



May 27, 2021

10 CFR 140.11(a)(4)  
10 CFR 50.54(w)

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

Indian Point Nuclear Generating Units 1, 2 and 3  
Docket Nos. 50-3, 50-247, 50-286 and 72-051  
Provisional Operating License No. DPR-5  
Renewed Facility Operating License Nos. DPR-26 and DPR-64

Subject: Documentary Evidence of Insurance for License Transfers to Holtec Decommissioning International, LLC, Holtec Indian Point 2, LLC and Holtec Indian Point 3, LLC

- References:
- [1] U.S. Nuclear Regulatory Commission (NRC) letter to Entergy Nuclear Operations, Inc (Entergy), "Indian Point Nuclear Generating Station, Unit Nos. 1, 2 and 3 – Order Approving Transfer of Licenses and Draft Conforming Administrative License Amendments, (EPID-L-2019-LLM-0003)," (ML20297A321), dated November 23, 2020.
  - [2] Letter from Entergy and Holtec Decommissioning International, LLC (HDI) to U.S. Nuclear Regulatory Commission – "Notification of Expected Date of Transfer of Ownership of Nuclear Units to Holtec Indian Point 2, LLC and Holtec Indian Point 3, LLC; and Notification of Receipt of all Required Regulatory Approvals," dated May 26, 2021 (ML21146A335).

In accordance with Section III of the Order issued in Reference 1, Entergy Nuclear Operations, Inc. (Entergy) provided pre-notification of the upcoming transfer of Indian Point Nuclear Generating Unit No. 1 (IP1) Provisional Operating License DPR-5, Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3, respectively) Renewed Facility Operating License Nos. DPR-26 and DPR-64, and the generally licensed IP1, IP2, and IP3 (collectively referred to as IPEC) Independent Spent Fuel Storage Installation to Holtec Indian Point 2, LLC (Holtec IP2) and Holtec Indian Point 3, LLC (Holtec IP3) and the transfer of Entergy's operating authority to Holtec Decommissioning International, LLC (HDI) (Reference 2). The notification indicated that the closing of the transaction and the license transfers are expected to occur on May 28, 2021.

as required by NRC regulation and consistent with the conditions in the approved order (Reference 1), HDI is providing documentary evidence that Holtec IP2, Holtec IP3, and HDI



have obtained nuclear liability insurance for IPEC from American Nuclear Insurers (ANI) and nuclear property insurance for IPEC from Nuclear Electric Insurance Limited (NEIL). The documents in Enclosures 1 and 2 to this letter provide evidence that the appropriate insurance required of a licensee under 10 CFR 140.11(a)(4) and 10 CFR 50.54(w) of the Commission's regulations have been obtained.

This letter contains no new regulatory commitments.

In the event that the NRC has any questions about the documentation provided in this letter or needs to obtain any additional information, please contact the undersigned at 724-493-1833 or [a.sterdis@holtec.com](mailto:a.sterdis@holtec.com).

Respectfully,

Andrea L. Sterdis  
Vice President Regulatory and Environmental Affairs  
Holtec Decommissioning International, LLC

cc (w/Enclosure):

NRC Director, NRR  
NRC Director, NMSS  
NRC Regional Administrator, Region I  
NRC Senior Resident Inspector, Indian Point Nuclear Generating Station  
NRC Project Manager, Indian Point Nuclear Generating Station  
President and CEO, NYSERDA  
New York State (NYS) Public Service Commission  
NYS Department of Health, Radiation Control Program  
NYS Emergency Management Agency

Enclosures:      1) Letter from American Nuclear Insurers, dated March 31, 2021  
                         2) Letter from Nuclear Electric Insurance Limited, dated May 27, 2021

**Enclosure 1**

**HDI-IPEC-21-001**

**Letter from American Nuclear Insurers, dated March 31, 2021**



Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

March 31, 2021

Attn: Document Control  
Director, Office of Nuclear Regulatory Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

***Re: Holtec Indian Point 2, LLC, Holtec Indian Point 3, LLC and Holtec Decommissioning International, LLC - NRC Operating License Transfer for the Indian Point Station Letter of Insurability***

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for the Indian Point Station, located in the Village of Buchanan, Town of Cortlandt, Westchester County, NY, upon the transfer of the NRC operating license from Entergy Nuclear Indian Point 2, LLC, Entergy Nuclear Indian Point 3, LLC and Entergy Nuclear Operations, Inc. to Holtec Indian Point 2, LLC, Holtec Indian Point 3, LLC and Holtec Decommissioning International, LLC.

Effective as of the transaction close date, which is expected to be on or before May 28, 2021, ANI will amend the below policy and certificates for the Indian Point Station as follows:

- a. **Facility Form Policy No. NF -0100:** ANI will amend the named insured to "Holtec Indian Point 2, LLC, Holtec Indian Point 3, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Indian Point 2, Entergy Nuclear Indian Point 3, LLC and Entergy Nuclear Operations, Inc.". ANI will also amend the operator of the facility to "Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Operations, Inc.".
- b. **Master Worker Certificate No. NW -0529:** ANI will amend the named insureds to "Holtec Indian Point 2, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Indian Point 2 and Entergy Nuclear Operations, Inc.". ANI will also amend the operator of the facility to "Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Operations, Inc.".
- c. **Master Worker Certificate No. NW -0530:** ANI will amend the named insureds to "Holtec Indian Point 3, LLC and Holtec Decommissioning International, LLC" in lieu of "Entergy Nuclear Indian Point 3 and Entergy Nuclear Operations, Inc.". ANI will also

**Enclosure 2**

**HDI-IPEC-21-001**

**Letter from Nuclear Electric Insurance Limited, dated May 27, 2021**

Nuclear Electric Insurance Limited  
1201 N Market St  
Suite 1100  
Wilmington, DE 19801  
USA

office +302 888 3000 fax +302 888 3007

May 27, 2021

ATTN: Document Control Desk  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re.: Entergy Nuclear Operations, Inc., Entergy Nuclear Indian Point 2, LLC and Entergy Nuclear Indian Point 3, LLC –  
License Transfer to Holtec Decommissioning International, Holtec Indian Point 2, LLC, and Holtec Indian Point 3, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Nuclear Liability and Decontamination Policy for Holtec Decommissioning International, Holtec Indian Point 2, LLC, and Holtec Indian Point 3, LLC as the 100% owner of the Indian Point Energy Center, subject to the payment of premium. A Nuclear Liability and Decontamination Policy will be effective upon close of the transfer of the facility license from Entergy Nuclear Operations, Inc., Entergy Nuclear Indian Point 2, LLC, and Entergy Nuclear Indian Point 3, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Nuclear Liability and Decontamination Policy for Holtec Decommissioning International, Holtec Indian Point 2, LLC, and Holtec Indian Point 3, LLC for a twelve-month policy period remains valid through May 30, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,



Scott Lauchlan  
Director – Underwriting (Core Business)

cc: Tim Farward (Marsh USA)  
Jon Levis (NEIL)  
Robert Curtis (NEIL)  
Ken Manne (NEIL)  
Peter Cavanaugh (NEIL)