



10 CFR 2.390

May 31, 2018

LC-2018-0037

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

LaCrosse Boiling Water Reactor  
Facility Operating License No. DPR-45  
NRC Docket Nos. 50-409 and 72-046

Subject: License Termination Plan Revision 1

References:

- 1) Gerard van Noordennen, *LaCrosseSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Amendment Request for the License Termination Plan," dated June 27, 2016
- 2) Gerard van Noordennen, *LaCrosseSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Update," dated December 1, 2016
- 3) Bruce Watson, U.S. Nuclear Regulatory Commission, Letter to John Sauger, *EnergySolutions*, "La Crosse Boiling Water Reactor-Request for Additional Information Regarding the LaCrosse Solutions License Termination Plan and Associated Conforming License Amendment," dated August 4, 2017
- 4) Gerard van Noordennen, *LaCrosseSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Request for Additional Information," dated May 31, 2018

The LaCrosse Boiling Water Reactor (LACBWR) License Termination Plan (LTP) was submitted to the U.S. Nuclear Regulatory Commission (NRC) for review on June 27, 2016 as documented in Reference 1. Following preliminary review and comments received during a public meeting held between NRC staff and *LaCrosseSolutions* representatives on October 20, 2016, an update to the LTP was submitted to the NRC on December 1, 2016 as documented in Reference 2. A Request for Additional Information (RAI) was received from the NRC on August 4, 2017 as documented in Reference 3. A response to that RAI was provided on May 31, 2018 as documented in Reference 4. This letter provides Revision 1 of the LTP which has incorporated the RAI responses.

Portions of this submittal provide the NRC with financial information to aid in the review of the License Termination Plan. *LaCrosseSolutions* considers this proprietary financial information to be confidential and requests NRC to withhold it from public disclosure under 10 CFR 2.390(a)(4).

This submittal contains a *LaCrosseSolutions* Proprietary Financial Information Affidavit pursuant to 10 CFR 2.390. The Affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). All documents within the scope of this affidavit are marked as "withhold from public disclosure under 10 CFR 2.390."

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The LTP has been revised to incorporate changes resulting from responses to the RAIs. LTP Revision 1 (pdf) is provided in Enclosure 1 and replaces in its entirety LTP Revision 0 provided in Reference 2. Enclosure 2 contains the Microsoft Word<sup>TM</sup> (Word) version of the LTP with the "track change" option enabled to assist in the review process. Chapter 7 of the LTP contains the proprietary financial information LaCrosseSolutions is providing to the NRC and seeks to have withheld from public disclosure in its entirety. Enclosure 3 of this submittal contains a redacted version of LTP Chapter 7 for public disclosure. Enclosure 4 contains LTP reference documentation. Enclosure 5 contains a preflight report for Enclosures 1, 3 and 4.

There are no regulatory commitments contained in this letter. If you have any questions regarding this letter, please contact me at (860) 462-9707.

Respectfully,



Gerard van Noordennen  
Vice President Regulatory Affairs

Enclosures:

- Enclosure 1: Proposed License Termination Plan, Revision 1 (pdf files)
- Enclosure 2: Proposed License Termination Plan, Revision 1 (Word files)
- Enclosure 3: Redacted Version of LTP Chapter 7 (Word & pdf files)
- Enclosure 4: LTP Reference Documentation (pdf file)
- Enclosure 5: Preflight Report for Enclosures 1, 3 and 4 to this submittal

- cc: Marlayna Vaaler, U.S. NRC Project Manager (1 hard copy & 2 CDs)  
U.S. Region III, Regional Administrator (1 hard copy & 1 CD)  
Service List (cover letter only, no enclosures)

**LaCrosseSolutions, LLC PROPRIETARY FINANCIAL INFORMATION AFFIDAVIT**

Affidavit of Gerard van Noordennen, Vice President Regulatory Affairs, LaCrosseSolutions, LLC.

LTP Chapter 7, contained in Enclosures 1 and 2 of this submittal, consists of proprietary financial information that LaCrosseSolutions, LLC considers confidential. Release of this information would cause irreparable harm to the competitive position of LaCrosseSolutions, LLC. The basis for this declaration is:

- i. This information is owned and maintained as proprietary by LaCrosseSolutions, LLC,
- ii. This information is routinely held in confidence by LaCrosseSolutions, LLC and not disclosed to the public,
- iii. This information is being requested to be held in confidence by the NRC by this petition,
- iv. This information is not available in public sources,
- v. This information would cause substantial harm to LaCrosseSolutions, LLC if it were released publicly, and
- vi. The information to be withheld is being transmitted to NRC in confidence.

I, Gerard van Noordennen, being duly sworn, state that I am the person who subscribes my name the foregoing statement, I am authorized to execute the Affidavit on behalf of LaCrosseSolutions, LLC, and that the matters and facts set forth in the statement are true to the best of my knowledge, information, and belief.

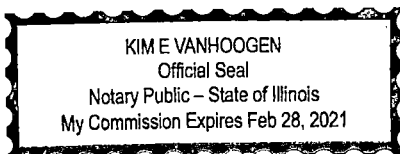
Gerard van Noordennen

Name: Gerard van Noordennen  
Title: Vice President Regulatory Affairs  
Company: LaCrosseSolutions, LLC

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 31<sup>st</sup> DAY of May, 2018

Kim E. VanHoogen  
Notary Public



**La Crosse Boiling Water Reactor Service List**

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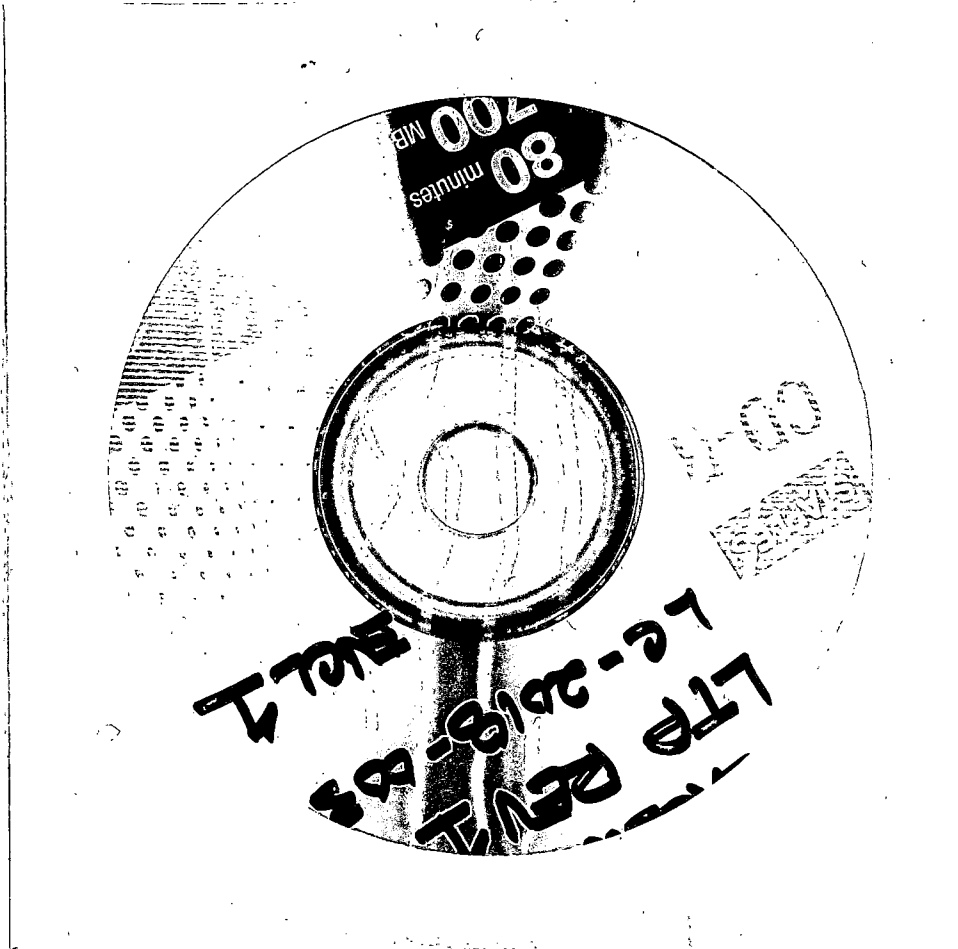
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**ENCLOSURE 1**

Proposed License Termination Plan, Revision 1

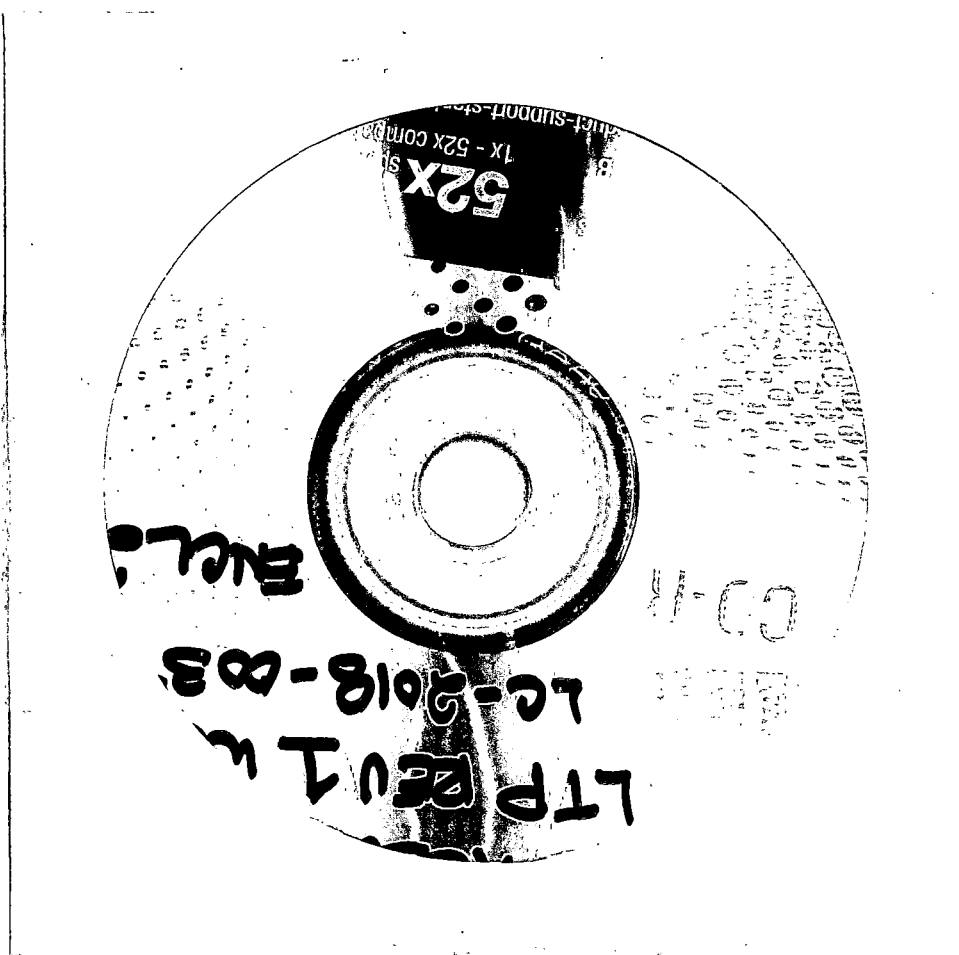
PDF files on attached CD



**ENCLOSURE 2**

Proposed License Termination Plan, Revision 1

Word files on attached CD



**ENCLOSURE 3**

Redacted Version of LTP Chapter 7

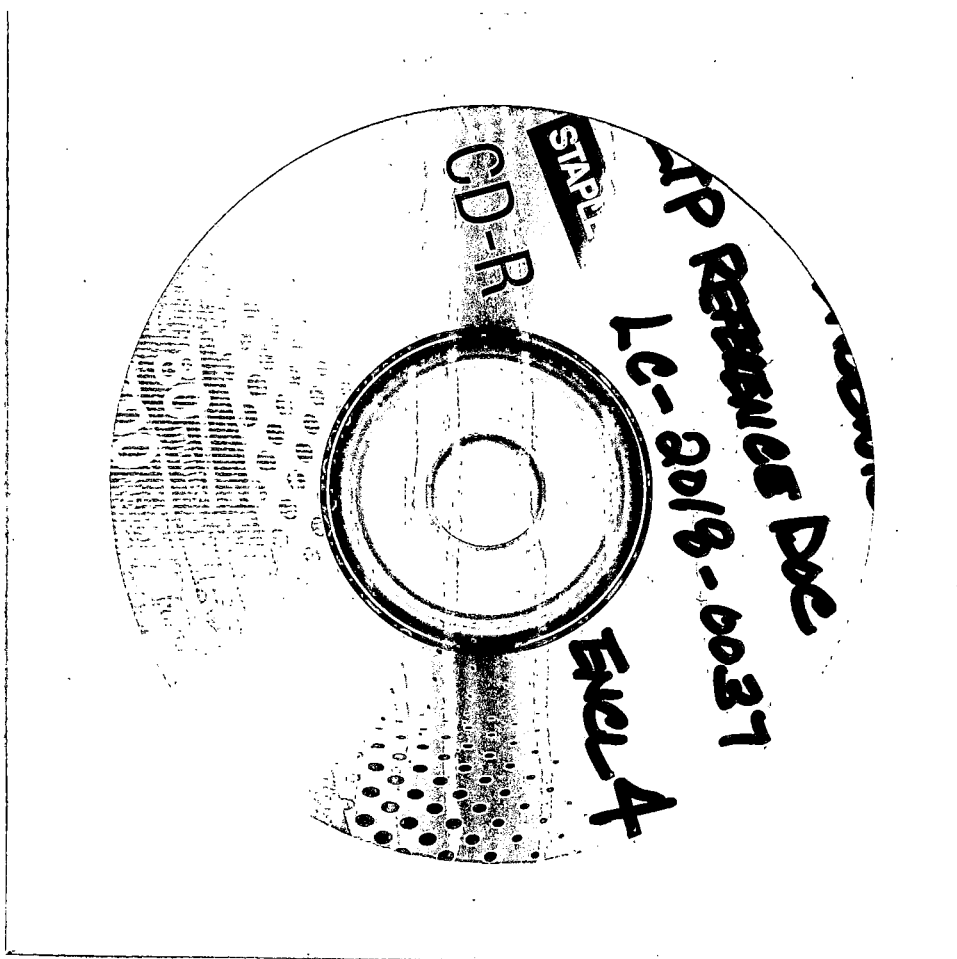
PDF files on attached CD



**ENCLOSURE 4**

LTP Reference Documentation

PDF files on attached CD





**ENCLOSURE 5**  
Preflight Report  
For  
Enclosures 1, 3 and 4

This document serves as preflight report for Enclosure 1, 3 and 4 to the letter LC-2018-0037. The following files do not pass preflight criteria or do not meet NRC criteria, but text is word searchable with clarity/legibility of high quality.

Document Name	File Name	Preflight Status	Reason
<b>ENCLOSURE 1 - LACBWR LTP REVISION 1</b>			
LACBWR LTP Chapter 1, Revision 1	LACBWR LTP Ch 1 Rev 1 5-31-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 2, Revision 1	LACBWR LTP Ch 2 Rev 1	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 3, Revision 1	LACBWR LTP Ch 3 Rev 1 5-29-18	Passed	
LACBWR LTP Chapter 4, Revision 1	LACBWR LTP Ch 4 Rev 1 5-26-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 5, Revision 1	LACBWR LTP Ch 5 Rev 1 5-31-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 6, Revision 1	LACBWR LTP Ch 6 Rev 1 5-30-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 7, Revision 1 (Withhold From Public Disclosure Under 10 CFR 2.390)	LACBWR LTP Ch 7 Rev 1 5-31-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR LTP Chapter 8, Revision 1	LACBWR LTP Ch 8 Rev 1 5-31-18	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
<b>ENCLOSURE 3 - LACBWR LTP REVISION 1</b>			
LACBWR LTP Chapter 7, Revision 1 REDARTED	LACBWR LTP Ch 7 Rev 1 Redacted 5-31-18	Passed	

Document Name	File Name	Preflight Status	Reason
<b>ENCLOSURE 4 - LTP REFERENCE DOCUMENTS</b>			
<b>RS-TD-313196-004, LACBWR Soil DCGL, Basement Concrete DCGL, and Buried Pipe DCGL, Revision 4 and Support Files</b>			
RS-TD-313196-004, LACBWR Soil DCGL, Basement Concrete DCGL, and Buried Pipe DCGL, Revision 4	RS-TD-313196-004 Rev 4	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
	LACBWR Buried Pipe Circ Excavation DSR 052618	Passed	
	LACBWR Buried Pipe Circ Insitu DSR 052618	Passed	
	LACBWR Buried Pipe Group Excavation DSR 052618	Passed	
	LACBWR Buried Pipe Group Insitu DSR 052618	Passed	
	LACBWR Soil DCGL Initial Suite RESRAD Summary Report 052618	Passed	
	LACBWR Soil UA Cm-243 043018	Passed	
	LACBWR Soil UA Cm-244 043018	Passed	
Calculations in Support of TSD RS-TD-313196-004 Rev 4	Calculations in Support of TSD RS-TD-313196-004 Rev 4	N/A	Excel File - Calculations
<b>T.S. LaGuardia et al., Guidelines for Decommissioning Cost Estimates, May 1986</b>			
Guidelines for Cost Estimates, AIFNESP-036, May 1986, Volume 1	Volume 1, Guidelines for Cost Estimates, AIFNESP-036, May 1986	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
Guidelines for Cost Estimates, AIFNESP-036, May 1986, Volume 2	Volume 2, Guidelines for Cost Estimates, AIFNESP-036, May 1986	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible

Document Name	File Name	Preflight Status	Reason
<b>LTP Reference Documents</b>			
Dairyland Power Cooperative La Crosse Boiling Water Reactor Offsite Dose Calculation Manual, Revision 14	2013 0802 by Dairyland ODCM Rev 14 CURRENT FORM	Passed	
Hydrogeological Investigation Report La Crosse Boiling Water Reactor Dairyland Power Cooperative Genoa, Wisconsin	2015-0115_HAI_Hydrogeologic Investigation Report-Final	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible (Password protected PDF file)
Environmental Report	197209 Full Term Operating License Stage- E Report by DPC Part 1 of 7 from LACBWR Sharepoint Site	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
Final NRC Environmental Statement NUREG-0191 (Part 1)	198004 Final NRC Environmental Assessment Part 1 NUREG 0191	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
Final NRC Environmental Statement NUREG-0191 (Part 2)	198004 Final NRC Environmental Assessment Part 2 NUREG 0191	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
Dairyland Power Cooperative LACBWR Decommissioning Plan	20031101 Dairyland Power Cooperative LACBWR Decommissioning Plan	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
LACBWR Initial Site Characterization Survey for SAFSTOR	20091201 LAC-TR-138 Initial Site Charac Survey	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
Hydrogeological Conceptual Site Model La Crosse Boiling Water Reactor Dairyland Power Cooperative Genoa, Wisconsin	20120830 HAI Hydrogeologic FINAL	Failed	Document contains scanned document (unembedded fonts) and images < 300 ppi, clear and legible
LACBWR Decommissioning Plan Revision- November 2012	20121129 LACBWR DP and PSDAR Revision ML12354A076	Failed	Document contains scanned document (unembedded fonts) and signatures < 300 ppi, clear and legible

Document Name	File Name	Preflight Status	Reason
LACBWR Decommissioning Plan and Post-Shutdown Decommissioning Activities Report (D-Plan/PSDAR) Revision - March 2014	20140312 DPC to NRC DP and PSDAR Update ML14079A352	Failed	Document contains scanned document (unembedded fonts) and signatures < 300 ppi, clear and legible
Atomic Power Review	Atomic Power Review article about Elk River Sept 24 2011	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
Environmental Report Supplement For La Crosse Boiling Water Reactor June 15, 1973	DCP-ED-3, 6-15-1973	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
LACBWR Fuel Storage Project Continues	DPC Power for Generations newsletter Dec 2009	Failed	Document contains logos, graphics, and maps < 300 ppi, clear and legible
LACBWR 50.59 Evaluation, "Temporary Airborne Effluent Monitoring System"	D-Plan 50.59 gas eval 2017-04	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
LACBWR 50.59 Evaluation, "Temporary Liquid Waste System"	D-Plan 50.59 liquid eval 2017-02	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
LACBWR 50.59 Screen, "LACBWR Decommissioning Plan and Post-Shutdown Decommissioning Activities Report"	D-Plan 50.59 scrn and 50.82 2017-01	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
Characterization Survey Report for La Crosse Boiling Water Reactor	GG-EO-313196-RS-RP-001, LACBWR 2014 Chz Report	Failed	Document contains logos, graphics, maps, and signatures < 300 ppi, clear and legible
Quality Assurance Project Plan LACBWR Site Characterization Project	GP-EO-313196-QA-PL-001 Characterization QAPP 2014	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
A nuclear option: After 25 years, Genoa reactor's waste gets new home	Hubbuck Article - Nuclear Option	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
Investigation of false positive laboratory results from LACBWR Non-Impacted Area	LACBWR False Positive Investigation Mar 2016	Failed	Document contains scanned document (unembedded fonts) and logos < 300 ppi, clear and legible

Document Name	File Name	Preflight Status	Reason
Evaluation of LSC and GFPC results from LACBWR Non-Impacted Area	LACBWR LSC_GFPC Evaluation Apr 2016 Beta	Failed	Document contains logos and graphics < 300 ppi, clear and legible
Planning for ISFSI	LAC-14029, Planning for ISFSI	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
Application for Order Approving License Transfer and Conforming Administrative License Amendments	LACBWR Application for Order Approving License Transfer	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
Decommissioning Plan and Post Shutdown Decommissioning Activities Report, November 2017	LACBWR D-Plan Revision November 2017	Failed	Document contains logos, graphics, and signatures < 300 ppi, clear and legible
Impingement and Entrainment of Fishes at Dairyland Power Cooperative Genoa Site	LACBWR Impingement and Entrainment of Fishes	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
LC-FS-TSD-002 Operational Derived Concentration Guideline Levels For Final Status Survey, Revision 1	LC_FS_TSD_002 Rev 1	Failed	Document contains logos, graphics, and signatures < 300 ppi, clear and legible
LC-FS-TSD-002 Operational Derived Concentration Guideline Levels For Final Status Survey, Revision 2	LC_FS_TSD_002 Rev 2 OP DCGLs FOR FSS	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
LC-FS-PN-002 Characterization Survey Plan	LC-FS-PN-002 Rev 0_Characterization Survey Plan	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
LC-FS-PR-002 Final Radiation Survey Package Development	LC-FS-PR-002 Rev 0_Final Radiation Survey Package Development	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
LC-FA-PR-03 Radiological Assessments and Remedial Action Support Surveys (RASS)	LC-FS-PR-003 Rev 0_Radiological Assessments RASS	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
LC-FS-TSD-001 Use of ISOCS for FSS of End State Sub Structures at LACBWR	LC-FS-TSD-001 Rev 0	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible

Document Name	File Name	Preflight Status	Reason
QAPP LTP Development, Site Characterization and Final Radiation Survey Projects	LC-QA-LTP-PL-001_Rev 0_LACBWR QAPP	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
ATTACHMENT A: EnergySolutions' LACBWR Site Characterization/LTP Project Standard Operating Procedures	LC-QA-LTP-PL-001_Rev 0_Attachment A	Passed	
LC-RS-PN-160417-001 Characterization Survey Report for LACBWR	LC-RS-PN-164017-001 Rev 0	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
Endangered Resources Review (ERR Log # 16-648) Proposed Dairyland LACBWR Plant Demolition, Vernon County, WI (T13N R07W S32)	LTR WDNR Endangered Resources Review LACBWR Plant Demolition	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
Mussel Survey for a Proposed Fleeting Site Mississippi River Pool 9 near Genoa, Wisconsin 11151999	Mussel Survey Fleeting Site Mississippi River Pool 9	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
PG-EO-313196-SV-PL-001 Characterization Survey Plan for LACBWR	PG_EO_313196_SV_PL_001 Rev 1	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
RS-TD-313196-005 La Crosse Open Air Demolition Limits	RS-TD-313196_005 Final	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
RS-TD-31319-001 Radionuclides of Concern During LACBWR Decommissioning	RS-TD-313196-001 Rev 5	Failed	Document contains logos, graphics, and signatures < 300 ppi, clear and legible
RS-TD-313196-002 La Crosse End State Basement Concrete Surface Areas, Volumes, and Void Spaces	RS-TD-313196-002 Rev 0 Final	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
RS-TD-313196-003 La Crosse Boiling Water Reactor Historical Site Assessment	RS-TD-313196-003 LACBWR HSA Rev 0	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible

Document Name	File Name	Preflight Status	Reason
RS-TD-313196-004 LACBWR Soil DCGL, Basement Concrete DCGL, and Buried Pipe DCGL	RS-TD-313196-004 Rev 4	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
RS-TD-313196-006 Ludlum Model 44-10 Detector Sensitivity	RS-TD-313196-006 Rev 0 - Ludlum Model 44-10 Detector Sensitivity	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
Default Soil Solid/Liquid Partition Coefecients, $K_d$ S, For Four Major Soil Types: A Compendium	Sheppard and Thibault Kd	Failed	Document contains scanned document (unembedded fonts) < 300 ppi, clear and legible
TSD # 13-004 Examination of Cs-137 Global Fallout In Soils At Zion Station	TSD-13-004 Rev 0 - Examination of Cs-137 Global Fallout in Soils at Zion Station Final	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible
Vernon County LWRM Plan	Vernon County Plan 2-2009	Failed	Document contains scanned document (unembedded fonts), logos, graphics, and signatures < 300 ppi, clear and legible