DUKE ENERGY FLORIDA

Stephanie A. Cuello
SENIOR COUNSEL

August 10, 2022

**VIA ELECTRONIC FILING**

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *Petition by Duke Energy Florida, LLC, to Approve Transaction with Accelerated Decommissioning Partners, LLC, for Accelerated Decommissioning Services at the CR3 Facility, etc.;* Dkt. No. 20190140-EI

Dear Mr. Teitzman:

Enclosed for filing on behalf of Duke Energy Florida, LLC ("DEF") in the above-referenced Docket, please find the attached Nuclear Regulatory Commission (NRC) inspection report dated August 9, 2022. ADP informed DEF on August 9, 2022, that inspection report number 05000302/2022002 was issued and included a non-cited violation (NCV) notice of violation associated with D&D activities. Order No. PSC-2020-0289-FOF- EI, dated August 27, 2020, issued in the above-referenced Docket, provides that "DEF shall be required to provide the following information through the final period of partial license termination: 1. the information responsive to items identified in the DSA [Decommissioning Services Agreement], Attachment 9, Section A should be provided to the Commission within two business days of DEF's receipt of this information from ADP."

A NRC, level IV, NCV is the least significant of NRC violations and does not require enforcement actions.

Thank you for your assistance in this matter and if you have any questions, please feel free to contact me at (850) 521-1425.

Sincerely,

*s/ Stephanie A. Cuello*

Stephanie A. Cuello

SAC/mw
Attachment

106 East College Avenue, Suite 800, Tallahassee, FL 32301 ▪ Phone: 850.521.1425 ▪ Fax: 727.820.5041
▪ Email: stephanie.cuello@duke-energy.com

**CERTIFICATE OF SERVICE**

*Docket No. 20190140-EI*

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 10th day of August, 2022.

*s/ Stephanie A. Cuello*
Attorney

| | |
|---|---|
| Suzanne Brownless<br>Florida Public Service Commission<br>2540 Shumard Oak Blvd.<br>Tallahassee, FL 32399-0850<br>sbrownle@psc.state.fl.us<br><br>Jon C. Moyle, Jr./ Karen A. Putnal<br>Moyle Law Firm, P.A.<br>118 North Gadsden Street<br>Tallahassee, FL 32301<br>jmoyle@moylelaw.com<br>kputnal@moylelaw.com<br>mqualls@moylelaw.com | Charles J. Rehwinkel<br>Office of Public Counsel<br>c/o The Florida Legislature<br>111 West Madison Street, Room 812<br>Tallahassee, FL 32399<br>rehwinkel.charles@leg.state.fl.us<br><br>James W. Brew / Laura Wynn Baker<br>Stone Mattheis Xenopoulos & Brew, PC<br>1025 Thomas Jefferson Street, NW<br>Suite 800 West<br>Washington, DC 20007-5201<br>jbrew@smxblaw.com<br>lwb@smxblaw.com |

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

August 9, 2022

Mr. Billy Reid
Site Vice President
ADP CR3, LLC
2760 South Falkenburg Rd.
Riverview, FL 33578

SUBJECT: ACCELERATED DECOMMISSIONING PARTNERS (ADP) CR3, LLC, CRYSTAL RIVER UNIT 3 - NRC INSPECTION REPORT NO. 05000302/2022002

Dear Mr. Reid:

On June 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection under Inspection Manual Chapter 2561, "Decommissioning Power Reactor Inspection Program," at the permanently shut down Crystal River Nuclear Plant Unit 3 (CR-3). The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and the conditions of your license. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walkdowns. The results of the inspection were discussed with you and other members of the CR-3 staff on July 19, 2022, and are described in the enclosed report.

Based on the results of this inspection, one Severity Level IV violation of NRC requirements was identified and is documented in this report. The violation is being treated as a non-cited violation (NCV), consistent with Section 2.3.2.a of the Enforcement Policy. If you contest the violation or the significance of the violation, you should provide a response within 30 days of the date of this letter, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if any, will be made available electronically for public inspectionin the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Website at http://www.nrc.gov/reading-rm/adams.html. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Radioactive Waste; Decommissioning of Nuclear Facilities**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Website at www.nrc.gov; select **About NRC, Organizations & Functions**; **Office of Enforcement**; **Enforcement documents**; then **Enforcement Policy** (Under 'Related Information'). You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

No reply to this letter is required. Please contact Katherine Warner, at 610-337-5389, if you have any questions regarding this matter.

Sincerely,

Anthony M. Dimitriadis

Digitally signed by Anthony M. Dimitriadis
Date: 2022.08 09 10:11:35 -04'00'

Anthony Dimitriadis, Chief
Decommissioning, ISFSI, and Reactor Health Physics Branch
Division of Radiological Safety and Security

Docket No. 05000302
License No. DPR-72

Enclosure: Inspection Report 05000302/2022002 w/Attachment

cc w/encl: Distribution via ListServ

SUBJECT: ACCELERATED DECOMMISSIONING PARTNERS (ADP) CR3, LLC, CRYSTAL RIVER UNIT 3, NRC INSPECTION REPORT NO. 05000302/2022002 DATED AUGUST 9, 2022

Distribution:
KWarner, DRSS
ADimitriadis, DRSS
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SVeunephachan, DRSS
JParrott, DUWP
BWatson, DUWP

DOCUMENT NAME: https://usnrc.sharepoint.com/teams/Region-I-Decommissioning-Branch/Inspection Reports/Inspection Reports - Final/2Q 2022 Crystal River report final.docx

**SUNSI Review Complete:** KWarner
After declaring this document An Official Agency Record it **will** be released to the Public.
**ADAMS ACCESSION NO. ML22209A130**

| OFFICE | DRSS/RI | DRSS/RI | | | | |
|---|---|---|---|---|---|---|
| NAME | KWarner | ADimitriadis | | | | |
| DATE | 07/19/2022 | 8/9/2022 | | | | |

OFFICIAL RECORD COPY

# U.S. NUCLEAR REGULATORY COMMISSION
# REGION I

## INSPECTION REPORT

| | |
|---|---|
| Report No. | 05000302/2022002 |
| Docket No. | 05000302 |
| License No. | DPR-72 |
| Licensee: | Accelerated Decommissioning Partners CR3, LLC (ADP) |
| Facility: | Crystal River Unit 3 (CR-3) |
| Location: | Crystal River, FL 34428-6708 |
| Inspection Dates: | April 1 – June 30, 2022 |
| Inspectors: | Katherine Warner, Senior Health Physicist<br>Decommissioning, ISFSI, and Reactor Health Physics Branch<br>Division of Radiological Safety and Security |
| | Andrew Taverna, Health Physicist<br>Decommissioning, ISFSI, and Reactor Health Physics Branch<br>Division of Radiological Safety and Security |
| | Storm Veunephachan, Health Physicist<br>Decommissioning, ISFSI, and Reactor Health Physics Branch<br>Division of Radiological Safety and Security |
| Approved By: | Anthony Dimitriadis, Chief<br>Decommissioning, ISFSI, and Reactor Health Physics Branch<br>Division of Radiological Safety and Security |

## EXECUTIVE SUMMARY

Accelerated Decommissioning Partners CR3, LLC (ADP)
Crystal River Unit 3
NRC Inspection Report No. 05000302/2022002

An announced decommissioning inspection was completed on June 30, 2022, at the permanently shutdown Crystal River Unit 3 (CR3). The inspection included a review of design changes and modifications, corrective actions, occupational radiation exposure, safety conscious work environment, financial assurance, decommissioning performance and status reviews, fire protection, effluent monitoring, and solid radioactive waste management and transportation of radioactive materials. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walkdowns. The NRC's program for overseeing the safe decommissioning of a shutdown nuclear power reactor is described in Inspection Manual Chapter (IMC) 2561, "Decommissioning Power Reactor Inspection Program."

Based on the results of this inspection, one Severity Level IV non-cited violation (NCV) of NRC requirements was identified.

### List of Violations

The inspectors identified one Severity Level IV NCV of Title 10 of the *Code of Federal Regulations* (10 CFR) 20.1904(a) for the licensee's failure to ensure that each container of licensed material in the fuel transfer canal bares a label or has documentation providing sufficient information to permit individuals handling the licensed material to minimize exposure. Specifically, the site did not ensure that a bucket of portions of the specimen holder tubes in the fuel transfer canal bore a label or had documentation providing sufficient information to permit individuals handling the licensed material to minimize radiation exposure. However, because the violation is of very low safety significance and was entered into Crystal River's CAP (2022000101), this violation is being treated as an NCV consistent with Section 2.3.2 of the Enforcement Policy.

# REPORT DETAILS

## 1.0 Background

On February 20, 2013, Duke Energy sent a letter [Agency Documentation and Management System Accession Number ML13056A005] to the NRC certifying the permanent cessation of power operations and permanent removal of fuel from the reactor. This met the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.82(a)(1)(i) and 50.82(a)(1)(ii). On June 14, 2019, the NRC received a license transfer application [ML19170A209] and conforming amendment request filed by the Duke Energy Florida (DEF), LLC on behalf of itself and Accelerated Decommissioning Partners (ADP) CR3, LLC. The application sought NRC approval of the direct transfer ofFacility Operating License No. DPR-72 for CR-3 and the general license for the CR-3 ISFSI from the current holder, DEF to ADP CR3, which is a wholly owned subsidiary of ADP, LLC, which the NRC approved on April 1, 2020 [ML20069A023]. On October 1, 2020, ADP and Duke Energy successfully completed the transaction.

CR-3 was inspected under the "Actively Decommissioning (DECON), No Fuel in the Spent Fuel Pool" category as described in IMC 2561 during this inspection period.

## 2.0 Active Decommissioning Performance and Status Review

### 2.1 Inspection Procedures (IPs) 37801, 40801, 64704, 71801, 83750, 84750, and 86750

a. Inspection Scope

The inspectors performed on-site decommissioning inspections on April 4 – 7 and May 23 – 25, supplemented by in-office reviews of information supplied by ADP and periodic phone calls. The inspection consisted of observations by the inspectors, interviews with site personnel, a review of procedures and records, and plant walkdowns.

The inspectors conducted document reviews and interviews with plant personnel to determine if ADP procedures and processes were adequate and conducted in accordance with the regulations and guidance associated with 10 CFR 50.59, and to determine if changes made by ADP under 10 CFR 50.59 required prior NRC approval. The inspectors reviewed the site training program to qualify personnel as evaluators in the use of the 10 CFR 50.59 and 10 CFR 72.48 processes.

The inspectors assessed the implementation and effectiveness of IPEC's corrective action program (CAP) by reviewing a sampling of issues, non-conformances and conditions adverse to quality into the CAP. The inspectors reviewed a representative selection of CAP documents and interviewed the CAP manager to determine if a sufficiently low threshold for problem identification existed, if follow-up evaluations were of sufficient quality, and if the site assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue. The inspectors continued to review of CAP documents related to the January 10, 2022, fire to

determine if a sufficiently low threshold for problem identification existed, if follow-up evaluations were of sufficient quality, if ADP assigned timely and appropriate prioritization for issue resolution commensurate with the significance of the issue, and if actions were taken by the site were timely and effective. The inspectors also reviewed the results of a February 2022 Safety Conscious Work Environment (SCWE) survey and subsequent action plan and discussed with site staff.

The inspectors reviewed documents and interviewed plant personnel to assess the licensee's effectiveness of its decommissioning fire protection program and to determine if it was maintained and implemented to address the potential for fires that could result in the release or spread of radioactive materials. The inspectors performed plant tours to assess field conditions and the storage of combustible materials and observed operators performing surveillance activities. Specific follow up actions associated with a fire that occurred on January 10, 2022 continued, including interviews with personnel, review of corrective actions taken to date, and site walkdowns of areas where hot work was performed.

The inspectors conducted plant walk-downs to assess field conditions and decommissioning activities by evaluating material condition of structures, systems, and components, housekeeping, system configurations, and worker level of knowledge or procedure use and adherence. These walk-downs included the reactor, auxiliary, and turbine buildings. The inspectors observed select pre-job briefings and various work activities in the turbine, auxiliary, and reactor buildings. The inspectors also observed select management meetings, including a site leadership meeting and various morning status meetings to assess the licensee's status, progress and changes that could potentially impact decommissioning. Inspectors reviewed documentation and met with site management and staff to discuss financial assurance, staffing, status of decommissioning and upcoming activities, among other topics to verify whether the licensee is conducting activities in accordance with regulatory and license requirements.

The inspectors observed activities, reviewed documentation, and interviewed personnel associated with occupational radiation exposure to evaluate the licensee's protection of worker health and safety. The inspectors conducted several site walk-downs, including radiologically controlled areas, to examine and verify radiological postings, airborne and contamination controls, and locked high radiation doors and gates. The inspectors reviewed the radiological use of respirators and respirator training, personnel contamination procedures and events, and reviewed aspects of the site dosimetry program. The inspectors reviewed the site open air demolition analysis and the demolition plan and radiological surveys for the demolition of the fire service pump house and maintenance support building to determine if the activities were performed in accordance with site procedures and whether the analysis was bounding for NRC dose regulations. The inspectors reviewed the qualifications of select individuals in the radiation protection organization to determine if they met requirements outlined in the quality assurance program and other licensing documents.

The inspectors observed site personnel perform a liquid release and walked down the system to review the material condition of the structures, systems, and components and assess procedure use and adherence.

The inspectors reviewed activities and documentation associated with the possession, processing, storage, and shipment of licensed radioactive material. The inspectors also reviewed work packages for select recent shipments of radioactive waste, interviewed one of the site shippers, and toured radioactive waste handling and storage areas. The inspectors discussed the planned disposition of reactor vessel internals and reactor vessel with site personnel, including Greater-Than-Class-C (GTCC) waste. The inspectors performed observations of the reactor vessel internals cutting operations to determine if appropriate radiation protection practices had been applied and if the work had been conducted in accordance with site procedures. The inspectors discussed an overview of the water filtration system and the cutting media collection system with cognizant staff.

b. Observations and Findings

The inspectors determined that selected 10 CFR 50.59 screenings and evaluations had been properly performed. The inspectors determined that selected changes under 10 CFR 50.59 did not require prior NRC approval and safety reviews were performed for design changes and modifications in accordance with applicable regulatory requirements, license conditions and the Decommissioning Safety Analysis Report. The inspectors reviewed a change documentation that evaluated the use of reactor coolant bleed tanks and corresponding piping to support liquid releases to the environment through ongoing decommissioning and demolition (D&D) activities. The inspectors noted that the release point to the environment remained the same and appropriate dilution water was provided per site procedures. The inspectors observed a portion of the release procedure being performed and observed appropriate procedure adherence and adequate worker knowledge. The inspectors determined that the site had an adequate training program and adequate staffing on-site to perform such screenings and evaluations in various topical areas.

The inspectors determined that issues had been identified, entered into the CAP, and evaluated commensurate with their safety significance through document reviews. The inspectors noted that progress had been made on the corrective actions associated with the January 10, 2022, fire.

The inspectors reviewed the site fire protection program as defined by Crystal River Unit 3 Fire Protection Plan, Revision 38 and associated procedures and fire hazards analysis for compliance with regulatory and license requirements. The inspectors continued review of corrective actions in response to a fire that occurred on January 10, 2022, including a daily sign-off of hot work permits and a required work area walk down by a knowledgeable individual. The inspectors observed several of these work area walkdowns and noted increased worker knowledge in appropriately identifying combustibles to be removed or covered prior to hot work being conducted. Inspectors reviewed progress on additional corrective actions, including weekly field observations by responsible managers and the impact of the assignment of knowledgeable staff members to each major work area for the purpose of increasing knowledge transfer between work groups. Inspectors noted an increased field presence of responsible

managers and collaboration between former nuclear operators and the D&D workforce indicated improvement The inspectors will continue to follow up on these corrective actions during future inspections.

The inspectors continued an increased focus on the site's SCWE, including follow up the condition reports and associated corrective actions generated from theresults of the 3Q2021 and 4Q2021 inspections (NRC Inspection Reports (IRs) 2021003 and 2021004 respectively). The inspectors continued review of the site response to a SCWE survey conducted in February 2022, which identified several weaknesses, including in the areas of respectful work environment and workplace safety as well as lack of confidence that management would appropriately resolve issues, and lack of confidence of the ability to stop work without fear of retaliation. These weaknesses are consistent with issues identified in the SCWE assessment conducted in July 2021. The NRC notes that the action plan has a number of actions to address the issues (CR2022000063). The inspectors will continue to maintain an increased inspection focus in this area during future inspections.

The inspectors noted that during this inspection period, the site continued decommissioning and dismantlement activities in the auxiliary and turbine buildings, demolished the fire service pump house and the maintenance support building, continued segmentation of the reactor vessel internals, and prepared for GTCC waste transfer to radioactive waste canisters. The NRC notes that the radiological surveys for both demolished structures demonstrated compliance with the site analysis for open air demolition. The inspectors observed the status of and interviewed workers performing the demolition of the fire service pump house and noted that appropriate precautions were implemented to protect the fire header nearby. The inspectors also observed mechanical cutting activities in the auxiliary building 95' South Hallway and waste load out activities and observed appropriate work controls.

The inspectors interviewed personnel from ADP and Duke Energy responsible for financial assurance on the overall financial status of decommissioning. The inspectors noted that ADP submitted updated Decommissioning Cost Estimate (DCE) tables pursuant to 10 CFR 50.82(a)(7) ADAMS accession number (ML22148A001) to reflect the actual decommissioning costs in 2020 and 2021. The inspectors note that NRC headquarters staff has the lead for assessing the appropriateness of a licensee's decommissioning fund allocation.

The inspectors verified that the radiological respiratory protection and contamination control programs were being properly implemented. The inspectors observed workers donning and doffing respirators and PPE and did not identify any issues of concern. The inspectors verified that RWP's and ALARA plans as implemented were effective in limiting worker exposure, and occupational dose was appropriate for the scope of the radiological activities performed. The inspectors determined that RP (Radiation Protection) staff effectively controlled work activities, used appropriate instruments for the surveys, and survey records were clear and complete. The inspectors noted that the qualifications reviewed for selected staff met the requirements in the site licensing basis.

The inspectors noted the increased site water usage for the segmentation and that the site had completed the modification of the water management system to accommodate for the increased inventory. The inspectors performed walked downs of the system with the Operations Field Work Supervisor and observed portions of the system operation and did not identify any issues of concern.

The inspectors verified that selected radioactive waste shipping paperwork was properly completed, and site personnel were knowledgeable of their duties and responsibilities as required. The inspectors observed reactor vessel internals segmentation activities, including a core support assembly cut and a grout entrance cut, and interviewed staff performing the operations. The inspectors reviewed and performed walk downs of the water filtration system and cutting media collection system and noted appropriate radiological controls were in place for current conditions. The inspectors determined that activities had been performed in accordance with site procedures and appropriate radiation protection practices had been employed.

Violation

The inspectors identified one Severity Level IV non-cited violation (NCV) of 10 CFR 20.1904(a) for the licensee's failure to label a bucket containing portions of the specimen holder tubes in the fuel transfer canal. Specifically, during reactor vessel internals segmentation work the licensee failed to ensure proper labelling of a bucket thereby providing sufficient information to other workers who may be handling the licensed material to minimize exposure.

The site began reactor vessel internals segmentation activities in early 2022 and in June 2022 were implementing work package CR3-TRWP-ORANO-0046, "Empty Surveillance Specimen Holder Tubes Removal and Staging." The work package specified the segmentation of large and small pieces where the small pieces would be set in a temporary staging container (bucket or basket) in the deep end of the fuel transfer canal, possibly inside the core barrel on the Lower Internal Assembly prior to final staging.

On June 14, 2022, workers prepared to move a piece of a specimen holder tube to a bucket being used as a temporary staging container and an RP technician used a teletector to monitor dose rates during the move. The RP technician halted the work when an unexpected increase in dose rate to 30 mrem/hour occurred. The RP technician determined that the bucket in question was unlabeled, attached by a rope to the refuel bridge, and was approximately 7 feet below the water line instead of being in the FTC deep end, possibly inside the Core Barrel on the Lower Internal Assembly as was expected according to the work package. The increase in dose rates was due to the workers raising the piece from lower in the deep end to the bucket's location. It should be noted that the move and the contents of the bucket were not clearly visible due to the lack of clarity of the water. After moving the piece to the bucket, an underwater survey displayed a contact dose rate of 330 Roentgen (R)/hour on contact with the bucket now containing 4 portions of the specimen holder tubes. Upon identification, the RP technician notified their supervisor of the unlabeled container, tagged the rope, and the bucket was lowered to the shallow end of the

refuel cavity where the four portions of the specimen holder tubes were transferred to the thermal shield cribbing. No change in posting requirements occurred during the movements and a review of the previous and current work crew accumulated dose did not indicate an increase above expected doses for the shift.

Site procedure HPS0003, “Radiological Posting and Labeling,” section 9.2, “Tagging and Labeling of Radioactive Material” requires each container holding radioactive material to be labeled appropriately or utilize one of the allowable exceptions provided. In this case, these highly radioactive items were stored in the fuel transfer canal and were accessible to workers during the segmentation campaign, but no labeling was readily available nor were written records provided to ensure the radiological contents were known by the workers. The NRC notes that there is available guidance, particularly health physics positions 27 and 333, on labeling of radioactive materials, including those stored under water.

Title 10 CFR 20.1904(a) requires, in part, that the licensee shall ensure that each container of licensed material bears a durable, clearly visible label that provides sufficient information (such as the radionuclides present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, radiation levels) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures. Contrary to the above, the licensee failed to ensure that a bucket containing portions of specimen holder tubes bore a durable, clearly visible label that provided sufficient information to permit the individuals handling or working in the vicinity of the items to take precautions to avoid or minimize exposures. Specifically, the licensee did not label or provide another readily available written record to inform workers of the radiological characteristics of the items in the fuel transfer canal. The licensee’s immediate corrective actions included labeling the material then moving the material out of the bucket to the thermal shield cribbing, conducting a stand down of fuel transfer canal work, and generating a condition report.

Because this violation was determined to be of very low safety significance and was entered into the licensee’s corrective action program as IR 2022000101, this violation is being treated as a non-cited violation, consistent with Section 2.3.2.a of the Enforcement Policy: NCV 05000302/2022002-01, “Failure to Label or Provide Written Information for Items Stored in the Fuel Transfer Canal.”

c. Conclusions

One Severity Level IV NCV of 10 CFR 20.1904(a) was identified based on the licensee’s failure to appropriately label or otherwise invoke an exception provided in 10 CFR 20.1905 for a bucket of specimen holder tube pieces in the fuel transfer canal in order to provide sufficient information to permit individuals handling the licensed material to minimize exposure.

## 3.0 Exit Meeting Summary

On, July 19, 2022, the inspectors presented the inspection results to Mr. Billy Reid, Site Vice President, and other members of the CR-3 staff. No proprietary information was documented in this report.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

### PARTIAL LIST OF PERSONS CONTACTED

B. Reid, Site Vice President
N. Langub, Site Decommissioning Director
B. Akins, Radiation Protection Manager
C. Burtoff, RP Engineer
A. Doruff, D&D Planner
M. Erickson, LTP/FSS Consultant TSSD
S. Guillot, RVI/RPVI/LCR Project Manager
E. Grohregin, ORANO RP/Safety Specialist
M. Lucus, ORANO Project Manger
J. Jernigan, Decommissioning Licensing Manager
G. McCallum, Power Block Manager
C. Gavin, CAP Manager
L. Reader, RP Specialist
G. Thibodeaux, Vice President Director of Health and Safety
M. Van Sicklen, ISFSI Licensing Manager
M. Walker, Site Manager
H. Walker, Employee Concerns
A. Mancini, ORANO Advisory Engineer
L. McDougal, ORANO Project Manager
M. Sirochman, Operations Field Work Supervisor
J. Strack, NorthStar HSE

### ITEMS OPEN, CLOSED, AND DISCUSSED

None

### PARTIAL LIST OF DOCUMENTS REVIEWED

Audits
Fire Protection (FP) Checklist,
QA-21-017, Radiological Protection Programs, November 30, 2021

Engineering Changes
REG10-2020-02
REG10-2022-08
REG10-2022-03
REG10-2021-23
REG10-2021-53
REG10-2022-04
REG10-2022-07
REG10-2022-02
REG10-2022-05
REG10-2022-011
REG10-2022-17

Procedures
CAP-0200, “Corrective Action Program,” Revision 7
CR3-TRWP-ORANO-46, “Specimen Holder Tubes Removal and Staging,” Revision 0
HPP-0116, “Annual Portal Monitor Sensitivity Verification,” May 4, 2021
HPS-0003, Radiological Posting and Labeling, Revision 3
OP-0407A, “Liquid Releases,” Revision 70
FIR-0003, “Control of Hot Work and Ignition Sources,” Revision 3
FIR-0005, “Guidelines for Handling Use and Control of Transient Combustibles,” Revision 0
FIR-0006, “Fire Protection Program Surveillances,” Revision 1
REG001, “10 CFR 50.59 and Selected Regulatory Reviews,” Revision 10
SP-300D, “Defueled Surveillance Log,” March 21, 2022
SP-300D, “Defueled Surveillance Log,” March 28, 2022

Condition Reports and Attachments

| | | |
|---|---|---|
| 2021000123 | 2022000045 | 2022000057 |
| 2021000130 | 2022000048 | 2022000058 |
| 2021000142 | 2022000049 | 2022000059 |
| 2021000150 | 2022000050 | 2022000063 |
| 2022000005 | 2022000051 | 2022000066 |
| 2022000007 | 2022000052 | 2022000067 |
| 2022000009 | 2022000053 | 2022000073 |
| 2022000024 | 2022000054 | 2022000101 |
| 2022000026 | 2022000055 | |
| | 2022000056 | |

Condition Reports Generated from Inspection
2022000066
2022000067

Miscellaneous
2022 ADP CR3 RUNNING SHIPMENT LOG, March 17, 2022
ADPCR3 Annual Site Trend Report, October 2020 – September 2021, January 3, 2022
Crystal River 50.59/72.48 Screening an Evaluator Training Presentation, October 15, 2019
DEM-TRWP-020, Maintenance Support Building and Fire Service Pump House Demolition, November 9, 2021
DRR-2021-001, Off-Site Dose Calculation Manual, Revision 41
Front line supervisor observations, April 4, 2022 – May 9, 2022
Passive Monitoring Evaluation, November 4, 2020
Qualifications and Resume for Bryant Akins, May 2022
Respirator Qualifications, various
Water Filtration and Garnet Collection System for RVI Operations Presentation, May 20, 2022
CR-3 to NRC, “Crystal River Unit 3 – Notification of Revised Decommissioning Cost Estimate,” dated May 26, 2022

Health Physics Survey Records

| | | |
|---|---|---|
| 21-10-0196 | 22-03-0042 | 22-03-0123 |
| 21-11-0062 | 22-03-0059 | 22-06-0080 |
| 21-11-0177 | 22-03-0072 | 22-06-0094 |
| 21-11-0093 | 22-03-0086 | 22-06-0096 |
| 22-03-0025 | 22-03-0106 | |

## LIST OF ACRONYMS

| | |
|---|---|
| ADAMS | Agencywide Document and Management System |
| ADP | Accelerated Decommissioning Partners |
| CAP | Corrective Action Program |
| CFR | Code of Federal Regulations |
| CR | Condition Report |
| CR-3 | Crystal River Unit 3 |
| D&D | Decommissioning and Demolition |
| DECON | Decommissioning |
| Duke Energy/DEF | Duke Energy Florida, Inc. |
| GTCC | Greater-Than-Class-C |
| HPPOS | Health Physics Position |
| IMC | Inspection Manual Chapter |
| IP | Inspection Procedure |
| IR | Inspection Report |
| NCV | Non-cited Violation |
| NRC | U.S. Nuclear Regulatory Commission |
| PSDAR | Post Shutdown Activities Report |
| RP | Radiation Protection |
| SAFSTOR | Safe Storage |
| SCWE | Safety Conscious Work Environment |