



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REQUEST FOR TRANSFER OF CONTROL OF
PROVISIONAL OPERATING LICENSE NO. DPR-5,
RENEWED FACILITY OPERATING LICENSE NOS. DPR-26 AND DPR-64,
AND THE GENERAL LICENSE FOR THE
INDEPENDENT SPENT FUEL STORAGE INSTALLATION
FROM ENERGY NUCLEAR OPERATIONS, INC.,
ENERGY NUCLEAR INDIAN POINT 2, LLC, AND
ENERGY NUCLEAR INDIAN POINT 3, LLC
TO HOLTEC INTERNATIONAL AND HOLTEC DECOMMISSIONING INTERNATIONAL, LLC
INDIAN POINT NUCLEAR GENERATING STATION, UNIT NOS. 1, 2, AND 3
DOCKET NOS. 50-003, 50-247, 50-286, AND 72--051

1.0 INTRODUCTION

By application dated November 21, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19326B953) (license transfer application (LTA)), as supplemented by information provided in letters from Holtec Decommissioning International, LLC (HDI) dated December 19, 2019; January 17, 2020; February 12, 2020; and August 7, 2020 (ADAMS Accession Nos. ML19354A698, ML20017A290, ML20043C539, and ML20220A666, respectively), Entergy Nuclear Operations, Inc. (ENOI), on behalf of itself; Entergy Nuclear Indian Point 2, LLC; Entergy Nuclear Indian Point 3, LLC; Holtec International (Holtec); and HDI (collectively, the Applicants), requested, pursuant to Section 184, "Inalienability of Licenses," of the Atomic Energy Act of 1954, as amended (AEA), and Sections 50.80, "Transfer of licenses," and 72.50, "Transfer of license," of Title 10 of the *Code of Federal Regulations* (10 CFR), that the U.S. Nuclear Regulatory Commission (NRC, the Commission) consent to the transfer of control of Provisional Operating License No. DPR-5 for Indian Point Nuclear Generating Station, Unit No. 1 (IP1); Renewed Facility Operating License Nos. DPR-26 and DPR-64 for Indian Point Nuclear Generating Station, Unit Nos. 2 and 3, respectively (IP2 and IP3) (collectively, with IP1, the Indian Point Energy Center (IPEC)); and the general license for the IPEC independent spent fuel storage installation (ISFSI) (collectively, the IPEC licenses) to Holtec subsidiaries. The Holtec subsidiaries would be known as Holtec Indian Point 2, LLC (Holtec IP2) and Holtec Indian Point 3, LLC (Holtec IP3). The Applicants

also requested that the NRC consent to the transfer of ENOI's operating authority (i.e., its authority to conduct licensed activities at the IPEC) to HDI. Finally, the Applicants requested that the NRC approve conforming administrative amendments to the IPEC licenses to reflect the proposed license transfer and to delete certain license conditions to reflect the satisfaction and termination of certain obligations after the license transfer pursuant to 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit."

The supplemental information provided by HDI in support of the LTA is (1) a December 19, 2019, post-shutdown decommissioning activities report (PSDAR) and site-specific decommissioning cost estimate (SSCE) for the IPEC, contingent upon NRC approval of the LTA and the consummation of the proposed transfer transaction; (2) a January 17, 2020, update to the LTA; (3) a February 12, 2020, request for exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) to allow the use of funds from the IP1, IP2, and IP3 decommissioning trust funds (DTFs) for spent fuel management and site restoration activities at the IPEC and to allow disbursements from the IP1, IP2, and IP3 DTFs for these activities to be made without prior notice, similar to withdrawals in accordance with 10 CFR 50.82(a)(8); and (4) an August 7, 2020, response to the NRC staff's request for additional information (RAI) dated July 8, 2020 (ADAMS Accession No. ML20190A234).

Upon an NRC approval of the LTA and the consummation of the proposed transfer transaction, Holtec IP2 would be the licensed owner for IP1 and IP2 and Holtec IP3 would be the licensed owner for IP3. Holtec IP2 and Holtec IP3 would also respectively own each unit's associated assets and real estate, including each unit's DTF, title to spent nuclear fuel, and rights pursuant to the terms of the Standard Contract for Disposal of Spent Nuclear Fuel and/or High-Level Radioactive Waste with the U.S. Department of Energy (DOE standard contract). A wholly-owned subsidiary of Holtec, Nuclear Asset Management Company, LLC (NAMCo), would acquire all equity interests in the parent companies owning the three units and would emerge as the direct parent company owner of both Holtec IP2 and Holtec IP3.

Holtec IP2 and Holtec IP3 would enter into an operating agreement for decommissioning services with HDI, which would act as their agent, and Holtec IP2 and Holtec IP3 would pay for HDI's decommissioning, spent fuel management, and site restoration costs incurred at the IPEC; HDI would be the licensed operator for the IPEC. Comprehensive Decommissioning International, LLC (CDI), a general contractor to HDI, would perform day-to-day activities at the IPEC, including decommissioning activities, pursuant to a general contractor agreement between HDI and CDI, subject to HDI's direct oversight and control as the licensed operator.

NAMCo and HDI would be direct, wholly-owned subsidiaries of Holtec Power, Inc. (Holtec Power), which is a direct, wholly-owned subsidiary of Holtec.

Notice of NRC consideration of the LTA was published in the *Federal Register* on January 23, 2020 (85 FR 3947) and included an opportunity to comment, request a hearing, and petition for leave to intervene. As published in the *Federal Register* on February 19, 2020 (85 FR 9486), the NRC extended the comment period for the LTA for an additional 30 days to allow more time for members of the public to develop and submit comments on the LTA. The NRC staff reviewed the comments and hearing requests received and considered them in its review of the LTA, as discussed in Section 11.0 of this safety evaluation (SE). The topics of the comments and hearing requests received that were within the scope of the NRC staff's review of the LTA, such as decommissioning funding and the financial and technical qualifications of Holtec and its partners and subsidiaries, are addressed in this SE.

The supplemental information in the letters dated January 17, 2020; February 12, 2020; and August 7, 2020, provided additional information that clarified the application and did not expand the scope of the application as originally noticed in the *Federal Register* on January 23, 2020.

2.0 REGULATORY EVALUATION

2.1 Background

The IPEC is located in Buchanan, New York, in Westchester County, on the east bank of the Hudson River. There are three units on the site. IP1 was a four-loop pressurized water reactor with a thermal rating of 615 megawatts thermal (MWt). Operation of IP1 began in August 1962 and was suspended on October 31, 1974. All spent fuel was removed from the IP1 reactor vessel by January 1976. In 1996, the NRC issued an order approving the safe-storage condition of the unit, and in 2003, the NRC issued Amendment No. 52 to the Provisional Operating License for the unit that changed the license's expiration date to be consistent with that of the IP2 license at that time (i.e., September 28, 2013).

IP2 and IP3 are four-loop pressurized water reactors, each with a thermal rating of 3,216 MWt. IP2 began operations in September 1973, and IP3 began operations in December 1975.

Pursuant to 10 CFR 50.54(bb) and 10 CFR 50.75(f)(3), by letter dated October 23, 2008 (ADAMS Accession No. ML083040378), ENOI submitted the "Unit No. 1 and 2 10 CFR 50.54(bb) Program for Maintenance of Irradiated Fuel," the "Preliminary Decommissioning Cost Analysis for the Indian Point Energy Center, Unit 1," and the "Preliminary Decommissioning Cost Analysis for the Indian Point Energy Center, Unit 2," and by letter dated December 10, 2010 (ADAMS Accession No. ML103550612), ENOI submitted the "[Unit No. 3] 10 CFR 50.54(bb) Program for Maintenance of Irradiated Fuel," and the "Preliminary Decommissioning Cost Analysis for the Indian Point Energy Center, Unit 3."

Pursuant to 10 CFR 50.82(a)(1)(i), by letter dated February 8, 2017 (ADAMS Accession No. ML17044A004), ENOI certified to the NRC its decision to permanently cease operations at IP2 by April 30, 2020, and at IP3 by April 30, 2021. Pursuant to 10 CFR 50.82(a)(1)(ii), by letter dated May 12, 2020 (ADAMS Accession No. ML20133J902), ENOI certified to the NRC that operations permanently ceased at IP2 on April 30, 2020, and that the fuel was permanently removed from the IP2 reactor vessel and placed in the IP2 spent fuel pool on May 12, 2020; therefore, pursuant to 10 CFR 50.82(a)(2), the IP2 license no longer authorizes operation of the reactor.

The LTA provided that if the NRC were to consent to the license transfer, the Applicants would enter into a transaction under which the IPEC would be transferred to Holtec and its subsidiaries. This transaction would occur under the terms of a "Membership Interest Purchase and Sale Agreement" (see Attachment B of the LTA). Pursuant to the purchase and sale agreement, Holtec IP2 would be the licensed owner for IP1 and IP2, and Holtec IP3 would be the licensed owner for IP3. In addition, HDI would assume from ENOI the responsibility of the IPEC licensed operator. Holtec IP2 and Holtec IP3 would be direct, wholly-owned subsidiaries of NAMCo, which would be a direct, wholly-owned subsidiary of Holtec Power. HDI would be a direct, wholly-owned subsidiary of Holtec Power. Holtec Power would be a direct, wholly-owned subsidiary of Holtec. HDI would contract with CDI, a company jointly formed and owned by Holtec and SNC-Lavalin Group, as the decommissioning general contractor. CDI would perform day-to-day activities at the IPEC, including decommissioning activities, subject to HDI's direct oversight and control as the licensed operator. CDI, although jointly formed and owned by

Holtec and SNC-Lavalin Group, would be the decommissioning general contractor after the proposed transfer transaction and would have no direct or indirect ownership or licensing authority at the IPEC. Figures 1 and 2 of the LTA show the corporate ownership structure, including the identity of the licensed owners and licensed operator, before and after the proposed transfer transaction.

The LTA also identifies the principal officers and directors of the transferees, including those of Holtec, Holtec Power, NAMCo, Holtec IP2, Holtec IP3, and HDI. Holtec would be the ultimate parent company of the proposed licensed entities. Holtec is a privately held corporation and is controlled by its Board of Directors, all of whom are U.S. citizens. It is owned by its shareholders as follows: (1) The Great Banyan Trust, 36.33 percent ownership interest and (2) Multi-Decades Trust, 63.67 percent ownership interest. Dr. Krishna Singh of Holtec controls these trusts.

The LTA provided that the purpose of the requested transfer of the IPEC licenses to Holtec and its subsidiaries is to permit the decommissioning of the IPEC and the unrestricted release of all portions of the site, other than the ISFSI, on an accelerated schedule using the DECON (i.e., prompt decommissioning) method. Specifically, following the consummation of the proposed transfer transaction, HDI plans to complete the transfer of spent nuclear fuel to the ISFSI as soon as practicable and to promptly proceed with decontamination and dismantlement of the site (other than the ISFSI) beginning in 2021. The projected goal for completing the radiological decommissioning, site restoration, and release for unrestricted use of the non-ISFSI portions of the IPEC site is within 15 years after the transfer, with a potential target date of 2033, as depicted in the cash flow analyses presented in the LTA. This envisioned use of the DECON method is different than the 60-year SAFSTOR decommissioning method envisioned under the current ownership of the licenses. Pursuant to the purchase and sale agreement, the proposed transfer transaction is subject to the condition that, prior to closing, the IPEC shall have been permanently shut down and all spent fuel shall have been removed from the IP2 and IP3 reactors and placed in the spent fuel pool.

By letter dated December 19, 2019, HDI provided a PSDAR, including an SSCE, reflecting its proposed use of the DECON method if the LTA were to be approved and the proposed transfer transaction consummated. The PSDAR and SSCE describe the planned decommissioning activities to be undertaken for IP1, IP2, IP3, and the IPEC ISFSI, along with a schedule for their accomplishment, an estimate of expected costs, and an evaluation of environmental impacts consistent with the discussion provided in the LTA. The decommissioning schedule as presented in the PSDAR reflects decommissioning beginning in 2021 and that the majority of decommissioning activities would occur, and associated decommissioning expenses would be incurred, by 2033, resulting in anticipated partial site release at that time. HDI indicated that the PSDAR was developed consistent with NRC Regulatory Guide (RG) 1.185, Revision 1, "Standard Format and Content for Post-Shutdown Decommissioning Activities Report" (ADAMS Accession No. ML13140A038), and includes an SSCE for license termination costs associated with radiological decommissioning, as well as cost estimates for spent fuel management and site restoration activities. The HDI exemption request dated February 12, 2020, also discusses cost projections related to radiological decommissioning, spent fuel management, and site restoration activities.

2.2 Regulations and Guidance

The proposed transaction described in the LTA involves the transfer of control of the IPEC licenses and, therefore, requires prior NRC approval. Generally, to approve the LTA, the NRC

must find that the proposed transferee is qualified to be the holder of the licenses and that transfer of the licenses is otherwise consistent with applicable provisions of law, regulations, and orders issued by the NRC pursuant thereto.

The request for approval of the transfer of control of the licenses, as described above and as discussed in this SE, is made pursuant to 10 CFR 50.80(a), which states:

No license for a production or utilization facility (including, but not limited to, permits under this part and part 52 of this chapter, and licenses under parts 50 and 52 of this chapter), or any right thereunder, shall be transferred, assigned, or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of the license to any person, unless the Commission gives its consent in writing.

In addition, the regulations at 10 CFR 50.80(b) and (c) apply. Section 50.80(b) of 10 CFR states that an application for a license transfer shall include as much of the information described in 10 CFR 50.33, "Contents of applications; general information," and 10 CFR 50.34, "Contents of applications; technical information," with respect to the identity and technical and financial qualifications of the proposed transferee as would be required by those sections if the application were for an initial license.

Section 50.80(c) of 10 CFR states, in part:

...the Commission will approve an application for the transfer of a license, if the Commission determines: (1) That the proposed transferee is qualified to be the holder of the license; and (2) That transfer of the license is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto.

In 10 CFR 50.33(a) through (d), the NRC requires applicants to provide information, including the name of the applicant, address of the applicant, description of the corporate structure of the applicant, citizenship of the applicant, and foreign ownership, control, or domination (FOCD) of the applicant, as applicable.

In addition, 10 CFR 50.33(f) states, in part:

Except for an electric utility applicant for a license to operate a utilization facility of the type described in § 50.21(b) or § 50.22, [each application shall state] information sufficient to demonstrate to the Commission the financial qualification of the applicant to carry out, in accordance with regulations in this chapter, the activities for which the permit or license is sought.

Section 50.2, "Definitions," of 10 CFR states, in part, that an electric utility means:

[A]ny entity that generates or distributes electricity and which recovers the cost of this electricity, either directly or indirectly, through rates established by the entity itself or by a separate regulatory authority.

The NRC staff applies the guidance in NUREG-1577, Revision 1, "Standard Review Plan on Power Reactor Licensee Financial Qualifications and Decommissioning Funding Assurance,"

dated December 2001 (ADAMS Accession No. ML013330264), to evaluate the financial qualifications of applicants to carry out the activities for which the permit or license is sought.

In addition, 10 CFR 50.33(k)(1) requires that applicants provide the information described in 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," indicating how reasonable assurance will be provided that funds will be available to decommission the facility.

The regulation under 10 CFR 50.75 specifies how a licensee will provide reasonable assurance that funds will be available for the decommissioning process. Specifically, 10 CFR 50.75(b) requires that decommissioning financial assurance be provided in an amount not less than the minimum formula amount in 10 CFR 50.75(c). In 10 CFR 50.75(e), the NRC includes the methods acceptable to the agency for covering this decommissioning financial assurance amount, including using a DTF. Finally, 10 CFR 50.75(f) and (h) provide additional requirements on the reporting and management of DTFs.

In addition, 10 CFR 50.82(a)(8)(i) states that licensees may use DTFs if:

- (A) The withdrawals are for expenses for legitimate decommissioning activities consistent with the definition of decommissioning in § 50.2;
- (B) The expenditure would not reduce the value of the decommissioning trust below an amount necessary to place and maintain the reactor in a safe storage condition if unforeseen conditions or expenses arise and;
- (C) The withdrawals would not inhibit the ability of the licensee to complete funding of any shortfalls in the decommissioning trust needed to ensure the availability of funds to ultimately release the site and terminate the license.

In accordance with 10 CFR 50.2, the term "decommission" means to remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license.

In 10 CFR 50.82(a)(8)(v), the NRC also requires power reactor licensees that have permanently ceased operations to provide to the NRC annually, by March 31, a decommissioning financial assurance status report. The report must include additional financial assurance to cover any projected shortfalls.

In 10 CFR 50.54(bb), the NRC requires, in part, a licensee to submit, for NRC review and preliminary approval, the program by which the licensee intends to manage and provide funding for the management of all spent fuel at the reactor following permanent cessation of operation of the reactor until title to the spent fuel and possession of the spent fuel is transferred to the DOE for its ultimate disposal in a repository. In addition, 10 CFR 50.82(a)(8)(vii) provides, in part, for the licensee's annual submittal to the NRC of a report on the status of its funding for managing spent fuel. If the funds accumulated do not cover the projected cost, a plan to obtain additional funds to cover the cost must be included.

In addressing FOCD issues, Section 103d of the AEA provides, in relevant part, that no license may be issued to:

[A]ny corporation or other entity if the Commission knows or has reason to believe it is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government.

The NRC regulation at 10 CFR 50.38, "Ineligibility of certain applicants," is the regulatory provision that implements the FOCD provisions of the AEA. The NRC staff evaluates license transfer applications in a manner that is consistent with the guidance provided in the NRC "Final Standard Review Plan on Foreign Ownership, Control, or Domination" (SRP) published in the *Federal Register* on September 28, 1999 (64 FR 52355), to determine whether the proposed transferee is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government. The NRC's position on FOCD, outlined in the SRP, states that "the foreign control limitation should be given an orientation toward safeguarding the national defense and security." Further, the SRP on FOCD outlines how the effects of foreign ownership may be mitigated through implementation of a "negation action plan" to ensure that any foreign interest is effectively denied control or domination over the licensee.

In 10 CFR 50.34(b)(6), the NRC requires that applicants provide certain information on facility operation. It requires, in part, that the information provided by the applicant includes:

- (i) The applicant's organizational structure, allocations or responsibilities and authorities, and personnel qualifications requirements.
- (ii) Managerial and administrative controls to be used to assure safe operation.

In 10 CFR 50.34(b)(7), the NRC also requires that applicants provide the following information in the final safety analysis report:

The technical qualifications of the applicant to engage in the proposed activities in accordance with the regulations in this chapter.

The NRC staff uses, in part, the following regulatory guidance to evaluate whether the qualifications of licensees would be affected by proposed transfers:

- (1) NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition," Chapter 13, "Conduct of Operations," Section 13.1.1, Revision 6, "Management and Technical Support Organization," dated August 2016 (ADAMS Accession No. ML15005A449), which provides guidance for the review of changes to the technical organization or personnel qualifications proposed as a result of an operating license transfer. Specifically, Section I.4, "Reviews of Operating License Transfers," states that the applicant for transfer of an operating license should provide a description of the organization to support plant operations, which should include (1) organizational charts of the corporate-level management and technical support organizations, emphasizing the changes to be made as a result of the transfer, (2) the relationship of the nuclear-oriented parts of the organization to the rest of the corporate organization, and (3) description of the specific provisions which have been made for uninterrupted technical support for operations.

- (2) NUREG-0800, Chapter 13, Sections 13.1.2–13.1.3, Revision 7, “Operating Organization,” dated August 2017 (ADAMS Accession No. ML15007A296), which provides guidance for the review of changes to the operating organization proposed as a result of an operating license transfer.

The purpose of this evaluation is to ensure that the proposed corporate management is involved with, informed of, and dedicated to the safe operation, maintenance, and decommissioning of the facility, and that adequate technical and financial resources will be provided to support these activities.

The NRC staff also reviews information that relates to nuclear onsite property damage insurance requirements under 10 CFR 50.54(w) and the Price-Anderson insurance and indemnity requirements under Section 170 of the AEA and 10 CFR Part 140, “Financial Protection Requirements and Indemnity Agreements.”

With respect to the transfer of control of a license for an ISFSI, 10 CFR 72.50(a) states:

No license or any part included in a license issued under this part for an ISFSI or MRS [monitored retrievable storage installation] shall be transferred, assigned, or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of the license to any person, unless the Commission gives its consent in writing.

Section 72.6(b) of 10 CFR states:

A general license is hereby issued to receive title to and own spent fuel, high-level radioactive waste, or reactor-related GTCC [greater than Class C] waste without regard to quantity. Notwithstanding any other provision of this chapter, a general licensee under this paragraph is not authorized to acquire, deliver, receive, possess, use, or transfer spent fuel, high-level radioactive waste, or reactor-related GTCC waste except as authorized in a specific license.

Section 72.210 of 10 CFR states:

A general license is hereby issued for the storage of spent fuel in an independent spent fuel storage installation at power reactor sites to persons authorized to possess or operate nuclear power reactors under 10 CFR part 50....

Section 72.30 of 10 CFR discusses financial assurance for decommissioning ISFSIs.

Finally, with respect to the requested conforming license amendments, 10 CFR 50.90 states, in part:

Whenever a holder of a license ... desires to amend the license..., application for an amendment must be filed with the Commission ... fully describing the changes desired, and following as far as applicable, the form prescribed for original applications.

Pursuant to 10 CFR 2.1315, where administrative license amendments are necessary to reflect an approved license transfer, such amendments will be included in the order that approves the license transfer.

3.0 FINANCIAL EVALUATION

3.1 Financial Qualifications

As noted above, pursuant to 10 CFR 50.2, “decommission” means to remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license. As explained below, the NRC staff’s review of financial qualifications for the proposed license transfer assesses whether the Applicants have provided reasonable assurance that funds will be available to the transferees to cover estimated costs for radiological decommissioning and spent fuel management activities at IP1, IP2, IP3, and the IPEC ISFSI, in accordance with the requirements of 10 CFR 50.33(f), 10 CFR 50.33(k)(1), 10 CFR 50.75, 10 CFR 50.82(a), and 10 CFR 72.30.

As previously noted, IP1 permanently ceased operations on October 31, 1974; IP2 permanently ceased operations on April 30, 2020; and pursuant to the purchase and sale agreement, the proposed transfer transaction is subject to IP3 having also permanently ceased operations. Accordingly, HDI (the proposed licensed operator for decommissioning) would not be authorized under the IPEC licenses to operate or load fuel in the IPEC reactors pursuant to 10 CFR 50.82(a)(2) and, therefore, would not conduct the operations contemplated by the financial qualifications provisions of 10 CFR 50.33(f). Rather, all of HDI’s licensed activities would involve the possession of radioactive material in connection with maintaining the safe condition of the IPEC units and ISFSI, radiological decommissioning of the IPEC units and ISFSI, license termination, and operational responsibilities associated with spent fuel management. Thus, following the proposed transfer, Holtec IP2 and Holtec IP3 (the proposed licensed owners) would maintain the existing DTFs and would be responsible for funding all of the expenses associated with radiological decommissioning and the operational costs for spent fuel management. Therefore, as described in this SE, the NRC staff’s evaluation of the HDI, Holtec IP2, and Holtec IP3 financial qualifications consists of an analysis of the projected costs for decommissioning the IPEC units and ISFSI and managing spent fuel until the DOE takes title and possession of the fuel.

As stated in the LTA, Holtec IP2 and Holtec IP3 would provide the decommissioning financial assurance required by 10 CFR 50.75, 10 CFR 50.82(a), and 10 CFR 72.30 for IP1, IP2, IP3, and the IPEC ISFSI using the prepayment method in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1). Holtec IP2 and Holtec IP3 would retain the IP1, IP2, and IP3 DTFs, which, as of December 31, 2019, contained \$555.74 million, \$701.30 million, and \$929.97 million, respectively (as documented in ENOI’s March 26, 2020, Decommissioning Funding Status Report (ADAMS Accession No. ML20086Q904)). According to the LTA, the transferees’ right to draw on the funds of the IP1, IP2, and IP3 DTFs and the estimate of expected decommissioning, spent fuel management, and site restoration costs referred to in the LTA and reflected in HDI’s PSDAR provide the requisite financial information for the proposed license transfer consistent with 10 CFR 50.33(f). Specifically, the LTA concludes that the projected DTFs values at the closing of the proposed transfer transaction are expected to fully fund HDI’s SSCE for radiological decommissioning and spent fuel management costs, as well as site restoration costs, at the IPEC. The NRC staff’s analysis of the transferees’ financial qualifications follows.

3.1.1 Estimated Costs for Decommissioning the IPEC

Separate from the LTA, HDI submitted a PSDAR (the HDI PSDAR) reflecting its plans for radiological decommissioning, spent fuel management, and site restoration at the IPEC if the license transfer is approved and the proposed transfer transaction is consummated. The NRC staff treated this submittal as a supplement to the LTA. The HDI PSDAR includes the following:

- a description of the planned decommissioning activities along with a schedule for their accomplishment and
- estimates of expected decommissioning costs, including an SSCE, using the DECON method for decommissioning the IPEC site.

The HDI PSDAR reflects HDI's plan to complete the decommissioning of the non-ISFSI portions of the IPEC site using the DECON method from between 12 to 15 years after the proposed transfer transaction is consummated. The HDI PSDAR also contains the most recent decommissioning cost estimate and plan for spent fuel management and site restoration.

Following the partial site release scheduled for 2033 (i.e., the unrestricted release of the entirety of the IPEC site with the exception of the ISFSI), HDI plans to remove stored spent fuel and greater than Class C (GTCC) waste from the site, decommission the ISFSI, terminate its NRC licenses, and release the remainder of the IPEC site for unrestricted use by 2063. In accordance with the requirements of 10 CFR 72.30 for ISFSI decommissioning, the cost estimate for decommissioning the ISFSI reflects: (1) the cost of HDI's decommissioning contractor performing the decommissioning activities, (2) a contingency allowance of 25 percent, and (3) the cost of meeting the criteria for unrestricted use. The cost summary for decommissioning the IPEC ISFSI is presented in Appendix A of the HDI PSDAR.

As part of its review of the LTA, the NRC staff reviewed the SSCE provided with the HDI PSDAR to ensure that it contains the appropriate information pursuant to NUREG-1713, "Standard Review Plan for Decommissioning Cost Estimates for Nuclear Power Reactors," dated December 2004 (ADAMS Accession No. ML043510113), for decommissioning planning purposes, which includes:

- A description of the decommissioning cost estimating methodology,
- A description of the overall decommissioning project,
- A summary decommissioning cost estimate by major activity and phase,
- A schedule of the major decommissioning activities,
- A summary of the decommissioning management with support staff levels, and
- An estimate of radioactive waste volume.

The SSCE identified radiological decommissioning costs of \$485,015,000, \$469,456,000, and \$583,168,000 for IP1, IP2, and IP3, respectively, including costs for decommissioning the IPEC ISFSI; spent fuel management costs of \$72,381,000, \$188,278,000, and \$371,370,000 for IP1, IP2, and IP3, respectively; and site restoration costs of \$40,788,000, \$44,088,000, and \$47,840,000 for IP1, IP2, and IP3, respectively, for total costs of \$598,184,000, \$701,822,000, and \$1,002,378,000 for IP1, IP2, and IP3, respectively.

By RAI dated July 8, 2020, the NRC staff requested, among other things, that the Applicants provide features of their cost estimating techniques and/or decommissioning assumptions that would account for the differences in radiological decommissioning and spent fuel management

costs estimated for IP2 and IP3. The staff also requested that the Applicants justify the SSCE's contingency allowance of 18 percent, and whether such a contingency considered all significant decommissioning costs.

By letter dated August 7, 2020, HDI responded to the NRC staff RAI and provided additional detail about, and further justification for differences in, radiological decommissioning costs among the IPEC units, as well as further discussion about the SSCE contingency allowance of 18 percent. HDI identified two major factors that addressed, collectively, significant portions of the variances between radiological decommissioning and spent fuel management costs between IP2 and IP3. Specifically, HDI indicated that its schedule and sequence for performing the major decommissioning activities, including reactor segmentation, dismantling, and demolition at the IPEC, and differences in estimated Class A waste volumes, accounted for much of the differences in the radiological costs between the units as depicted in the SSCE.

With respect to the 18 percent contingency allowance, HDI discussed its use of simulation risk modeling tools to evaluate the impacts of uncertainty and risk events on the project, its schedule, and its costs. The use of these tools, coupled with reliance on decommissioning subject matter experts at HDI and CDI, helped HDI conclude in the SSCE that the 18 percent contingency allowance was reasonable and adequate. As stated by HDI:

Based on an integrated and extensive evaluation of estimate uncertainty and discrete risk events utilizing industry-accepted risk modeling tools and techniques in addition to a review of industry experience with similar decommissioning projects, the 18 percent Contingency Allowance reasonably bounds the universe of risks that are appropriate to be taken into account at the estimate phase (considering industry practice, accepted NRC methodology, and the information that is available today) for the IPEC decommissioning project. The development of the Contingency Allowance as discussed in the HDI [SSCE] was comprehensive and demonstrates its adequacy.

The NRC staff reviewed the estimated costs associated with each of the five major periods of decommissioning identified in the SSCE: pre-decommissioning planning and preparation, plant deactivation, safe storage operation, dismantlement, and ongoing ISFSI operations. In particular, the staff considered the costs associated with Period 4, the dismantlement period, and the overall program management costs, which, when combined, represent approximately 96 percent, 92 percent, and 95 percent of the estimated radiological decommissioning expenses at IP1, IP2, and IP3, respectively. Work completed during Period 4 will result in removed reactor components that will be packaged, placed in containers, and transported to storage, treatment, or disposal facilities; radioactive waste that will be packaged and shipped for disposal; and buildings that will be cleared of all radioactive components and declared ready for free release or demolition. The cost estimate anticipates that reactor vessel and internals segmentation activities will begin with IP3 and proceed to IP2 with anticipated efficiencies gained due to similarities in design of the IP2 and IP3 units. The staff reviewed the estimated costs associated with these activities, including the costs for site infrastructure and operational management, and concluded that these costs appear to be reasonable.

Regarding spent fuel management, the NRC staff reviewed the following information submitted as part of the LTA:

- Estimated costs to construct additional dry fuel storage capacity in order to isolate spent fuel at the IPEC,

- Estimated costs to transfer spent fuel to dry fuel storage canisters,
- Estimated costs to move and then place spent fuel into long term storage at the ISFSI,
- Operational costs of the ISFSI until all spent fuel is placed at the ISFSI, and
- Operational activities and affiliated costs from the time that all spent fuel is in storage at the ISFSI until spent fuel and GTCC waste is removed from the ISFSI for receipt by the DOE.

HDI's decommissioning plan includes expanding the existing ISFSI to provide the dry cask storage capacity required for the spent fuel currently in the IP3 reactor and in the IP2 and IP3 spent fuel pools. The expanded ISFSI will also include storage capacity for GTCC waste, with 13 GTCC canisters estimated to be needed for decommissioning activities. Spent fuel and GTCC waste will remain at the ISFSI until it is transferred to the DOE. HDI also provided clarifying information in its response to the NRC staff RAI regarding the differences in spent fuel management costs between IP2 and IP3. HDI indicated that the differences in spent fuel heat load between IP2 and IP3, the differing amounts of spent fuel stored in wet storage between IP2 and IP3, and the allocation of specific costs, such as those related to the use of a crane for IP3 only, were the primary factors that explain the differences in spent fuel cost estimates between IP2 and IP3.

Regarding spent fuel removal, the Applicants provided that IP1 possesses spent fuel that has early eligibility for removal by the DOE once it begins accepting spent fuel from the commercial nuclear industry. While dates by which the DOE will begin to accept spent fuel remain uncertain, the Applicants' spent fuel management plan assumes a start date of 2030. Based on this assumption and on the DOE-authorized exchange rights allowed for by the DOE standard contract, the Applicants estimated that for IP2, spent fuel removal will begin in 2031 and finish in 2048; for IP1, spent fuel removal will begin in 2048 and finish in 2049; and for IP3, spent fuel removal will begin in 2049 and finish in 2061. The number of IP1, IP2, and IP3 fuel assemblies requiring DOE acceptance is 160, 1,998, and 1,870, respectively, containing approximately 3,800 metric tons of uranium in total.

Regarding site restoration activities, HDI's decommissioning plan for the IPEC anticipates the majority of site restoration expenditures to occur during the first 12 years of decommissioning at the site (beginning in, and including, 2021). Site restoration costs are those costs associated with conventional dismantling, demolition, and removal from the site of structures and systems after confirmation that radioactive contaminants have been removed. Based upon the Applicants' decommissioning schedule, by the end of 2032, \$40.7 million of the \$40.8 million estimated site restoration costs at IP1 will have been incurred; \$42.9 million of the \$44.1 million estimated site restoration costs at IP2 will have been incurred; and \$46.8 million of the \$47.8 million estimated site restoration costs at IP3 will have been incurred. The description of site restoration activities provided by the Applicants identifies costs associated with building demolition, including equipment required for demolition, personnel costs, permit requirements, and surveys to perform hazardous waste (asbestos and lead paint) removal from buildings and components; demolition of site buildings to 3 feet below grade and backfill with clean fill material; demolition of above ground tanks; removal of parking lot surfaces; final grading; and final site restoration activities after ISFSI decommissioning and demolition is completed. In addition, the schedule for site restoration considers the required coordination with radiological decommissioning and spent fuel management activities.

The LTA, as supplemented by the HDI PSDAR and the Applicants' responses to the NRC staff RAI, provided a comprehensive cost estimate reflecting the full scope, schedule, cost, and

contingency baselines for the radiological decommissioning of the IPEC and for spent fuel management, as well as for site restoration activities. Consistent with guidance in NUREG-1713 and RG 1.202, "Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors," dated February 2005 (ADAMS Accession No. ML050230008), the Applicants provided information on the decommissioning method selected; a description of, and schedules for, planned decommissioning activities; and estimates of expected costs, including decommissioning of the ISFSI. Schedule and cost details were provided for pre-decommissioning planning activities, facility shutdown activities, dismantlement activities within the radiologically controlled area, waste processing, storage, and disposal activities, site infrastructure and operation activities, project management, engineering, and support activities, spent fuel and nuclear material management activities, and site restoration activities. Therefore, the NRC staff determined that the LTA, as supplemented, addressed in sufficient detail the activities and associated costs required to complete the decommissioning of the IPEC.

Based on its independent review of the LTA, as supplemented, the NRC staff concludes that the Applicants have adequately addressed and evaluated all of the activities required to complete the decommissioning of the IPEC and to manage spent fuel, as well as site restoration activities, and their costs. Therefore, the staff concludes that the Applicants' estimates of the costs required to complete the decommissioning of the IPEC appear to be reasonable.

3.1.2 Availability of Funding for Decommissioning the IPEC

The LTA indicated that the proposed new owners of the IPEC, Holtec IP2 and Holtec IP3, would fully fund all decommissioning costs from the DTFs acquired in the proposed transfer transaction. With respect to the adequacy of this funding, the NRC staff reviewed the cost estimates, the DTFs balances, the pre-license transfer spending forecasts, and the projected DTFs growth. The staff performed independent cash flow analyses of the IPEC DTFs over the proposed 43-year period beginning in, and including, 2021, which includes all phases of the decommissioning project,¹ and determined the projected earnings² for each DTF. The cash flow analyses are contained in Attachments A, B, and C to this SE for IP1, IP2, and IP3, respectively.

Attachments A, B, and C to this SE reflect the NRC staff's cash flow analyses based on the decommissioning costs presented by the Applicants, which, as discussed above, the staff determined appear to be reasonable. These costs are divided into three categories: license termination (i.e., radiological decommissioning), spent fuel management, and site restoration. As reflected in the attached cash flow analyses, after annual withdrawals for decommissioning activities associated with IP1, IP2, IP3, and the IPEC ISFSI are considered, as well as withdrawals for annual expenditures associated with spent fuel management and site restoration activities, and including an annual 2-percent real rate of return on remaining trust assets, excess funds are present in each IPEC DTF at the end of 2033, the anticipated date of partial site release (i.e., the unrestricted release of the entirety of the site with the exception of the ISFSI). Specifically, the excess funds in the DTFs under this scenario equal \$54.8 million

¹ The 43-year period covers the 13-year radiological decommissioning period beginning in, and including, 2021, leading to the partial site release of IP1, IP2, and IP3, as well as the period of spent fuel management and ISFSI decommissioning prior to license termination. The staff's analyses also considered site restoration expenses during this period.

² Projected earnings were determined consistent with 10 CFR 50.75(e)(1)(i), which states, in part, "A licensee that has prepaid funds based on a site-specific estimate ... may take credit for projected earnings on the prepaid decommissioning trust funds, using up to a 2 percent annual real rate of return ... through the projected decommissioning period...."

for IP1, \$125.6 million for IP2, and \$269.1 million for IP3. At the time of partial site release in 2033, the Applicants estimate that for IP1, IP2, and IP3, 98 percent, 94 percent, and 96 percent, respectively, of total radiological decommissioning would have been completed. When evaluating decommissioning costs, including spent fuel management, site restoration, and ISFSI decommissioning costs, to 2063, the NRC staff again found a positive balance in each DTF. Specifically, the excess funds in the DTFs under this scenario equal \$19,996,000 for IP1, \$72,686,000 for IP2, and \$170,594,000 for IP3.

In assessing the adequacy of the DTFs to cover decommissioning costs, the NRC staff also considered the impact on returns in the equity markets as a result of the Coronavirus Disease 2019 (COVID-19) public health emergency and the potential impacts that this might have to the asset balances in the DTFs. During the staff's review, equity markets declined by 32 to 36 percent between mid-February to mid-March 2020, as measured by the Standard and Poor's 500 equity index (S&P 500) and the Dow Jones industrial average index. Since that time, however, these market indices have recovered from their March 2020 low valuations. As a result of these market recoveries, and recognizing that equity markets fluctuate with time, the staff was satisfied that the beginning DTF values used by the Applicants in the LTA appear to be reasonable. Additionally, despite the COVID-19 public health emergency, the S&P 500 index increased at a rate of approximately 13.2 percent during the last year (September 2019 to September 2020), after accounting for inflation and including reinvestment of dividends. Annualized returns from the S&P 500 index, after accounting for inflation and including reinvestment of dividends, equate to 8.0 percent, 4.1 percent, and 11.8 percent, for the preceding 30-year, 20-year, and 10-year periods, respectively. Accordingly, the staff continues to consider the 2-percent annual real rate of return allowed by the NRC's regulations to be conservative over the 43-year period of the planned IPEC decommissioning.

Based on its review, and in consideration of its independent cash flow analyses provided in Attachments A, B, and C to this SE, the NRC staff concludes that the Applicants have provided information sufficient to demonstrate that there is reasonable assurance that, after the proposed license transfer, funds will be available to cover estimated costs for decommissioning IP1, IP2, IP3, and the IPEC ISFSI.

3.1.3 Financial Qualifications Summary

The NRC staff determined that the Applicants adequately addressed and evaluated all decommissioning costs associated with all phases of decommissioning the IPEC site. Additionally, information provided by HDI further addressed the differences in estimated decommissioning costs between IP2 and IP3 and provided greater detail on the models and approaches for determining the contingency allowance used in developing the decommissioning cost estimates. Therefore, the staff concluded that the Applicants' estimate of radiological decommissioning costs of \$485,015,000, \$469,456,000, and \$583,168,000, spent fuel management costs of \$72,381,000, \$188,278,000, and \$371,370,000, and site restoration costs of \$40,788,000, \$44,088,000, and \$47,840,000 for IP1, IP2, and IP3, respectively, appear to be reasonable. Further, based on its review, and in consideration of its independent cash flow analyses, the NRC staff determined that, with respect to the IP1, IP2, and IP3 DTFs, which would be transferred to Holtec IP2 and Holtec IP3 as part of the proposed transfer transaction and used as the source of funds for decommissioning, they would have significant, positive balances at both the time of partial site release in 2033 and the time of license termination in 2063. Therefore, the staff also concluded that the Applicants provided reasonable assurance of the transferees obtaining the funds necessary to cover the estimated decommissioning costs. Taken together, the staff concludes that the Applicants provided reasonable assurance that the

transferees would be financially qualified to be the holders of the IPEC licenses in accordance with the requirements of 10 CFR 50.33(f), 10 CFR 50.33(k)(1), 10 CFR 50.75, 10 CFR 50.82(a), and 10 CFR 72.30.

3.2 Spent Fuel Management Funding at the IPEC; Exemption to Use Funds from the IPEC DTFs

For a facility in decommissioning, a licensee is required to execute financial plans for spent fuel management under 10 CFR 50.54(bb) and report annually on the status of funding dedicated towards radiological decommissioning and spent fuel management under 10 CFR 50.82(a)(8)(v) – (vii). At the close of the proposed transfer transaction, Holtec IP2 and Holtec IP3 would hold title to the spent fuel at the IPEC and the related DOE standard contracts, including all rights and obligations under the terms of those contracts (see Section 5.0, “Standard Contract for Disposal of Spent Nuclear Fuel and/or High Level Radioactive Waste,” of this SE for further discussion on this topic).

The LTA provided that the transferees’ funding plan for spent fuel management at the IPEC, as well as for site restoration activities, would rely on the use of funds from the appropriate DTF in excess of those needed for radiological decommissioning. In order to use excess funds from the DTFs for these purposes, HDI submitted to the NRC an exemption request dated February 12, 2020. Separate from this SE, the NRC staff reviewed and approved the exemption request (ADAMS Accession No. ML20309A788). The staff is issuing its approval of the exemption request concurrent with its approval of the LTA; the exemption is effective immediately, but will only apply to Holtec IP2, Holtec IP3, and HDI if and when the proposed transfer transaction is consummated.

The NRC staff’s review and independent analysis of the exemption request found that there was reasonable assurance that adequate funds would be available in each IPEC unit’s DTF to complete the radiological decommissioning of that unit, including the decommissioning of the ISFSI, and also to pay for the entirety of the estimated costs for spent fuel management and site restoration. This was based on an estimate of the IP1, IP2, and IP3 DTF balances of \$533.5 million, \$654.1 million, and \$916.1 million, respectively, at the consummation of the proposed transfer transaction in 2021 and an estimate of the IP1, IP2, and IP3 total decommissioning costs, including spent fuel management and site restoration costs, of \$598,184,000, \$701,822,000, and \$1,002,378,000, respectively, all of which estimates, as discussed above, the NRC staff concluded appeared to be reasonable. The following table provides a summary breakdown of these estimated costs.

	IP1	IP2	IP3
Radiological Decommissioning Costs	\$ 485,015,000	\$ 469,456,000	\$ 583,168,000
Spent Fuel Management Costs	\$ 72,381,000	\$ 188,278,000	\$ 371,370,000
Site Restoration Costs	\$ 40,788,000	\$ 44,088,000	\$ 47,840,000
Totals	\$ 598,184,000	\$ 701,822,000	\$ 1,002,378,000

In its analysis and to confirm HDI's assumptions and calculations, the NRC staff, consistent with 10 CFR 50.75(e)(1)(i), applied a 2-percent annual real rate of return to the DTF balances, less annual costs for radiological decommissioning, spent fuel management, and site restoration, which resulted in significant, positive DTF balances at the time that all license termination activities are projected to be completed, as explained above. The staff's cash flow analyses in Attachments A, B, and C to this SE project that the IP1, IP2, and IP3 DTFs would contain approximately \$20.0 million, \$72.7 million, and \$170.6 million, respectively, after the completion of all radiological decommissioning (including ISFSI decommissioning), spent fuel management, and site restoration activities in 2063, considering partial site release in 2033 and the use of the DTFs to pay for all of these activities. The staff's cash flow analyses align with the cash flow analyses provided by the Applicants.

The NRC staff considered the findings from its evaluation of the exemption request as part of its review of the LTA. These findings support the staff's conclusion that the proposed use of the IPEC DTFs for spent fuel management and site restoration will not negatively impact the availability of funding for radiological decommissioning. Therefore, the staff concludes that the use of excess funds from the DTFs for spent fuel management provides a reasonable source of funding to cover the costs associated with those activities because, even after these withdrawals and withdrawals for site restoration activities, the decommissioning schedule proposed in the LTA would result in significant, positive ending balances in the IP1, IP2, and IP3 DTFs at license termination.

Additionally, Holtec IP2 and Holtec IP3 expect to recover from the DOE through litigation or settlement of their claims the spent fuel management costs that they will incur as a result of the DOE's breach of its obligations under the standard contracts. In recent years, DOE reimbursements have become more consistent and predictable despite the longevity of the litigation process and complexity of the DOE standard settlement agreements. Therefore, the NRC staff concludes that DOE reimbursements provide a reasonable source of funds to cover spent fuel management costs at the IPEC. However, the Applicants' annualized cash flows do not take credit for any DOE reimbursements and, instead, show that, even without DOE reimbursements, the IPEC DTFs will be sufficient to cover the costs of radiological decommissioning, spent fuel management, and site restoration, with significant, positive balances at license termination. Therefore, the potential for DOE reimbursements provides added conservatism to the Applicants' demonstration of spent fuel management funding.

Based on its determination that the assumptions, activities, and associated costs of HDI's spent fuel management plan for the IPEC appear to be reasonable and that the DTFs appear to be sufficient to cover these costs, the NRC staff concludes that there is reasonable assurance of the transferees obtaining the funds necessary to cover estimated costs for spent fuel management in accordance with 10 CFR 50.33(f) and 10 CFR 50.54(bb).

3.3 Financial Evaluation Conclusion

As discussed above, the NRC staff has concluded that the Applicants' estimate of decommissioning and spent fuel management costs, as well as site restoration costs, appears to be reasonable and that, with the acquisition of the IPEC DTFs by Holtec IP2 and Holtec IP3 as part of the proposed transfer transaction, the transferees have reasonable assurance of obtaining the funds necessary to cover decommissioning and spent fuel management costs in

accordance with 10 CFR 50.33(f), 10 CFR 50.33(k)(1), 10 CFR 50.54(bb), 10 CFR 50.75, 10 CFR 50.82(a), and 10 CFR 72.30.

Based on a regulatory commitment in the LTA, ENOI will be required to provide to the NRC pre-notification that Holtec IP2 and Holtec IP3 will enter into an operator services agreement with HDI prior to the planned closing date for the proposed transfer transaction. Therefore, the order approving the transfer will be conditioned as follows.

At least 2 business days before the planned closing date of the purchase and sale transaction, Holtec shall provide the Directors of the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) and Office of Nuclear Reactor Regulation (NRR) with pre-notification that Holtec IP2 and Holtec IP3 and HDI will enter into a decommissioning operator services agreement that provides for HDI to act as agent for Holtec IP2 and Holtec IP3 and for Holtec IP2 and Holtec IP3 to pay HDI's costs of post-shutdown operations, including decommissioning and spent fuel management costs.

Additionally, based on a regulatory commitment in the LTA, ENOI will be required to provide to the NRC notice of the planned closing date for the proposed transfer transaction at least 2 days prior to the date planned so that the NRC staff can timely issue the conforming administrative license amendments. Therefore, the order approving the transfer will be conditioned as follows:

At least 2 business days before the planned closing date of the purchase and sale transaction, ENOI shall provide the Directors of NMSS and NRR with pre-notification of the planned transaction.

Considering the foregoing evaluation and license conditions, the NRC staff concludes that Holtec IP2 is financially qualified to be the licensed owner of Provisional Operating License No. DPR-5 for IP1 and Renewed Facility Operating License No. DPR-26 for IP2, that Holtec IP3 is financially qualified to be the licensed owner of Renewed Operating License No. DPR-64 for IP3, and that HDI is financially qualified to be the licensed operator of the IPEC licenses, as proposed.

4.0 DOE STANDARD CONTRACT FOR DISPOSAL OF SPENT NUCLEAR FUEL

By the terms of the proposed transfer transaction, Holtec IP2 and Holtec IP3 will hold title to the spent fuel at the IPEC and the related DOE standard contracts, including all rights and obligations under the terms of those contracts. Standard Contract No. DE-CR01-83NE44373, dated as of June 17, 1983, and Standard Contract, No. DE-CR01-83NE-44407, dated as of June 20, 1983 were entered into by the previous owners and the United States of America, represented by the DOE, to govern the disposal of the spent fuel generated at the IPEC. Holtec IP2 and Holtec IP3 expect to recover from the DOE through litigation or settlement of their claims the spent fuel management costs that they will incur as a result of the DOE's breach of its obligations under the standard contracts.

5.0 ANTITRUST REVIEW

The AEA does not require or authorize antitrust reviews of post-operating license transfer applications (*Kansas Gas and Electric Co., et al.* (Wolf Creek Generating Station, Unit 1), CLI-99-19, 49 NRC 441 (1999)). The LTA post-dates the issuance of the operating licenses for

the units under consideration in this SE and, therefore, no antitrust review is required or authorized.

6.0 FOREIGN OWNERSHIP, CONTROL, OR DOMINATION

The LTA provided that Holtec is a privately held corporation and is controlled by its Board of Directors, all of whom are U.S. citizens. The directors are ultimately appointed by Holtec's owners, who are trust companies organized in the State of Florida and are controlled by U.S. citizens. Holtec has been U.S.-owned since its inception in 1986 without any non-U.S. control or domination. The NRC has previously found that Holtec is not foreign owned, controlled, or dominated (see ADAMS Accession Nos. ML19095A457 and ML19170A250 regarding the transfers of the licenses for Oyster Creek Nuclear Generating Station (Oyster Creek) and Pilgrim Nuclear Power Station (Pilgrim), respectively). Holtec Power, NAMCo, Holtec IP2, Holtec IP3, and HDI are all directly or indirectly under Holtec's control, and all of the directors and executive committee members as identified in Attachment C to the LTA are U.S. citizens. The LTA provided that, although Holtec performs work in foreign countries, the contractual arrangements to provide products and services do not result in any FOCD of the Holtec organization or its subsidiaries or contracts; the activities conducted in foreign countries are ultimately controlled by U.S. citizens.

Further, the LTA provided that, as the licensed entity with possession of and responsibility for direct oversight, control, and decommissioning of the IPEC, HDI will act for itself and on behalf of Holtec IP2 and Holtec IP3, as their agent. Neither Holtec IP2 or Holtec IP3 nor HDI are acting as the agent or representative of any other entity in the proposed license transfer. The LTA also provided that CDI is jointly owned by HDI and SNC-Lavalin. HDI, as the majority owner of CDI, controls CDI. SNC-Lavalin, a company based in Montreal, Quebec, Canada, is a publicly-traded company on the Toronto Stock Exchange. CDI's role is defined as the decommissioning general contractor under a contract between HDI and CDI. CDI will not be the licensed owner or operator of the IPEC licenses and will not have direct access to the IPEC DTFs. CDI will perform decommissioning activities pursuant to its contract with HDI, subject to HDI's direct oversight and control. The LTA provided that there is no prohibition against a company with foreign minority ownership performing licensed activities at U.S. nuclear reactors; therefore, notwithstanding CDI's foreign minority ownership and engagement as the decommissioning operations contractor, Holtec and the licensee entities proposed for the IPEC will not be owned, controlled, or dominated by any foreign person.

Based on this information, the NRC staff finds that the transfer of the licenses to Holtec IP2, Holtec IP3, and HDI, as proposed, does not raise any issues related to FOCD within the meaning of the AEA and the NRC's regulations. In light of the above, and pursuant to Section 103d of the AEA and 10 CFR 50.38, the NRC staff concludes that it does not know or have reason to believe that any of the transferees or their respective owners will be owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government as a result of the license transfer.

7.0 NUCLEAR INSURANCE AND INDEMNITY

Pursuant to the requirements of the Price-Anderson Act (Section 170 of the AEA) and the NRC's implementing regulations in 10 CFR Part 140, the current indemnity agreement must be modified to reflect that, after the proposed transfer transaction, Holtec IP2 and Holtec IP3 (licensed owners) and HDI (licensed operator for decommissioning) will be the sole licensees for the IPEC licenses. Consistent with NRC practice, the NRC staff will require Holtec IP2,

Holtec IP3, and HDI to provide evidence that they have obtained the appropriate amount of insurance pursuant to 10 CFR 140.11(a)(4) and 10 CFR 50.54(w), and that the insurance is effective concurrent with the date of the license transfer and amended indemnity agreement. Therefore, the order approving the transfer will be conditioned as follows:

Before the closing of the license transfer, Holtec IP2, Holtec IP3, and HDI shall provide the Directors of NMSS and NRR satisfactory documentary evidence that they have obtained the appropriate amount of insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w).

Based on the above, the NRC staff concludes that the proposed license transfer, as conditioned, satisfies the nuclear insurance and indemnity requirements of 10 CFR Part 140 and 10 CFR Part 50.

8.0 TECHNICAL EVALUATION

8.1 Management and Technical Support Organization

The Applicants provided two figures of simplified organization charts in the LTA. The first figure shows the current chain of ownership of the IPEC licenses. The second figure shows the proposed post-transfer ownership structure.

Holtec International

On top of the post-transfer organization chart is Holtec, the parent company that will provide the leadership to transition the IPEC to active decommissioning and subsequent long-term dry storage of spent fuel. As stated by the Applicants, Holtec has specialized in spent fuel management technologies with resources and experience in nuclear decommissioning, spent fuel handling equipment, and spent fuel storage systems and components.

Holtec Decommissioning International

HDI, an indirect, wholly-owned subsidiary of Holtec, will become the IPEC licensed operator for decommissioning after the proposed transfer transaction.

As stated by the Applicants, HDI is structured to serve as a fully resourced organization to directly oversee and manage licensed decommissioning operations and the dismantlement of the IPEC units and ISFSI. The specific responsibilities of HDI are as follows:

- Assume responsibilities for the duties and obligations of the decommissioning operator licensee following the proposed transfer transaction, including development of and continuing compliance with the dry storage system Certificate(s) of Compliance and the licensing basis including the technical specifications, regulatory requirements, and regulatory commitments.
- Possess and dispose of radioactive material.
- Maintain the facility in a safe condition, including the storage, control, and protection of the spent fuel in the spent fuel pools and in the ISFSI until the ISFSI is decommissioned.
- Establish and implement governance processes to ensure compliance with the IPEC licenses and NRC regulations, and retain decision-making authority for any issues

related to compliance with the IPEC licenses (including whether to seek amendments thereto) and NRC regulations.

- Oversee the development and submittal of periodic licensing and regulatory actions (e.g., exemption requests and license amendment requests) required to support ongoing decommissioning activities.
- Assume authority and responsibility for modifications to the emergency preparedness and security plans and responses to NRC orders regarding security.
- Assume authority and responsibility for the functions necessary to fulfill the quality assurance (QA) requirements of the IPEC technical specifications and as specified in the IPEC Quality Assurance Program Manual in place at the time of the proposed transfer transaction.
- Ensure that the site safety procedures are consistent with Holtec's corporate safety plan.
- Ensure that only legitimate expenditures are made from, and ensure prudent investment management of, the IPEC DTFs.
- Serve as the interface with Holtec's counterparties, government organizations, and other stakeholders.
- Provide oversight of CDI, including oversight of schedule and cost control, QA, regulatory compliance, safety, security, and human resource management pursuant to the Decommissioning General Contractor Agreement.
- Oversee the development of tools, fixtures, and robots to improve the duration and as low as reasonably achievable goals of the decommissioning operations.

The Applicants stated that HDI is managed by Holtec senior staff to provide the requisite managerial capabilities and decision-making authority within the licensed organization. The Applicants provided in their supplement dated January 17, 2020, Figure A-1, "IPEC Combined Org Chart Depiction," a combined organizational chart that shows the relationships between Holtec, HDI, and the CDI senior management team for both corporate and technical groups. Table A-1, "Roles and Responsibilities of HDI Senior Management," which describes in detail the specific position, role, and that position's responsibilities, was also provided. The resumé for the senior management team (both HDI and CDI) are included in Attachment C of the LTA and in the supplement.

Comprehensive Decommissioning International

The Applicants stated that CDI is a company jointly owned by HDI and SNC-Lavalin Group's subsidiary, Kentz USA, Inc.; however, CDI is majority owned by HDI. CDI will perform the day-to-day activities at the IPEC, including the decommissioning activities pursuant to the Decommissioning General Contractor Agreement between HDI and CDI, and will be subject to HDI's direct oversight and control as the licensed operator.

CDI has stated that it plans to subcontract with nuclear industry vendors with decommissioning experience to complete various decommissioning activities. The Applicants stated that the subcontractor and vendor selection will be made consistent with customary industry vendor evaluation and selection processes. The key criteria for the subcontractor evaluation and vetting processes are listed in Section 5.E, "Strategic Partner Experience and Expertise," of Enclosure 1 of the LTA. Furthermore, HDI is the current licensed operator for Oyster Creek and Pilgrim, while CDI is HDI's Decommissioning General Contractor for these sites.

The Applicants stated that CDI has an experienced nuclear management team and its staff has extensive, in-depth experience in decommissioning a wide variety of nuclear power plants,

research reactors, and other facilities in technical areas including as low as reasonably achievable, nuclear security, waste management, dismantlement, project management, regulatory compliance, and environmental protection. Additionally, CDI will be staffed with a combination of Holtec and SNC-Lavalin personnel and it will have the ability to draw resources from them, as well. CDI has also transitioned experienced nuclear power plant personnel from Oyster Creek and Pilgrim. The Applicants stated that CDI will establish an integrated decommissioning organization from the ENOI IPEC decommissioning organization site personnel who will then be integrated into the CDI decommissioning organization. Those personnel will be placed in a manner consistent with their expertise and previous positions in the ENOI IPEC decommissioning organization. This personnel retention is intended to form a seamless organization operation under a common set of processes and procedures to minimize the interruption in technical support for operations.

As stated in the LTA, the integrated site decommissioning organization will provide the following:

- A single CDI site Decommissioning General Manager who reports to the HDI Site Vice President and is accountable to HDI for overall management, leadership, performance, nuclear safety, QA, and employee safety.
- Several key managers who report to the CDI Decommissioning General Manager who have responsibilities for radiological safety, spent fuel management, industrial health and safety, project administration and financial services, training, labor relations, fuel storage, regulatory affairs, QA, licensing, environmental, decontamination and decommissioning, engineering, operations, waste operations, and project controls. This organization provides an experienced nuclear management team with control over activities to maintain the site within the requirements of the IPEC licenses and perform decommissioning operations under HDI's direct oversight and control.
- Implementation of industry high standards, best practices, effective program and processes, and management controls.
- Effective and integrated oversight and technical support functions.

Furthermore, the Applicants stated that Holtec IP2 and Holtec IP3 will maintain the assets that will be needed to maintain the IPEC in accordance with NRC requirements and the IPEC licenses; specifically, the necessary books, records, safety and maintenance manuals, and engineering construction documents, in addition to the structures and equipment.

Conclusion

The Applicants have provided the organizational charts of the corporate-level and technical support organizations and the roles and responsibilities for the senior management teams. They have described the changes that will be made as a result of the proposed transfer transaction and listed the provisions that will be made for uninterrupted technical support for decommissioning operations. The Applicants have provided a basis for assurance that there will be sufficient resources and support from the parent company to conduct licensed activities at multiple sites. Based on the review of the LTA, the NRC staff finds the Applicants' management and technical organization, HDI, to be acceptable with the technical qualifications to support the transfer of the licenses to Holtec IP2 and Holtec IP3, and ENOI's operating authority to HDI. Therefore, the NRC staff concludes that the Applicants have provided

reasonable assurance that the license transfer will meet the relevant technical requirements of 10 CFR 50.80 and 10 CFR 50.34.

8.2 Operating Organization

The Applicants stated that prior to the proposed transfer transaction closing, ENOI and HDI will develop and implement a transition plan to facilitate a smooth transfer of licensed and decommissioning responsibilities at the IPEC. HDI management, along with HDI and CDI department leads, will verify completion of the transition plan.

The Applicants stated that the HDI decommissioning fleet corporate organization is based on a Governance, Oversight, Support, and Performance (GOSP) management model, which will be applied to the IPEC. The Applicants stated that the GOSP model provides for efficiency by establishing standard processes, procedures, and approaches at the corporate level and at the decommissioning sites. The GOSP model is similar to the model used by many operating plant fleets and is used in Holtec's current decommissioning plant fleet, which includes Oyster Creek and Pilgrim. Section 5.F of the LTA, "HDI's Ability to Conduct Licensed Activities at Multiple Sites," discusses the GOSP model principles in detail.

Regarding staffing levels, the Applicants stated that staffing levels at the time of the proposed transfer transaction will be fully compliant with the requirements of the IPEC licenses and NRC regulations. HDI has stated that it will fill the vacated positions due to attrition that were previously filled by incumbent employees with qualified personnel, subject to a determination of need for that position. This will be accomplished by finding other qualified employees, hiring from a community of retired IPEC employees, assigning qualified personnel from the HDI and CDI parent companies, and seeking qualified personnel from industry staff augmentation firms. All the individuals will be qualified to IPEC's programs and procedures, as applicable.

The Applicants stated that ENOI policies, programs, procedures, and work instructions applicable to the IPEC as of the proposed transfer transaction will be adopted in their current state, with minimal or no revisions or substitutions, and that HDI and CDI will continue to work in accordance with those documents, consistent with the Governance plans. As decommissioning progresses at the site, HDI stated that it intends to make changes to the site governance documents in accordance with NRC regulations, with the overall goal of standardizing site governance documents across the HDI decommissioning plant fleet as much as practicable. Furthermore, the existing IPEC programs and procedures at the time of the proposed transfer transaction, including the emergency plan, security plans, fire protection program, radiological protection program, certified fuel handler training, and QA program will also be implemented post-transfer. Should there be a need to make changes to these procedures, HDI will make that determination and make those changes in accordance with NRC regulations.

Additionally, the Applicants provided in Attachment A to the LTA the conforming administrative amendments to the licenses that reflect the proposed transfer of the IPEC licenses to HDI, Holtec IP2, and Holtec IP3, and the deletion of certain license conditions to reflect satisfaction and termination of certain obligations after the transfer.

Conclusion

The Applicants have provided a detailed discussion of HDI, the proposed IPEC licensed operator organization. The Applicants discussed HDI's technical qualifications, staffing level, and qualification requirements for the proposed staff. Based on the review of the LTA, the NRC

staff concludes that HDI will be an acceptable licensed operator organization and has adequate resources to provide technical support for the operation and maintenance of the IPEC under both normal and off-normal conditions. Therefore, the NRC staff concludes that the Applicants provided reasonable assurance that the license transfer will meet the relevant technical requirements of 10 CFR 50.80 and 10 CFR 50.34.

8.3 Technical Evaluation Conclusion

The NRC staff has reviewed the Applicants' request to transfer the IPEC licenses to Holtec IP2 and Holtec IP3 and the IPEC operating authority to HDI. The Applicants have described the management and technical support organization, as well as the operating organization that will be responsible for the maintenance and decommissioning of the IPEC after the proposed transfer transaction. Based on its evaluation as described above, the NRC staff determined that: (1) HDI will have an acceptable management organization, (2) HDI will retain an onsite organization capable of safely conducting decommissioning activities, and (3) HDI will have the technically qualified resources and experience to support the safe maintenance and decommissioning of the IPEC after the proposed transfer transaction. The staff also determined that the Applicants provided reasonable assurance that the transferees have met the relevant technical requirements of 10 CFR 50.80 and 10 CFR 50.34 to engage in the proposed activities. Accordingly, in light of the foregoing evaluation, the NRC staff concludes that Holtec IP2, Holtec IP3, and HDI are technically qualified to hold the IPEC licenses, as proposed.

9.0 LICENSE TRANSFER EVALUATION SUMMARY

Based on its review of the information provided in the LTA, as supplemented, its independent analysis, and the conditions described herein, the NRC staff finds that Holtec IP2 and Holtec IP3, with respect to being the licensed owners of the IPEC licenses, and HDI, with respect to being the licensed operator of the IPEC licenses, have satisfied the NRC's financial qualifications; decommissioning funding assurance; antitrust; foreign ownership, control, or domination; nuclear insurance and indemnity; and technical qualifications requirements. Therefore, the NRC staff concludes that: (1) the proposed transferees are qualified to be the holders of the licenses and (2) the transfer of the licenses is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto.

10.0 CONFORMING LICENSE AMENDMENTS

10.1 Conforming Amendments

The Applicants requested conforming amendments to Provisional Operating License No. DPR-5 for IP1 and Renewed Facility Operating License Nos. DPR-26 and DPR-65 for IP2 and IP3, respectively. The proposed conforming amendments reflect the proposed license transfer action. The proposed conforming amendments do not involve any change in the design or licensing basis, plant configuration, the status of the IPEC units, or the requirements of the IPEC licenses.

The NRC staff reviewed the proposed changes to the IPEC licenses and determined that they involve no safety questions, are administrative in nature, and are necessary to reflect the approved license transfer. Accordingly, the staff concludes that the proposed conforming amendments are acceptable. The amendments shall be issued and made effective at the time of the completion of the proposed transfer transaction.

10.2 No Significant Hazards Consideration

As provided in 10 CFR 2.1315, unless otherwise determined by the Commission with regard to a specific application, the Commission has determined that any amendment to the license of a utilization facility, which does no more than conform the license to reflect the transfer action, involves no significant hazards consideration. No contrary determination has been made by the Commission with regard to this specific application.

10.3 Conforming License Amendments Conclusion

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

11.0 HEARING REQUESTS AND PUBLIC COMMENTS

The NRC staff's notice of consideration of approval of the LTA and of consideration of amending the licenses to reflect the proposed transfer was published in the *Federal Register* on January 23, 2020 (85 FR 3947). This notice provided an opportunity to request a hearing within 20 days and an opportunity to comment within 30 days. The comment period was extended on February 19, 2020 (85 FR 9486), for an additional 30 days.

In response, on February 11, 2020, the Safe Energy Rights Group, Inc. (ADAMS Accession No. ML20042C984) and, on February 12, 2020, the State of New York (ADAMS Accession No. ML20043E118); the Town of Cortlandt, Village of Buchanan, and Hendrick Hudson School District (ADAMS Accession No. ML20043F054); and Riverkeeper, Inc. (ADAMS Accession No. ML20043F530) each filed separate hearing requests. These hearing requests are pending before the Commission. Because hearing requests are pending on the LTA, the order approving the transfer will be conditioned as follows:

The NRC staff's approval of this license transfer is subject to the Commission's authority to rescind, modify, or condition the approved transfer based on the outcome of any post-effectiveness hearing on the license transfer application.

The NRC also received over 400 comment submissions. The table in Attachment D of this SE provides a complete listing of the comment submissions, with the date and the ADAMS accession number for each submission, the submitter's name, and references to the topics listed below that most closely relate to the content of the submission. Additional comment submissions were received from the public and the State of New York after the *Federal Register* comment period had closed, and they are included in the summary table in Attachment D of this SE. The NRC staff also received oral comments that were applicable to the proposed license transfer during the Indian Point annual assessment meeting conducted by WebEx videoconference on September 22, 2020. A transcript of the public meeting is available at ADAMS Accession No. ML20289A537.

Generally, the topics discussed in the comment submissions received were:

- (1) Concerns about the responsibility for any decommissioning funding shortfalls and the financial integrity or technical qualifications and experience of Holtec and its partners and subsidiaries;
- (2) Concerns about the business ethics of Holtec and its partners and subsidiaries;
- (3) Concerns about site restoration and environmental degradation during site decontamination, demolition, and cleanup, including concerns about the use of the site after decommissioning;
- (4) Concerns about continued storage of spent fuel after decommissioning, transportation of spent fuel and radioactive waste, and where spent fuel will go once removed from the site;
- (5) Concerns about Holtec dry cask canister design and spent fuel handling operations;
- (6) Concerns about the sufficiency of the HDI PSDAR;
- (7) Concerns about Holtec's previous legal issues regarding alleged bribery charges and falsification of tax credit applications;
- (8) Concerns about reductions in staffing and ensuring that the necessary personnel are hired to ensure continued safety and security at the site, including in the areas of emergency planning;
- (9) Concerns about the Algonquin Incremental Market (AIM) natural gas pipeline and supporting hazard analysis;
- (10) Concerns referencing charges against SNC-Lavalin for corruption, fraud, and bribery relating to business operations;
- (11) Concerns that a public meeting should be held before the NRC staff approves the license transfer;
- (12) Concerns about unknown radiation ground contamination;
- (13) Concerns about NRC regulatory oversight, responsibilities, and communications regarding the license transfer review process;
- (14) Concerns about Holtec's use and management of the IPEC DTFs, its demonstration of financial assurance, and the effects on ratepayers; and Holtec's limited liability corporate structure and decommissioning business model, including the need for transparency of its financial terms for the proposed license transfer;
- (15) Concerns about the permanent closure of the IPEC, including global climate change and power production;
- (16) Concerns about the proposed license transfer and decommissioning activities during the COVID-19 public health emergency; and

- (17) Concerns that the Commission should fully adjudicate all pending hearing requests before issuing a determination on the LTA.

The NRC staff reviewed the hearing requests, the written comment submissions received during the open comment period, the additional written comment submissions received outside of the comment period, and the oral comments on the proposed license transfer received during the Indian Point annual assessment meeting, and considered them as part of its evaluation of the LTA. The comment submission topics within the scope of the NRC staff's review of the LTA are addressed in this SE. The staff also provides the following additional discussion of some of the comment submission topics.

Regarding comment submission topics 1 and 14 concerning technical and financial qualifications, the NRC staff reviewed the proposed management and technical organization of HDI and its general contractor, CDI, and determined that there is reasonable assurance that HDI (1) will have an acceptable management organization, (2) will retain an onsite organization capable of safely conducting decommissioning activities, and (3) will have the technically qualified resources and experience to support the safe maintenance and decommissioning of the IPEC after the proposed transfer transaction. The staff also determined that the Applicants have adequately addressed and evaluated all of the activities required to complete the decommissioning of the IPEC and to manage spent fuel, as well as site restoration activities, and their costs. The NRC staff concluded that the Applicants' estimates of the costs required to complete the decommissioning of the IPEC appear to be reasonable. Regarding the availability of funds for decommissioning the IPEC, based on its review, and in consideration of its independent cash flow analyses provided in Attachments A, B, and C to this SE, the NRC staff determined that the Applicants have provided information sufficient to demonstrate that there is reasonable assurance that, after the proposed license transfer, funds will be available to cover the total estimated costs for decommissioning the IPEC. Therefore, the staff concluded that the transferees have reasonable assurance of obtaining the funds necessary to cover decommissioning and spent fuel management costs. Regarding comments concerning the differences in cost estimates between the IPEC units and concerning the contingency allowance used in the cost estimates, the NRC staff issued an RAI to the Applicants on these topics. As discussed in this SE, the staff evaluated the Applicants' responses to this RAI and, coupled with the information provided in the LTA, concluded that the Applicants' estimates of the costs required to complete the decommissioning of the IPEC appear to be reasonable.

Moreover, the staff notes that, pursuant to 10 CFR 50.82(a)(8)(v) – (vii), during decommissioning, a licensee must submit a financial assurance status report and a spent fuel management funding status report to the NRC every year containing the actual costs to date, an updated estimate of the costs remaining, and the funds available, with any projected shortfall required to be made up. The staff also notes that the Applicants' discussion of available funding does not take credit for potential DOE reimbursements. In general, a licensee can cover projected shortfalls by methods that could include modifying the decommissioning schedule to allow for additional DTF growth or dedicating DOE reimbursements to decommissioning expenses.

Regarding comment submission topic 6 concerning the sufficiency of the HDI PSDAR, the NRC staff treated the PSDAR as a supplement to the LTA based on the determination that the site-specific decommissioning cost estimate information included in the PSDAR was necessary to complete the review of the LTA. The staff will only review the HDI PSDAR itself if and when the proposed license transfer transaction is consummated. Pursuant to 10 CFR 50.82(a)(4)(ii), this review would involve an opportunity for public comment and a public meeting.

Regarding comment submission topics 11 and 13 concerning the license transfer application review process and public participation, while there is no requirement for the NRC to hold a public meeting on license transfer applications, the NRC staff did communicate with the public and State and local officials regarding the LTA and the expected schedule for review completion during the September 22, 2020, Indian Point annual assessment public meeting. During that meeting there was an opportunity for members of the public to ask questions and to provide comments concerning the LTA. As stated above, the NRC staff considered these oral comments that were within the scope of its review of the LTA as part of its review. Additionally, the staff extended the written comment submission period to 60 days instead of the 30 days that is typically provided for license transfer applications. Finally, the staff has considered all within-scope comments received even if they were received after the close of the comment period.

Regarding comment submission topic 17 concerning the adjudication of pending hearing requests before the NRC staff approves the LTA, 10 CFR 2.1316 provides that, during the pendency of any hearing, the staff is expected to promptly issue approval or denial of license transfer requests. Moreover, the staff's approval of the LTA is explicitly made subject to the Commission's authority to later rescind, modify, or condition the approved transfer based on the outcome of any post-effectiveness hearing on the LTA.

12.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed license transfer and issuance of draft conforming amendments on October 28, 2020. The State official responded by letter dated November 12, 2020 (ADAMS Accession No. ML20318A379), stating, in part:

The State incorporates by reference the arguments made in its [hearing request], which the Commission has yet to address. The State strongly objects to the issuance of an NRC Staff determination on the IPEC license transfer application prior to a Commission ruling in the pending requests for hearing. The NRC should not grant the license transfer, or related regulatory exemptions, until the issues raised in the [hearing requests] are adjudicated or the [hearing requests] are denied. To do so deprives the State and the public of any meaningful input in the proceeding. Substantively, the State does not believe that the license transfer application as drafted may be granted without the imposition of additional financial assurance, which is provided for in NRC regulation for purposes precisely like this one. To grant the application without adequate financial safeguards puts the successful completion of the Indian Point decommissioning project in jeopardy.

As discussed above, the NRC staff reviewed these comments, as well as the State of New York hearing request and all of the other comments and hearing requests received, and considered them in its review of the LTA.

13.0 ENVIRONMENTAL CONSIDERATION

The subject application is for approval of a transfer of licenses issued by the NRC and for approval of associated amendments of the licenses required to reflect the approval of the transfer. Accordingly, the actions involved meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(21). Pursuant to 10 CFR 51.22(b), no environmental impact

statement or environmental assessment need be prepared in connection with the approval of the transfer application and conforming license amendments.

14.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) the proposed transferees are qualified to be the holders of the licenses and (2) transfer of the licenses is otherwise consistent with applicable provisions of law, regulations, and orders issued by the Commission pursuant thereto.

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Richard Turtill, NMSS
DaBin Ki, NRR
Richard Guzman, NRR

Date: November 23, 2020

SAFETY EVALUATION ATTACHMENT LIST

Attachment A: Unit 1, Indian Point Energy Center, Closing Balance Calculations in Support of Holtec Decommissioning International, LLC's Post-Shutdown Decommissioning Activities Report

Attachment B: Unit 2, Indian Point Energy Center, Closing Balance Calculations in Support of Holtec Decommissioning International, LLC's Post-Shutdown Decommissioning Activities Report

Attachment C: Unit 3, Indian Point Energy Center, Closing Balance Calculations in Support of Holtec Decommissioning International, LLC's Post-Shutdown Decommissioning Activities Report

Attachment D: Table of Public Comments Received

ATTACHMENT A: Unit 1, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2021 ^a	\$533,532	\$29,941	\$2,676	\$0	\$5,844	\$506,759
2022	\$506,759	\$27,637	\$4,546	\$0	\$9,492	\$484,068
2023	\$484,068	\$52,768	\$2,516	\$2,113	\$8,533	\$435,204
2024	\$435,204	\$65,344	\$1,654	\$4,550	\$7,273	\$370,929
2025	\$370,929	\$22,059	\$1,708	\$5,224	\$6,839	\$348,777
2026	\$348,777	\$25,850	\$1,660	\$5,076	\$6,324	\$322,515
2027	\$322,515	\$34,183	\$1,582	\$4,850	\$5,638	\$287,538
2028	\$287,538	\$30,731	\$1,613	\$4,943	\$5,005	\$255,256
2029	\$255,256	\$22,503	\$1,702	\$5,204	\$4,517	\$230,364
2030	\$230,364	\$50,400	\$1,523	\$1,804	\$3,533	\$180,169
2031	\$180,169	\$75,149	\$1,465	\$1,498	\$2,041	\$104,098
2032	\$104,098	\$37,915	\$1,569	\$5,460	\$1,183	\$60,338
2033 ^b	\$60,338	\$2,422	\$4,209	\$0	\$1,074	\$54,781
2034	\$54,781	\$0	\$2,870	\$0	\$1,038	\$52,949
2035	\$52,949	\$0	\$2,870	\$0	\$1,002	\$51,080
2036	\$51,080	\$0	\$2,875	\$0	\$964	\$49,170
2037	\$49,170	\$0	\$2,870	\$0	\$926	\$47,226
2038	\$47,226	\$0	\$2,870	\$0	\$887	\$45,243
2039	\$45,243	\$0	\$2,870	\$0	\$847	\$43,220
2040	\$43,220	\$0	\$2,875	\$0	\$807	\$41,152
2041	\$41,152	\$0	\$2,870	\$0	\$766	\$39,048
2042	\$39,048	\$0	\$2,870	\$0	\$724	\$36,901
2043	\$36,901	\$0	\$2,870	\$0	\$681	\$34,712
2044	\$34,712	\$0	\$2,875	\$0	\$637	\$32,474
2045	\$32,474	\$0	\$2,870	\$0	\$592	\$30,196
2046	\$30,196	\$0	\$5,162	\$0	\$501	\$25,534
2047	\$25,534	\$145	\$4,343	\$0	\$421	\$21,467
2048 ^c	\$21,467	\$386	\$0	\$0	\$422	\$21,503
2049 ^d	\$21,503	\$386	\$0	\$0	\$422	\$21,539
2050	\$21,539	\$386	\$0	\$0	\$423	\$21,576
2051	\$21,576	\$386	\$0	\$0	\$424	\$21,614
2052	\$21,614	\$386	\$0	\$0	\$425	\$21,653
2053	\$21,653	\$386	\$0	\$0	\$425	\$21,692
2054	\$21,692	\$386	\$0	\$0	\$426	\$21,732

ATTACHMENT A: Unit 1, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2055	\$21,732	\$714	\$0	\$0	\$420	\$21,438
2056	\$21,438	\$715	\$0	\$0	\$414	\$21,138
2057	\$21,138	\$715	\$0	\$0	\$408	\$20,831
2058	\$20,831	\$715	\$0	\$0	\$402	\$20,519
2059	\$20,519	\$715	\$0	\$0	\$396	\$20,200
2060	\$20,200	\$715	\$0	\$0	\$390	\$19,874
2061	\$19,874	\$715	\$0	\$0	\$383	\$19,543
2062	\$19,543	\$257	\$0	\$66	\$384	\$19,604
2063	\$19,604	\$0	\$0	\$0	\$392	\$19,996
Total		\$485,015	\$72,381	\$40,788		

- a** – Reflects the estimated value of the DTF following the consummation of the transfer transaction in 2021, including deductions for costs incurred prior to consummation.
- b** – Anticipated year in which IP1 meets partial site release criteria.
- c** – Anticipated year in which the Department of Energy initiates taking possession of spent fuel from the ISFSI.
- d** – Anticipated year in which the Department of Energy completes taking possession of spent fuel from the ISFSI.
- e** – Includes funding for ISFSI decommissioning.
- f** – Based on 2% real rate of return consistent with 10 CFR 50.75(e)(1)(i), which considers growth of DTF net of taxes.

ATTACHMENT B: Unit 2, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2021 ^a	\$654,078	\$42,737	\$27,287	\$0	\$6,814	\$590,868
2022	\$590,868	\$69,990	\$34,019	\$1,825	\$9,701	\$494,735
2023	\$494,735	\$67,919	\$11,439	\$6,137	\$8,185	\$417,424
2024	\$417,424	\$33,157	\$4,337	\$6,618	\$7,466	\$380,779
2025	\$380,779	\$36,136	\$1,608	\$6,250	\$6,736	\$343,520
2026	\$343,520	\$32,379	\$1,636	\$6,358	\$6,063	\$309,210
2027	\$309,210	\$32,796	\$1,635	\$5,266	\$5,390	\$274,904
2028	\$274,904	\$51,731	\$1,548	\$1,884	\$4,395	\$224,135
2029	\$224,135	\$50,554	\$1,553	\$1,853	\$3,404	\$173,579
2030	\$173,579	\$8,592	\$6,857	\$0	\$3,163	\$161,293
2031 ^c	\$161,293	\$8,592	\$6,857	\$0	\$2,917	\$148,760
2032	\$148,760	\$5,994	\$5,905	\$6,747	\$2,602	\$132,717
2033 ^b	\$132,717	\$1,922	\$7,701	\$0	\$2,462	\$125,556
2034	\$125,556	\$0	\$5,990	\$0	\$2,391	\$121,957
2035	\$121,957	\$0	\$6,000	\$0	\$2,319	\$118,276
2036	\$118,276	\$0	\$6,014	\$0	\$2,245	\$114,507
2037	\$114,507	\$0	\$6,000	\$0	\$2,170	\$110,677
2038	\$110,677	\$0	\$5,990	\$0	\$2,094	\$106,781
2039	\$106,781	\$0	\$6,000	\$0	\$2,016	\$102,797
2040	\$102,797	\$0	\$6,005	\$0	\$1,936	\$98,728
2041	\$98,728	\$0	\$6,000	\$0	\$1,855	\$94,582
2042	\$94,582	\$0	\$6,000	\$0	\$1,772	\$90,354
2043	\$90,354	\$0	\$6,000	\$0	\$1,687	\$86,041
2044	\$86,041	\$0	\$6,005	\$0	\$1,601	\$81,637
2045	\$81,637	\$0	\$5,990	\$0	\$1,513	\$77,159
2046	\$77,159	\$0	\$3,152	\$0	\$1,480	\$75,488
2047	\$75,488	\$145	\$749	\$0	\$1,492	\$76,086
2048 ^d	\$76,086	\$386	\$0	\$0	\$1,514	\$77,214
2049	\$77,214	\$386	\$0	\$0	\$1,537	\$78,364
2050	\$78,364	\$386	\$0	\$0	\$1,560	\$79,538
2051	\$79,538	\$386	\$0	\$0	\$1,583	\$80,735
2052	\$80,735	\$386	\$0	\$0	\$1,607	\$81,956
2053	\$81,956	\$386	\$0	\$0	\$1,631	\$83,201
2054	\$83,201	\$386	\$0	\$0	\$1,656	\$84,471

ATTACHMENT B: Unit 2, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2055	\$84,471	\$3,274	\$0	\$0	\$1,624	\$82,821
2056	\$82,821	\$3,285	\$0	\$0	\$1,591	\$81,127
2057	\$81,127	\$3,285	\$0	\$0	\$1,557	\$79,399
2058	\$79,399	\$3,285	\$0	\$0	\$1,522	\$77,636
2059	\$77,636	\$3,285	\$0	\$0	\$1,487	\$75,838
2060	\$75,838	\$3,285	\$0	\$0	\$1,451	\$74,004
2061	\$74,004	\$3,285	\$0	\$0	\$1,414	\$72,134
2062	\$72,134	\$1,121	\$0	\$1,149	\$1,397	\$71,261
2063	\$71,261	\$0	\$0	\$0	\$1,425	\$72,686
Total		\$469,456	\$188,278	\$44,088		

a – Reflects the estimated value of the DTF following the consummation of the transfer transaction in 2021, including deductions for costs incurred prior to consummation.

b – Anticipated year in which IP2 meets partial site release criteria.

c – Anticipated year in which the Department of Energy initiates taking possession of spent fuel from the ISFSI.

d – Anticipated year in which the Department of Energy completes taking possession of spent fuel from the ISFSI.

e – Includes funding for ISFSI decommissioning.

f – Based on 2% real rate of return consistent with 10 CFR 50.75(e)(1)(i), which considers growth of DTF net of taxes.

ATTACHMENT C: Unit 3, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2021 ^a	\$916,100	\$63,590	\$46,741	\$442	\$9,395	\$814,722
2022	\$814,722	\$103,657	\$16,745	\$3,833	\$13,810	\$704,297
2023	\$704,297	\$68,921	\$35,203	\$3,616	\$11,931	\$608,488
2024	\$608,488	\$51,552	\$30,858	\$3,514	\$10,451	\$533,016
2025	\$533,016	\$49,120	\$1,421	\$3,630	\$9,577	\$488,422
2026	\$488,422	\$52,082	\$1,407	\$3,594	\$8,627	\$439,965
2027	\$439,965	\$42,955	\$1,451	\$3,714	\$7,837	\$399,682
2028	\$399,682	\$26,334	\$1,638	\$4,192	\$7,350	\$374,869
2029	\$374,869	\$26,318	\$1,638	\$4,185	\$6,855	\$349,582
2030	\$349,582	\$26,314	\$1,638	\$4,186	\$6,349	\$323,793
2031	\$323,793	\$26,314	\$1,638	\$4,186	\$5,833	\$297,488
2032	\$297,488	\$22,366	\$1,561	\$7,751	\$5,316	\$271,126
2033 ^b	\$271,126	\$2,581	\$4,763	\$0	\$5,276	\$269,058
2034	\$269,058	\$0	\$3,607	\$0	\$5,309	\$270,760
2035	\$270,760	\$0	\$3,607	\$0	\$5,343	\$272,496
2036	\$272,496	\$0	\$3,612	\$0	\$5,378	\$274,262
2037	\$274,262	\$0	\$3,607	\$0	\$5,413	\$276,068
2038	\$276,068	\$0	\$3,607	\$0	\$5,449	\$277,910
2039	\$277,910	\$0	\$3,607	\$0	\$5,486	\$279,789
2040	\$279,789	\$0	\$3,612	\$0	\$5,524	\$281,701
2041	\$281,701	\$0	\$3,607	\$0	\$5,562	\$283,656
2042	\$283,656	\$0	\$3,607	\$0	\$5,601	\$285,650
2043	\$285,650	\$0	\$3,607	\$0	\$5,641	\$287,683
2044	\$287,683	\$0	\$3,612	\$0	\$5,681	\$289,753
2045	\$289,753	\$0	\$3,607	\$0	\$5,723	\$291,869
2046	\$291,869	\$0	\$4,433	\$0	\$5,749	\$293,184
2047	\$293,184	\$0	\$7,453	\$0	\$5,715	\$291,446
2048	\$291,446	\$0	\$11,953	\$0	\$5,590	\$285,083
2049 ^c	\$285,083	\$0	\$11,917	\$0	\$5,463	\$278,629
2050	\$278,629	\$0	\$11,927	\$0	\$5,334	\$272,036
2051	\$272,036	\$0	\$11,917	\$0	\$5,202	\$265,322
2052	\$265,322	\$0	\$11,953	\$0	\$5,067	\$258,436
2053	\$258,436	\$0	\$11,927	\$0	\$4,930	\$251,439
2054	\$251,439	\$0	\$11,927	\$0	\$4,790	\$244,302

ATTACHMENT C: Unit 3, Indian Point Energy Center
Closing Balance Calculations in Support of Holtec Decommissioning International,
LLC's Post-Shutdown Decommissioning Activities Report
(thousands of 2019 Dollars)

Year	Opening DTF Balance	License Termination Costs ^e	Spent Fuel Management Costs	Site Restoration Costs	Interest Earned ^f	Closing Balance
2055	\$244,302	\$2,888	\$11,917	\$0	\$4,590	\$234,087
2056	\$234,087	\$2,899	\$11,943	\$0	\$4,385	\$223,630
2057	\$223,630	\$2,899	\$11,927	\$0	\$4,176	\$212,980
2058	\$212,980	\$2,899	\$11,927	\$0	\$3,963	\$202,117
2059	\$202,117	\$2,899	\$11,927	\$0	\$3,746	\$191,037
2060	\$191,037	\$2,899	\$11,943	\$0	\$3,524	\$179,719
2061 ^d	\$179,719	\$2,899	\$11,912	\$0	\$3,298	\$168,206
2062	\$168,206	\$782	\$2,459	\$996	\$3,279	\$167,249
2063	\$167,249	\$0	\$0	\$0	\$3,345	\$170,594
Total		\$583,168	\$371,370	\$47,840		

- a** – Reflects the estimated value of the DTF following the consummation of the transfer transaction in 2021, including deductions for costs incurred prior to consummation.
- b** – Anticipated year in which IP3 meets partial site release criteria.
- c** – Anticipated year in which the Department of Energy initiates taking possession of spent fuel from the ISFSI.
- d** – Anticipated year in which the Department of Energy completes taking possession of spent fuel from the ISFSI.
- e** – Includes funding for ISFSI decommissioning.
- f** – Based on 2% real rate of return consistent with 10 CFR 50.75(e)(1)(i), which considers growth of DTF net of taxes.

Attachment D – Table of Public Comments Received

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20050N670	01/31/2020	Joel Gingold	(1), (2), (5), (10), (14)
ML20063L685	02/07/2020	Joseph Hochreiter	(11), (13)
ML20049H233	02/07/2020	Benjamin Boykin	(1), (2), (4), (9), (12), (14)
ML20054B444	02/10/2020	Bruce Rosen	(1), (2)
ML20063L683	02/10/2020	Thomas Abinanti	(11), (13)
ML20044G103	02/11/2020	Brian Fitzpatrick	(15)
ML20054B411	02/11/2020	Sally Gellert	(1), (2), (4), (11), (14)
ML20054B449	02/11/2020	Courtney Williams	(6), (9)
ML20052E506	02/11/2020	Courtney Williams (2 nd submission)	(1), (6), (14)
ML20044G097	02/12/2020	Darrell Corti	(15)
ML20044G098	02/12/2020	J Best	(15)
ML20044G100	02/12/2020	Lynn Mastroddi	(1)
ML20054B442	02/12/2020	Anonymous	N/A
ML20054B443	02/12/2020	Anonymous	(11), (13)
ML20054B448	02/12/2020	Cora Impenna	(1), (2), (4), (5), (7), (11), (14)
ML20054B451	02/12/2020	Daniel Frome	(1), (14)
ML20054B454	02/12/2020	James Phelan	(1), (11)
ML20057F699	02/12/2020	Mariella Vargas	(1), (2), (11)
ML20057F705	02/12/2020	Anonymous	(13)
ML20057F708	02/12/2020	Courtney Nandagiri	(1), (2), (5), (10), (11), (13), (14)
ML20044G101	02/13/2020	Robert May	(1), (2), (6), (9), (11)
ML20044G102	02/13/2020	Robyn Ruina	(1), (2), (5), (10), (11), (13), (14)
ML20050L281	02/13/2020	Dylan Basescu.	(1), (9)
ML20054B457	02/13/2020	Jennifer Horowitz	(1), (2)
ML20054B470	02/13/2020	Polly Bijur	(1), (2), (5), (10)
ML20058E948	02/13/2020	Mary Grenough	(1), (4), (6), (9), (12), (14)
ML20058E950	02/13/2020	Michelle Babian	(1), (4), (6), (9), (12), (14)
ML20058E951	02/13/2020	Mitchell Miller	(1), (4), (6), (9), (12), (14)
ML20058E954	02/13/2020	Molly Mosher	(1), (4), (6), (9), (12), (14)
ML20058E956	02/13/2020	Monika Half	(1), (4), (6), (9), (12), (14)
ML20058E957	02/13/2020	Nell Cox	(1), (4), (6), (9), (12), (14)

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20058E960	02/13/2020	Pamela Hudson	(1), (4), (6), (9), (12), (14)
ML20058E961	02/13/2020	Patricia Young	(1), (3), (4), (6), (9), (12), (14)
ML20058E963	02/13/2020	Robert Puca	(1), (4), (6), (9), (10), (12), (14)
ML20058E965	02/13/2020	Robin Meadows	(1), (4), (6), (9), (10), (12), (14)
ML20058E967	02/13/2020	Russ Demarest	(1), (4), (6), (9), (10), (12), (14)
ML20058E969	02/13/2020	Stan Jacob	(1), (4), (6), (9), (10), (12), (14)
ML20058E971	02/13/2020	Susan Hayward	(1), (4), (6), (9), (10), (12), (14)
ML20058E972	02/13/2020	Ted Sabety	(1), (4), (6), (9), (10), (12), (14)
ML20058E973	02/13/2020	Theresa Kardos	(1), (4), (6), (9), (10), (12), (14)
ML20058E974	02/13/2020	Wendy Fast	(1), (4), (6), (9), (10), (12), (14)
ML20058E976	02/13/2020	Adele Pascucci	(1), (4), (6), (9), (10), (12), (14)
ML20058E978	02/13/2020	Allan Goldhammer	(1), (4), (6), (9), (10), (12), (14)
ML20058E980	02/13/2020	Bob Stein	(1), (4), (6), (9), (10), (12), (14)
ML20058E981	02/13/2020	Candance Balmer	(1), (4), (6), (9), (10), (12), (14)
ML20058E985	02/13/2020	Carl Grimm	(1), (4), (6), (9), (10), (12), (14)
ML20058E989	02/13/2020	Carol Milano	(1), (4), (6), (9), (10), (12), (14)
ML20058E990	02/13/2020	Carol Seaver	(1), (4), (6), (9), (10), (12), (14)
ML20058E992	02/13/2020	Cathy Carnevale	(1), (4), (6), (9), (10), (12), (14)
ML20058E993	02/13/2020	Christopher Esposito	(1), (4), (6), (9), (10), (12), (14)
ML20058E995	02/13/2020	Cristina Ramos-Payne	(1), (4), (6), (9), (10), (12), (14)
ML20058E996	02/13/2020	Deidre Moderaki	(6)
ML20058E998	02/13/2020	Edward Brody	(1), (6), (9), (10), (14)
ML20058E999	02/13/2020	Frances and Gregory Jacobson	(1), (4), (6), (9), (10), (12), (14)
ML20058F002	02/13/2020	Fred Robin	(1), (4), (6), (9), (10), (12), (14)
ML20058F004	02/13/2020	Grace Gordon	(1), (4), (6), (9), (10), (12), (14)
ML20058F006	02/13/2020	James Desmond	(1), (4), (6), (9), (10), (12), (14)
ML20058F007	02/13/2020	James Mulder	(1), (4), (6), (9), (10), (12), (14)
ML20058F008	02/13/2020	Jill McManus	(1), (2), (4), (6), (9), (10), (12), (14)
ML20058F009	02/13/2020	Kathie Mock	(1), (4), (6), (9), (10), (12), (14)
ML20058F010	02/13/2020	Liz Wassell	(1), (4), (6), (9), (10), (12), (14)
ML20058F012	02/13/2020	Maria Ragucci	(1), (4), (6), (9), (10), (12), (14)
ML20058F014	02/13/2020	Marion Lakatos	(1), (4), (6), (9), (10), (12), (14)
ML20054A031	02/14/2020	Jay Forbes	(1)

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20054B453	02/14/2020	Fred Polvere	(1)
ML20054B473	02/14/2020	Robert May	(1), (2), (3), (4), (11)
ML20052E411	02/14/2020	Gerald Ravnitzky	(1), (2), (4), (5), (10),
ML20058G750	02/14/2020	Norman Rosenberg	(1), (4), (6), (9), (10), (12), (14)
ML20058G751	02/14/2020	Philip Viola	(1), (4), (6), (9), (10), (12), (14)
ML20058G752	02/14/2020	Robin Alpern	(1), (4), (6), (9), (10), (12), (14)
ML20058G753	02/14/2020	Robin Knauth	(1), (2), (4), (6), (9), (10), (12), (14)
ML20058G755	02/14/2020	Susan Schwarz	(1), (4), (6), (9), (10), (14)
ML20058G757	02/14/2020	Tracey Jordan	(1), (4), (6), (9), (10), (12), (14)
ML20058G759	02/14/2020	Amy Anderson	(1), (4), (6), (9), (10), (12), (14)
ML20058G761	02/14/2020	Charles Zekus	(1), (4), (6), (9), (10), (12), (14)
ML20058G763	02/14/2020	Daniel White	(1)
ML20058G764	02/14/2020	Gail Hovey	(1), (4), (6), (9), (10), (12), (14)
ML20058G765	02/14/2020	Gail Moran	(1), (4), (6), (9), (10), (12), (14)
ML20058G766	02/14/2020	Jean Naples	(1), (4), (6), (9), (10), (12), (14)
ML20058G767	02/14/2020	Jerold Huebner	(1), (4), (6), (9), (10), (12), (14)
ML20058G768	02/14/2020	Joan Gussow	(1), (4), (6), (9), (10), (12), (14)
ML20058G769	02/14/2020	K.P. Muller	(1), (4), (6), (9), (10), (12), (14)
ML20058G770	02/14/2020	Katherine Desmond	(1), (3), (4), (6), (9), (10), (12), (14)
ML20058G774	02/14/2020	Linda and Larry Queipo	(1), (4), (6), (9), (10), (12), (14)
ML20058G776	02/14/2020	Lisa Harrison	(1), (4), (6), (9), (10), (12), (14)
ML20058G780	02/14/2020	Lucile Hamlin	(1), (4), (6), (9), (10), (12), (14)
ML20058G781	02/14/2020	Lynn Bowdery	(1), (3), (4), (6), (9), (10), (12), (14)
ML20058G783	02/14/2020	Naomi Woodard	(1), (4), (6), (9), (10), (12), (14)
ML20072M657	02/14/2020	Elizabeth Peterson	(1), (2), (5), (10), (11), (13), (14)
ML20054A030	02/15/2020	Susan Van Dolsen	(1), (2), (5), (9)
ML20054B452	02/15/2020	Edith Kantrowitz	(1), (2), (5), (11)
ML20054B461	02/15/2020	Judith Canepa	(1), (2), (4), (5), (11)
ML20058H117	02/15/2020	Leslie English	(1), (4), (6), (9), (10), (12), (14)
ML20058H118	02/15/2020	Martin Lupowitz	(1), (4), (6), (9), (10), (12), (14)
ML20050M260	02/16/2020	Cherie Raglin	(2)
ML20050M883	02/16/2020	Sheryl Lerner	(11)

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20054B458	02/16/2020	John Cavuoto	(2), (5), (11)
ML20054B467	02/16/2020	Peter Arno	(1), (2), (7)
ML20058H106	02/16/2020	Iris Arno	(1), (4), (6), (9), (10), (12), (14)
ML20058H124	02/16/2020	Vincent Ferri	(1), (4), (6), (9), (10), (12), (14)
ML20058H136	02/16/2020	Doretta Cornell	(1), (2), (4), (6), (9), (10), (12), (14)
ML20058H138	02/16/2020	Elaine Weir	(1), (2), (4), (6), (9), (10), (12), (14)
ML20050M905	02/17/2020	Linda DeStefano	(9), (11)
ML20050N390	02/17/2020	Felicia Tavares	(11)
ML20054B416	02/17/2020	Sally Jones	(2), (6), (10),
ML20054B437	02/17/2020	Susan Van Dolsen	(2), (5), (9)
ML20054B438	02/17/2020	Suzannah Glidden	(1), (6), (7), (9), (11), (14)
ML20054B440	02/17/2020	Victor Tiship	(1), (3), (4), (9), (11), (12)
ML20054B446	02/17/2020	Bryan Dunlap	(4), (11), (13)
ML20054B455	02/17/2020	Jean Fallon	(1), (2), (5), (6), (9), (11),(12), (13)
ML20054B464	02/17/2020	Kelly Lundeen	(1), (2), (6), (9)
ML20054B469	02/17/2020	Peter Gollon	(1), (3), (6), (11)
ML20052E413	02/17/2020	Joan Gussow	(5), (7), (9), (10), (11)
ML20058H111	02/17/2020	Lance Haug	(1), (2), (5), (10), (11), (13), (14)
ML20066G809	02/17/2020	Wendy Whetsel	(9)
ML20066G811	02/17/2020	Paul Corell	(3), (11)
ML20066G814	02/17/2020	Alice Slater	(4), (10), (11), (14)
ML20066G816	02/17/2020	Julie Woodward	(1), (7), (9), (12), (13)
ML20066G818	02/17/2020	Nivo Rovedo	(6), (7), (9), (10), (11), (14)
ML20066G820	02/17/2020	Judy Allen	(6), (7), (9), (10), (11), (12), (14)
ML20066G821	02/17/2020	Alex Stavis	(6), (9), (12), (14)
ML20054A026	02/18/2020	Janine Melillo	(1), (2)
ML20054A027	02/18/2020	Susan Montemorano	(1)
ML20054A028	02/18/2020	Tom Siracuse	(5)
ML20054A029	02/18/2020	Thomas Siracuse	(1)
ML20054B441	02/18/2020	Anne Carter	(11)
ML20054B466	02/18/2020	Martha Saxton	(5), (9), (10), (11), (12), (14)
ML20054B472	02/18/2020	Richard Fennelly	(1)
ML20052E405	02/18/2020	Pat Schories	(5), (6), (9), (10), (11), (12)

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20058H119	02/18/2020	Michael Hamilton	(1), (2), (4), (5), (7), (11), (14)
ML20058H139	02/18/2020	Harvey Weiss	(1), (2), (4), (5), (7), (11), (14)
ML20063L712	02/18/2020	Ramona Harragin	(3), (5),
ML20063L711	02/18/2020	Vicki McFadyen	(7),
ML20054B447	02/19/2020	Catherine Skopic	(3), (5)
ML20054B450	02/19/2020	Dale Saltzman	(11)
ML20052E408	02/19/2020	Catherine Skopic	(1), (7), (10), (11)
ML20058H121	02/19/2020	Nancy Brown	(1), (4), (6), (9), (12), (14)
ML20058H125	02/19/2020	Alisa Eilenberg	(1), (4), (6), (9), (12), (14)
ML20066G822	02/19/2020	Andy Stein	(5), (6), (7), (9), (10), (12), (14)
ML20066G824	02/19/2020	John Reynolds	(11)
ML20066G826	02/19/2020	Donna Knipp	(6), (9), (11), (12), (14)
ML20054A032	02/20/2020	Robert Emerick	(13)
ML20054B460	02/20/2020	John Sullivan	(1), (5), (7), (11), (13)
ML20054B462	02/20/2020	Judy Jacobs	(5), (7), (11)
ML20054B475	02/20/2020	S. Anspach	(1), (11)
ML20052E400	02/20/2020	John Dunn	(1), (10)
ML20052E402	02/20/2020	Jordan Dale	(12)
ML20052E404	02/20/2020	Laura Lynch	(1), (4), (6), (9), (12), (14)
ML20052E407	02/20/2020	Arelene Novich	(3)
ML20052E410	02/20/2020	Don Hawkins	(1), (4), (6), (9), (12), (14)
ML20058H108	02/20/2020	Jan Boudart	(10)
ML20058H122	02/20/2020	Russell Faller	(1), (4), (6), (9), (12), (14)
ML20062G094	02/20/2020	Kara Uleman	(7), (9), (11), (12),
ML20066G807	02/20/2020	Susan Spieler	(11)
ML20066G828	02/20/2020	Nydia Leaf, et al	(6), (7), (11)
ML20052E559	02/21/2020	Iris Arno	(1), (2), (7)
ML20052E560	02/21/2020	Jacquelyn Dreshler	(1), (5), (11)
ML20052E561	02/21/2020	Lynda Scneekloth	(5), (7), (9)
ML20052E609	02/21/2020	Erin Macchiaroli	(1), (2), (3), (4), (6), (7), (9), (10), (14)
ML20055G106	02/21/2020	Robert Conticchio	(3)
ML20055G109	02/21/2020	Sally Gellert	(3), (11)

Accession Number	Submission Date	Commenter Name	Comment Topic Reference Number
ML20055G120	02/21/2020	Jeff Tyler	(3), (4)
ML20055G125	02/21/2020	Mai Jacobs	(1), (4), (5), (6), (14)
ML20058H107	02/21/2020	Jackson Gillman	(1), (4), (6), (9), (10), (14)
ML20058H109	02/21/2020	Jane Alcorn	(1), (4), (6), (9), (10), (14)
ML20058H120	02/21/2020	Nancy Boyd	(1), (3), (6), (9), (10), (14)
ML20058H130	02/21/2020	Bella Kosmacher	(1), (3), (6), (9), (10), (14)
ML20062G058	02/21/2020	Naomi Schechter	(1), (3), (6), (9), (10), (14)
ML20062G061	02/21/2020	Philip Van Itallie	(1), (3), (13)
ML20062G063	02/21/2020	Robert May	(6), (9), (14)
ML20062G065	02/21/2020	Robin Wald	(3), (4)
ML20062G070	02/21/2020	Amy Anderson	(1), (3), (7), (9), (10), (14)
ML20062G071	02/21/2020	Amy Benesch	(1)
ML20062G073	02/21/2020	Andrea Bunch	(1), (6), (9), (12), (14)
ML20062G077	02/21/2020	Art Shervs	(10)
ML20062G080	02/21/2020	Arthur Greenberg	(3)
ML20062G081	02/21/2020	Benny Cipriano	(3)
ML20062G083	02/21/2020	Corinne Kelly	(1), (2), (4), (5), (8), (9), (12), (14)
ML20062G086	02/21/2020	Dorothea Halliday	(1)
ML20062G087	02/21/2020	Frank Stoppenbach	(1), (2), (4), (5), (6), (9), (12), (14)
ML20062G091	02/21/2020	Heidi Hutner	(1), (2), (3), (4), (5)
ML20062G093	02/21/2020	Jamie Levato	(13)
ML20062G096	02/21/2020	Krystal Ford	(1), (2), (7), (9), (10), (12), (14)
ML20062G098	02/21/2020	Lori Gross	(3), (7)
ML20063L684	02/21/2020	Henry Kelly	(1), (3), (4), (8), (9), (12), (14)
ML20055G101	02/22/2020	Michele Reed	(1), (7)
ML20055G102	02/22/2020	Peggy Kurtz	(6), (7), (11), (12)
ML20055G105	02/22/2020	Peter Guerrero	(1)
ML20055G108	02/22/2020	Robert Petrie	(1)
ML20055G114	02/22/2020	Carla Johnson	(1), (9), (11), (12), (14)
ML20055G115	02/22/2020	Chris Owens	N/A
ML20058H127	02/22/2020	Anne Symmes	(1), (4), (6), (9), (10), (14)
ML20058H128	02/22/2020	Arthur Lubow	(1), (4), (6), (9), (10), (14)

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ML20058H134	02/22/2020	Bente Strong	(1), (4), (6), (9), (10), (14)
ML20062G068	02/22/2020	Scott Gassman	(1), (14)
ML20062G082	02/22/2020	Bruce Esrig	(3)
ML20064C570	02/22/2020	Anne Scheinberg	(13)
ML20064C571	02/22/2020	Bradley Kerr	(1), (9), (14)
ML20064C572	02/22/2020	Denise Marinaccio	N/A
ML20064C574	02/22/2020	Dillon Reilly	(1)
ML20064C576	02/22/2020	Kathleen Quinn	(1), (14)
ML20064C579	02/22/2020	Laura Lamash	(1), (3), (4)
ML20064C580	02/22/2020	Lori Morris	(1), (3), (4)
ML20064C582	02/22/2020	Marina Gutierrez	(14)
ML20064D046	02/22/2020	James Sheehan	(1), (5), (6), (9), (10), (14)
ML20064D049	02/22/2020	Kathleen Sweeney	(1), (7), (10), (12), (14)
ML20064D050	02/22/2020	Mary and Robert Reader	(1), (2)
ML20064D054	02/22/2020	Mary Florin-McBride	(1), (14)
ML20064D056	02/22/2020	Michael Massagli	(1)
ML20064D058	02/22/2020	Michael Piper	(1)
ML20064D061	02/22/2020	Michele Wagner-Nebbia	(1), (3)
ML20064D064	02/22/2020	Nancy Gillespie	(1)
ML20064D067	02/22/2020	Nathaniel Lange	(1)
ML20064D068	02/22/2020	Raphael Kosek	(1)
ML20064D069	02/22/2020	Amy Trompeter	(3), (13)
ML20064D072	02/22/2020	Stephen Bangert	(1), (11), (14)
ML20064D074	02/22/2020	Dale Saltzman	(5), (11), (12) (13)
ML20064D077	02/22/2020	Douglas Wehrle	(1), (2), (5), (11), (12) (13), (14)
ML20064D079	02/22/2020	Kristin Brown	(1), (4), (7), (9), (10),
ML20064D082	02/22/2020	Alan Levin	N/A
ML20064D083	02/22/2020	Cate Woodruff	(3), (7)
ML20064D085	02/22/2020	Jordan Abbott	(1), (6), (12), (14)
ML20064D089	02/22/2020	Katharine Plummer	(1)
ML20064D092	02/22/2020	Kathleen Thomas	(3), (5), (7), (9), (11)
ML20064D094	02/22/2020	Kevin Kilner	(1), (7), (9), (10), (14)

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ML20064D097	02/22/2020	Robert Morrow	(1), (3), (12)
ML20064D098	02/22/2020	William Messmer	(15)
ML20064D102	02/22/2020	Ann Sarrantonio	(13)
ML20064D104	02/22/2020	Bernard Nemes	(1), (4), (10), (14)
ML20064D106	02/22/2020	Gary Schoenberger	(1), (4), (6), (9), (10), (14)
ML20066H359	02/22/2020	Anonymous	(1)
ML20066H361	02/22/2020	Anonymous	(1)
ML20066H378	02/22/2020	Misha Fredericks	(1), (4), (6), (9), (10), (14)
ML20066H379	02/22/2020	Paola Betchart	(1), (2), (7), (10), (14)
ML20055G111	02/23/2020	Sarah Eggleston	(5), (7), (9), (11), (14)
ML20055G112	02/23/2020	Anna Markowitz	(1)
ML20055G117	02/23/2020	Daniel Lucas	(1), (5), (14)
ML20055G118	02/23/2020	Dolores Jones	(2), (7), (10),
ML20055G119	02/23/2020	Janelle Peotter	(1), (12)
ML20055G122	02/23/2020	Liam Henrie	(1), (14)
ML20057F701	02/23/2020	Noah Kimerling	(1), (4), (5), (6), (9), (10), (14)
ML20057F707	02/23/2020	Caryl Kottmann	(1), (4), (5) (6), (9), (12), (14)
ML20057F710	02/23/2020	Daniel Levy	(1), (4), (5), (6), (9), (10), (12), (14)
ML20057F713	02/23/2020	Ervine Kimerling	(1), (4), (5), (6), (10), (14)
ML20066H352	02/23/2020	Paula Zimmerman-Taylor	(2), (3)
ML20066H353	02/23/2020	Robert Powell	(3)
ML20066H356	02/23/2020	Vincent Ferri	(1), (3), (4), (7), (9), (10), (14)
ML20066H362	02/23/2020	Anthony Maresco	(1), (7), (9), (10), (14)
ML20066H364	02/23/2020	Carol Schragger	(3)
ML20066H365	02/23/2020	David Johnson	(15)
ML20066H366	02/23/2020	Deborah Dougherty	(1), (3), (12)
ML20066H367	02/23/2020	Dennis Phayre	(1)
ML20066H368	02/23/2020	Eric Wolf	(3), (12)
ML20066H369	02/23/2020	Greg Lubow	(1), (3), (14)
ML20066H370	02/23/2020	Jeanne Casatelli	(1), (2)
ML20066H374	02/23/2020	Leigh Hill	(3), (4), (12)
ML20066H376	02/23/2020	Mark Bierman	(1), (3)

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ML20066H377	02/23/2020	Marnie Scheinberg	(1), (3), (4), (6), (7), (10), (12), (14)
ML20055G123	02/24/2020	Ling Tsou	(4), (5), (7), (9), (10),
ML20057F696	02/24/2020	Laura Seitz	(4), (5), (9), (11)
ML20057F702	02/24/2020	Puja Thomson	(1), (4), (6), (10), (14)
ML20057F703	02/24/2020	Rita DeMaria	(1)
ML20057F704	02/24/2020	Anne Bassen	(4), (5), (7), (11), (12)
ML20057F706	02/24/2020	Camala Projansky	(1), (4), (6), (9), (12), (14)
ML20066G808	02/24/2020	Sheila Geist	(5), (6), (9), (10), (11),
ML20066H354	02/24/2020	Sonia Hairabedian	(1)
ML20069F156	02/24/2020	Sean Brennan	(1), (4), (5), (6), (7), (9), (14)
ML20069F157	02/24/2020	Jon Fein	(1), (4), (5), (6), (7), (9), (14)
ML20069F160	02/24/2020	Anonymous	(1), (2), (13)
ML20069F163	02/24/2020	Anthony Nigro	(1), (2), (13)
ML20069F165	02/24/2020	Lisa Breznak	(3), (4), (11)
ML20069F167	02/24/2020	Laurie Bleich	(1)
ML20057F694	02/25/2020	Jay Kosack	(1), (2), (4), (5), (6), (9), (10), (14)
ML20057F697	02/25/2020	Margaret Fort	(1), (5)
ML20069F169	02/25/2020	Anonymous	(1), (2), (4), (5), (6), (9), (10), (14)
ML20069F171	02/25/2020	Anonymous	(1), (3)
ML20057F712	02/26/2020	Deborah Tompkins	(1)
ML20069F172	02/26/2020	Joel Gingold	(1), (2), (4), (5), (7) (14)
ML20069F176	02/26/2020	Sharon Radulov	(1), (4), (7), (10), (14)
ML20058H110	02/27/2020	Kathy Flaherty	(1), (2),
ML20058H114	02/27/2020	Laurel Becker	(3)
ML20069F175	02/27/2020	Richard DeCrosta	(1)
ML20069F181	02/28/2020	Patricia Matteson	(1), (3)
ML20069F183	02/28/2020	Sarah Underhill	(1), (2), (4), (5), (6), (9), (10), (14)
ML20069F185	02/28/2020	Andi Weiss Bartczak	(3)
ML20087L849	02/28/2020	Elizabeth Marrapodi	(1), (2) (6), (10), (11), (13), (14)
ML20087L851	02/28/2020	Daria Greggs	(1), (2), (6), (10), (11), (13), (14)
ML20069F188	02/29/2020	Michael Green	(1), (5), (6), (9), (10)
ML20069F190	02/29/2020	Iris Arno	(1), (7), (9)

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ML20069F193	02/29/2020	Christine Dakin	(7)
ML20069F194	02/29/2020	Kathie Talbot	(1), (7)
ML20069F197	03/01/2020	Philip Ratcliff	(1), (4), (6), (9), (12), (14)
ML20069F200	03/01/2020	Anna Paritsky	(1), (3), (14)
ML20069F202	03/02/2020	David LeVine	(13)
ML20069F204	03/02/2020	Susan Schwarz	(4), (13)
ML20069F206	03/03/2020	Carl Arnold	(1), (14)
ML20069F207	03/03/2020	Wendy Fast	(1), (5), (10), (14)
ML20069F210	03/03/2020	Walter Terrell	(13)
ML20069F213	03/03/2020	Donna Knipp	(1), (4), (6), (9), (10), (12), (14)
ML20069F215	03/03/2020	Anonymous	(1), (14)
ML20069F218	03/03/2020	Norman Ross	(7)
ML20069F220	03/03/2020	Meredith Priestley	(1), (7), (9), (10), (12), (14)
ML20069F121	03/04/2020	Kira Peterson	(1), (5), (6), (9), (10), (12), (14)
ML20069F224	03/04/2020	Judith Fletcher	(1), (5), (7),
ML20069F227	03/04/2020	Natalie Polvere	(1), (9), (13)
ML20069F229	03/04/2020	Holly Malekian	(1)
ML20069F123	03/05/2020	Pat Townsend	(1), (7)
ML20069F124	03/05/2020	Tracy Feldman	(1), (6), (9),(10), (14)
ML20069F128	03/05/2020	Linda Silversmith	(1)
ML20069F131	03/05/2020	Mark Grenard	(7)
ML20069F134	03/05/2020	Francisco Velez	(1), (3), (7)
ML20069F138	03/05/2020	Anonymous	(1), (7)
ML20069F139	03/05/2020	Virginia Davis	(1)
ML20069F140	03/05/2020	Virginia Davis	(4), (14)
ML20069F144	03/05/2020	Don Smith	(13)
ML20069F147	03/05/2020	Melissa Frazier	(1), (7)
ML20069F148	03/05/2020	Anonymous	(1), (14)
ML20069G695	03/05/2020	Susi Cummings	(1), (6), (9), (12), (14)
ML20069F129	03/06/2020	Gabrielle Swanberg	(6), (7), (9), (10), (12), (14)
ML20069F151	03/06/2020	Elizabeth Butler	(6), (7), (9), (10), (12), (14)
ML20069F153	03/06/2020	Patrick Bosold	(1), (4), (6), (9), (10), (14)

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ML20069G698	03/06/2020	Paul Correll	(13)
ML20073G970	03/06/2020	Janice Rusche	(1), (7), (13)
ML20073G971	03/06/2020	John Ewing	(3), (7)
ML20086J783	03/06/2020	Eugene Hamond	(1), (4), (6), (8), (9), (10), (12), (14)
ML20073H003	03/07/2020	Charlene Woodcock	(4), (7), (10), (12), (14)
ML20073G967	03/08/2020	Gian Ascione	(1), (4), (14)
ML20073G964	03/10/2020	Diane von Roesgen	(1), (6), (9), (7), (12), (14),
ML20073G976	03/11/2020	Kate Mitchell	(1)
ML20073G979	03/11/2020	Katherine Becker	(1), (6), (9), (7), (12), (14)
ML20073G984	03/11/2020	Marshall Kitchell	(1), (6), (9), (7), (12), (14)
ML20073G988	03/11/2020	Abby Newton	(1), (6), (9), (7), (12), (14)
ML20073G990	03/11/2020	Adam Scheneider	(1)
ML20073G997	03/11/2020	Anonymous	(13)
ML20073G966	03/12/2020	Ed Miller	(1), (4), (6), (9), (7), (12), (14)
ML20073G986	03/12/2020	Nancy Bernstein	(1), (6), (9), (7), (12), (14)
ML20073G995	03/12/2020	Allan Fujita	(1), (6), (9), (7), (12), (14)
ML20073H000	03/12/2020	Carol Shore	(3)
ML20073H005	03/12/2020	Dassi Citron	(1), (13)
ML20073G993	03/12/2020	Alice Slater	(1), (6), (9), (7), (12), (14)
ML20073G974	03/12/2020	Julie ONeill	N/A
ML20073G981	03/13/2020	Marjory Donn	(3), (7), (10)
ML20084M929	03/13/2020	Skip Short	(1), (6), (9), (7), (12), (14)
ML20084M935	03/15/2020	M Kosstrin	(1), (4), (6), (9), (12), (14)
ML20084M928	03/15/2020	Alma Rodriguez	(7), (10)
ML20084M927	03/15/2020	Jane Wong	(3)
ML20084M922	03/16/2020	Philip Ratcliff	(1), (4), (7), (9), (10), (12), (14)
ML20084M933	03/16/2020	Barbara Warren	(1), (2), (3), (4), (5), (9), (13), (14)
ML20084M924	03/17/2020	Gail Moran	(1), (4), (6), (9), (12), (14)
ML20084M923	03/19/2020	Jennifer Horowitz	(7)
ML20086N076	03/21/2020	Paula Moats	(1), (7), (9), (14)
ML20085H149	03/24/2020	Ellen Weininger	(1), (3), (6), (7), (9), (10), (12), (14)
ML20086N077	03/24/2020	Robert DiFrancesco	(1),

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ML20086N101	03/24/2020	Holly Malekian	(1)
ML20086N108	03/24/2020	Karl Brabenec	(13), (15)
ML20085J346	03/25/2020	Beverly Dyckman	(1), (4), (6), (7), (9) (14)
ML20085J347	03/25/2020	Laura Seitz	(1), (6), (9), (12), (14)
ML20085J348	03/25/2020	Tina Volz-Bongar	(1), (4), (6), (7), (10),(12), (14)
ML20085J349	03/25/2020	Bruce Campbell	(1), (3), (4), (5), (6), (7), (9), (14)
ML20085J350	03/25/2020	Craig Wilson	N/A
ML20085J351	03/25/2020	Eileen Manhood-Jose	(6), (9), (12), (14)
ML20086J784	03/25/2020	Judy Allen	(1), (5), (6), (9), (10), (12), (14)
ML20086K719	03/25/2020	Michael Lee	(3), (4), (5), (6), (8), (9), (13), (16)
ML20086K721	03/25/2020	Victoria Leung	(1), (6), (9), (14)
ML20086N062	03/25/2020	Laura Seitz	(1), (2), (3), (12)
ML20086N065	03/25/2020	Manna Jo Greene	(1), (14)
ML20086N067	03/25/2020	Manna Jo Greene (corrected submission)	(1), (14)
ML20086N070	03/25/2020	Nicola Coddington	(1), (7),(10), (14)
ML20086N072	03/25/2020	Noel Kropf	(1), (9), (10), (14)
ML20086N080	03/25/2020	Sally Jane Gellert	(1),(2),(3),(4),(6),(7),(9),(10),(12),(14)
ML20086N083	03/25/2020	Stephen VanderMerwe	(1), (4), (14)
ML20086N086	03/25/2020	Al Samuels	(13), (15)
ML20086N091	03/25/2020	Amy Allen	(13), (15)
ML20086N092	03/25/2020	Anonymous	(1), (14)
ML20086N095	03/25/2020	Deborah Milone	(13), (15)
ML20086N098	03/25/2020	Eric Eller	(13), (15)
ML20086N100	03/25/2020	Gail Payne	(13), (15)
ML20086N104	03/25/2020	John Ravitz	(13)
ML20086N963	03/25/2020	Kevin Byrne	(3), (8), (13)
ML20091J918	03/31/2020	Form Comments from (36) Residents Living in Close Proximity to Indian Point	(1), (2), (5), (11), (14)
ML20091J919	03/31/2020	Form Comments from (417) Riverkeeper Constituents	(1), (4), (6), (9), (12), (14)
ML20091L448	03/31/2020	Form Comments from (8) Citizens Opposing the Indian Point License Transfer Application	(1), (2), (6), (7), (14)
ML20092G718	04/01/2020	Form Comments from (190) Citizens Opposing the Indian Point License Transfer Application	(1), (4), (5), (6), (9), (10), (13),
ML20113F021	04/12/2020	Clare Francis	(13)

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ML20188A345	04/24/2020	Armand Sabitonie	N/A
ML20119A091	04/27/2020	Dale Saltzman	(5), (9), (11), (12)
ML20119B075	04/28/2020	Roy Volpe	(2), (11)
ML20126G349	04/28/2020	Paul and Dorothy Nierman	(1), (2)
Additional Submission of Comments Considered by the NRC staff			
ML20013E521	12/16/2019	State of New York, New York State Energy Research and Development Agency, New York State Department of Environmental Conservation, Office of Attorney General, Lisa Burianek, Joshua Tallent, Channing Wistar-Jones	(1), (6), (13)
ML20091J663	03/24/2020	State of New York, Office of Attorney General, Lisa Burianek, Joshua Tallent, Channing Wistar-Jones	(1), (6), (13), (14)
ML20265A201	09/21/2020	Utility Workers Union of America	(1), (3), (4), (8), (9)
ML20281A635	10/07/2020	State of New York, Office of Attorney General, Lisa Burianek, Joshua Tallent, Channing Wistar-Jones	(1), (13), (14)
ML20304A072	10/19/2020	Mia Azcue	(1), (3), (7), (14), (17)
ML20304A074	10/19/2020	Nivo Rovedo	(1), (3), (7), (14), (17)
ML20304A075	10/19/2020	Nora Gaines	(1), (3), (7), (14), (17)
ML20304A076	10/19/2020	Pamela Brandt	(1), (3), (7), (14), (17)
ML20304A077	10/19/2020	Pamela Hudson	(1), (3), (7), (14), (17)
ML20304A079	10/19/2020	Steven David	(1), (3), (7), (14), (17)
ML20304A083	10/19/2020	Alisa Eilenberg	(1), (3), (7), (14), (17)
ML20304A084	10/19/2020	Alix Keast	(1), (3), (7), (14), (17)
ML20304A085	10/19/2020	Allan Goldhammer	(1), (3), (7), (14), (17)
ML20304A086	10/19/2020	Allison Schubert	(1), (3), (7), (14), (17)
ML20304A087	10/19/2020	Andrew Stein	(1), (3), (7), (14), (17)
ML20304A088	10/19/2020	Andy Lukas	(1), (3), (7), (14), (17)
ML20304A089	10/19/2020	Barbara Lalicki	(1), (3), (7), (14), (17)
ML20304A093	10/19/2020	Carol Greenstreet	(1), (3), (7), (14), (17)
ML20304A095	10/19/2020	Cary Kittner	(1), (3), (7), (14), (17)
ML20304A098	10/19/2020	Deidre Moderacki	(1), (3), (7), (14), (17)
ML20304A101	10/19/2020	Elizabeth Lynch	(1), (3), (7), (14), (17)
ML20304A102	10/19/2020	Elsa Levisieur	(1), (3), (7), (14), (17)
ML20304A103	10/19/2020	Frances Jacobson	(1), (3), (7), (14), (17)
ML20304A106	10/19/2020	Hilary Vidalakis	(1), (3), (7), (14), (17)
ML20304A107	10/19/2020	J Patricia Connolly	(1), (3), (7), (14), (17)

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ML20304A108	10/19/2020	Jean McAvoy	(1), (3), (7), (14), (17)
ML20304A109	10/19/2020	Jean Naples	(1), (3), (7), (14), (17)
ML20308A765	10/19/2020	Briana Rose	(1), (3), (7), (14), (17)
ML20308A766	10/19/2020	Margaret Teahan	(1), (3), (7), (14), (17)
ML20308A767	10/19/2020	Beverly Simone	(1), (3), (7), (14), (17)
ML20309A853	10/19/2020	Form Comments from (329) Riverkeeper Constituents	(1), (3), (7), (14), (17)
ML20304A073	10/20/2020	Nancy Houghton Brown	(1), (3), (7), (14), (17)
ML20304A078	10/20/2020	Stephen Mantor	(1), (3), (7), (14), (17)
ML20304A080	10/20/2020	Susan Schwarz	(1), (3), (7), (14), (17)
ML20304A081	10/20/2020	Terry Meyers	(1), (3), (7), (14), (17)
ML20304A082	10/20/2020	Wendy Alberg	(1), (3), (7), (14), (17)
ML20304A090	10/20/2020	Barbara Warren	(1), (3), (7), (14), (17)
ML20304A094	10/20/2020	Carol Milano	(1), (3), (7), (14), (17)
ML20304A096	10/20/2020	Courtney Nandagiri	(1), (3), (7), (14), (17)
ML20304A099	10/20/2020	M. Doretta Cornell	(1), (3), (7), (14), (17)
ML20304A104	10/20/2020	Francis Breen	(1), (3), (7), (14), (17)
ML20304A105	10/20/2020	Gale Pisha	(1), (3), (7), (14), (17)
ML20304A111	10/20/2020	Joan Schildwachter	(1), (3), (7), (14), (17)
ML20304A114	10/20/2020	K. Muller	(1), (3), (7), (14), (17)
ML20304A115	10/20/2020	Kate D	(1), (3), (7), (14), (17)
ML20304A116	10/20/2020	Kevin Cawley	(1), (3), (7), (14), (17)
ML20304A071	10/21/2020	Mary Mallonee	(1), (3), (7), (14), (17)
ML20304A068	10/22/2020	Louise Golub	(1), (3), (7), (14), (17)
ML20304A070	10/22/2020	Marie Inserra	(1), (3), (7), (14), (17)
ML20304A067	10/23/2020	Linda Brunner	(1), (3), (7), (14), (17)
ML20304A097	10/23/2020	Deborah Brown	(1), (3), (7), (14), (17)
ML20304A110	10/23/2020	Jeff Wanshel	(1), (3), (7), (14), (17)
ML20304A112	10/23/2020	John Sullivan	(1), (3), (7), (14), (17)
ML20304A113	10/23/2020	Jude Jussim	(1), (3), (7), (14), (17)
ML20304A100	10/25/2020	Eileen Leonard	(1), (3), (7), (14), (17)
ML20304A069	10/26/2020	Margaret Sikora	(1), (3), (7), (14), (17)
ML20304A091	10/28/2020	Beverly Harris	(1), (3), (7), (14), (17)
ML20303A335	10/29/2020	Herschel Specter	(6), (14)
ML20303A337	10/29/2020	Herschel Specter	(6), (14)

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ML20303A338	10/29/2020	Herschel Specter	(6), (14)
ML20321A286	11/04/2020	Sandra R. Galef, 95 th Assembly District, State of New York	(11), (13), (14)
ML20322A144	11/05/2020	Freya Goldstein	(1), (3), (7), (14), (17)
ML20322A145	11/05/2020	Eileen Bartley	(1), (3), (7), (14), (17)
ML20316A008	11/10/2020	Alyse Peterson, New York State Energy Research and Development Authority, State of New York	(1), (14)
ML20318A379	11/12/2020	Alyse Peterson, New York State Energy Research and Development Authority, State of New York	(14), (17)
ML20324A638	11/16/2020	Form Comments from (3) Riverkeeper Constituents	(1), (3), (7), (14), (17)

- (1) Concerns about the responsibility for any decommissioning funding shortfalls and the financial integrity or technical qualifications and experience of Holtec and its partners and subsidiaries
- (2) Concerns about the business ethics of Holtec and its partners and subsidiaries
- (3) Concerns about site restoration and environmental degradation during site decontamination, demolition, and cleanup, including concerns about the use of the site after decommissioning
- (4) Concerns about continued storage of spent fuel after decommissioning, transportation of spent fuel and radioactive waste, and where spent fuel will go once removed from the site
- (5) Concerns about Holtec dry cask canister design and spent fuel handling operations
- (6) Concerns about the sufficiency of the HDI PSDAR
- (7) Concerns about Holtec's previous legal issues regarding alleged bribery charges and falsification of tax credit applications
- (8) Concerns about reductions in staffing and ensuring that the necessary personnel are hired to ensure continued safety and security at the site, including in the areas of emergency planning
- (9) Concerns about the Algonquin Incremental Market (AIM) natural gas pipeline and supporting hazard analysis
- (10) Concerns referencing charges against SNC-Lavalin for corruption, fraud, and bribery relating to business operations
- (11) Concerns that a public meeting should be held before the NRC staff approves the license transfer
- (12) Concerns about unknown radiation ground contamination
- (13) Concerns about NRC regulatory oversight, responsibilities, and communications regarding the license transfer review process
- (14) Concerns about Holtec's use and management of the IPEC DTFs, its demonstration of financial assurance, and the effects on ratepayers; and Holtec's limited liability corporate structure and decommissioning business model, including the need for transparency of its financial terms for the proposed license transfer
- (15) Concerns about the permanent closure of the IPEC, including global climate change and power production
- (16) Concerns about the proposed license transfer and decommissioning activities during the COVID-19 public health emergency
- (17) Concerns that the Commission should fully adjudicate all pending hearing requests before issuing a determination on the LTA