

10 CFR 50.4(b)(1)

July 20, 2017

ZS-2017-0084

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Zion Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

Subject: License Termination Plan Request for Additional Information

References:

- 1) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Amendment Request for the License Termination Plan", dated December 19, 2014
- 2) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Update of the Site-Specific Decommissioning Costs", dated February 26, 2015
- 3) John B. Hickman, U.S. Nuclear Regulatory Commission, Letter to John Sauger, *ZionSolutions*, "Request for Additional Information Related to the License Termination Plan for Zion Nuclear Power Station, Units 1 and 2," dated December 10, 2015
- 4) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Request for Additional Information", dated March 8, 2016
- 5) John B. Hickman, U.S. Nuclear Regulatory Commission, Letter to John Sauger, *ZionSolutions*, "Request for Additional Information Related to the License Termination Plan for Zion Nuclear Power Station, Units 1 and 2," dated May 31, 2016
- 6) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Request for Additional Information", dated July 20, 2016
- 7) John B. Hickman, U.S. Nuclear Regulatory Commission, Letter to John Sauger, *ZionSolutions*, "Request for Additional Information Related to the License Termination Plan for Zion Nuclear Power Station, Units 1 and 2," dated November 30, 2016

NM5SD1

The Zion Station License Termination Plan (LTP) was submitted to the U.S Nuclear Regulatory Commission (NRC) for review on December 19, 2014 as documented in Reference 1. Following initial NRC review, a Request for Additional Information (RAI), as documented in Reference 3, was received on December 10, 2015. A response to that request was submitted on March 8, 2016 as documented in Reference 4. A second RAI was received on May 31, 2016 as documented in Reference 5. A response to that RAI was provided on July 20, 2016 as documented in Reference 6. This letter provides responses to the third RAI requested in Reference 7.

Responses to the issues identified in Reference 7 are provided in Enclosure 1. Supporting references are provided in Enclosure 2. The LTP has been revised to incorporate changes resulting from responses to the RAIs. LTP Revision 1 is provided in Enclosure 3 and replaces in entirety LTP Revision 0 provided in Reference 1. Note that Chapter 7 is only provided in redacted format as no changes to the redacted information have been made. For convenience, a change matrix providing a cross reference between the RAI response and the LTP section impacted is included in Enclosure 4. Enclosure 5 contains a preflight report for Enclosures 1, 2 and 3.

The RAI responses and revised LTP have resulted in revisions to the original LTP License Amendment Request (LAR) documented in Reference 1. LAR Attachment 1, Section 2.0, "Description of Proposed Changes," and LAR Attachment 2, "Proposed License Changes," have been revised to eliminate the reference to LTP Revision 0, eliminate Basement Dose Factor criteria, and delete the reference to Wilcoxon Rank Sum test which was not used. These changes are administrative in nature and have no impact on the Technical Analysis, Significant Hazards Consideration, or Environmental Impact Consideration documented in Reference 1. These changes are being provided as replacement pages to the LAR and are included in Enclosure 6.

A conference call was conducted with the NRC on March 29, 2016. The purpose of the call was to discuss the adequacy of the site ground water monitoring program. During the call, the NRC stated that the existing ground water monitoring program was adequate and that no new wells were required provided the site maintains the current ground water monitoring program through 2018. This transmittal documents the agreement with the NRC Staff during this call.

There are no regulatory commitments made in this submittal. If you should have any questions regarding this submittal, please contact Robert Yetter at (224) 789-4250.

Respectfully,



For  
Gerard van Noordennen  
Vice President Regulatory Affairs

Enclosures:

Enclosure 1: RAI Responses

Enclosure 2: Reference Documentations

Enclosure 3: Proposed License Termination Plan, Revision 1

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Enclosure 4: LTP Change Matrix

Enclosure 5: Preflight Report for Enclosures 1 and 2 to this submittal

Enclosure 6: LTP LAR Replacement Pages

cc: John Hickman, U.S. NRC Senior Project Manager (1 hard copy & 3 CDs)  
Regional Administrator, U.S. NRC, Region III (1 hard copy & 1 CD)  
Service List (Cover letter only, no enclosures)

## **Zion Nuclear Power Station, Unit 1 and 2 License Transfer Service List**

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Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request (Raised at or after 3/22/17 Meeting)	Comments
1	NA-Title	NA	Editorial -"Revision 1" added
2	1101	NA	Editorial
2	1243	NA	Editorial
2	1344	NA	Editorial
2	1374	NA	Editorial
2	1379	NA	Editorial
2	1442	NA	Editorial
2	1451	NA	Editorial
2	1486	NA	Editorial
3	14	Delete reference to MARSAME	
4	229	NA	Editorial
4	488	NA	Editorial
4	520	NA	Editorial
4	534	NA	Editorial
4	592	NA	Editorial
7	4	NA	Editorial
8	NA	NA	No.Changes to LTP Chapter 8

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	47	NA	Editorial
5	115-116	NA	Clarification
5	128-129	NA	Editorial
5	202-208	Revised response to RAI HP 5c	Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for speciifc area if justified
5	214-216	HTD analysis of all soil samples exceeding SOF of 0.1	
5	226-228	HTD analysis of all soil samples exceeding SOF of 0.1	
5	230-236	Revised response to RAI HP 5c	Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for speciifc area if justified
5	238	Operational DCGL	
5	240	Operational DCGL	
5	242-244	Operational DCGL	Survey design is now based on the Operational DCGL as opposed to Base Case DCGL so sentence deleted
5	245	Operational DCGL	
5	246	Operational DCGL	
5	248-257	Operational DCGL	
5	258-260	NA	Clarification
5	266	NA	Editorial
5	268-269	Operational DCGL	
5	272	Area Factors and EMC to be applied to soil only.	
5	274	Operational DCGL	
5	281	NA	Editorial
5	281-284	Operational DCGL	
5	286	Operational DCGL	
5	286-290	Operational DCGL	
5	291	Operational DCGL	
5	292-294	Operational DCGL	
5	295-300	Operational DCGL	
5	301	Operational DCGL	
5	312	NA	Editorial
5	314	Operational DCGL	
5	316-317	NA	Editorial
5	318	Operational DCGL	
5	319	Operational DCGL	
5	320-328	Operational DCGL	
5	329	Operational DCGL	Editorial
5	333	NA	
5	334-336	Operational DCGL	
5	337-344	Operational DCGL	
5	346	NA	Clarification
5	353	NA	Editorial

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	354	Operational DCGL	
5	356	NA	Editorial
5	357	Operational DCGL	
5	358-362	Operational DCGL	
5	380-381	NA	Clarification
5	383-384	Operational DCGL	
5	385	NA	Editorial
5	390	Operational DCGL	
5	391	Operational DCGL	
5	394-400	Operational DCGL	
5	421	NA	Editorial
5	422-423	Revised response to RAI HP 5c	Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for speciifc area if justified
5	428-432	Revised response to RAI HP 5c	Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for speciifc area if justified
5	444	NA	Editorial
5	453	NA	Editorial
5	459	NA	Editorial
5	460	Operational DCGL	
5	461	NA	Editorial
5	468-476	Operational DCGL	
5	479-485	For all areas other than soil, no remediation required unless SOF exceeds one using Base Case DCGLs. For soil, no remediation required if the EMC test is passed.	
5	485-486	Operational DCGL	
5	488-506	Operational DCGL	Clarification of Terms in Compliance Dose Equation consistent with description in TSD 17-004
5	512	NA	Editorial
5	516	AF and EMC applies to soil only	
5	517-519	AF and EMC applies to soil only	
5	528	NA	Editorial
5	531-534	Operational DCGL	
5	545	NA	Editorial
5	559	NA	Editorial
5	574	NA	Editorial
5	575	NA	Editorial
5	585	NA	Editorial
5	662-663	NA	Clarification
5	684-685	NA	Clarification
5	687-688	NA	Clarification
5	707	NA	Editorial
5	717	NA	Editorial

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	726	NA	Editorial
5	728	NA	Editorial
5	743-747	Operational DCGL	
5	749-755	Operational DCGL	
5	758	Operational DCGL	
5	761	Operational DCGL	
5	763	Operational DCGL	
5	765	Operational DCGL	
5	772	NA	Editorial
5	777	NA	Editorial
5	782	NA	Clarification
5	784	NA	Clarification
5	785	Operational DCGL	
5	786	NA	Editorial
5	786	Operational DCGL	
5	788	Operational DCGL	
5	792-798	No AF or EMC to be applied to concrete. Any FSS ISOCS results with SOF>1 using Base Case DCGLs will be remediated.	
5	802	Operational DCGL	
5	837-838	NA	Editorial
5	846-847	NA	Clarification
5	849	NA	Editorial
5	861	Operational DCGL	
5	887	Operational DCGL	
5	902	Operational DCGL	
5	902-906	NA	Clarification
5	910	NA	Clarification
5	913	Operational DCGL	
5	913	NA	Editorial
5	916	NA	Editorial
5	934	Operational DCGL	
5	935	NA	Editorial
5	939	NA	Editorial
5	949	NA	Editorial
5	959	NA	Clarification
5	963-965	Operational DCGL	
5	965-966	NA	Editorial
5	986	NA	Editorial
5	989	NA	Editorial
5	989	NA	Clarification to add Circulating Water Discharge Tunnel to Table
5	999	NA	Editorial
5	999		Clarification to add Circulating Water Discharge Tunnel to Table
5	1023-1079	AF and EMC will not be applied to basements	
5	1080	NA	Editorial
5	1094	NA	Editorial



Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	1102	NA	Editorial
5	1107	NA	Editorial
5	1108	NA	Editorial
5	1109	Operational DCGL	
5	1113-1114	NA	Clarification
5	1115	Operational DCGL	
5	1117	Operational DCGL	
5	1120	Operational DCGL	
5	1121	Judgemental results will be added to FSS systematic mean for compliance dose	
5	1122-1143	..Operational DCGL .. Judgemental results will be added to FSS systematic mean for compliance dose	
5	1152	Operational DCGL	
5	1153-1154	NA	Editorial
5	1156	NA	Editorial
5	1166	NA	Editorial
5	1187	Operational DCGL	
5	1190-1215	..Operational DCGL .. Judgemental results will be added to FSS systematic results for compliance dose. ..FSS Measurement with SOF >1 using Base Case DCGL will be remedited	
5	1222-1223	Operational DCGL	
5	1228-1252	Operational DCGL	Also Editorial Table numbering changes
5	1253-1267	Embedded Pipe and Penetrations addressed by calculating dose from Alternate Drilling Spoils scenario for Resident Farmer and Worker	
5	1274	NA	Editorial
5	1278-1297	Dose from clean Concrete Fill will be calculated using actual maximum MDC after URS is completed	
5	1298-1321	...Operational DCGL ..Compliance dose calculated using mean FSS results and activity in elevated judgmental areas	
5	1328	NA	Editorial
5	1330	NA	Clarification
5	1332-1336	NA	Clarification
5	1339	NA	Editorial
5	1341	NA	Clarification
5	1343-1357	Operational DCGL	
5	1516	NA	Editorial
5	1534	Operational DCGL	
5	1606	NA	Editorial
5	1625	Operational DCGL	
5	1631	Operational DCGL	
5	1636	Operational DCGL	

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	1677-1683	AF and EMC will be applied to soil only and not be applied to structure surfaces, embedded pipe, or penetrations	
5	1690	NA	Editorial
5	1694	NA	Editorial
5	1701-1703	NA	Editorial
5	1712	NA	Editorial
5	1714	NA	Editorial
5	1717	NA	Editorial
5	1729	NA	Editorial
5	1750	NA	Editorial
5	1764	NA	Editorial
5	1797	Operational DCGL	
5	1798	NA	Editorial
5	1799	Operational DCGL	
5	1802	NA	Clarification
5	1804-1807	AF and EMC will be applied to soil only and not be applied to structure surfaces, embedded pipe, or penetrations	
5	1808-1821	Operational DCGL and Clarification	
5	1828-1861	FSS Resurvey Process	
5	1879-1880	Operational DCGL	
5	1880	AF and EMC for soil only	
5	1885	Operational DCGL	
5	1905	NA	Editorial
5	1922	NA	Editorial
5	1943	NA	Editorial
5	1967-1968	Operational DCGL	
5	1978	Operational DCGL	
5	1981	Operational DCGL	
5	1999	Operational DCGL	
5	2004-2005	Operational DCGL	
5	2025=2026	Operational DCGL	
5	2026	NA	Editorial
5	2040-2041	HTD analysis to be performed for any individual sample that exceed SOF of 0.1 for gamma emitters.	
5	2047-2051	NA	Clarification
5	2075	Operational DCGL	
5	2077	Operational DCGL	
5	2090-2092	Operational DCGL	
5	2097	Operational DCGL	
5	2097	NA	Editorial
5	2101	NA	Editorial
5	2118	Operational DCGL	
5	2132	Operational DCGL	
5	2133	NA	Editorial
5	2143	NA	Editorial
5	2158	Operational DCGL	

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	2165	Operational DCGL	
5	2185	Operational DCGL	
5	2187-2188	Operational DCGL	
5	2191	Operational DCGL	
5	2203	NA	Editorial
5	2205	NA	Editorial
5	2212	NA	Editorial
5	2221	NA	Editorial
5	2221	Operational DCGL	
5	2267	NA	Editorial
5	2270	NA	Editorial
5	2271	NA	Editorial
5	2287	NA	Editorial
5	2344	NA	Editorial
5	2357	Operational DCGL	
5	2358	NA	Editorial
5	2492	NA	Editorial
5	2510	NA	Editorial
5	2571	Operational DCGL	
5	2579	Operational DCGL	
5	2581	Operational DCGL	
5	2584	Operational DCGL	
5	2587	Operational DCGL	
5	2593-2594	Activity in elevated judgmental areas will be added to the FSS mean	Deleted sentence that indicated activity from all judgmental results will be added to FSS mean. Also, sentence is out of place - this commitment is discussed in more detail in other sections of Ch 5.
5	2595	AF and EMC apply to soil only	
5	2617-2618	Operational DCGL	
5	2620	Operational DCGL	
5	2623	Operational DCGL	
5	2629	Operational DCGL	
5	2655	Operational DCGL	
5	2669	Operational DCGL	
5	2670	Operational DCGL	
5	2676	Operational DCGL	
5	2678	Operational DCGL	
5	2680-2682	Operational DCGL	
5	2684	NA	Editorial
5	2688-2692	Operational DCGL	
5	2693-2694	Compliance Dose Calculation	Clarification
5	2698	Operational DCGL	
5	2706-2709	AF and EMC apply to soil only	
5	2710-2712	Operational DCGL	
5	2714	NA	Editorial
5	2721	Operational DCGL	
5	2726	NA	Editorial
5	2730	Operational DCGL	

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
5	2743-2744	Operational DCGL	
5	2765	Operational DCGL	
5	2835	Operational DCGL	
5	2839-2840	Operational DCGL	
5	2899-2900	NA	Add TSD 17-004 as reference
5	2901-2919	NA	Editorial

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
6	23-24	Delete MARSSIM Acronym	
6	142	NA	Clarification
6	147	NA	Clarification
6	184	NA	Clarification
6	186	NA	Clarification
6	187	NA	Clarification
6	188	NA	Clarification
6	189-190	NA	Clarification
6	194	NA	Clarification
6	198	NA	Clarification
6	203	NA	Clarification
6	210	NA	Define acronym at first use
6	229	NA	Define acronym at first use
6	232	NA	Clarification
6	233	NA	Clarification
6	244	NA	Clarification
6	251	NA	Define acronym at first use
6	254	NA	Editorial
6	255	NA	Clarification
6	265	NA	Define acronym at first use
6	266	NA	Clarification
6	270	NA	Editorial
6	271	NA	Clarification
6	296-300	Alternate Drilling Spoils scenario for basements. embedded pipe, and penetrations	
6	410-413	Operational DCGLs	Remediation limits are defined in TSD 17-004 and LTP Ch 5 Rev 1
6	538-540	No AF or EMC to be applied to basements	
6	632-634		Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for specific area if justified (as discussed in LTP Ch 5 Rev1)
6	779	NA	Clarification
6	780	NA	Clarification
6	873	State that NRC approval is required to increase a DCGL	
6	914-915	State that NRC approval is required to increase a DCGL	
6	1310	NA	Editorial
6	1359-1449	No AF or EMC to be applied to basements	

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
6	1452-1453	Alternate Drilling Spoils scenario for basements. embedded pipe, and penetrations	
6	1454	NA	Editorial
6	1485	NA	Editorial
6	1485-1491	Alternate scenarion dose should be less than 25 mrem/yr	Included Operational DCGL dose fraction for basements from LTP Ch 5 Rev 1 in the calculation of Large Scale Industrial Excavation Fill Dose to demonstrate dose less than 25 mrem/yr
6	1501	NA	Clarification
6	1504-1508	Alternate scenarion dose should be less than 25 mrem/yr	Included Operational DCGL dose fraction for basements from LTP Ch 5 Rev 1 in the calculation of Large Scale Industrial Excavation Fill Dose to demonstrate dose less than 25 mrem/yr
6	1509-1510	NA	Clarification
6	1511-1543	Alternate Drilling Spoils scenario for basements. embedded pipe, and penetrations	
6	1602	NA	Editorial
6	1606	NA	Editorial
6	1608	NA	Editorial
6	1610	NA	Editorial
6	1626	NA	Clarification
6	1628-1629	NA	Revised to allow the use the HTD analysis results from continuing characterization to adjust surrogate ratio for speciifc area if justified (as discussed in LTP Ch 5 Rev1)
6	1650	NA	Editorial
6	1684	NA	Editorial
6	1685	NA	Editorial
6	1694	NA	Editorial
6	1695	NA	Editorial
6	1697	NA	Editorial
6	1708	NA	Editorial
6	1709	NA	Editorial
6	1724	NA	Editorial
6	1725	NA	Editorial
6	1894	NA	Editorial
6	1908	NA	Editorial
6	1923	NA	Editorial
6	1936	NA	Editorial
6	1945	NA	Editorial
6	1976	NA	Editorial
6	1980	NA	Editorial

Reason for Change			
LTP Chapter	Change Bar line No.	NRC Issue/Request/Agreement (Raised at or after 3/22/17 Meeting)	Comments
6	1981	NA	Corrected error in 'cut and paste' from TSD 14-010 to Table 6-48. The penetration DCGLs reported in LTP Ch 5 were correct.
6	1982-2045	Provide dose calculation for grouted Auxiliary Basement Floor drains including the effect of grout.	
6	2076	NA	Editorial
6	2102		
6	2129-2130	Delete reference to I&E Circular 81-07	
6	2145-2146	NA	Clarify that clean concrete fill dose calculations based on maximum MDC of 5,000 dpm/100 cm <sup>2</sup> allowed by URS program
6	2147-2150	Operational DCGLs - per TSD 17-004 the final compliance dose calculation for clean concrete fill will be based on the actual maximum scan MDC after all URS surveys are completed	
6	2159	NA	Editorial
6	2160	NA	Clarification
6	2161	Operational DCGL	Changed nomenclature to be consistent with TSD 17-004
6	2170	NA	Clarification
6	2173-2264	Operational DCGL	Referenced TSD 17-004 for detailed discussion of methods and terminology for compliance dose calculation. Changed nomenclature to be consistent with TSD 17-004.
6	2332	Operational DCGL	Added reference TSD 17-004

Enclosure 5  
Preflight Report  
for  
Enclosure 1, 2 & 3



This document serves as preflight report for Enclosure 5 to the letter ZS-2017-0084. The following files do not pass pre-flight criteria or do not meet NRC criteria, but text is word searchable with clarity/legibility of high quality.

Reference Document Name	File Name	Preflight Status	Reason
<b>Enclosure 1 RAI Responses</b>	ZS-2017-0084_Enclosure 3 RAI Responses	Passed	
<b>Enclosure 2 Reference Documentations</b>			
<b>TSD 14-010 Rev 6</b>			
TDS 14-010 RESRAD Dose Modeling for Basement Fill Model and Soil DCGL and Calculation of Basement Fill Model Dose Factors and DCGLs Rev 6	TSD-14-010 Rev 6 - RESRAD Dose Modeling for BFM_Soil DCGL and Calc for BFM Dose Factors and DCGL	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
	TSD-14-010 Rev 6 - Section 6 - Zion Industrial Use Soil RESRAD Summary Report 5_27	Passed	
	TSD-14-010 Rev 6 - Section 7 - Surface Soil Kd RESRAD Uncertainty Summary Report	Passed	
TSD 14-009 Brookhaven National Laboratory: Evaluation of Maximum Radionuclide Groundwater Concentrations for Basement Fill Model Revision 3	TSD-14-009 Rev 3 - BNL Evaluation of Max Radionuclide Groundwater Concentrations for Basement Fill Model	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 14-010 RESRAD Dose Modeling for Basement Fill Model and Soil DCGL and Calculation of Basement Fill Model Dose Factors and DCGLs Revision 6	TSD-14-010 Rev 6 - RESRAD Dose Modeling for BFM_Soil DCGL and Calc for BFM Dose Factors and DCGL	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 14-014 End State Surface Areas, Volumes, and Source Terms of Ancillary Buildings Revision 3	TSD-14-014 Rev 3 - End State Surface Areas Volumes and Source Terms of Ancillary Bldgs	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 14-015 Buried Pipe Dose Modeling & DCGLs Revision 3	TSD-14-015 Rev 3 - Buried Pipe Dose Modeling and DCGLs	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible

Reference Document Name	File Name	Preflight Status	Reason
TSD 14-016 Description of Embedded Piping, Penetrations, and Buried Pipe to Remain in Zion End State Revision 0	TSD-14-016 Rev 0 - Description of Embedded Piping Penetrations and Buried Pipe to Remain in Zion End State	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 14-019 Radionuclides of Concern for Soil and Basement Fill Model Source Terms Revision 2	TSD-14-019 Rev 2 - Radionuclides of Concern for Soil and BFM Source Terms	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 17-004 Operational Derived Concentration Guideline Levels for Final Status Survey Revision 2	TSD-17-004 Rev 2 - Operational Derived Concentration Guideline Levels for FSS	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
TSD 17-007 Evaluation of Static Measurements Performed for Unconditional Release Surveys of Building Materials used for Backfill at the Zion decommissioning Project	TSD-17-007 Rev 0 - Evaluation of Static Measurements Performed for Unconditional Release Surveys of Material used for Backfill	Failed	Document contains logos, graphs, drawings, photos, scanned signatures and/or maps < 300 ppi, clear and legible
<b>Enclosure 3</b> <b>Zion Station Restoration Project</b> <b>License Termination Plan</b>			
Zion Station Restoration Project License Termination Plan Chapter 1, Revision 1 General Information	Zion LTP Ch 1 Rev 1 070517	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Chapter 2, Revision 1 Site Characterization	Zion LTP Ch 2 Rev 1 070517	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Chapter 3, Revision 1 Identification Of Remaining Site Dismantlement Activities	Zion LTP Ch 3 Rev 1 070517	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible

Reference Document Name	File Name	Preflight Status	Reason
Zion Station Restoration Project License Termination Plan Chapter 4, Revision 1 Remediation Plan	Zion LTP Ch 4 Rev 1 070517	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Chapter 5, Revision 1 Final Status Survey Plan	Zion LTP Ch 5 Rev 1 final	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Chapter 6, Revision 1 Compliance With The Radiological Criteria For License Termination	Zion LTP Ch 6 Rev 1 062817 final	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Section 7, Revision 1 Update Of The Site-Specific Decommissioning Costs <b>REDACTED</b>	Zion LTP Ch 7 Rev 1 070517 Redacted	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible
Zion Station Restoration Project License Termination Plan Chapter 8, Revision 1 Supplement To The Environmental Report	Zion LTP Ch 8 Rev 1 070517	Failed	Document contains logos, graphs, drawings, photos and/or maps < 300 ppi, clear and legible

Enclosure 6

LTP LAR Replacement Pages

## 2.0 DESCRIPTION OF PROPOSED CHANGES

*ZionSolutions* proposes to amend the licenses to include a provision to allow *ZionSolutions* to make changes to the approved LTP without prior NRC approval, similar to the flexibility afforded to licensees in making changes to the facilities or procedures, as described in the DSAR.

The change method includes nine change criteria elements. Thus, *ZionSolutions* proposes to amend the ZNPS Unit 1 and Unit 2 licenses to incorporate a new license condition, License Condition 2.C.17 as follows:

### 2. C (17) License Termination Plan (LTP)

*ZionSolutions* shall implement and maintain in effect all provisions of the approved License Termination Plan as approved in License Amendment No. xxx subject to and as amended by the following stipulations:

*ZionSolutions* may make changes to the LTP without prior approval provided the proposed changes do not meet any of the following criteria:

- (A) Require Commission approval pursuant to 10 CFR 50.59.
- (B) Result in significant environmental impacts not previously reviewed.
- (C) Detract or negate the reasonable assurance that adequate funds will be available for decommissioning.
- (D) Decrease a survey unit area classification (i.e., impacted to not impacted; Class 1 to Class 2; Class 2 to Class 3; or Class 1 to Class 3) without providing the NRC a minimum 14 day notification prior to implementing the change in classification.
- (E) Increase the derived concentration guideline levels (DCGL) and related minimum detectable concentrations (for both scan and fixed measurement methods).
- (F) Increase the radioactivity level, relative to the applicable DCGL, at which an investigation occurs.
- (G) Change the statistical test applied other than the Sign test.
- (H) Increase the probability of making a Type I decision error above the level stated in the LTP.

The following license condition to be added to the ZNPS Units 1 and 2 licenses:

2.C (17) License Termination Plan (LTP)

ZionSolutions shall implement and maintain in effect all provisions of the approved License Termination Plan as approved in License Amendment No. xxx subject to and as amended by the following stipulations:

ZionSolutions may make changes to the LTP without prior approval provided the proposed changes do not meet any of the following criteria:

- (A) Require Commission approval pursuant to 10 CFR 50.59.
- (B) Result in significant environmental impacts not previously reviewed.
- (C) Detract or negate the reasonable assurance that adequate funds will be available for decommissioning.
- (D) Decrease a survey unit area classification (i.e., impacted to not impacted; Class 1 to Class 2; Class 2 to Class 3; or Class 1 to Class 3) without providing the NRC a minimum 14 day notification prior to implementing the change in classification.
- (E) Increase the derived concentration guideline levels (DCGL) and related minimum detectable concentrations (for both scan and fixed measurement methods).
- (F) Increase the radioactivity level, relative to the applicable DCGL, at which an investigation occurs.
- (G) Change the statistical test applied other than the Sign test.
- (H) Increase the probability of making a Type I decision error above the level stated in the LTP.