



Dianne M. Triplett  
DEPUTY GENERAL COUNSEL

May 18, 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 Decommissioning 2022 Project Annual Report received from Accelerated Decommissioning Partners ("ADP") dated May 23, 2023. Order No. PSC-2020-0289-FOF-EI, dated August 27, 2020, issued in the above-referenced docket, provides that "2. The information responsive to items identified in the DSA [Decommission Services Agreement], Attachment 9, Section B through E should be provided to the Commission within two weeks of DEF's receipt of this information from ADP."

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 18<sup>th</sup> day of May, 2023.

*/s/ Dianne M. Triplett*

Attorney

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| <p>Suzanne Brownless<br/>Florida Public Service Commission<br/>2540 Shumard Oak Blvd.<br/>Tallahassee, FL 32399-0850<br/><a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a></p> <p>Jon C. Moyle, Jr. / Karen A. Putnal<br/>Moyle Law Firm, P.A.<br/>118 North Gadsden Street<br/>Tallahassee, FL 32301<br/><a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a><br/><a href="mailto:kputnal@moylelaw.com">kputnal@moylelaw.com</a><br/><a href="mailto:mqualls@moylelaw.com">mqualls@moylelaw.com</a></p> | <p>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/><a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a></p> <p>James W. Brew / Laura Wynn Baker<br/>Stone Mattheis Xenopoulos &amp; Brew, PC<br/>1025 Thomas Jefferson St., N.W.<br/>Suite 800 West<br/>Washington, DC 20007-5201<br/><a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a><br/><a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a></p> |
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# **Crystal River Unit 3 (CR3) Decommissioning Project 2022 Duke Energy Annual Report**

**5/23/2023**

This report was prepared in accordance with the Decommissioning Services Agreement (DSA) between Duke Energy Florida (DEF), LLC and Accelerated Decommissioning Partners (ADP), LLC. After approval, this report will be provided to the Florida Public Service Commission as directed by order number PSC-2020-0289-FOF-EI.

## **Executive Summary:**

ADP worked safely in 2022 with zero OSHA recordable accidents, no used fuel storage or security incidents and no environmental events.

Two reports were made by the Nuclear Regulatory Commission (NRC) and corrective actions taken by ADP in 2022:

- NRC Non cited violation for a fire in January 2022 as identified by the NRC Inspector.
- NRC Non cited violation for failure to ensure that each container of licensed material in the fuel transfer canal bares a label or has documentation.

## **A. Summary of events, defined in attachment 9 section A, ADP made to DEF in 2022**

ADP notified DEF that the NRC has informed them of non-cited violations (NCV) associated with:

- A fire that occurred in the auxiliary building in January 2022. The NCV was for failure to comply with 10 CFR 50.48 (f). The NRC issued the 1st quarter 2022 inspection report in May 2022 that included the NCV. The correspondence from the NRC met the DSA attachment 9 section A reporting requirements. The NRC inspection report was provided to the Florida Public Service Commission in accordance with Order No. PSC-2020-0289-FOF-EI.
- A failure to ensure that each container of licensed material in the fuel transfer canal bares a label or has documentation. The NCV was for failure to comply with (10 CFR) 20.1904(a). The NRC issued the 2<sup>nd</sup> quarter 2022 inspection report in August 2022 that included the NCV.

The correspondence from the NRC met the DSA attachment 9 section A reporting requirements. The NRC inspection report was provided to the Florida Public Service Commission in accordance with Order No. PSC-2020-0289-FOF-EI.

## **B. Summary of the quarterly information ADP provided to DEF by ADP in 2022**

The quarterly reports and face-to-face meetings between DEF and ADP highlighted the following:

- ADP had no used fuel storage or security related issues in 2022
- ADP had no OSHA recordable injuries or illnesses, and their safety focus remained on fire prevention, heat stress management and other more job-specific topics.
- ADP also focused on maintaining the project in a high state of readiness for violent weather such as storms and hurricanes
- Both parties complied with all the requirements, including deliverables, in the DSA.
- There were no pay disputes in 2022.
- There were no issues that were elevated to levels of management beyond those leaders at the site for resolution.
- ADP provided quarterly schedule updates and regulatory – related activities to DEF during the year.

There were two areas of performance that were discussed in the quarterly meetings.

- The first was the on-going corrective actions related to the two NCVs were discussed during the meetings. The common corrective actions included worker accountability actions and increased management oversight in the field. Specific corrective actions included improved training for the workers doing the hot work and fire watch duties, a practical examination to qualify to do the work, training workers involved on the correct process for labeling radioactive material.

In response to these events, ADP strengthened their fire protection hot work and radioactive material procedures and processes and provided additional training on the procedures and processes to their workers. There were no additional fire or radioactive material labeling incidents following the corrective actions during the 2022 reporting period.

- The second area of performance discussed is related to the on-going implementation actions associated with the Safety Conscious Work Environment (SCWE) were discussed during the meetings. Feedback associated with SCWE

from the latest ADP NRC exit was covered. ADP indicated positive NRC feedback on their actions and the agency continues to monitor.

### **C. Summary of Schedule Performance**

- 1) On January 1, 2022, the decommissioning project was 32.9% complete with a baseline target completion of 28.15%.
- 2) On December 31, 2022, the decommissioning project was 49.3% complete with a baseline target completion of 46.32%. ADP outperformed the baseline schedule by 2.98% at the end of 2022.
- 3) The decommissioning project baseline target for December 31, 2023, is 64.19%.
- 4) ADP estimates that Milestone 1 conditions will be met in 4th quarter 2026.

### **D. Summary of Cost Performance**

- 1) ADP submitted twelve monthly invoices in 2022 totaling \$97,149,311.
- 2) DEF owner's cost in 2022 was \$1,637,291.
- 3) During calendar year 2022, \$1,651,191 was disbursed from the Nuclear Decommissioning Fund (NDF) for DEF costs and \$ 84,590,047 for ADP payments for a total of \$86,241,238.
- 4) The NDF balance on December 31,2022 was \$405,885,954 not including the non-qualified portion of the fund.
- 5) The NDF withdrawals were for DEF costs and ADP payments from the December 2021 invoice through the October 2022 invoice due to the timing of the invoice payment process and the NDF reimbursement process.
- 6) It is estimated that ADP will invoice DEF \$94,549,662 for calendar year 2023 and DEF owner costs are estimated to be \$1.9M. It is estimated that \$ 80,889,841 will be disbursed from the NDF in 2023.
- 7) The provisional trust balance on 12/31/2022 was \$19,674,304. The provisional milestone balance was \$14,134,539.