

REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO A PROPOSED LICENSE AMENDMENT  
TO APPROVE THE INDEPENDENT SPENT FUEL STORAGE  
INSTALLATION-ONLY EMERGENCY PLAN  
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC  
INDIAN POINT NUCLEAR GENERATING UNITS 1,2,AND 3  
DOCKET NOS. 50-003, 50-247 AND 50-286

By letter dated November 17, 2022, (Agencywide Documents Access and Management System Accession No. [ML22321A148](#)), Holtec Decommissioning International, LLC (HDI), on behalf of Holtec Indian Point 2, LLC (IP1 and IP2) and Holtec Indian Point 3, LLC (IP3), collectively referred to as Indian Point Energy Center (IPEC), requests an amendment to Provisional Operating License No. DPR-5 for IP1, Renewed Facility License No. DPR-26 for IP2, and Renewed Facility Operating License No. DPR-64 for IP3. The license amendments requested 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 (SFPs) to dry cask storage within a site controlled ISFSI. The proposed changes are being submitted to the NRC for approval prior to implementation, as required under Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 50.54(q)(4), "[Conditions of licenses – 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.

The following request for additional information (RAI) is needed to facilitate the technical review being conducted by the Division of Preparedness and Response, Reactor Licensing Branch staff. Timely and accurate response to the draft RAI is requested in order to continue the staff's review of the IPEC 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.

**RAI 1**

Requirement:

- 10 CFR 50.47(b)(12), "[Emergency plans.](#)" as proposed to be exempted, states, in part: "Arrangements are made for medical services for contaminated injured individuals.

- Associated guidance in NUREG-0654, "[Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants \(FEMA-REP-1\)](#)," as modified by NSIR/DPR/ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants," Evaluation Criterion O.3, states: "Training for individuals assigned to licensee first aid teams shall include courses equivalent to Red Cross First Aid, CPR, Automated External Defibrillators (AED) for Lay Responders or equivalent."

However, Section O of the proposed ISFSI IOEP, Item 1.1(1), "First Aid Response," states: "First Aid training is provided to personnel assigned on-shift in accordance with site training and qualification plan."

Issue:

HDI does not provide information that the first aid training offered to personnel assigned on-shift is equivalent to Red Cross First Aid, Cardiopulmonary Resuscitation (CPR), or AED.

Request:

Please provide what level of training is offered to on-shift personnel assigned to respond to medical emergencies at IPEC.