



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

April 14, 2023

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 Materials for Annual Meeting received from Accelerated Decommissioning Partners ("ADP"). The information is responsive to items identified in the DSA [Decommission Services Agreement], Attachment 9, Section 6.12.1.

Thank you for your assistance in this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/mw
Enclosure

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 14th day of April, 2023.

/s/ Dianne M. Triplett

Attorney

Suzanne Brownless
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

Jon C. Moyle, Jr. / Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

Charles J. Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399
rehwinkel.charles@leg.state.fl.us

James W. Brew / Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., N.W.
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
lwb@smxblaw.com



Billy E. Reid, Decommissioning Program Manager

c.865.384.6789

BReid@NorthStar.com

ADP23-0008

March 31, 2023

Gene Flavors (via electronic mail)
DEF General Manager
Site Administration Building
Crystal River Energy Complex (CREC)

Subject: Materials for Annual Meeting

Dear Mr. Flavors,

In accordance with the Decommissioning Services Agreement (DSA) section 6.12.1 and Attachment 9, attached you will find the materials prepared by ADP CR3, LLC (ADP) for the upcoming Annual meeting scheduled for April 26, 2023.

Should you have any questions or comments, contact me at your convenience at either bereid@northstar.com or 865-384-6789.

Sincerely,

A handwritten signature in blue ink that reads "Billy E. Reid".

Billy E. Reid
Decommissioning Program Manager

Cc: Nelson Langub (ADP / NS)
Luke Self (ADP/NS)
David Pearson (ADP/NS)
Geoff Wilde (ADP / Orano)



ADP CR3, LLC

Decommissioning 2022 Annual Report

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1.0 EXECUTIVE SUMMARY

This is the ADP CR3 annual report on the decommissioning of the Crystal River Unit 3 nuclear plant in accordance with the requirements of the First Amendment to the Decommissioning Services Agreement (DSA), Attachment 9, *Reporting and Notification Requirements*, reflecting performance for year ending December 31, 2022.

Safety and Environmental Performance

- ADP Total Hours 2022 – 337,071MH
- First Aid – 8, OSHA Recordable – 0, Lost Time Cases – 0
- ALARA Actual exposure to date = 23402 mrem vs budget 24150 mrem
- Personnel Contamination = 0
- NRC Non cited violation for fire January 2022

This year commenced with the continued planning for Decommissioning to include RPV segmentation, system removal, building demolition and site restoration. Reactor Vessel Internals completed in December. Reactor Vessel Segmentation mobilization of equipment finished in October with Reactor Vessel Segmentation Starting in 2023. Significant progress continued in the Turbine building, Auxiliary Building and Intermediate building. Fire Pump House, RB Maintenance Building and Emergency Feed Water building demolition completed this year. License Termination Plan was submitted to the NRC in December. Planning and preparations for other sequences of work continued. Corrective actions continued with respect to the Safety Conscious Work Environment. No used nuclear fuel related violations, environmental non-compliance, or significant industrial safety events occurred or were reported.

2.0 SUMMARY OF REGULATORY EVENTS AND REPORTS

1. Reportable events to Governmental Authority (e.g., NRC, OSHA, FDEP, EPA):

NONE

2. Receipt of any correspondence from any Governmental Authority of violation or finding:

NRC Non cited violation for a fire in January 2022 as identified by the NRC Inspector.

3. Any breach of debt covenants, default acceleration, insolvency, reorganization, bankruptcy or liquidation of NorthStar Group Services, Inc., and/or proposed organizational changes in equity ownership of NorthStar Group Holdings, LLC or ORANO SA:

NONE

4. Events that require Duke Energy Florida (DEF) to make a report to ANI:

NONE

5. Events that require Duke Energy Florida (DEF) to make a report to NEIL:

NONE

3.0 PAY ITEM DISPUTE SUMMARY

There are no pay items in dispute. DEF has communicated that the quality of the documentation of Pay Item completion has been very good, with progress of all Pay Item being validated.

4.0 ADP CR3 NON-COMPLIANCE ITEMS

NONE

5.0 CONCERNS NEEDING MANAGEMENT ATTENTION

NONE

6.0 SUBMITTED AND PENDING REGULATORY SUBMITTALS

NRC

NUMBER	DATE	FROM ORG	FROM PERSON	SUBJECT	NRC ACCESSION #
3F0122-01	01/26/22	CR3	Reid	Crystal River 3 – License Amendment Request to remove from the Facility Operating License, Appendix B, "Environmental Protection Plan (Non-Radiological) Technical Specifications"	ML22026A433
3F0122-02	01/17/22	CR3	Dixon	Crystal River Unit 3 – Proof of Financial Protection	ML22018A052
3F0122-03	01/17/22	CR3	Dixon	Crystal River Energy Complex – Environmental Protection Plan Report: 2021 Sea Turtle Rescue and Recovery Summary Report	ML22018A051
3F0222-01	02/09/22	CR3	Dixon	Updated Spent Fuel Management Plan	ML22040A134
3F0222-02	02/09/22	CR3	Dixon	Crystal River 3 – Onsite Property Insurance Coverage	ML22040A135
N/A	02/23/22	CR3	White	DEF-Annual FFD Electronic Submittal (Electronic Only Submittal -No letter sent)	ML22054A075
3F0322-01	03/30/22	CR3	State	Crystal River Unit 3 – Annual Decommissioning and Irradiated Fuel Management Financial Status Report for 2021	ML22089A163
3F0322-02	03/07/22	CR3	Dixon	Crystal River 3 – 2021 Individual Monitoring NRC Form 5 Report.	ML22066A983
3F0322-03	03/10/22	CR3	Dixon	Crystal River 3 – HHS Lab Error Investigation Report. (per 10 CFR 26.719(c)(1))	ML22069A581
3F0322-04	03/23/22	CR3	Dixon	Crystal River 3 (XEG) – DOE/NRC Forms 741, 742 and 743C (SNM Report)	ML22088A055
3F0422-01	04/06/22	CR3	Dixon	Crystal River Unit 3 – 2021 Annual Radioactive Effluent Release Report	ML22096A103
3F0422-02	04/06/22	CR3	Dixon	Crystal River Unit 3 – 2021 Annual Radiological Environmental Operating Report	ML22096A104
3F0522-01	05/17/22	CR3	Reid	Crystal River Unit 3 – Safety Analysis Report, QAPM and 10 CFR 50.59 - 10 CFR 72.48 Report – May 2020	ML22138A042
3F0522-02	05/10/22	CR3	Adix	ADP Financial Report	ML22131A303
3F0522-03	05/28/22	CR3	State	PSDAR and DCE update	ML22148A001
3F1222-01	12/21/22	CR3	Reid	LTP/LAR	ML22355A441

FDEP –

2022 Summary of H&A's Work at CR3-ADP

In 2022, H&A continued to work with DEP to continue the site closure work for the non-radiological impacts at ADP CR3. The work was a continuation of the initial characterization and included the following:

AOC 12 – Firing Range

- Submitted the final Source Removal Report Addendum 1 (Feb 2022)
- Received No Further Assessment letter from FDEP on 29 July 2022

AOC 18 - East Settling Pond

- Installed and sampled wells to characterization of AOC 18 (May 2022)
- Removal Action Report submitted to FDEP (Sept 2022)
- Received No Further Assessment letter from FDEP on 13 October 2022

Completed tasks that have not been submitted to FDEP

- Collected additional soil and groundwater samples to support site wide characterization.
- Supplemental Phase II Site Investigation Report (Feb 2022 and updated/ revised to include additional data in (Dec 2022). (Submitted to FDEP in Q1 2023).
- Additional collection of paint/coatings samples
- Technical support document to address keeping paint on basement structures.
- Updated background evaluation non-site related soils and groundwater constituents.
- Abandoned and reinstalled two REMP wells MW-6S and D.
- Installed MW-18 within the berm, to evaluate groundwater quality inside the former curtain wall.
- Completed the Five Year Groundwater Evaluation for NEI 0707.

Permitting

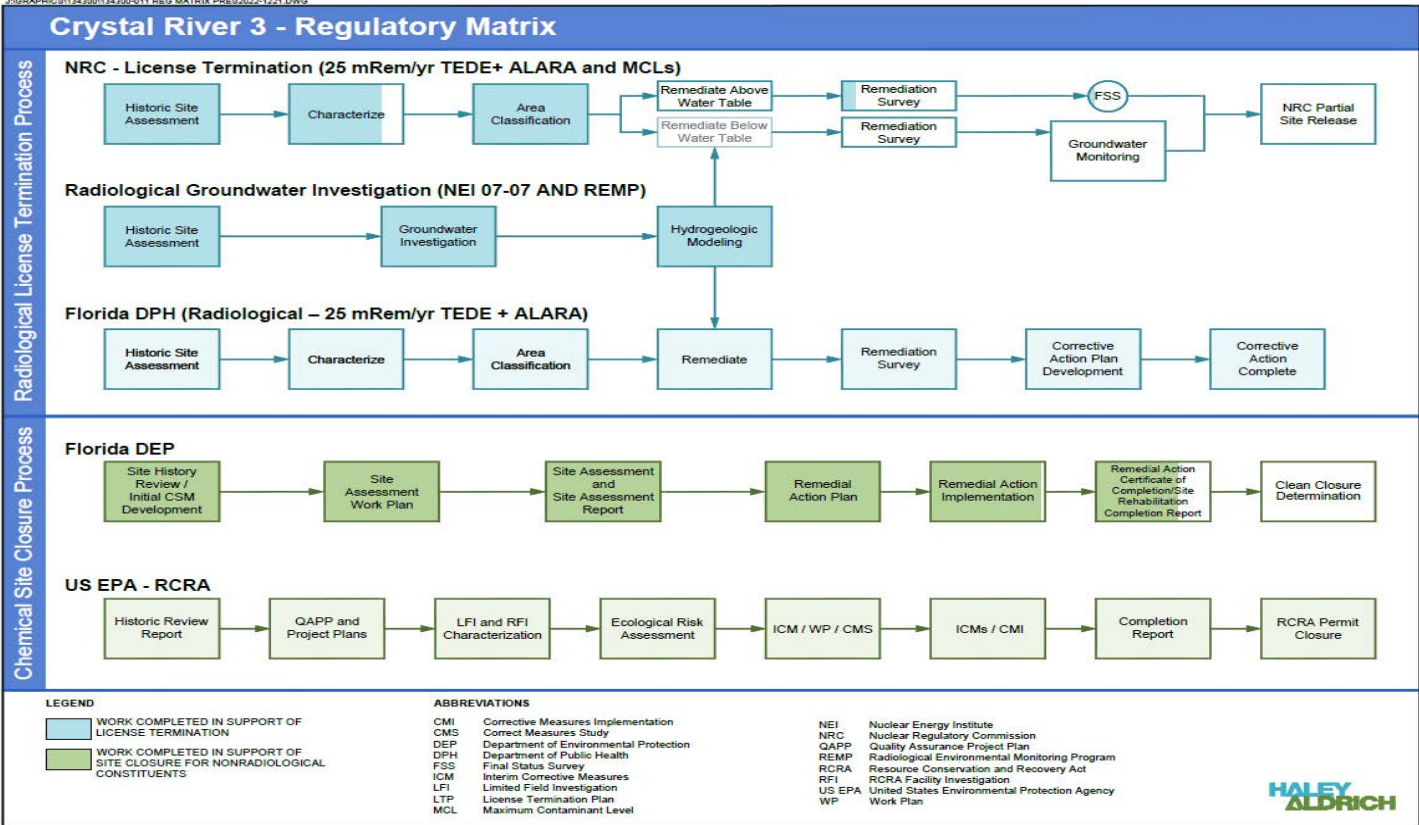
- Updated the Spill Prevention, Control, and Countermeasures (SPCC) Plan in February and November 2022
- Completed and submitted the Annual MSGP Report
- Completed and submitted the Tier II documents.
- Completed the EPA QA Study 42, in Support of the NPDES program (Sept 2022)
- Supported the removal of the Turtle Reporting from licensing requirements.
- Paid UST registration fees.
- Maintained ADP CR3 Small Quantity Generator status.

ADP CR3 Decommissioning 2022 Annual Report

Summary of Haley & Aldrich Submittals and Actions Q4 2022 (January through December)						
Number	Date	From Org	From Person	Subject	Submitted To	
Site Investigation/Remediation						
	28-Feb-22	H&A	Nadia Glucksberg	AOC 12 - Former Firing Range Interim Source Removal Report - Addendum No 1	ADP CR3	
	28-Feb-22	H&A	Nadia Glucksberg	Supplemental Site Investigation Report	ADP CR3	
3S0322-01	1-Mar-22	H&A	Nadia Glucksberg	AOC 12 - Former Firing Range Interim Source Removal Report Addendum No 1	FDEP	
	15-Mar-22	H&A	Nadia Glucksberg	AOC 18 - Settling Basin, Interim Source Removal Report	ADP CR3	
	22-Feb-22	H&A	Miles van Noordennen	Building Material Summary Memorandums (Emergency Diesel Gen, Emergency Feedwater Pumphouse, Central Alarm Station 2 Building, Aux Building)	ADP CR3	
	Jan-22			Collection of groundwater samples from AOC 12 and 18 to support ISRP's		
	Feb-22			Well repair for MW-6S and 6D		
	Mar-22			Collection of Coatings (two week field program)		
	May-22	H&A	Elida Danaher	Additional Well Installation and Groundwater Sampling Work Package	ADP CR3	
	May-22	H&A	Nadia Glucksberg	NEI 5 Year GW Review	ADP CR3	
	Jul-22	H&A	Miles van Noordennen	Building Characterization - Turbine Building	ADP CR3	
3S0922-02	Sep-22	H&A	Nadia Glucksberg	AOC 18 - Settling Basin, Interim Source Removal Report (updated, submitted to FDEP)	FDEP	
				Conduct Field Program (May/June)		
3S0622-01	1-Mar-22	H&A	Nadia Glucksberg	Background Evaluation for Groundwater	FDEP	
	23-Dec-22	H&A	Nadia Glucksberg	Subgrade Coated Concrete Evaluation	ADP CR3	
	29-Dec-22	H&A	Elida Danaher	Supplemental Site Investigation Report	ADP CR3	
Permitting Support						
	2/22/2022	H&A	Nadia Glucksberg	SPCC Plan Revision	ADP CR3	
	2/22/2022	ADP CR3	Elida Danaher	Annual MSGP Report	ADP CR3	
		ADP CR3	Elida Danaher	Annual MSGP Report	FDEP	
	3/1/2022	ADP CR3	Elida Danaher	Tier II Report	E-plan reporting system*	
	Dec 2021; Jan/Feb 2022	ADP CR3	Elida Danaher	Monthly NPDES submittal - Discharge Monitoring Reports	FDEP	
	2/28/2022	H&A	Bethany Brooks	Wastewater Regulatory Program and Surveillance Fee - paid	FDEP	
	3/25/2022	H&A	Nick Davis	Facilitated removal of turtle reporting from license	FDEP/ADP CR3	
	March 2022	H&A	Elida Danaher	Annual Toxicity Testing - testing start 3/31/22	FDEP	
	March 2022	H&A	Elida Danaher	Wastewater Regulatory Program - update ADP point of contact	FDEP	
	21-Jun-22	H&A	Elida Danaher	Submitted Request for new Site Contact (Guy McCallum) for permit compliance.	FDEP	
	15-Jun-22	H&A	Bethany Brooks	Storage Tank Renewal fee - paid	FDEP	
3S0622-01	21-Jun-22	H&A	Elida Danaher	NPDES Contact Updated	FDEP	
3S0922-01	6-Sep-22	H&A	Elida Danaher	EPA QA Study 42 in Support of NPDES Program	US EPA	
	1-Nov-22	H&A	Miles van Noordennen	SPCC Plan Revision	ADP CR3	
		H&A	Elida Danaher & Miles van Noordennen	Weekly Support for Permitting	ADP CR3	

Notes:
 * Tier II submittal to FDEP, EPA, Fire Dept, and the Tampa Bay Regional Planning Council, as required.

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7.0 COMPLETED AND NEAR-TERM SCHEDULE MILESTONES

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
3.1.1.1	Planning & Site Preparation Utilities Reactivation		100% Complete
3.1.1.2	Planning & Site Preparation Containment Access, Waste Handling Areas		100% Complete
3.1.2	Planning & Site Preparation Site Characterization		100% Complete
3.1.3.1	Planning & Site Preparation LCR and RV/RVI Planning and Engineering General transition Planning/Engineering		100% Complete
3.1.3.2	Planning & Site Preparation LCR and RV/RVI Planning and Engineering Site/Plant infrastructure Planning and Engineering		100% Complete
3.1.3.3	Planning & Site Preparation LCR and RV/RVI Planning and Engineering RVI Planning and Engineering	03/31/2023	95 % Complete
3.1.3.4	Planning & Site Preparation LCR and RV/RVI Planning and Engineering RV Planning and Engineering	5/10/2023	75% Complete
3.1.3.5	Planning & Site Preparation LCR and RV/RVI Planning and Engineering LCR Planning and Engineering		100% Complete
3.1.4.1	Planning & Site Preparation Balance of Plant D&D Planning Temporary Utilities, Site Preparation Planning		100% Complete
3.1.4.2	Planning & Site Preparation Balance of Plant D&D Planning Turbine, Condenser, Steam Generator Removal Planning		100% Complete
3.1.4.3	Planning & Site Preparation Balance of Plant D&D Planning Systems Removal and Decon Work Planning		100% Complete
3.1.4.4	Planning & Site Preparation Balance of Plant D&D Planning Demolition Work Planning	3/31/2023	44% Complete
4.A.1.1	Large Component Removal Reactor Internals Segmentation Reactor Internals Mobilization, Setup & Commissioning		100% Complete
4.A.1.2	Large Component Removal Reactor Internals Segmentation Reactor Internals Segmentation (Plenum Assembly)		100% Complete

ADP CR3 Decommissioning 2022 Annual Report

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
4.A.1.3	Large Component Removal Reactor Internals Segmentation Reactor Internals Segmentation (Core Support Assembly/Remaining)	03/31/2022	90% Complete
4.A.1.4	Large Component Removal Reactor Internals Segmentation Reactor Internals Waste Packaging, Transportation and Disposal	12/31/2023	19% Complete
4.A.2.1	Large Component Removal Reactor Vessel Segmentation Reactor Vessel Mobilization	3/31/2023	90% Complete
4.A.2.2	Large Component Removal Reactor Vessel Segmentation Reactor Vessel Segmentation	9/15/2023	0% Complete
4.A.3	Large Component Removal Reactor Vessel Segmentation Reactor CRDMs, ICIs, Services Structure		100% Complete
4.A.4.1	Large Component Removal Reactor Coolant System Reactor Coolant Piping		100% Complete
4.A.4.2	Large Component Removal Reactor Coolant System Reactor Coolant System Pumps and Motors		100% Complete
4.A.5	Large Component Removal Reactor Coolant System Pressurizer and Relief Tank		100% Complete
4.A.6.5	Large Component Removal Steam Generators Steam Generator Package, Transportation and Disposal		100% Complete
4.A.7.1	Large Component Removal Main Turbine/Generator/Condensers Turbine and Generator Removal		100% Complete
4.A.7.1	Large Component Removal Condenser Removal	3/31/2023	79% Complete
4.B.1.2	Site Decontamination Remove Plant Systems Auxiliary Building elev 95'	4/06/2023	76% Complete
4.B.1.3	Site Decontamination Remove Plant Systems Auxiliary Building elev 119'	4/06/2023	76% Complete
4.B.1.4	Site Decontamination Remove Plant Systems Intermediate Building	5/30/2023	55% Complete
4.B.1.5	Site Decontamination Remove Plant Systems Turbine Building	12/31/2022	70% Complete

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
4.B.4	Site Decontamination Decontaminate Buildings License Termination Planning		100% Complete
4.B.5.1	Site Decontamination Decontaminate Buildings West Settling Pond Remediation		100% Complete
4.B.5.3	Site Decontamination Decontaminate Buildings Transfer Canal Sand Removal		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Emergency Feed Water Building		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Diesel Generator Building		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Alternate AC Diesel Generator Bldg Demo		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Fire Pump House Building		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures RB Maintenance Bldg Demo		100% Complete
5.2.1	Site Restoration		100% Complete

2022 Annual Summary CR3 ISFSI Operations and Maintenance

- Implemented the ISFSI Security remote monitoring modification, including overseeing the installation and testing of vendor equipment that eliminated the need to man the Secondary Alarm Station on a 24 hour per day basis.
- Submitted a License Amendment Request (LAR) and received approval to remove Appendix B, “Environmental Protection Plan (Non-Radiological) Technical Specifications,” from the facility operating license. This allowed Duke Energy and ADP CR3 to discontinue actions associated with endangered turtle species monitoring and reporting.
- Completed the transfer of the ISFSI Only Emergency Plan (IOEP) program ownership to Security and successfully completed the Biennial Exercise.
- Assisted in the development of the technical basis and justification for removal of the legacy Greater than Class C (GTCC) Waste from the ISFSI Facility. Self-performed the engineering change and assisted in the physical removal of the legacy GTCC, which reduced the number of containers that will have to be shipped offsite when a storage or disposal facility becomes available.
- Performed owner acceptance reviews on documentation associated with the manufacture and inspection of the two Radioactive Waste Containers (RWCs) and Liners purchased by ODS for ADP CR3 storage of GTCC.

- Revised Security program and procedure requirements to allow for improved budget efficiencies (terminated fork-lift contract, eliminated several PAA support contracts that are no longer required).
- Submitted all required Regulatory Submittals associated with the ISFSI and Part 50 License within their required timeframes.
- Completed over 300 preventative and corrective maintenance and operations activities, including code-required and vendor-recommended maintenance, security door maglock repairs, security computer hardware replacement, and two security camera replacements.
- Developed and implemented new ISFSI Health and Safety, Work Control, and Radiation Protection program procedures.
- Improved the guidance in Security procedures for reporting lost or stolen radioactive material shipments.
- Hosted tours by officials from Korea Hydro and Nuclear Power (KHNP) and an Orano TN Board Meeting.

8.0 PROJECT SCHEDULE PERFORMANCE AND FORECAST ASSESSMENT

Project Schedule is tracking to a December 2026 completion date. The project has accelerated many of the planning, site characterization, abatement, demolition and other site preparatory activities in order to start Large Component Removal and select building demolition ahead of schedule. At this time Critical Path remains the same going thru the Reactor Building to License Termination.

Updated Schedule and Critical Path Schedule is attached

9.0 PAY ITEM SCHEDULE PERFORMANCE AND FORECAST ASSESSMENT

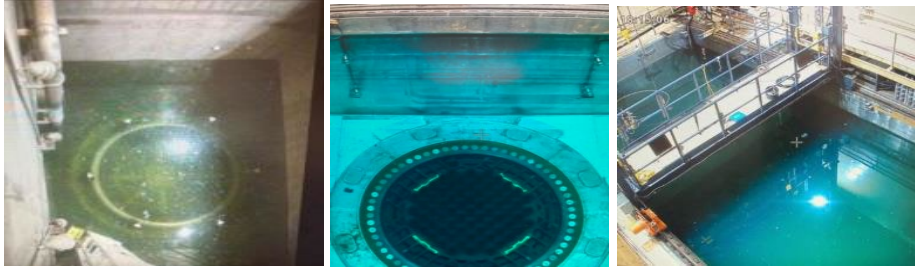
Project is currently performing within budget of the original pay item schedule. Below is the current annual forecast for the project and percent complete by period.

- Period 3 – 95% Complete
- Period 4A – 61% Complete
- Period 4B – 25% Complete
- Period 5 – 13% Complete

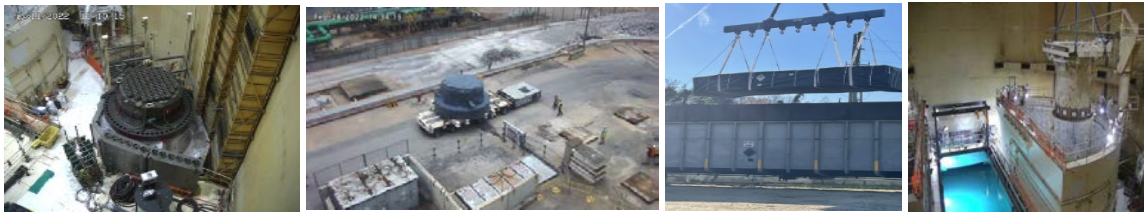
2020	\$68,523
2021	\$100,546
2022	\$97,149
2023	\$93,858
2024	\$93,320
2025	\$50,562
2026	\$36,041
Total	\$540,000

Reactor Pressure Vessel Internals Segmentation

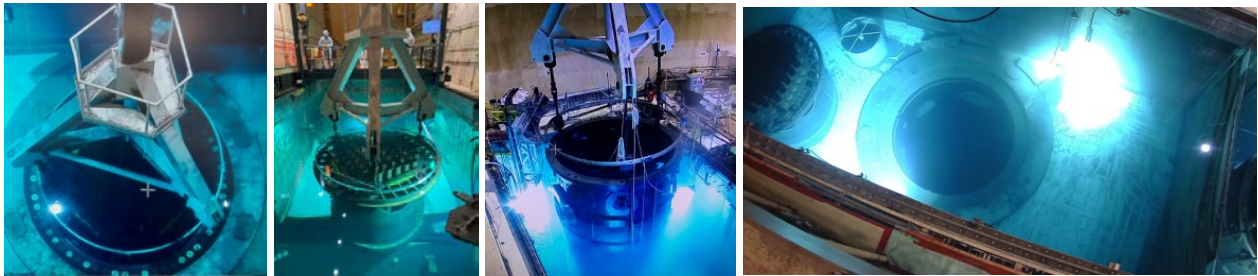
Flooding of the Pools



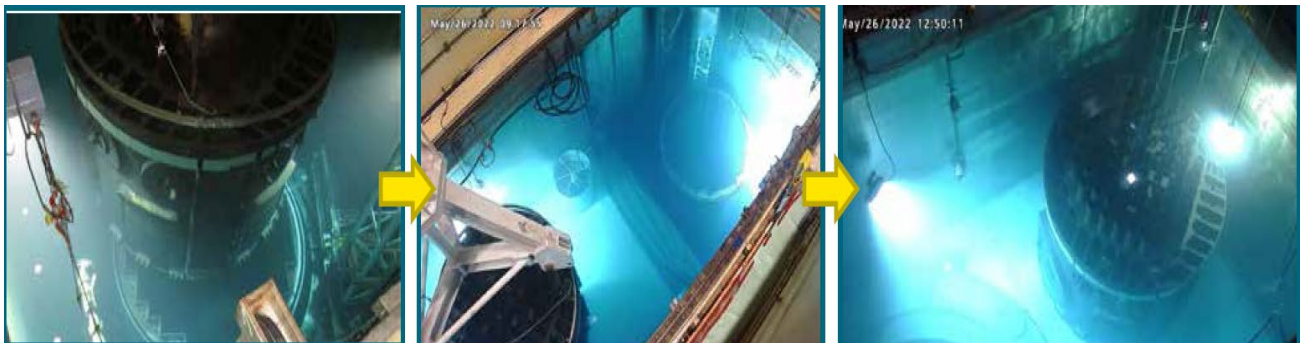
Removal of Reactor Head, CRDM's, Service Structure and ICI's



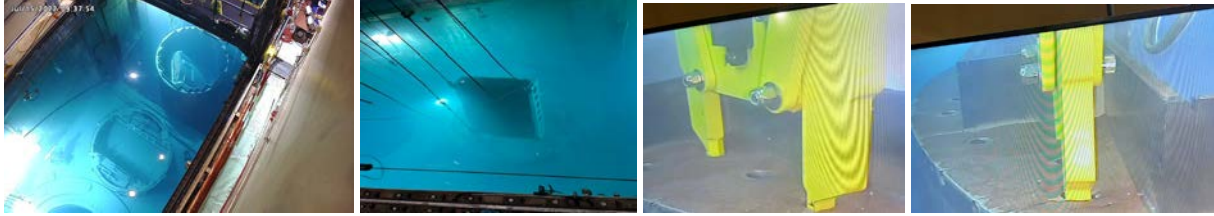
RVI Plenum Removal, Staging and Core Support Lift and Transfer



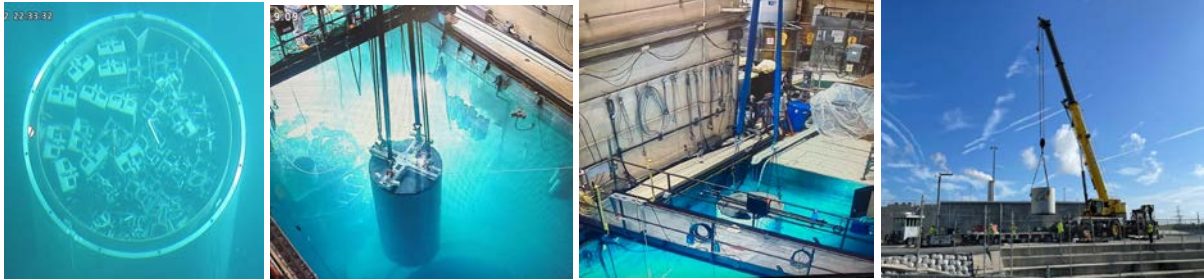
Core Support Separation



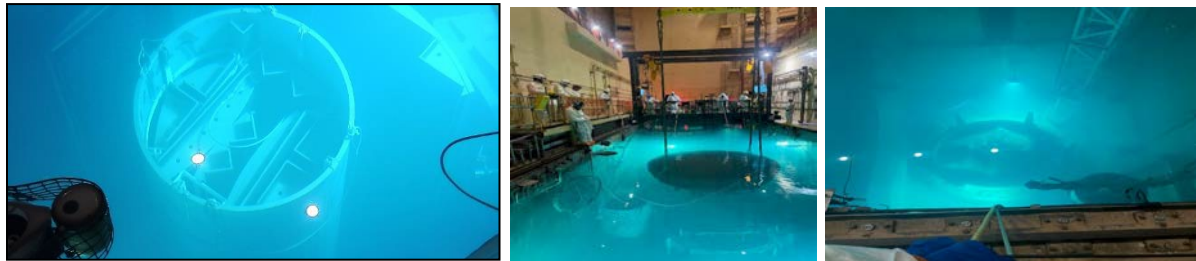
Thermal Shield Segmentation & RVI Core Barrel and Baffle Segmentation



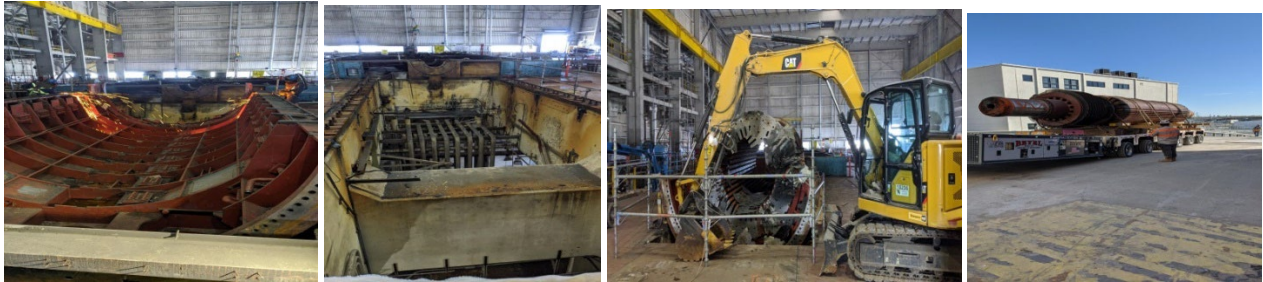
GTCC Loading and Move to ISFSI



Load Internals into Reactor Vessel



Turbine Generator Removal



Condenser Removal



System Removal

Turbine, Auxiliary, Intermediate & Controlled Complex

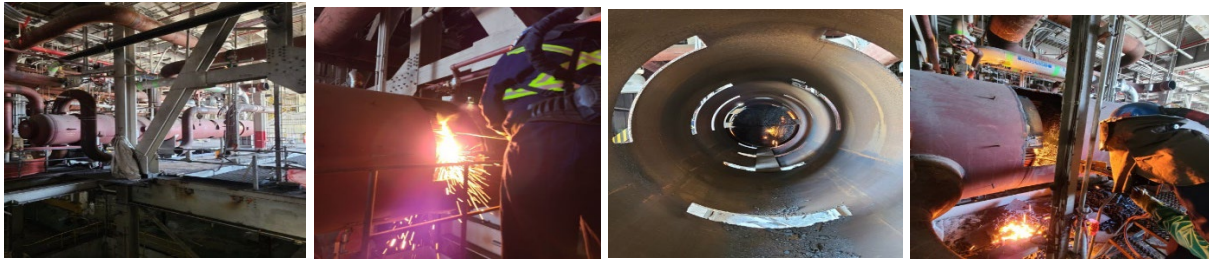
Turbine Building



Auxiliary Building



Intermediate Building



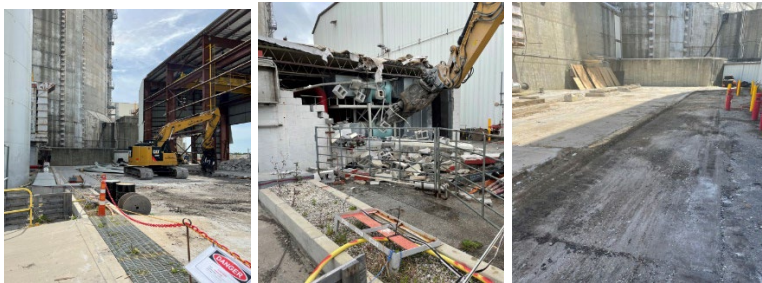
Controlled Complex



Site Restoration

Building Demolition

Fire Service Pumphouse Demo



Emergency Feed Water Pump Building Demo



RB Maintenance Building Demo



Activity ID	Activity Name	Orig Dur	Rem Dur	% Comp	Start	Finish	2023				2024				2025				2026			
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
	Croncrete Crushing	429.0	429.0		08-Apr-24	27-Nov-25																
	Security VBS	19.0	19.0		28-Nov-25	24-Dec-25																
	CR3 D&D Project - GTCC Management	34.0	34.0		18-Jan-23	06-Mar-23																

