORT

Docket Nos.	05000003, 05000247, 05000286, and 07200051
License Nos.	DPR-5, DPR-26, and DPR-64
Report Nos.	05000003/2024005, 05000247/2024005, 05000286/2024005, and 07200051/2024001
Licensee:	Holtec Decommissioning International, LLC (HDI)
Facility:	Indian Point Energy Center, Units 1, 2 and 3
Location:	Buchanan, NY
Inspection Dates:	January 1 – March 31, 2024
Inspectors:	K. Warner, CHP, Senior Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
	M. Henrion, Senior Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
	A. Kostick, Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
Accompanied By:	G. Eklund, Health Physicist Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security
Observed By:	H. Roth, P.E., Fire Protection Engineer 2 New York State Office of Fire Prevention and Control New York State Homeland Security and Emergency Service
Approved By:	Anthony Dimitriadis, Chief Decommissioning, ISFSI and Reactor Health Physics Branch Division of Radiological Safety and Security

EXECUTIVE SUMMARY

Holtec Decommissioning International, LLC (HDI)
Indian Point Energy Center Units 1, 2, and 3 (IP-1, IP-2, and IP-3)
NRC Inspection Report Nos. 05000003/2024005, 05000247/2024005, 05000286/2024005, and 07200051/2024001

An announced decommissioning inspection was completed on March 31, 2024, at Indian Point Units 1, 2, and 3. A combination of on-site and remote inspection activities were performed over this period. The inspection included a review of design changes and modifications, problem identification and resolution, fire protection, decommissioning performance and status, occupational radiation exposure, Material Control and Accountability, and solid radioactive waste management and transportation. 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 decommissioning of a shutdown nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Additionally, the inspection period included discussion of Open Item 07200051/2023004-001, Use of Holtec Multipurpose Canister Continuous Basket Shim Variant. The NRC's program for overseeing the operation of dry storage of spent fuel at an Independent Spent Fuel Storage Installation (ISFSI) is described in IMC 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor-Related Greater-Than-Class C Waste at Independent Spent Fuel Storage Installations and for Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71 Transportation Packagings."

List of Violations

The inspectors identified one Severity Level IV Non-Cited Violation (NCV) of 10 CFR 20.1101(a) because HDI failed to implement the radiation protection program commensurate with the full extent of radiological issues at the site and sufficient to ensure compliance with provisions of this part, including 10 CFR 20.1201(a)(1). Specifically, HDI failed to implement site procedure IP-EN-RP-122, "Alpha Controls," during reactor coolant system (RCS) segmentation activities in Unit 1, an Alpha Level 3A area. Upon identification, HDI entered the issue into its corrective action program as IR-IP2-01031.

The inspectors identified one Severity Level IV violation of 10 CFR 50.7(f) because HDI failed to ensure that Holtec agreements were free of any provisions that would restrict or otherwise discourage employees from participating in protected activities as defined in 10 CFR 50.7(a)(1). This violation includes two examples of Holtec agreements containing language that would restrict or otherwise discourage an employee from participating in protected activities, including freely and voluntarily communicating with the NRC and testifying on matters within NRC's regulatory responsibility. HDI entered the issue into its corrective action program as IR-IP2-01091.

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, such as the integrated liquid waste system and the air handling system, as well as facilities, such as the chemistry and health physics laboratories. Liquid waste from IP-3 will be transported to and processed at IP-1. Radiological effluent limits are met on an overall site basis; specific operating limits and surveillance requirements for effluent monitoring instrumentation, including stack noble gas monitoring, are discussed in the Offsite Dose Calculation Manual.

IP-1, IP-2 and IP-3 were inspected under the “Actively Decommissioning (DECON), No Fuel in the Spent Fuel Pool” category. The categories of decommissioning are described in IMC 2561.

2.0 Active Decommissioning Performance and Status Review

2.1 Inspection Procedures 37801, 40801, 64704, 71801, 83750, 85103 and 86750

a. Inspection Scope

The inspectors performed on-site decommissioning inspection activities on January 9 – 11, February 12 – 15, and March 18 – 20, 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 February 12 – 15, 2024, NRC inspection of Indian Point Energy Center’s (IPEC’s) recently

changed materials security stance is documented in a standalone security inspection report (ADAMS Accession Nos. ML24080A014: Cover letter – Public and ML24065A124: OUO-SRI – Non-Public) issued on March 20, 2024.

The inspectors conducted document reviews and interviews with site personnel to determine if IPEC procedures and processes, including training and qualifications, were adequate and in accordance with the requirements and guidance associated with 10 CFR 50.59. The inspectors reviewed a sampling of changes to determine if changes made by IPEC under 10 CFR 50.59 required prior NRC approval.

The inspectors assessed the implementation and effectiveness of IPEC's corrective action program (CAP) by reviewing a sampling of issues, non-conformances, and conditions adverse to quality into 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 issue significance. The inspectors attended several management review committee meetings to determine if IPEC management was engaged in issue disposition and resolution. Additionally, the inspectors interviewed site personnel responsible for the CAP program.

The inspectors reviewed documents and interviewed plant personnel to assess the effectiveness of IPEC's decommissioning fire protection program and to determine if it was maintained and implemented to address the potential for fires that could result in the release or spread of radioactive materials. Documents reviewed included the fire protection plan, implementing procedures, routine surveillances, and corrective action documents. The inspectors reviewed recent changes to the fire protection program to determine whether the changes reduced the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard, taking into account the decommissioning plant conditions and activities. The inspectors conducted walk-downs of hot work areas to determine if the work was performed in accordance with the applicable fire protection program implementing procedures.

The inspectors reviewed documentation and met with IPEC management to discuss 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 walk-downs 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 walk-downs included all levels of Units 2 and 3 containments, select areas in the Unit 1 sphere and the Unit 3 Fuel Storage Building, and the solid radwaste storage building. The inspectors observed select pre-job briefings and associated work activities, including RCS pipe cutting work in Unit 1, hot work in the Unit 2 reactor cavity, and shipment preparation activities for Unit 3 reactor cavity filters generated during reactor internals segmentation.

The inspectors conducted site walk-downs of radiologically controlled areas and observed select work activities to examine and assess radiological protection (RP) controls including airborne and contamination controls, and radiological postings. The inspectors reviewed radiation work permits (RWPs) and As Low As Reasonably Achievable (ALARA) work plans to determine if radiation work activities were pre-planned effectively to limit worker exposure, if ALARA briefings describing radiation safety during work activities, and if Total

Effective Dose Equivalent (TEDE) ALARA evaluations to determine whether or not respirators were needed for work activities. The inspectors continued to review source term characterization and radiological controls for Unit 1. The inspectors reviewed IPEC's current and previous prospective dose evaluations to determine if HDI adequately evaluated the need to monitor personnel radiation exposures in accordance with the requirements outlined in 10 CFR 20.1502.

The inspectors attended various RP meetings, including daily RP technician briefings and daily RP supervisor meetings. The inspectors observed RP personnel during site work activities to determine if technicians and supervisors adequately implemented both RP procedures and controlled the work, including any applicable coaching of radiological workers.

The inspectors examined the programs, processes, procedures, and records related to the Material Control and Accountability (MC&A) of Special Nuclear Material (SNM). This program is specified in 10 CFR 74.19, with the objective of preventing the loss or misuse of SNM. This included a detailed review of major Spent Fuel Pool (SFP) evolutions since the last inspection, the most recent annual physical inventory, the relevant Department of Energy (DOE)/NRC 741 and 742 forms, an inspection of the SFPs, and a walkdown of select item control areas with the SNM site custodian.

The inspectors observed activities, interviewed personnel, and reviewed documentation to assess the effectiveness of IPEC's programs for handling, storage, and transportation of radioactive material. The inspectors observed portions of radioactive waste handling and radiological surveys for shipment of a package to determine if it met the requirements outlined in 10 CFR Part 37. Appendix A, Category 2. The review included records of shipment packaging, surveying, labeling, marking, placarding, vehicle checks, emergency instructions, to determine compliance with NRC and Department of Transportation Regulations.

b. Observations

The inspectors determined that the reviewed process applicability screenings and 10 CFR 50.59 screenings and evaluations had been adequately performed. The inspectors determined that HDI had trained and qualified individuals to perform the screenings and evaluations.

The inspectors determined through document review and interviews that issues had been identified, entered into the CAP, and evaluated commensurate with their safety significance. The inspectors determined that, generally, the CAP paperwork reviewed effectively addressed the issue identified and management was engaged during the management review committee meetings. CAP documents reviewed included those for recent NRC violations, including those documented in NRC inspection reports 2022004, 2023001, and 2023002 (ADAMS Accession Numbers ML23047A154, ML23125A134, and ML23215A139, respectively) other than NCV 050000247/2022004-02, which was previously reviewed. The inspectors determined that the corrective actions were appropriate for the issues, adequately implemented, and addressed what the inspectors' considered to be the root cause of each issue.

The inspectors noted that HDI wrote IR-IP2-01043 to document the need for a fleet common cause analysis due to a cognitive review of regulatory performance in the past two

years. The IR stated that “an analysis to review and improve fleet performance is warranted.” The inspectors will review any analyses and corrective action assignments when available. The inspectors identified a halogen lamp used in the 21-waste hold-up tank cubicle without the required hot work permit. HDI documented the issue their CAP as IR-IP2-01044. No fires occurred, but the inspectors noted the similarity to the recent failure to utilize a hot work permit to control the use of a halogen lamp at another HDI site, which led to a fire and an NRC violation (ML23031A208).

The inspectors determined that HDI maintained the fire protection program in accordance with NRC requirements and site procedures. The inspectors verified fire protection water supply systems and fire extinguishers had been maintained and appropriately tested and were in a state of operational readiness. The inspectors verified that staffing and training of the on-site personnel were adequate and that agreements were appropriately established with the local fire department to be the primary responder for on-site fires. The inspectors noted that HDI made several changes to the fire protection program since the last inspection of the program. The inspectors determined that the changes were appropriate and did not reduce the effectiveness of fire protection for facilities, systems, and equipment that could result in a radiological hazard. The inspectors noted that since the last inspection of fire protection program, HDI had moved all spent fuel into dry storage, which significantly decreased the overall fire risk profile of the site.

The inspectors noted that during this inspection period, HDI prepared for and began segmentation activities of the reactor lower internals in Unit 3, investigated and commenced repair of Unit 2 reactor cavity liner leakage, continued cutting and removing RCS piping in Unit 1, and began segmentation of the Unit 2 reactor vessel head. The inspectors noted that, for the areas of the plant toured, the material condition and housekeeping were adequate.

The inspectors evaluated the implementation of IPEC’s “Phase 3” organization and staffing after the transition to the Fuel on Pad Protected (FOPP) security and emergency preparedness stance and noted that the organization incorporated the appropriate qualifications and skillsets commensurate with both the reduction in risk associated with the FOPP stance and the planned work activities in CY2024.

The inspectors reviewed IPEC’s prospective dose evaluation, IPEC-RPT-24-004-R0, dated February 2024. The inspectors determined that HDI adequately evaluated personnel monitoring for radiation exposures at IPEC, considering that maximum extremity monitoring is required because it is possible to approach or exceed 10 percent of NRC limits at the site. The inspectors found that the evaluation for internal dose monitoring, as it pertains specifically to the higher alpha contamination present at Unit 1, lacked technical rigor. The inspectors noted that between 2019 and 2023 HDI documented no internal dose assignments greater than or equal to 10 millirem committed effective dose equivalent (minimal dose). However, the inspectors found that the evaluation lacked documentation of any validation of the internal dose prospective evaluation when evaluating the site alpha characterization, which is stated to be a required validation of voluntary internal dose monitoring. Additionally, the evaluation lacked justification that the work activities in Unit 1, specifically work in Alpha Level 3 and 3A areas, have “the same maximum personnel exposure risk” as those performed during the 2019 through 2023 period. The evaluation indicates that decommissioning at Unit 1 has the potential to expose personnel to alpha intake risks but the increased controls for alpha are not described. While a history of low internal exposure at IPEC is notable, the much lower derived air concentration (DAC)

values for alpha emitting radionuclides presents some level of increased risk. The inspectors will review this topic during future inspections.

The inspectors held discussions with radiation protection management about planned work in Unit 1 involving a whole-body surface contamination monitor and a note regarding the use of radon progeny rejection using specific equipment for this purpose. The inspectors provided the manufacturer's application note to IPEC staff in June 2023. The inspectors highlighted the conditions and extreme caution/conservatism that should be exercised and should be restricted to personnel who are not working in areas of potentially elevated alpha contamination, or not at all." The inspectors noted that there was a missed opportunity and HDI continued to allow workers to exit the radiologically controlled area for a period of time without sufficient justification. Based on a review of airborne survey data and the radiological mix, the inspectors did not identify that any significant intakes were missed. Upon identification of the condition, in March 2024, HDI entered the concern into the station's CAP as IR-IP2-01093 and discontinued the use of radon progeny rejection by workers in elevated alpha contamination areas. The inspectors will review the site implementation of alpha controls and monitoring in future inspections.

The inspectors determined that HDI's activities were performed safely and in accordance with work plans and plant procedures and that RP effectively maintained radiological controls for the work-in-progress, with one exception of alpha control implementation at Unit 1, as described below. The inspectors observed the implementation of corrective actions for the violation described below, including the performance of alpha frisking of workers exiting an Alpha Level 3A work area in Unit 1 and usage of powered air purifying respirators by RP technicians. The inspectors observed that personnel removed their protective clothing and respirators appropriately when exiting the Unit 1 sphere.

The inspectors noted the issuance of an NRC correction letter on February 22, 2024 (ADAMS Accession No. ML24045A088), to HDI regarding clarification of the amended pages to be retained from previous license amendments (ADAMS Accession No. ML23242A275). This letter corrected an administrative error that removed several technical specification pages for Unit 2 and Unit 3, associated with the requirements for high radiation areas. As stated in the letter, HDI indicated that the requirements included in those additional technical specification pages remained in effect since the issuance of license amendment approvals on November 29, 2023. The inspectors identified the discrepancies during routine review of the HDI technical specifications in January 2024 and communicated with staff from the Office of Nuclear Material Safety and Safeguards to correct the error. The inspectors did not identify any concerns.

The inspectors determined that MC&A program records were complete, comprehensive, and maintained in accordance with regulations and site procedures. Routine reports of SNM inventory and mass-balance to the U.S. DOE and the NRC were made as required and item control areas were posted and had adequate access control. The program of SNM security seals was adequately maintained and the inspectors verified that the Unit 2 and 3 SFPs were emptied of any gross material, including fuel bundles and irradiated hardware, with the exception of fuel racks in the Unit 3 SFP. The inspectors noted that two new SNM custodians were trained as part of the transition to the FOPP organization. The inspectors verified that the new custodians were trained and qualified for the positions and noted that previous SNM custodians were still available to provide assistance.

The inspectors verified that solid radioactive waste was adequately stored and monitored and radioactive waste shipping paperwork was properly completed and site personnel were knowledgeable of their duties and responsibilities. The inspectors determined that radioactive waste shipped for shipment number SR-M1092-0019 was properly classified, packaged, marked, labeled, was in proper condition for transportation, and was in accordance with NRC and Department of Transportation requirements.

Violations

1. Failure to Implement Adequate Radiological Controls in an Alpha Level 3A Area

The inspectors identified one Severity Level IV NCV of 10 CFR 20.1101(a) for failure to implement the radiation protection program commensurate with the full extent of radiological issues at the site and sufficient to ensure compliance with provisions of 10 CFR 20.1201(a)(1). Specifically, HDI failed to implement several provisions of site procedure IP-EN-RP-122, “Alpha Controls,” during RCS segmentation activities in Unit 1, an Alpha Level 3A area.

Alpha emitting radionuclides have a significantly lower annual limit on intake than beta-gamma emitting radionuclides that might be present at a nuclear power plant. While the processes used to identify, monitor, and control alpha contamination are similar to those used for beta-gamma emitting contamination, the instrumentation for alpha contamination is often different and the time needed to measure alpha contamination is typically longer than the count times normally used for beta-gamma contamination. Consequently, nuclear power stations typically perform detailed evaluations of plant systems and areas and determine the ratio of beta-gamma contamination to alpha contamination. The result of this assessment identifies circumstances where controls normally used for beta-gamma contamination may no longer be effective for the contamination hazards in zones or systems with relatively low ratios of beta-gamma to alpha contamination. Alpha Level 1 areas have the highest ratios (>30,000:1) of beta-gamma to alpha contamination and typical beta-gamma controls are generally adequate while Alpha Level 3A areas represent the lowest ratios (<50:1) and require augmented alpha monitoring controls. Some additional actions and controls typically used in areas with relatively low ratios of beta-gamma to alpha contamination include using lapel air samples as dosimeters to estimate the intake of radioactive material taken into the body, counting a higher percentage of air samples for alpha, and performing alpha frisks using an appropriate alpha sensitive instrument (i.e., a zinc sulfide detector) on workers before they exit the work area to augment contamination monitoring.

The inspectors performed walk-downs and observed RCS segmentation activities in Unit 1 and held discussions with RP staff associated with Alpha Level controls. Based on those discussions, the inspectors noted inconsistencies between RP personnel expected to observe robust Alpha Level 3 controls. However, the inspectors observed a mixture between Alpha Level 1 and 3 controls and noted that no instrumentation capable of detecting alpha radiation was present in the field where alpha emitting radionuclides were likely present at a high ratio in the area of work being conducted involving the RCS of a plant shut down for 50 years. The inspectors observed that workers involved in the cutting of piping were wearing respirators, but no RP personnel in the area were wearing respirators.

The inspectors reviewed air sampling data, including general area, work area, and lapel air samples, and radiological survey data. Additionally, the inspectors examined multiple RP

procedures, including the alpha monitoring procedure and respiratory protection program and noted that the reviewed survey data of alpha contamination inside the RCS represented Alpha Level 3A conditions. The inspectors compared the conditions in the field and the paperwork to the Alpha Level controls procedure and concluded that multiple steps in IP-EN-RP-122, “Alpha Controls,” Revision 0 had not been followed. Upon identification, HDI entered the issue into its CAP as IR-IP2-01031. Licensee corrective actions included a full review of the work area conditions, remediation and retraining of RP personnel, and implementation of required controls.

10 CFR 20.1101(a) requires licensees to develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provisions of Part 20.

10 CFR 20.1201(a)(1) states in part “The licensee shall control the occupational dose to individual adults to an annual limit, which is the more limiting of (i) the Total Effective Dose Equivalent being equal to 5 rems (0.05 Sv); or (ii) the sum of the deep-dose equivalent and the committed dose equivalent to any individual organ or tissue other than the lens of the eye being equal to 50 rems (0.5 Sv).”

IPEC procedure, IP-EN-RP-122, “Alpha Controls,” Revision 0 requires, in part, that the licensee: (1) stop work and notify the RP manager immediately when unexpected alpha activity greater than or equal to 500 disintegrations per minute/100 square centimeters is identified; (2) all air samples be counted for alpha; (3) lapel air samples be used by each individual involved in the work activity; (4) an RP technician perform alpha frisks of workers exiting Alpha Level 3A areas; (5) ensure area postings reflect the alpha hazard in the area; and (6) conduct a TEDE ALARA screening according to IP-EN-RP-503, “Selection, Issue and Use of Respiratory Protection Equipment.”

Contrary to the above, between September and December 2023, HDI failed to implement its radiation protection program commensurate with the scope and extent of licensed activities and sufficient to ensure compliance with the provision to control the occupational dose to individual adults to the annual limit. Specifically, HDI did not follow its prescribed alpha monitoring and respiratory protection programs during RCS segmentation activities in the Unit 1 sphere, in that: (1) the RP manager was not notified as required; (2) the inspectors identified that at least 15 air samples were not counted for alpha; (3) lapel air samples were not utilized by RP technicians involved in the work activity; (4) alpha frisking of workers was not performed; (5) HDI failed to ensure that areas were posted to reflect the alpha hazard in the area; and (6) the RP technicians involved in the work activity were not wearing respiratory protection, as required.

Based on the inspectors’ review of the cutting method used (mechanical vice hot work) and survey data counted for alpha, the inspectors determined that no substantial intakes of radioactive material likely occurred as a result of this condition. This violation was evaluated using section 6.3.d of the NRC Enforcement Policy, dated January 12, 2024, to be a Severity Level IV NCV, regarding the failure to implement procedures, including surveys, which has a low safety significance.

Because this violation was determined to be of no or relatively inappreciable (very low) potential safety consequence, was entered into the licensee’s CAP, and was not willful or repetitive, the violation was treated as a Non-Cited Violation, consistent with section 2.3.2.a

of the Enforcement Policy **(NCV 05000003/2024005-01, Failure to Implement Adequate Radiological Controls in an Alpha Level 3A Area)**.

2. Restrictive or Otherwise Discouraging Language in Holtec Agreements

The inspectors identified one Severity Level IV violation of 10 CFR 50.7(f) because HDI failed to ensure that Holtec agreements were free of any provisions that would restrict or otherwise discourage employees from participating in protected activities as defined in 10 CFR 50.7(a)(1). This violation includes two examples of Holtec agreements containing language that would restrict or otherwise discourage an employee from participating in protected activities, including freely and voluntarily communicating with the NRC and testifying on matters within NRC's regulatory responsibility.

The inspectors reviewed a sampling of Holtec agreements and determined, in coordination with Regional Counsel and the Office of General Counsel, that at least two of the reviewed agreements contained language that would restrict or otherwise discourage an employee from engaging in protected activities. These two agreements included (1) a recent separation and release agreement utilized during site layoffs for UWUA employees and (2) Holtec's "Confidentiality, Non-Compete, and Non-Solicitation Agreement" for HDI and HSI employees, referred to in Holtec's Employee Manual as the "Conditions of Employment" form.

Section 3 of the UWUA agreement is a general release of claims. The third sentence of section 3.b states that the release "further includes, but is not limited to, any rights and claims" under "any federal statute," and then lists several specific statutes. As written, rights under "any federal statute" could be reasonably interpreted to include the employee's right to engage in activities protected under section 211 of the Energy Reauthorization Act.

The agreement states in section 3.d.(iv) that the release of claims does not affect the employee's "right to file a charge with any state of federal administrative agenda although release waives right to any monetary relief related to any such charge or administrative complaint." However, the phrase "file a charge with any state or federal administrative agenda" does not convey with sufficient clarity that the employee retains the right to engage in all protected activities in 10 CFR 50.7(a)(1).

In addition, section 5.b of the agreement (1) prohibits the employee from voluntarily acting as a witness for any party in a matter adverse to Holtec and (2) requires the employee to inform Holtec of "all subpoenas, correspondence, telephone calls, requests for information, inquiries or other contacts" received from third parties, including government agencies. This language restricts the employee from voluntarily testifying on behalf of the NRC in a matter adverse to Holtec (for example, in a matter involving a potential violation) and restricts the ability of the employee to engage in back-and-forth communications with the NRC without informing Holtec.

The previous section of the agreement, section 4, contains "non-disclosure, non-solicitation, and non-disparagement" provisions. At the end of the second sentence, which describes the non-disparagement requirement, is a statement reading, "provided, however, nothing contained herein" is intended to or acts to prevent the employee from testifying, making statements, or providing information in connection with "any legal or governmental investigation or proceeding or making any disclosures required by law, subpoena or court order." While the language at the end of this section talks about the employee's ability to

testify and provide information related to a legal or governmental investigation or proceeding, it is unclear whether this language applies just to that sentence, to section 4, or to the entire agreement. Also, this language is followed almost immediately by the clearly restrictive language in section 5.b described above.

The Conditions of Employment forms require Holtec/HSI employees to agree, both during and after employment, that the employees will not "disclose, in whole or in part, any [Holtec/HSI] and Holtec International's Confidential Information to any person, firm, corporation, association, or other entity for any reason or purpose whatsoever unless authorized in writing to do so by [Holtec/HSI]." Confidential Information is broadly defined to include, among other things, "engineering designs, technological analyses, mechanical and nuclear industry reports, licensing, manufacturing, site construction services, hardware components, product and other designs and other trade secrets, inventions, designs, know-how, or other private, confidential or proprietary information." This language restricts the employee from reporting to the NRC safety concerns, potential violations, or other information related to the NRC's regulatory activities if there is "Confidential Information" involved, unless the employee receives prior written authorization from Holtec.

10 CFR 50.7(f) states in part: "No agreement affecting the compensation, terms, conditions, or privileges of employment, including an agreement to settle a complaint filed by an employee with the Department of Labor pursuant to section 211 of the Energy Reorganization Act of 1974, as amended, may contain any provision which would prohibit, restrict, or otherwise discourage an employee from participating in protected activity as defined in paragraph (a)(1) of this section including, but not limited to, providing information to the NRC or to his or her employer on potential violations or other matters within NRC's regulatory responsibilities."

Contrary to the above, Holtec agreements contained language that would restrict or otherwise discourage Holtec employees from participating in protected activities as evidenced by the following examples:

1. Between July 2022 and December 2023, at least seven Holtec employees signed a UWUA separation and release agreement containing language that would restrict or discourage employees from participating in protected activities. Specifically, the agreements contain a general release of rights and claims under "[a]ny federal statute" without sufficiently clear language indicating that employees retain their rights to engage in activities protected under section 211 of the Energy Reorganization Act. The agreements also contain language prohibiting employees from voluntarily acting as witnesses for any party in matters adverse to Holtec and requiring employees to inform Holtec of "all subpoenas, correspondence, telephone calls, requests for information, inquiries or other contacts" received from third parties, including government agencies.

2. As of January 2021, and May 2022, respectively, Holtec's Conditions of Employment forms, 11HR and 11HR-HSI, restrict or otherwise discourage Holtec/HSI employees from providing information voluntarily to the NRC on potential violations or other matters within NRC's regulatory responsibilities. Specifically, the Conditions of Employment forms state, in part, that "[y]ou agree that you will not, during or after your employment with [Holtec/HSI], (i) disclose or allow the publication of, in whole or in part, any [Holtec/HSI] and Holtec International's Confidential Information to any person, firm, corporation, association, or other entity

for any reason or purpose whatsoever unless authorized in writing to do so by [Holtec/HSI].” These forms concern the terms and Conditions of Employment with Holtec/HSI, and as stated in the documents, constitute “binding and enforceable” agreements between Holtec/HSI and its employees.

This violation was determined to be a Severity Level IV violation. The NRC considered the guidance in the NRC Enforcement Policy, section 6.10, “Discrimination,” which considers escalation of the severity level of a violation if the violation was deliberate, and, conversely, that the severity level of a violation may be mitigated based on factors unique to the specific facts and circumstances of the case. The NRC considered the specific facts of this case, including both the lack of evidence of deliberate action and the widespread usage of this language (i.e., that this was not a single failure event). In addition, the NRC also took into consideration inspectors’ observations at the site, including observations of employee willingness to raise concerns, evidencing a healthy safety culture at IPEC. The NRC is not aware of any evidence of the language in question actually having had an impact upon an individual’s willingness to engage in protected activities—though that is a potential consequence and would be considered to interfere with the NRC’s ability to regulate.

This violation meets the criteria in section 2.3.2.a of the NRC Enforcement Policy to be dispositioned as an NCV. However, the violation is cited in the enclosed Notice of Violation (NOV) because the issue involves employee protection requirements and potentially widespread extent of condition given that the language appears to be ingrained in corporate documents that are likely used at all HDI sites subject to NRC regulations. Therefore, the NRC is issuing a NOV and is requiring a response from HDI that describes a comprehensive corrective action plan and a review of extent of condition at IPEC. **(NOV 05000003/2024001-02, 05000247/2024001-02, 05000286/2024001-02, Restrictive or Otherwise Discouraging Language in Agreements).**

c. Conclusions

Two Severity Level IV violations were identified and documented. One SL IV, NCV of 10 CFR 20.1101(a) was identified and one SL IV, NOV of 10 CFR 50.7(f) was identified.

3.0 Independent Spent Fuel Storage Installation (ISFSI)

3.1 Operation of an Independent Spent Fuel Storage Installation (Inspection Procedure 60855)

a. Inspection Scope

The inspectors evaluated Indian Point’s use of the Holtec Multipurpose Canister (MPC) bolted Continuous Basket Shim (CBS) variant during the continuous full core offload of Unit 2 and Unit 3 as described in Open Item 0720051/2023004-001.

b. Observations and Findings

The inspectors noted that Indian Point used 69 MPCs with the bolted CBS design during the continuous full core offload of Unit 2 and Unit 3. The inspectors will continue to review this topic during future inspections.

c. Conclusions

One Open Item 07200051/2023004-001, Use of Holtec Multipurpose Canister Continuous Basket Shim Variant was discussed.

4.0 Exit Meeting Summary

On April 17, 2024, the inspectors presented the inspection results to Frank Spagnuolo, Site Vice President, and other members of the IPEC organization. No proprietary information was documented in this report.

ATTACHMENT: SUPPLEMENTARY INFORMATION

SUPPLEMENTARY INFORMATION
KEY POINTS OF CONTACT

F. Spagnuolo, Site Vice President
B. Noval, HDI Director Regulatory Affairs
M. Johnson, Nuclear Manager
W. Wittich, Senior Licensing Specialist
W. O'Brien, Radiation Protection Superintendent
R. Fucheck, Radiation Protection Manager
R. Whitely, RV Segmentation Decommissioning Manager
M. Kempski, Maintenance Manager
C. Bohren, Operations Manager
C. Fabricante, ALARA Engineer
D. Quinn, Radiological Supervisor
J. McMickens, Senior Radiation Protection Technician
D. Maruco, Radiation Protection Supervisor
A. Arbuthnot, Junior Radiation Protection Technician
J. Swart, Security Manager
G. Martin, Watch Supervisor
K. Elliott, Fire Protection Engineer
S. Epps, Human Resources Representative

ITEMS OPEN, CLOSED, AND DISCUSSED

Opened	Section	Summary
07200051/2023004-01	3.1.	Use of Holtec Multipurpose Canister Continuous Basket Shim

PARTIAL LIST OF DOCUMENTS REVIEWED

Procedures
DSP-RA-001, Corrective Action Procedure, Revision 1
IP-EN-RP-122, Alpha Monitoring, Revision 0
0-RP-IC-502, Operation and Calibration of the Argos Personnel Contamination Monitor, Revision 9
IP-EN-NF-200, Special Nuclear Material Control, Revision 16
EN-NF-202, Tamper Proof Seals for Special Nuclear Material, Revision 6
EN-NF-201, Special Nuclear Material Reporting, Revision 10
EN-NF-104, Special Nuclear Materials Program, Revision 9
0-NF-203, Internal Transfer of Fuel Assemblies and Inserts, Revision 29
AP-64.1, Fire Protection Systems and Components Functionality and Surveillance Requirements, Revision 12
EN-DC-127, Control of Hot Work and Ignition Sources, Revision 21
EN-DC-128, Fire Protection Impact Reviews, Revision 14
IP-EN-DC-161, Control of Combustibles, Revision 2
SAO-703, Fire Protection Impairment Criteria and Surveillance, Revision 37
SEP-FPP-IP-001, IPEC Fire Protection Program Plan, Revision 10
0-ONOP-FP-1, Plant Fires, Revision 0

Issue Reports Reviewed
IR-IP2-00648
IR-IP2-00720
IR-IP2-00892
IR-IP2-01058
IR-IP3-00892
IR-IP3-01174
IR-IP3-01181
IR-IP3-01182
IP2-00932
IP3-01112
IP3-01285
IP2-00929

Issue Reports Generated from Inspection
IP2-01044
IP2-01045
IP2-01046
IP3-01562

Licensing Bases Documents
Indian Point 1 Technical Specifications, Amendment 63
Indian Point 2 Technical Specifications, Amendment 299
Indian Point 3 Technical Specifications, Amendment 275
Indian Point 2 Defueled Safety Analysis Report, Revision 1
Indian Point 3 Defueled Safety Analysis Report, Revision 1
Post Shutdown Decommissioning Activities Report (IPEC 1, 2, and 3 PSDAR), December 19, 2019

Miscellaneous
Apparent Cause Evaluation, IP2-00892, Compliance with EN-DC-127- Control of Hot Work and Ignition, event date June 15, 2023
IPEC-RPT-23-013, Radionuclide Characterization for Indian Point Unit 1, November 29, 2023
IPEC-RPT-19-001, Prospective Evaluation for Indian Point Energy Center, September 30, 2019
IPEC-RPT-24-004, Prospective Evaluation for Indian Point Energy Center, February 2024
Nuclide Distribution Report, Unit 1 Primary System Components, October 25, 2023
IPEC Organization Chart FOPP, December 12, 2023
IPEC Segmentation Schedule, January 8, 2024
ALARA Plan and TEDE ALARA screening and evaluation, June 14, 2023
20231000, Unit 1 Demolition (Excludes Unit 1 Reactor Cavity) RWP, Revision 3
Radiological Survey Form, Spent Fuel Rack E-3 Post Bagging i/s the IP-1 Shipping Bag, November 27, 2023
Radiological Survey Form, Unit 1 VC SG#11 and #12, various September – December 2023
Beta-Gamma/Alpha Ratio Worksheet, SG#11 and #12 Pipe cutting, various September – December 2023
Airborne Radioactivity Calculation Forms, RCS Pipe cutting, various September – December 2023
Lapel Sample Alpha Analysis, Unit 1 pipe cutting, various September – December 2023
IPEC CPP -Summary, Revision 5
NDT Credit Letter – IPEC1, January 11, 2024
NDT Credit Letter – IPEC2, January 11, 2024
NDT Credit Letter – IPEC3, January 11, 2024

Report 20-919-RE-273, IPEC Units 2 and 3 Activation Analysis and Component Characterization, July 2021
RWP 20243061, Radiation Work Permit Cut and Package Lower Internals in Unit 3 VC, Revision 0
20233061, ALARA Plan for Cut and Pack Lower Internals U3, September 14, 2023
IPEC Annual Physical Inventory Report 2021, August 17, 2021
IPEC Annual Physical Inventory Report 2022, August 16, 2022
IPEC Annual Physical Inventory Report 2023, August 25, 2023
2-TF-2022-50, December 14, 2022
3-TF-2023-38, September 14, 2023
2-TF-2022-53, December 14, 2022
3-TF-2023-48, October 16, 2023
ICA-22-02, May 2, 2022
ICA-22-03, June 29, 2022
ICA-22-01, March 25, 2021
FTK-ESPP-G00101, Special Nuclear Material Accounting Qualification Card for Wesley O'Brien, August 31, 2023
FTK-ESPP-G00101, Special Nuclear Material Accounting Qualification Card for Mike Kempski, August 31, 2023
HI-2230867, Acceptance Review for Indian Point Energy Center Annual SNM Inventory (2023), October 11, 2023
Process Applicability Determination for AP-64.1, Change #12, January 25, 2024
Process Applicability Determination for EC-IPC-2023-095 and 0-PT-M004, Revisions 0/19, August 29, 2023
Process Applicability Determination for EC-IPC-2023-0108, Change #0, December 4, 2023
Process Applicability Determination for IP3 TRS 3.7.A.1.7/3.7.A.1.8 frequency, Change #0, August 15, 2023
Process Applicability Determination for Delete TRO/TRS 3.7.A.7, Change #0, January 16, 2024
LBDCR U2-TRM-2024-01, Delete TRM, January 22, 2024
LBDCR U3-TRM-2024-01, Delete TRM, January 22, 2024
Package Characterization Report Liner Serial No: 160L-22020, March 6, 2024
Form 540 Uniform Low-Level Radioactive Waste Manifest Shipping Paper, Shipment Number SR-M 1092-0019
72.48-1532
Mirion Application Note, Radon Progeny Rejection with Mirion Argos-5AB Personnel Contamination Monitors, December 6, 2022
Unit 2 Hot Work Permit, March 2024
Separation and Release Agreements, various
Holtec International Form HR-11, Confidentiality, Non-Compete, and Non-Solicitation Agreement, January 4, 2021
Holtec Security International Form 11HR-HSI, Confidentiality, Non-Compete, and Non-Solicitation Agreement, May 24, 2022

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
ALARA	As Low As Reasonably Achievable
CAP	Corrective Action Program
CFR	Code of Federal Regulations
DAC	Derived Air Concentration
DECON	Actively Decommissioning
DOE	Department of Energy
Entergy	Entergy Nuclear Operations, Inc.
FOPP	Fuel on Pad Protected
GPO	Government Printing Office
Holtec/HDI	Holtec Decommissioning International, LLC (HDI)
HSI	Holtec Security International
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
MC&A	Material Control and Accountability
NCV	Non-cited Violation
Notice	Notice of Violation
NOV	Notice of Violation
NRC	Nuclear Regulatory Commission
RCS	Reactor Coolant System
RP	Radiation Protection
RWP	Radiation Work Permits
SFP	Spent Fuel Pool
SNM	Special Nuclear Material
TEDE	Total Effective Dose Equivalent
TS	Technical Specifications
UWUA	Utility Workers Union of America