



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

SAFETY EVALUATION BY

THE OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

RELATED TO AMENDMENT NO. 297

TO RENEWED FACILITY LICENSE NO. DPR-26

HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, AND HOLTEC INDIAN POINT 2, LLC

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

1.0 FACILITY BACKGROUND

The Indian Point Nuclear Generating Unit No. 2 (IP2) is located on the east bank of the Hudson River in the Village of Buchanan in upper Westchester County, New York, about 24 miles North of the New York City. IP2 is part of the Indian Point Nuclear Generating Unit Nos. 1, 2, and 3 facilities, which is collectively referred to as the Indian Point Energy Center (IPEC).

By letter dated February 8, 2017 (Reference 1), pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Paragraph 50.82(a)(1)(i), the licensed owner, Entergy Nuclear Operations Inc. (Entergy), provided formal notification to the U.S. Nuclear Regulatory Commission (NRC), that they planned to permanently cease power operations at IP2 by April 30, 2020. On November 21, 2019 (Reference 2), Entergy, Holtec International (Holtec), and Holtec Decommissioning International, LLC (HDI) (together, the Applicants), submitted a License Transfer Application requesting NRC approval to transfer the Indian Point Renewed Facility Licenses for Units 1, 2, and 3, as well as the general license for the Independent Spent Fuel Storage Installation (ISFSI), to Holtec as the new licensed owner, and to HDI as the licensed Operator. By letter dated December 19, 2019 (Reference 3), both Entergy and HDI submitted a Post Shutdown Decommissioning Activities Report (PSDAR) for IPEC.

Power operations ceased at IP2 on April 30, 2020, and Entergy certified that all fuel was permanently removed from the IP2 reactor and placed in the spent fuel pit (SFP) by letter dated May 12, 2020 (Reference 4), providing formal notification in accordance with 10 CFR 50.82(a)(ii). On November 23, 2020 (Reference 5), the NRC issued an order approving the license transfer and draft conforming license amendments and concluded that Holtec and HDI are financially and technically qualified to own and provide decommissioning activities for IP2, as well as to manage the spent fuel at IPEC. In accordance with 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for IP2 no longer authorizes operation of the reactor, or emplacement or retention of fuel into the reactor vessel. As stated in the current licensee's PSDAR schedule, HDI has chosen the DECON method to decommission IPEC, where the activities include preparation for, and conduct of, fuel movement to the dry fuel storage facility.

2.0 INTRODUCTION

By application dated August 2, 2022 (Reference 6), HDI, on behalf of Holtec Indian Point 2, LLC, requested amendments to Renewed Facility License (RFL) No. DPR-26 for IP2 to modify the RFL, the Permanently Defueled Technical Specifications (PDTS) in Appendix A, and the Appendix C, "Inter-Unit Fuel Transfer Technical Specifications (TS)," to reflect the removal of all spent fuel from the IP2 SFP.

The proposed revisions to IP2 RFL No. DPR-26 would:

- Modify License Condition 2.C.(2) to eliminate the reference to the Appendix C TS related to inter-transfer of spent fuel.
- Eliminate License Condition 2.P related to inter-unit transfer of spent fuel from Indian Point Nuclear Generating Unit No. 3 (IP3) to the IP2 SFP.
- Revise the PDTS (Appendix A) related to IP2 and IP3 facility staffing, qualifications, and responsibilities once all IP2 spent fuel is in the ISFSI.

The proposed amendments to RFL, PDTS, and Appendix C TS would modify the IP2 staffing requirements to be commensurate with the hazards associated with a permanently shutdown and defueled facility that has transferred all spent fuel from its SFP to dry storage within an ISFSI. The PDTS revision includes a new SFP design requirement which prevents storage of spent fuel in the IP2 SFP. The RFL and Appendix C TS would also be revised to eliminate the provisions for transferring spent fuel from IP3 to the IP2 SFP. The proposed changes to the staffing requirements would be implemented following the removal of all spent fuel from the IP2 SFP and will become applicable only after the last spent fuel assembly has been removed from the IP2 SFP and stored within the onsite ISFSI. HDI completed the transfer of the spent fuel from the IP2 SFP to dry storage within the ISFSI on February 1, 2023 (Reference 7). These changes are proposed pursuant to the criteria contained in 10 CFR 50.36, "Technical specifications."

3.0 REGULATORY EVALUATION

This safety evaluation assesses the acceptability of the HDI's proposed License Amendment Request (LAR) based on applicable regulations for the specific modifications and deletions to the IP2 RFL, PDTS, and Appendix C TS. The regulatory requirements on which the NRC based its evaluation of the IP2 changes are as follows.

3.1 Applicable Regulations

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and mitigation of accident consequences. Specifically, the Commission noted that Applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity" [see "Technical Specification for Facility License; Safety Analysis Reports," 33 *Federal Register* (FR) 18610; December 17, 1968 (Reference 8)]. Pursuant to 10 CFR 50.36, TS are required to include items in the following five categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. However, the rule does

not specify the particular requirements to be included in a plant's TS.

In 1996, the NRC added regulations, including 10 CFR 50.36(c)(6) and (e) ("Decommissioning of Nuclear Power Reactors," 61 FR 39278; July 29, 1996 (Reference 9)), clarifying that existing TS for reactors that are not authorized to operate will remain effective until removed or modified by license amendment. The Commission explained (61 FR 39283) that:

In addition to continuing requirements that the licensee must comply with, such as 10 CFR Part 20, regarding protection of workers and the public from radiation, and Appendix B to 10 CFR Part 50 regarding quality assurance, the final rule explicitly extends certain technical requirements to cover decommissioning activities (e.g., Secs. 50.36, 50.36a, 50.36b, and Appendix I regarding technical specifications for surveillance requirements, administrative controls, control of effluents, and conditions to protect the environment). Thus, there will be a licensing basis appropriate to the activities undertaken using the Sec. 50.59 process during decommissioning. By maintaining certain requirements throughout the decommissioning process, licensees will be able to use the existing Sec. 50.59 process to perform decommissioning activities and thus provide comparable assurance that protection of the public health, safety, and the environment will not be compromised.

Accordingly, 10 CFR 50.36(e) states that the provisions of 10 CFR 50.36 "apply to each nuclear reactor licensee whose authority to operate the reactor has been removed by license amendment, order, or regulation." In addition, 10 CFR 50.36(c)(6) states:

Decommissioning. This paragraph applies only to nuclear power reactor facilities that have submitted the certifications required by § 50.82(a)(1)^[1] and to non-power reactor facilities which are not authorized to operate. Technical specifications involving safety limits, limiting safety system settings, and limiting control system settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls will be developed on a case-by-case basis.

Therefore, when deciding whether to amend the TS for a permanently shutdown and defueled reactor such as IP2, the NRC staff considers, on a case-by-case basis, whether the proposed amended TS, along with the operating procedures, the facility and equipment, and the use of the facility, collectively provide reasonable assurance that the applicant will comply with the Commission's regulations, and that the health and safety of the public will not be endangered.

1 Pursuant to 10 CFR 50.82(a)(1)(i), "[w]hen a licensee has determined to permanently cease operations the licensee shall, within 30 days, submit a written certification to the NRC." Per 10 CFR 50.82(a)(1)(ii), "[o]nce fuel has been permanently removed from the reactor vessel, the licensee shall submit a written certification to the NRC." Per 10 CFR 50.82(a)(2), "[u]pon docketing of the certifications for permanent cessation of operations and permanent removal of fuel from the reactor vessel,...the 10 CFR part 50 license no longer authorizes operation of the reactor or emplacement or retention of fuel into the reactor vessel."

4.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses in support of the proposed RFL and TS changes, as described in the LAR application dated August 2, 2022. The proposed amendment deletes some portions of the IP2 PDTs (Appendix A) that are no longer applicable to a permanently defueled facility with all irradiated fuel in dry storage within an ISFSI, while modifying the associated facility staffing requirements. This includes the complete deletion of Part I, "Inter-Unit Fuel Transfer Technical Specifications," and Part II, "Spent Fuel Transfer Canister and Transfer Cask System," of the Appendix C TS, which will prohibit transfer of IP3 spent fuel to the IP2 SFP. HDI indicated in the application that it will be submitting another LAR to fully convert the IP2 PDTs to an ISFSI-only configuration at a later date.

4.1 Background

Once the spent nuclear fuel assemblies have been transferred from the IP2 SFP to an onsite ISFSI, the spent fuel will be stored in dry casks within the ISFSI until it is shipped off site consistent with the schedules described in the IPEC PSDAR (Reference 10) and the irradiated Fuel Loading Plan (Reference 11). During decommissioning with all spent fuel in dry storage within an ISFSI, there are no installed plant systems relied upon for the safe storage of spent fuel. In this condition, there are no credible accidents at IP2 whose prevention or mitigation would need to be addressed by the PDTs. In addition, the NRC-approved spent fuel storage casks and canisters used for spent fuel storage at IPEC are subject to their own Certificate of Compliance (CoC) and Cask Technical Specifications (CTS). After all the spent fuel has been transferred from the IP2 SFP and placed in dry storage within the ISFSI, many of the requirements in the IP2 RFL and TS are inapplicable or are no longer appropriate.

4.2 Renewed Facility License Changes

License Condition 2.C.(2)

The licensee proposed to modify License Condition 2.C.(2) for IP2 to eliminate the reference to the Appendix C TS, which will be deleted as a result of the proposed amendment. Following the transfer of all spent fuel from the IP2 SFP to dry storage within the ISFSI, the discrete conditions, Required Actions, Completions Times, Surveillances, and Frequencies for management of spent fuel in the Appendix C TS will no longer be required or permitted. On this basis, the NRC staff find the proposed modification to this License Condition acceptable.

License Condition 2.P

The licensee proposed to eliminate License Condition 2.P for IP2 related to transfer of IP3 spent fuel to the IP2 SFP. The License Condition originally permitted HDI the ability to conduct inter-unit transfers of the spent fuel from IP3 to the IP2 SFP subject to the conditions listed in the Appendix C TS. It also permitted the transfer of IP3 spent fuel into approved dry storage casks for onsite storage. Following the transfer of all spent fuel from the IP2 SFP to dry storage within the ISFSI, inter-unit transfer of spent fuel from IP3 to IP2 will no longer be permitted and the Appendix C TS will no longer exist. The capability to transfer IP3 spent fuel to dry storage casks for onsite storage will remain, as permitted by the ISFSI general license conditions specified in 10 CFR Part 72, "Licensing-Requirements for the Independent Storage of Spent Fuel and High-Level Radioactive Waste." On this basis, the NRC staff finds the deletion of the License Condition regarding inter-unit spent fuel transfers acceptable.

Attachments

The licensee proposed to modify the list of attachments to the RFL to eliminate the reference to the Appendix C TS, which will be completely deleted as a result of the proposed amendment. On this basis, the NRC staff find the proposed modification to this part of the RFL acceptable.

4.3 Technical Specification Changes

Appendix A – Permanently Defueled Technical Specifications

The existing IP2 PDTs contain LCOs that provide for appropriate functional capability of equipment required for the safe storage and management of irradiated fuel stored in a SFP. As such, the existing PDTs provide a level of control in excess of that needed for safe storage and management of irradiated fuel with fuel stored in an ISFSI. The majority of the existing PDTs are only applicable when irradiated fuel assemblies are within the SFP.

Once all the spent fuel assemblies have been transferred to the ISFSI, all remaining LCOs (and associated SRs) will no longer be applicable for IP2. HDI has indicated that these LCOs and SRs will be proposed for deletion as part of a future application. The revised PDTs being evaluated as part of the current change reflect the changes in facility staffing that are commensurate with removal of all spent fuel from the IP2 SFP. In addition, a new PDT design requirement is being added that prohibits storage of spent fuel in the IP2 SFP. The proposed changes will result in PDTs that will be applicable to IP2 after the last spent fuel assembly has been removed from the SFP and placed within the onsite ISFSI.

Section 1.1: Definitions

The licensee proposed to delete the definitions for “Certified Fuel Handler” and “Non-Certified Operator” in IP2 PDTs Section 1.1, “Definitions.” The purpose of these definitions was to provide uniform interpretation of frequently used terms in the PDTs for the existing staffing requirements for IP2. After the transfer of spent fuel from the IP2 SFP to the ISFSI is complete, and the prohibition for storing fuel in the IP2 SFP discussed below is put in place, the IP2 staffing requirements related to certified fuel handlers and non-certified operators will no longer be necessary. In addition, the proposed changes to other IP2 PDTs sections would either eliminate or relocate the information that references these terms.

As a result of the deletion of any reference to the terms, certified fuel handlers and non-certified operators, they need not be defined or included in the IP2 PDTs. The NRC staff finds that since the terms would no longer be applicable after the spent fuel has been removed from the SFP and transferred to the ISFSI, this change is administrative in nature and will not impact the continued safe storage and maintenance of spent fuel in the ISFSI. The NRC staff therefore finds it acceptable to delete these definitions from Section 1.1 of the IP2 PDTs.

Section 4.3: Fuel Storage

The licensee proposed to delete and replace Section 4.3, “Fuel Storage,” of the IP2 PDTs. Section 4.3 currently provides a description and requirements regarding prevention of criticality of spent fuel in the SFP storage racks, prevention of SFP drainage, and spent fuel capacity limitations, to reflect the condition of permanent removal of all spent fuel from the IP2 SFP. Specifically, the license has proposed to replace the contents of PDTs Section 4.3 with the statement: “Spent fuel shall not be stored in the Spent Fuel Pit.”

Section 4.3 would be revised to reflect that there will no longer be any fuel assemblies in the IP2 SFP, or need for the associated PDTs requirements, as well as deleting the associated SFP design references. A new design feature will be added stating that spent fuel shall not be stored in the SFP. This new design feature documents the premise on which the proposed amendment is based (i.e., that spent fuel will no longer be stored in the IP2 SFP). The NRC staff finds that the removal or change of these design feature descriptions will have no impact on the requirements for spent fuel safety and storage in the ISFSI configuration, or the continued safe storage and maintenance of irradiated fuel in the ISFSI, and the proposed changes to Section 4.3 of the IP2 PDTs are therefore acceptable.

Section 5.0: Administrative Controls

Section 5.0, "Administrative Controls," of the PDTs establishes the requirements associated with responsibility, organization, and facility staff qualifications for IP2. The licensee has proposed to revise this section of the PDTs to include only those administrative requirements that are applicable to the facility when all of the spent fuel from the IP2 SFP is in the ISFSI. Therefore, portions of Section 5.0 of the PDTs, such as Sections 5.1.2, 5.2.2, and 5.3.2, are to be deleted in their entirety, with modifications to Sections 5.2.1.d and 5.7.2.a.1.

Section 5.1 "Responsibility," provides a description of requirements for the plant manager and the designee, as well as the shift manager. With the removal of all spent fuel from the IP2 SFP, the need for a shift manager to be responsible for the shift command function during spent fuel management tasks no longer exists. Accordingly, the IP2 shift manager responsibilities are being eliminated and the licensee proposed to delete Section 5.1.2 of the IP2 PDTs to remove the requirement for a shift manager and shift command function.

The IP2 shift manager responsibilities are being eliminated. The position of the IP2 shift manager is a holdover from supervising multiple functions at an operating nuclear power plant. With the limited requirements for supervision of the passive fuel storage at the ISFSI, or with respect to the decommissioning of the former power generation facility, the shift manager position and the shift command function are no longer required. Because this change is administrative in nature, is consistent with the level of responsibilities when all of the IP2 spent fuel is stored in the ISFSI, the NRC staff finds this change acceptable.

Section 5.2.1, "Onsite and Offsite Organization," establishes the requirements for plant lines of authority, responsibilities, and requirements for organizational freedom for certain personnel, including those performing health physics or quality assurance (QA) functions. Section 5.2.1.d provides requirements for organizational freedom of the Certified Fuel Handler (CFH) trainers, as well as the health physics and QA personnel. The licensee proposed to eliminate the term CFH from PDTs Section 5.2.1.d and replace it with "...*individuals that* carry out health physics or perform QA functions.

Section 5.2.2, "Facility Staff," establishes the requirements for personnel required at the plant to assure safe facility operation and the safety of the nuclear fuel. This section provided for adequate staff to ensure the safe storage and movement of fuel, including an individual qualified in radiation protection procedures. The licensee proposed to delete PDTs Section 5.2.2 in its entirety. Following the transfer of all spent fuel to the ISFSI, and the new provision in Section 4.3 of the IP2 PDTs prohibiting storage of fuel in the IP2 SFP, there will no longer be a need for CFHs or the other specified personnel requirements in this section.

After implementation of the proposed revisions to the IP2 PDTs, storage of spent fuel in the IP2 SFP will be prohibited and with the removal of the spent fuel from the IP2 SFP, there are no remaining spent fuel assemblies to be monitored in the IP2 SFP and there are no credible accidents at IP2; accordingly, there will no longer be a need for many of the personnel described in Section 5.2, or the associated training programs. There are no credible accidents at IP2 requiring the actions of a CFH, Shift Manager, or a Non-certified Operator to prevent occurrence or mitigate the consequences of an accident. Therefore, the proposed deletions of the PDTs Section 5.2 requirements will have no impact on safe storage and maintenance of spent fuel in the ISFSI and are therefore acceptable to the NRC staff.

Section 5.3, "Facility Staff Qualifications," establishes the minimum requirements for staff qualification. The licensee proposed to delete PDTs Section 5.3.2, which specifies requirements for an NRC-approved CFH training and retraining program, in its entirety. The ISFSI is a passive system, and upon removal of the spent fuel from the IP2 SFP, there are no remaining spent fuel assemblies to be monitored and there are no credible spent fuel related accidents that require the actions of a CFH to prevent occurrence or mitigate the consequences. As such, following the transfer of all IP2 spent fuel to the ISFSI, and the new PDTs Section 4.3 prohibition from storing spent fuel in the IP2 SFP, there will no longer be a need for certified fuel handlers, which obviates the need for the associated training or retaining program. Therefore, the proposed deletion of PDTs Section 5.3.2 is acceptable.

The licensee has also proposed to modify Section 5.7, "High Radiation Area," which provides a description and requirements regarding controls applied to high radiation areas at IP2. Specifically, PDTs Section 5.7.2.a.1 would be revised to allow the IP3 Shift Manager, rather than shift supervisor, along with the radiation protection manager or his or her designee, to maintain administrative control of all door and gate keys involved with entry control for the high radiation areas specified in that section. This change is administrative in nature and is consistent with the changes discussed above and is therefore acceptable to the NRC staff.

Appendix C – Inter-Unit Fuel Transfer Technical Specifications

The licensee proposed the deletion of the Appendix C TS, which define requirements that permitted the transfer of spent fuel from IP3 to the IP2 SFP, in their entirety. Following the transfer of all spent fuel from the IP2 SFP to dry storage within the ISFSI, inter-unit transfer of spent fuel from IP3 to IP2 will no longer be permitted. Therefore, this deletion is consistent with the changes discussed above, and is acceptable to the NRC staff.

4.4 Conclusion

Based on the NRC staff's review of the proposed changes to the IP2 RFL and PDTs, as described above, the NRC staff concluded that the requirements of 10 CFR 50.36, pertaining to the prevention of accidents and the mitigation of accident consequences, are addressed in a satisfactory manner, considering the permanently shutdown and defueled status of the facility, complemented by the complete transfer of all remaining spent fuel from the IP2 SFP to the onsite ISFSI. Further, the changes proposed by this LAR will delete or modify requirements that will no longer be applicable following the transfer of all IP2 spent fuel to the ISFSI, as well as updating administrative controls. On the basis of its review, the NRC staff concluded that the licensee's request adequately addresses the applicable regulatory requirements for a permanently shutdown nuclear power facility with all spent fuel transferred to dry cask storage in an ISFSI. Therefore, the NRC staff concludes that the licensee's proposed changes to the IP2 RFL and PDTs are acceptable.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment to the IP2 RFL and PDTs includes changes to requirements with respect to installation or use of a facility component located within the protected area, as well as changes to the licensee's administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, as published in the *Federal Register* on December 7, 2022 (87 FR 75071) (Reference 12), and there have been no public comments on this finding. Additionally, the IP2 amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22 (c)(9) and 10 CFR 51.22(c)(10)(ii). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the amendment on February 22, 2023. The State official had no comments per an email dated February 23, 2023 (Reference 13).

7.0 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) issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

8.0 REFERENCES

1. Letter from Anthony J. Vitale (Entergy Nuclear Northwest), to U.S. Nuclear Regulatory Commission, "Notification of Permanent Cessation of Power Operations Indian Point Nuclear Generating Unit Nos. 2 and 3," dated February 8, 2017 (ADAMS Accession No. ML17044A004).
2. Letter from A. Christopher Bakken III (Entergy Nuclear Operations, Inc.), to U.S. Nuclear Regulatory Commission, "Application for Order Consenting to Transfers of Control of Licenses and Approving Conforming License Amendments Indian Point Nuclear Generating Units 1, 2 and 3," dated November 21, 2019 (ML19326B953).
3. Letter from Andrea L. Sterdis (Holtec Decommissioning International, LLC), to U.S. Nuclear Regulatory Commission, "Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3," dated December 19, 2019 (ML19354A698).
4. Letter from Anthony J. Vitale (Entergy Nuclear Northwest), to U.S. Nuclear Regulatory Commission, "Certifications of Permanent Cessation of Power Operations and

Permanent Removal of Fuel from the Reactor Vessel Indian Point Nuclear Generating Unit No. 2,” dated May 12, 2020 (ML20133J902).

5. Richard V. Guzman (U.S. Nuclear Regulatory Commission), letter package to A. Christopher Bakken III (Entergy Nuclear Operations, Inc.), “Indian Point Nuclear Generating Unit Nos. 1, 2 and 3 - Order, Safety Evaluation, and Draft Conforming Amendment for Transfer of Facility Operating Licenses to Holtec International, Owner, and Holtec Decommissioning International, LLC, Operator,” dated November 23, 2020 (ML20297A341).
6. Letter from Jean A. Fleming (Holtec Decommissioning International, LLC), to U.S. Nuclear Regulatory Commission, “Description and Evaluation of Proposed Changes - License Amendment Request to Revise Indian Point Nuclear Generating Unit No. 2 Permanently Defueled Technical Specifications to Modify IP2 Staffing Requirements following Transfer of Spent Fuel to Dry Storage,” dated August 2, 2022 (ML22214A128).
7. Letter from Jean A. Fleming (Holtec Decommissioning International, LLC) to U.S. Nuclear Regulatory Commission, “Registration of Spent Fuel Casks and Notification of Permanent Removal of All Indian Point Unit 2 Spent Fuel Assemblies from the Spent Fuel Pit,” dated February 15, 2023 (ML23046A102).
8. NRC Final Policy Statement on “Technical Specifications Improvements for Nuclear Power Reactors,” dated July 22, 1993 (33 FR 18610).
9. NRC Final Rule on, “Decommissioning of Nuclear Power Reactors,” dated July 29, 1996 (61 FR 39278).
10. Indian Point Energy Center, Indian Point Units 1, 2 and 3, Post Shutdown Decommissioning Activities Report, Revision 0, December 2019 as amended by HDI Letter to U.S. NRC, “Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations – Holtec Decommissioning International, LLC,” (Letter HDI-IPEC-22-029) (ML22084A059) dated March 25, 2022.
11. HI-2210651, Revision 6, “Fuel Loading Plan for Indian Point Unit 2 and Unit 3,” dated July 8, 2022.
12. NRC License amendment request; opportunity to comment, request a hearing and to petition for leave to intervene, “Holtec Decommissioning International, LLC, Holtec Indian Point 2, LLC; Indian Point Nuclear Generating Unit No. 2,” dated December 7, 2022 (87 FR 75071).

13. Email from Alyse Peterson (New York State Energy Research and Development Authority), to U.S. Nuclear Regulatory Commission, "Formal comments on Holtec License Amendment Request to Revise Indian Point Nuclear Generating Unit No. 2 Permanently Defueled Technical Specifications to Modify Staffing Requirements following Transfer of Spent Fuel to Dry Storage," dated February 23, 2023 (ML23055A111).

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