



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

August 26, 2021

Mr. Pierre Paul Oneid  
Senior Vice President  
and Chief Nuclear Officer  
Holtec International  
Krishna P. Singh Technology Campus  
1 Holtec Blvd.  
Camden NJ 08104

Ms. Andrea L. Sterdis  
Vice President, Regulatory and  
Environmental Affairs  
Holtec Decommissioning International, LLC  
Krishna P. Singh Technology Campus  
1 Holtec Blvd.  
Camden NJ 08104

SUBJECT: INDIAN POINT NUCLEAR GENERATING STATION, UNIT NO. 3 –  
AUDIT PLAN IN SUPPORT OF REVIEW OF LICENSE AMENDMENT  
REQUEST REGARDING THE INSTALLATION AND USE OF A NEW  
AUXILIARY LIFTING DEVICE (EPID L-2020-LLA-0051)

Dear Mr. Oneid and Ms. Sterdis:

By letter dated March 24, 2020, as supplemented by letters dated October 2, 2020, November 9, 2020, February 26, 2021, and May 20, 2021, Entergy Nuclear Operations, Inc., the licensee at the time, submitted a license amendment request (LAR) for Indian Point Nuclear Generating Station, Unit No. 3 (Indian Point 3). In its LAR, the licensee proposed changes to the current licensing basis in the updated final safety analysis report with regards to the installation and use of a new single failure proof auxiliary lifting device in the Indian Point 3 fuel storage building. On May 28, 2021, Holtec Decommissioning International, LLC (HDI) became the licensee for Indian Point 3.

During the initial review of the LAR, the U.S. Nuclear Regulatory Commission (NRC) staff identified several items that require further clarification and detailed explanations. The NRC staff will conduct a regulatory audit to support its review of the LAR in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to increase the NRC staff's understanding of the LAR and identify information that will require docketing to support the NRC staff's regulatory finding.

The audit will be conducted using audio/video conferencing and an internet-based portal from September 1 to October 1, 2021. The logistics and scope of this audit were discussed with your staff on July 16, 2021. The audit plan is enclosed.

If you have any questions, please contact me by telephone at 301-415-1030 or by e-mail to [Richard.Guzman@nrc.gov](mailto:Richard.Guzman@nrc.gov).

Sincerely,

*/RA/*

Richard V. Guzman, Senior Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosure:  
Audit Plan

cc: Listserv

AUDIT PLAN

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REGARDING LICENSE AMENDMENT REQUEST FOR THE INSTALLATION AND

USE OF A NEW AUXILIARY LIFTING DEVICE

HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

DOCKET NO. 50-286

EPID L-2020-LLA-0051

1.0 BACKGROUND

By letter dated March 24, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20084U773), Entergy Nuclear Operations, Inc., (Entergy, at the time, the licensee) submitted a license amendment request (LAR) to revise the Indian Point Nuclear Generating Unit No. 3 (IP3) licensing basis for spent fuel cask handling. Specifically, the licensee requested approval to incorporate into the IP3 Licensing Basis the installation and use of a new single failure-proof auxiliary lifting device (i.e., the Holtec International (Holtec) HI-LIFT) to handle a dry cask storage transfer cask (i.e., the HI-TRAC) in the IP3 fuel storage building. The change to the IP3 licensing basis would be documented in a revision to the IP3 updated final safety analysis report.

In a response to a request for additional information dated May 20, 2021 (ADAMS Accession No. ML21140A451), Entergy provided information regarding thresholds of safe operation and mitigation measures that challenged the staff understanding regarding how certain proposed HI-LIFT design criteria could be met. Specifically, the LAR stated that operator action could place the HI-LIFT frame in a stable configuration following seal leakage or control system problems, but the limits of safe operation for uneven HI-LIFT cylinder positions and specified acceptable seal leakage rates suggest insufficient time would be available to implement those actions if hydraulic power was lost. Furthermore, the LAR also indicated that the hydraulic system and controls were not important to safety because the HI-LIFT would lock following actuation of an emergency stop, but the response to the request for additional information indicated that certain control system functions would be necessary to alert operators to adverse conditions and control the cylinder positions within safe limits.

The Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML19226A274) states that a regulatory audit is a planned, licensed or regulation-related activity that includes the examination of primarily non-docketed information with the intent to gain understanding, to verify information, or to identify information held by the licensee that will require docketing to support the basis of the licensing or regulatory decision.

Enclosure

## 2.0 REGULATORY AUDIT BASES

The Nuclear Regulatory Commission (NRC, or Commission) staff will perform the audit to support its evaluation of whether the licensee's request can be approved per Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.92, "Issuance of Amendment," which states in part that, "In determining whether to issue an amendment to a license, ..., the Commission will be guided by the considerations which govern issuance of initial licenses...." Applicable regulations considered in that review include 10 CFR 50.34, "Contents of Applications; Technical Information," and applicable general design criteria (GDC) from Appendix A to 10 CFR Part 50 (i.e., GDC 1 and 4).

## 3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The NRC staff will review the licensee's information related to the design and operation of the hydraulic swing cylinders and the associated hydraulic control system, the analysis of HI-LIFT deformation under certain credible accident conditions, and, to the extent applicable, the instrumentation, procedures and equipment associated with time-critical operator actions necessary to ensure the HI-LIFT configuration remains within limits for safe operation.

## 4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE AUDIT

The NRC staff requests the licensee to have the following information readily available and accessible for the NRC staff's review, via an internet-based portal:

Information related to:

1. Analyses of the HI-LIFT structure used to determine acceptable deformation and the safe limits of operation.
2. The following information related to important to safety functions of the (1) hydraulic swing cylinders; (2) hydraulic power system for movement of the swing cylinders, including power supply if appropriate; (3) control system for positioning swing cylinders; and (4) instrumentation and actuation systems necessary to place the HI-LIFT in a safe state following credible malfunctions of the hydraulic control system:
  - a. System/component descriptions or purchase specifications, including identification of important to safety functions.
  - b. Drawings of components and systems showing attributes essential to performance of identified important to safety functions.
  - c. Plans for qualification of the components/systems credited with performing important to safety functions, including high-level acceptance criteria necessary to demonstrate quality commensurate with the importance to safety.
3. Technical basis for scope of testing and associated acceptance criteria applied to hydraulic seals and valves performing important to safety functions related to the hydraulic cylinders.
4. Analysis determining the time available for operator actions to place the HI-LIFT in a safe configuration following credible failures affecting the hydraulic swing cylinders.
5. Plans to place the HI-LIFT in a safe configuration following credible failures of the hydraulic cylinder seals, hydraulic power system, and hydraulic control system (i.e., any instrumentation necessary to alert operators to a hydraulic system problem, necessary operator actions, locations where operator actions would be performed, and equipment such as man-lifts or pre-staged scaffolding necessary to support the operator actions in a timely fashion).

The NRC staff will determine, after completing an initial review of the above information within the first 5 business days following the above information becoming available, whether it needs to request any additional documents to be available on the portal or arrangements for an on-site audit.

#### 5.0 AUDIT TEAM

The audit team will consist of the following NRC staff from NRR:

- Mr. Ian Tseng, Mechanical Engineering and Inservice Testing Branch (EMIB)
- Mr. Steve Jones, Containment and Plant Systems Branch (SCPB)
- Mr. Rich Guzman, Plant Licensing Branch 1 (LPL1)

#### 6.0 LOGISTICS

The NRC staff conducted a teleconference with the licensee on July 16, 2021, for the purposes of introductions and discussing the purpose of the audit and information needs. The NRC staff also confirmed the sensitivity of any information to be discussed or presented on the licensee's online portal.

The audit will be conducted using audio/video conferencing and an internet-based portal from September 1 to October 1, 2021. The NRC staff requests the licensee to have the information discussed in Section 4.0 readily available and accessible for the NRC staff's review via the internet-based portal by August 31, 2021. The NRC staff requests the licensee to have its staff available at mutually agreeable times during normal business hours (e.g., Monday - Thursday, 9:00 a.m. to 4:00 p.m., Eastern Time) by telephone if the NRC staff has any questions during the audit. The NRC staff will not take possession of any of the information made available by the licensee for viewing only through the on-line portal. Based on information on the internet-based portal, an on-site audit may need to be performed. Dates for any necessary on-site audit activities would be determined through consultation with the licensee. The NRC staff will not conduct an exit meeting; however, the NRC's licensing project manager will inform the licensee via routine communications when the NRC staff no longer needs access to the portal.

#### 7.0 DELIVERABLES

After the audit, the NRC staff will develop any additional requests for information, as needed, which it will provide the licensee via separate docketed correspondence. The NRC staff intends to issue an audit summary within 30 days of completion of the audit.

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 DATED AUGUST 26, 2021

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**ADAMS Accession No.: ML21231A182**

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|--------|--------------------|------------------|------------------|
| OFFICE | NRR/DORL/LPL1/PM   | NRR/DORL/LPL1/LA | NRR/DSS/SCPB/BC  |
| NAME   | RGuzman            | KEntz            | BWittick         |
| DATE   | 08/19/2021         | 08/23/2021       | 8/19/2021        |
| OFFICE | NRR/DEX/EMIB/BC(A) | NRR/DORL/LPL1/BC | NRR/DORL/LPL1/PM |
| NAME   | ITseng             | JDanna           | RGuzman          |
| DATE   | 8/19/2021          | 8/26/2021        | 8/26/2021        |

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