

From: [Karl Sturzebecher](#)
To: [Jean Fleming](#)
Cc: [Bill Noval](#); [Matthew Johnson](#); [Walter Wittich](#); [Shaun Anderson](#); [michael norris](#); [Jeannette Arce](#)
Subject: Request for Additional Information related to IPEC LAR to Revise the Emergency Plan and Emergency Action Level Scheme (L-2022-LLA-0195)
Date: Friday, June 23, 2023 8:14:00 AM
Attachments: [IPEC ISFSI Only NRC RAI Issuance FINAL.pdf](#)

Dear Jean Fleming:

By letter dated November 17, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML22321A148](#)), Holtec Decommissioning International, LLC on behalf of Holtec Indian Point 2, LLC (IP2) and Holtec Indian Point 3, LLC (IP3), collectively referred to as Indian Point Energy Center (IPEC), requests U.S. Nuclear Regulatory Commission (NRC) review and approval of the IPEC Independent Spent Fuel Storage Installation Facility (ISFSI)-Only Emergency Plan (IOEP) and associated Emergency Action Level (EAL) scheme to reflect removal of all spent nuclear fuel from the IP2 and IP3 Spent Fuel Pits to dry cask storage within a site controlled ISFSI. The proposed changes were submitted to the NRC for approval prior to implementation, as required under Paragraph 50.54(q)(4), "[Conditions of licenses – Emergency plans](#)," of Title 10 of the *Code of Federal Regulations* (10 CFR) and 10 CFR Part 50, "[Domestic Licensing of Production and Utilization Facilities](#)," Appendix E, "[Emergency Planning and Preparedness for Production and Utilization Facilities](#)," Section IV.B.2, "Content of Emergency Plans."

The proposed amendment would modify the IPEC license by replacing the IPEC Permanently Defueled Emergency Plan (PDEP) and the associated EAL scheme with the IOEP and its associated EAL scheme to reflect the storage of all IPEC fuel on the ISFSI. The proposed changes reduce the scope of onsite emergency planning requirements to reflect the reduced scope of potential radiological accidents with all IPEC spent fuel in dry cask storage within the ISFSI. After all spent fuel is in dry cask storage within the ISFSI, the number and severity of potential radiological accidents possible at IPEC are substantially lower, which are under review by the NRC staff.

The NRC staff has reviewed the subject submittal and determined that additional information is needed to complete its review, as described in the enclosed Request for Additional Information (RAI). In order to continue the review of the proposed changes to the IPEC PDEP and the Permanently Defueled EAL scheme, please respond to this RAI within 30 days.

In accordance with 10 CFR Section 2.390, "[Public inspections, exemptions, requests for withholding](#)," of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC website at <https://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning the above, please contact me at 301-415-8534 or via email at Karl.Sturzebecher@nrc.gov.

Karl

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Docket Nos.:

50-003, 50-247, 50-286

Enclosure:

Request for Additional Information

cc w/enclosures: Indian Point ListServ

ADAMS Accession No.: ML23171B038; Letter: ML23171B043; Enclosure: B23171B044