



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD, SUITE 102  
KING OF PRUSSIA, PA 19406-1415

January 20, 2026

Kelly Trice  
President - HDI  
Holtec Decommissioning International, LLC  
Krishna P. Singh Technology Campus  
1 Holtec Boulevard  
Camden, NJ 08104

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT ENERGY CENTER UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2025003, 05000247/2025003, 05000286/2025003, INDEPENDENT SPENT FUEL STORAGE INSTALLATION INSPECTION REPORT 07200051/2024001, AND EXERCISE OF ENFORCEMENT DISCRETION

Dear Kelly Trice:

On December 31, 2025, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Indian Point Energy Center (IPEC) Units 1, 2 and 3. The results of the inspection were discussed with Matthew Johnson, Acting Site Vice President, and other members of your staff on January 8, 2026, and are described in the enclosed inspection report.

The NRC identified a violation of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72.48, paragraphs (c)(1), (c)(2), and (d)(1), and provisions of 10 CFR 72.212 that resulted from a Certificate of Compliance (CoC) holder's failure to comply with 10 CFR 72.48 for a CoC holder-generated change for the Holtec continuous basket shim multi-purpose canister variant design. However, an Interim Enforcement Policy issued in August 2025 is applicable to this violation. Specifically, Enforcement Policy Section 9.4, "Enforcement Discretion for General Licensee Adoption of Certificate of Compliance (CoC) Holder-Generated Modifications under 10 CFR Part 72.48," provides enforcement discretion to not issue an enforcement action for this violation. The licensee will be expected to comply with 10 CFR 72.212 provisions after the NRC dispositions the noncompliance for a CoC holder-generated change that affects the General Licensee.

No other violations of more than minor safety significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Elise Eve, Acting Chief  
Decommissioning, ISFSI, and Reactor  
Health Physics Branch  
Division of Radiological Safety and Security

Docket Nos. 05000003, 05000247,  
05000286, and 07200051  
License Nos. DPR-5, DPR-26, and DPR-64

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Enclosure: Inspection Report Nos.  
05000003/2025003, 05000247/2025003,  
05000286/2025003, and 07200051/2024001

SUBJECT: HOLTEC DECOMMISSIONING INTERNATIONAL, LLC, INDIAN POINT ENERGY CENTER UNITS 1, 2 AND 3 - NRC INSPECTION REPORT NOS. 05000003/2025003, 05000247/2025003, 05000286/2025003, INDEPENDENT SPENT FUEL STORAGE INSTALLATION INSPECTION REPORT 07200051/2024001, AND EXERCISE OF ENFORCEMENT DISCRETION DATED JANUARY 20, 2026

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**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Nos. 05000003, 05000247, 05000286, and 07200051

License Nos. DPR-5, DPR-26, and DPR-64

Report Nos. 05000003/2025003, 05000247/2025003, 05000286/2025003, and 07200051/2024001

Enterprise Identifiers: I-2025-002-0074 and I-2024-001-0110

Licensee: Holtec Decommissioning International, LLC (HDI)

Facility: Indian Point Energy Center, Units 1, 2, and 3

Location: Buchanan, NY

Inspection Dates: July 1, 2025, to December 31, 2025

Inspectors: S. Veunephachan, Senior Health Physicist  
Decommissioning, ISFSI and Reactor Health Physics Branch  
Division of Radiological Safety and Security

B. Edwards, Health Physicist  
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Division of Radiological Safety and Security

Approved By: Elise Eve, Acting Chief  
Decommissioning, ISFSI and Reactor Health Physics Branch  
Division of Radiological Safety and Security

Enclosure

## SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection of problem identification and resolution, fire protection, decommissioning performance and status reviews, occupational radiation exposure, and solid radioactive waste management and transportation. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and site walk-downs. The U.S. Nuclear Regulatory Commission's (NRC's) program for overseeing the safe decommissioning of a permanently shutdown nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Additionally, this inspection report includes a review of Independent Spent Fuel Storage Installation (ISFSI) dry cask activities. The NRC's program for overseeing the operation of dry storage of spent fuel at an ISFSI is described in IMC 2690, "Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for Title 10 of the Code of Federal Regulations (CFR) Part 71 Transportation Packagings."

### List of Violations

No violations of more than minor significance were identified. One violation was identified for which enforcement discretion was granted.

### Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	07200051/2023004-01	Use of Holtec Multipurpose Canister Continuous Basket Shim Variant	60855	Closed
EDG	EAF-NMSS-2025-0225	Noncompliance Related to a General Licensee's Use of Non-Qualified Spent Fuel Casks (IEP 9.4)	60855	Closed

## **SITE STATUS**

Indian Point Units 1, 2, and 3 were inspected under the “Actively Decommissioning (DECON), No Fuel in the Spent Fuel Pool” category. The categories of decommissioning are described in IMC 2561.

The inspectors performed on-site decommissioning inspection activities on July 21 – 24, September 8 – 11, and December 8 – 11, 2025 supplemented by in-office reviews and periodic phone calls. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and site walk-downs.

HDI continued reactor vessel internal segmentation for Unit 2 and Unit 3. The site continued segmentation in Unit 1, including the 12 and 13 boilers. HDI continued conventional demolition including the access building. HDI continued to package and ship radioactive waste offsite during the inspection period. HDI began steam generator segmentation on 21 steam generators.

## **INSPECTION SCOPES**

The inspection was conducted using the appropriate portions of the Inspection Procedures (IPs). Currently approved IPs are located and may be viewed on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. The inspectors reviewed select procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. The inspections were declared complete when the objectives of the IPs were met, consistent with Inspection Manual Chapters (IMCs) 2561, “Decommissioning Power Reactor Inspection Program.” and 2690 “Inspection Program for Storage of Spent Reactor Fuel and Reactor-Related Greater-than-Class C Waste at Independent Spent Fuel Storage Installations (ISFSI) and for 10 CFR Part 71 Transportation Packagings.”

### IP 71801 - Decommissioning Implementation and Status

#### Status of Decommissioning (IP Section 03.01)

The inspectors attended select management meetings, including station oversight committee and management review committee meetings.

The inspectors performed plant walk-downs of the following locations to assess field conditions and decommissioning activities:

- 1) Unit 1, 2, and 3 containments
- 2) Unit 2 primary auxiliary building
- 3) Unit 3 primary auxiliary building

#### Implementation of Regulatory and Licensing Requirements (IP Section 03.02)

The inspectors reviewed 50.59 screenings to determine if changes made by HDI required prior NRC approval. The reviews included:

- 1) EC IPC-2024-014, Class B/C Waste Onsite Transport and Storage – IP2
- 2) EN-LI-100 for SAO-703 R39

The inspectors reviewed the following licensing basis documents and regulatory required documents:

- 1) 10 CFR 50.75(g) file
- 2) Offsite Dose Calculation Manual (ODCM), Revision 8

#### IP 83750 - Decommissioning Occupational Radiation Control

##### Radiological Work Planning and Execution (IP Section 03.01)

The inspectors reviewed Radiation Work Permits (RWPs) and As Low As Reasonably Achievable (ALARA) work plans and observed Radiation Protection (RP) activities associated with the following:

- 1) Unit 2 primary auxiliary building
- 2) Unit 2 steam generator segmentation
- 3) Steam generator segmentation in the steam generator mausoleum

##### Occupational Radiation Exposure Topical Areas (IP Section 03.02)

###### Dosimetry (IP Section 03.02a)

The inspectors verified the 2025 National Voluntary Laboratory Accreditation Program certification.

###### Airborne and Contamination Controls (IP Section 03.02b)

The inspectors observed the following activities for contamination control:

- 1) Workers exiting of the radiologically controlled area (RCA) for Unit 1, 2, and 3.
- 2) Radiation Protection (RP) technicians surveying and decontaminating material for release from the RCA
- 3) Walk downs and observations of continuous air monitors and grab samplers located in:
  - Unit 2 95' elevation by roll-up door, AMS-4, S/N: 11724 on September 10, 2025
  - Unit 2 95' elevation near D-Ring entrance, AMS-4, S/N: 11521 on September 10, 2025
  - Steam generator mausoleum, low flow air sampler, S/N: 10504 on December 10, 2025

###### Source Term Characterization

The inspectors reviewed the following source term characterization to ensure the licensee was using appropriate instruments commensurate with the characterized radiation types and energies:

- 1) Unit 3 spent fuel pool racks dry active waste
- 2) Unit 2 segmentation TN filters
- 3) Unit 1 primary system components decayed

#### IP 84750 - Decommissioning Radioactive Waste Treatment, and Effluent and Environmental Monitoring

### Annual Effluent and Environmental Reports (IP Section 03.02)

The inspectors verified the annual Radiological Effluent Release Report and Radiological Environmental Operating Report were submitted as required and reported doses are below regulatory requirements.

### Implementation of the Radiological, Effluent, and Groundwater Protection Initiative Programs (IP Section 03.03)

#### Radioactive Gaseous and Liquid Effluent Treatment (Section 03.03a)

The inspectors performed walkdowns on the following effluent radiation monitors to ensure adequate material condition:

- 1) U3 Plant Vent
- 2) R-27
- 3) U3 Rams Vent

#### Radiological Environmental Monitoring Program (Section 03.03b)

The inspectors conducted walkdowns of the following thermoluminescent dosimeter monitoring stations to ensure they were located as stated in the ODCM and to determine adequate material condition on July 23, 2025:

- 1) OSL-7, City Water Tank
- 2) OSL-8, Main Entrance, bus stop
- 3) OSL-36, Lower South Street & Franklyn
- 4) OSL-5, Bleakly entrance

The inspectors conducted walkdowns of the following air sampling stations to determine they were located as stated in the ODCM and to determine adequate material condition on July 24, 2025:

- 1) Meteorological tower location
- 2) Algonquin

#### Groundwater Protection Initiative (IP Section 03.03c)

The inspectors performed walkdowns of the following groundwater wells to assess adequate material condition and location:

- 1) MW-32
- 2) MW-33
- 3) MW-37
- 4) MW-42
- 5) MW-43
- 6) MW-55
- 7) MW-58
- 8) MW-60
- 9) MW-66
- 10) U3-4D
- 11) U3-4S
- 12) U3-T1

IP 86750 - Decommissioning Solid Radioactive Waste Management, Demolition and Transportation of Radioactive Materials

Radioactive Material Storage, Control, and Processing (IP Section 03.01)

Radioactive Sources (IP Section 03.01c)

The inspectors reviewed the leak tests and conducted walkdowns on July 23, 2025, for the listed sealed sources to verify sources to be intact and located commensurate with licensee records:

- 1) S/N: IP3-403
- 2) S/N: IP3-376
- 3) S/N: IP3-45
- 4) S/N: IP3-120

Transportation of Radioactive Materials (IP Section 03.02)

The inspectors reviewed the shipping manifests for the following radioactive waste shipments:

- 1) 25-2-100, Mechanical Filter Liner, Radioactive Material, LSA-II
- 2) 25-3-043, TN Filter Liner, Radioactive Material, LSA-II
- 3) 25-3-091, Mechanical Filter Liner, Radioactive Material, LSA-II

IP 60855, "Operation of an Independent Spent Fuel Storage Installation"

The inspector conducted a periodic in-office follow-up that focused on the review of the general licensee's (GL's) implementation of the 10 CFR 72.48 process and associated corrective actions related to Independent Spent Fuel Storage Installation (ISFSI) activities.

The review included:

- 1) 72.48 Evaluations and Screenings: Reviewed the GL's 72.48 process and associated evaluation associated with the adoption of the continuous basket shim (CBS) variant
- 2) Corrective Action Program (CAP): Reviewed condition reports related to the design change of the CBS variant

## INSPECTION RESULTS

Enforcement Discretion	Enforcement Action EAF-NMSS-2025-0225: Noncompliance Related to a General Licensee's Use of Non-Qualified Spent Fuel Casks (IEP 9.4)	60855
<p><u>Description</u>: Holtec International (also referred to as the CoC [Certificate of Compliance] Holder) implemented a design change to its Multi-Purpose Canister (MPC) fuel basket, known as the continuous basket shim (CBS) variant, which altered the structural configuration from welded to bolted shims. This change resulted in a departure from the method of evaluation (MOE) described in the final safety analysis report (FSAR) used to establish the design basis for tip-over events. Holtec did not fully evaluate the cumulative impact of the MOE changes or apply them consistently with the licensing basis. As a result, the NRC issued three Severity Level IV violations to Holtec for noncompliance with 10 CFR 72.48 requirements (see "U.S. Nuclear Regulatory Commission Inspection Report 07201014/2022-201, Holtec International," Agencywide Documents Access and Management System [ADAMS] Accession No. ML23145A175 and "Holtec International, Inc. – Notice of Violation; The U.S. Nuclear Regulatory Commission Inspection Report No. 07201014/2202-201," ADAMS Accession No. ML24016A190).</p> <p>When the General Licensee (GL) chooses to adopt a change the CoC holder made pursuant to a CoC holder's change authority under 10 CFR 72.48 (referred to herein as a "CoC holder-generated change"), the GL must perform a separate review using the requirements of 10 CFR 72.48(c). Accordingly, when the GL chooses to adopt a CoC holder-generated change, and that change results in a non-conforming cask, there is a violation of 10 CFR 72.48 and certain provisions of 10 CFR 72.212 by the GL, in addition to a CoC holder violation of 10 CFR 72.48. As it relates to the adoption of the continuous basket shim (CBS) variant casks, the GL failed to recognize the noncompliance with 10 CFR 72.48 requirements made by the CoC holders design change and subsequently loaded the CBS variant casks.</p> <p>Corrective Actions: The GL entered this into its corrective action program with actions to restore compliance with the 10 CFR 72.212 provisions that require each cask to conform to the terms, conditions, and specifications of a CoC or an amended CoC listed in 72.214.</p> <p>Corrective Action References: IR-IP2-1059</p>		
<p><u>Enforcement</u>:</p> <p>Significance/Severity: This violation was dispositioned in accordance with Section 9.4, "Enforcement Discretion for General Licensee Adoption of CoC Holder-Generated Changes Under 10 CFR 72.48," of the NRC's Enforcement Policy.</p> <p>Specifically, as stated in the Policy, the NRC will exercise enforcement discretion and not issue an enforcement action to a General Licensee, for a noncompliance with the requirements of paragraphs (c)(1) and (2) and (d)(1) of 10 CFR 72.48 and with provisions of 10 CFR 72.212 that require GLs to ensure use of casks that conform to the terms, conditions and specifications of a CoC listed in 10 CFR 72.214, when the noncompliance results from a CoC holder's failure to comply with 10 CFR 72.48 for a CoC holder-generated change.</p>		

Violation: Title 10 CFR 72.48 (c)(1) requires, in part, that a licensee or certificate holder may make changes in the facility or spent fuel storage cask design as described in the FSAR (as updated), without obtaining: (ii) CoC amendment submitted by the certificate holder pursuant to § 72.244 if: (c) The change, test, or experiment does not meet any of the criteria in paragraph (c)(2) of this section.

Title 10 CFR 72.48(c)(2) requires, in part, that a general licensee shall request that the certificate holder obtain a CoC amendment, prior to implementing a proposed change, if the change would: (viii) Result in a departure from an MOE described in the FSAR used in establishing the design bases or in the safety analyses.

Title 10 CFR 72.48(d)(1) requires, in part, that the licensee shall have a written evaluation which provides the bases for the determination that the change does not require a CoC amendment pursuant to 72.48(c)(2).

Title 10 CFR 72.212(b)(3) requires, in part, a general licensee must ensure that each cask used by the general licensee conforms to the terms, conditions, and specifications of a CoC or an amended CoC listed in 72.214.

Contrary to the above, in August 2022, the licensee loaded the first CBS design variant and failed to maintain records of changes in the spent fuel storage cask design made pursuant to 72.48(c) that include a written evaluation which provided the bases for the determination that the change did not require a CoC amendment. The licensee failed to request that the certificate holder obtain a CoC amendment, prior to implementing a proposed change, if the change would: (viii) result in a departure from an MOE described in the FSAR used in establishing the design bases or in the safety analyses. Further, the licensee failed to ensure each cask conformed to the terms, conditions, and specifications of a CoC or amended CoC listed in 72.214.

Basis for Discretion: When a general licensee chooses to adopt a CoC holder-generated change, and that change results in a non-conforming cask, there is a violation of 10 CFR 72.48 and certain provisions of 10 CFR 72.212 by the GL, in addition to a CoC holder violation of 10 CFR 72.48. And, when a general licensee chooses to adopt a CoC holder-generated change without performing a separate 10 CFR 72.48 analysis, the general licensee is in violation of 10 CFR 72.48. These requirements could lead to enforcement actions being issued against both the general licensee's 10 CFR 72.48 program (as well as certain 10 CFR 72.212 violations) and the CoC holder's 10 CFR 72.48 program for changes that originated with the CoC holder. The NRC has concluded that this enforcement approach would be inconsistent with efficiency, which is one of the NRC's Principles of Good Regulation, and NRC's mission of efficient and reliable oversight.

Since this violation meets the conditions of the NRC's Enforcement Policy Section 9.4, "Enforcement Discretion for General Licensee Adoption of Certificate of Compliance Holder-Generated Changes under 10 CFR 72.48" (ML25224A097), and the licensee has entered the noncompliance into the corrective action program, the NRC is exercising enforcement discretion by not issuing an enforcement action for this violation.

The disposition of this violation closes URI: 07200051/2023004-001

IP 92702 - Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, and Orders

In accordance with guidance in Inspection Procedure (IP) 92702, Follow-Up on Traditional Enforcement Actions Including Violations, Deviations, Confirmatory Action Letters, And Orders, inspector conducted follow-up inspection, in-office, of corrective actions associated with Notice of Violation; EA-24-010/EAF-RI-2025-0056.

The inspectors determined that the licensee has taken proper corrective actions in response to the violations as presented in the Holtec Root Cause Evaluation IP-01668 and associated corrective action plan.

**EXIT MEETING**

On January 8, 2026, the inspectors presented the inspection results to Matthew Johnson, Acting Site Vice President, and other members of the IPEC organization. No proprietary information was retained by the inspectors or documented in this report.