



June 22, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Division of Spent Fuel
Management Office of Nuclear Material
Safety and Safeguards
Washington, DC 20555-0001

Indian Point Nuclear Generating Unit Nos. 1, 2, and 3
Provisional License No. DPR-5
Renewed Facility License No. DPR-26 and DPR-64
Docket Nos. 50-003, 50-247, 50-286 and 71-0240

Subject: Request to Transfer the Quality Assurance Program Approval
Form for Radioactive Material Packages

- References:
1. U. S. Nuclear Regulatory Commission (NRC) Letter to Entergy Operations, Inc. (Entergy), "Quality Assurance Program Approval for Radioactive Material Packages No. 0240, Revision 11" dated July 18, 2017 (ADAMS Accession No. ML 17193A153)
 2. U. S. Nuclear Regulatory Commission (NRC) Letter to Entergy Operations, Inc. (Entergy), "Quality Assurance Program Approval for Radioactive Material Packages No. 0963, Revision 0" dated October 11, 2018 (ADAMS Accession No. ML18289A384)
 3. U. S. Nuclear Regulatory Commission (NRC) Letter to Holtec International "Indian Point Nuclear Generating Station, Unit Nos. 1, 2, And 3 – Issuance of Amendment Nos. 64, 295, And 271 Re: Order Approving Transfer of Licenses and Conforming License Amendments," dated May 28, 2021 (ADAMS Accession No. ML21126A005)
 4. U. S. Nuclear Regulatory Commission (NRC) Letter to Holtec Decommissioning International, LLC (HDI) "Holtec Decommissioning International – Review and Acceptance of the Holtec Decommissioning International Fleet Decommissioning Quality Assurance Program (EPID I-2020-DP3-0000)," dated January 12, 2021 (ADAMS Accession No. ML21011A106)

By letter dated July 18, 2017 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued a revised NRC Form 311 Quality Assurance Program Approval for



Radioactive Material Packages to Entergy Nuclear Operations, Inc. (ENOI) for the Indian Point Nuclear Generating Station Units 1, 2 and 3 (IPEC) and for Pilgrim Nuclear Power Station (PNPS). By letter dated October 11, 2018 (Reference 2), the U.S. Nuclear Regulatory Commission separated IPEC and PNPS and issued a revised NRC Form 311 Quality Assurance Program Approval for Radioactive Material Packages to Entergy Nuclear Operations, Inc. (ENOI) – Pilgrim Nuclear Power Station (PNPS).

By letter dated May 28, 2021 (Reference 3), the U.S. Nuclear Regulatory Commission (NRC) transferred control of Provisional License No. DPR-5 and Renewed Facility License Nos. DPR-26 and DPR-64 for Indian Point Nuclear Generating Station Units 1, 2 & 3 as well as the general license for the IPEC Independent Spent Fuel Storage Installation ("ISFSI") to Holtec International subsidiaries, Holtec Indian Point 2, LLC ("Holtec IP2") and Holtec Indian Point 3, LLC ("Holtec IP3"). The letter also transferred ENOI's operating authority (*i.e.*, its authority to conduct licensed activities at IPEC) to Holtec Decommissioning International, LLC (HDI).

With sale closure and license transfer, the IPEC site has adopted the HDI Decommissioning Quality Assurance Program (DQAP). The DQAP was approved in January 2021 (Reference 4).

In accordance with 10 CFR 71.101(f), HDI requests the following changes to the subject Form 311 Quality Assurance Program Approval for Radioactive Material Packages be approved as soon as practical:

1. Revise Block 2 "Name" to: Holtec Decommissioning International, LLC (Indian Point Units 1, 2 and 3)
2. Revise Block 2 "Street Address" to: 1 Holtec Boulevard
3. Revise Block 2 "City", State and "Zip Code" to: Camden, NJ 08104

A marked up copy of the NRC Form 311 is provided as an enclosure to this letter. HDI will apply the DQAP to Radioactive Material Packages.

If you have any questions regarding this information, please contact me at (856) 797-0900, x3813.

Sincerely,

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



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

Enclosure: 1. Mark-up of NRC Form 311

cc: NRC Senior Project Manager, NRC NRR DORL
Regional Administrator, NRC Region I
NRC Senior Resident Inspector, Indian Point Energy Center
President and CEO, NYSERDA
New York State (NYS) Public Service Commission
NYS Department of Health – Radiation Control Program
NYS Emergency Management Agency



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Enclosure 1
HDI-IPEC-21-002
Mark-up of NRC Form 311

**QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES**

1. APPROVAL NUMBER

0240

REVISION NUMBER

12

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 4 by the organization named in Item 2, the Quality Assurance Program identified in Item 4 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME

~~Entergy Nuclear Operations, Inc. (Indian Point Units 1, 2, & 3)~~ **Holtec Decommissioning International, LLC (Indian Point Units 1, 2 & 3)**

STREET ADDRESS

~~1340 Echelon Parkway~~ **1 Holtec Blvd.**

CITY

~~Jackson~~ **Camden**

STATE

~~MS~~ **NJ**

ZIP CODE

~~39213~~ **08104**

3. DOCKET NUMBER

71-0240

4. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S)

Sept 30, 1999; July 18, 2001; Sept 28, 2004; Jan 15, 2015; June 14, 2017; and June 18, 2018

5. CONDITIONS

1. Activities conducted with regard to transportation packagings under applicable criteria of Appendix B to 10 CFR Part 50 authorized by this approval: procurement, maintenance, repair, and use. All other activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from packaging suppliers that these activities were conducted in accordance with an NRC-approved Quality Assurance Program. It shall remain the responsibility of the Quality Assurance Program holder that all transportation activities meet the requirements of 10 CFR 71.101.
2. Records shall be maintained in accordance with the provisions of 10 CFR Part 71. Specifically:
 - a. Records of each shipment of licensed material shall be maintained for 3 years after that shipment [10 CFR 71.91(a)].
 - b. Records providing evidence of packaging quality shall be maintained for 3 years after the life of the packaging [10 CFR 71.91(d)].
 - c. Records describing activities affecting packaging quality shall be maintained for 3 years after this Quality Assurance Program Approval is terminated [10 CFR 71.135].
3. Planned and periodic audits of all aspects of the Quality Assurance Program shall be conducted in accordance with written procedures or checklists, by appropriately trained personnel not having direct responsibility in the areas being audited, in accordance with 10 CFR 71.137.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

SIGNATURE

DATE

10/11/18

PATRICIA SILVA, CHIEF
INSPECTIONS AND OPERATIONS BRANCH
DIVISION OF SPENT FUEL MANAGEMENT
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS