

Stephanie A. Cuello SENIOR COUNSEL

January 28, 2025

### 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.

Docket No. 20190140-EI

Dear Mr. Teitzman:

Enclosed for filing on behalf of Duke Energy Florida, LLC ("DEF"), please find the Decommissioning Quarterly Report received from Accelerated Decommissioning Partners (ADP) on January 13, 2025 for the quarter ending December 2024. 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 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/clg Enclosure

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 28<sup>th</sup> day of January, 2025.

/s/ Stephanie A. Cuello
Attorney

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

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**Billy E. Reid,** Decommissioning Program Manager c.865.384.6789

BReid@NorthStar.com

ADP25-0002

January 13, 2025

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

Subject: Materials for Quarterly 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 quarterly meeting scheduled for January 22, 2025. Please note that the schedule included in the attached also satisfies the requirements for the quarterly schedule update stipulated at section 6.7 of the DSA.

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

Sincerely,

Billy E. Reid

Decommissioning Program Manager

Cc: Luke Self (ADP / NS)

Nelson Langub (ADP / NS) David Pearson (ADP / NS) James Seals (ADP / Orano)



# **Decommissioning Quarterly Report**

for quarter ending

December 2024

### 

7.0

#### 1.0 EXECUTIVE SUMMARY

This is the ADP CR3 quarterly 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 the quarter from October 1, through December 31, 2024.

Q3 Safety and Environmental Performance

Injury/Illness Summary	4th Quarter 2024	YTD 2024	PTD 2024
Project Hours	86,866	335,211	1,437,633
First Aid Cases	0	4	20
Recordable Cases	0	0	1
Lost Workday Cases	0	0	0

- First Aid Cases 0
- ALARA exposure 4th qtr 2024: 597 mrem vs 800 mrem budget, YTD = 7280 mrem vs 7568 budget
- Personnel Contamination events 4th gtr: No PCEs, YTD = 4 Level 1 PCE
- ALARA Exposure 2024 Annual Goal: 13,865 mrem was revised downward to 9440 mrem for 2nd half of 2024 and revised downward again to 7568 mrem for 4<sup>th</sup> quarter. This was due to worker and equipment efficiencies applied in the field.
- NRC RP Inspections identified no discrepancies.
- Heat Stress = 0
- 2.0 This quarter commenced with the continued progress on the building demolition with the Auxilliary Building demolition finishing in December. Demolition debris transporation and disposal will continue into 2<sup>nd</sup> quarter. Interior decon of the Auxiliary building remaining structure to Final Status Survey standards will start January and projected to complete in Q1, (all areas minus the areas that Reactor Building is using for waste processing). Reactor building systems removal is ongoing scheduled to be completed at the end of April with the removal of the sump. Decon and demolition of the interior of the Reactor Building to open air demo limits will continue through the first quarter. No spent nuclear fuel related violations, environmental non-compliance, or significant industrial safety events occurred or were reported.

#### 3.0 SUMMARY OF REGULATORY EVENTS AND REPORTS

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: NONE

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

### **4.0 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.

### 5.0 ADP CR3 NON-COMPLIANCE ITEMS

There have been no non-compliance items this quarter.

### **6.0 CONCERNS NEEDING MANAGEMENT ATTENTION**

No concerns needing management attention currently.

### 7.0 SUBMITTED AND PENDING REGULATORY SUBMITTALS

## NRC Letter Log and Submittal Register

NUMBER	DATE	FROM ORG	FROM PERSON	SUBJECT	NRC ACCESSION #	Notes
3F0124-01	1/18/2024	CR3	Reid	Response to Environmental RAIs	ML24018A151	3F and REG0016 submitted to records
3F0124-02	1/18/2024	CR3	Reid	Proof of Financial Protection	ML24018A213	3F submitted to records
3F0124-03	1/19/2024	CR3	Reid	Late Received Radiological Shipment	ML24021A001	3F and REG0016 submitted to records
3F0224-01	2/5/2024	CR3	Jemigan	Email Clarifications related to the NRC Staff's EA for Crystal River	ML24025A095	3F and REG0016 submitted to records
3F0224-02	2/6/2024	CR3	Reid	Crystal River 3 - Application to for Minor Revision to NPDES, FL0A00004	ML24039A099	3F and REG0016 submitted to records
3F0224-03	2/7/2024	CR3	Reid	Late Received Radiological Shipment	ML24039A108	3F and REG0016 submitted to records
3F0224-04	2/20/2024	CR3	Reid	CR3 ISFSI Security Plan, Security Training and Qualificiation Plan, and Safeguards Contingency Plan, Rev. 4	ML24054A032 ML25045A035 ML24054A037 (PKG)	-Safeguards Information, hard copy mailedSubmitted to records.
3F0224-05	2/24/2024	CR3	Reid	Late Received Radiological Shipment	ML24053A388	3F and REG0016 submitted to records
3F0324-01	3/27/2024	CR3	State	CR3 Annual Decommissioning and Irradiated Fuel Management Financial Status Report for 2023	ML24087A205	3F submitted to records.
3F0324-02	3/22/2024	CR3	Reid	Crystal River 3 – Onsite Property Insurance Coverage	ML24082A011	3F and REG0016 submitted to records
3F0324-03	3/29/2024	CR3	Reid	Response to RAIs - LTP Submittal	ML24089A036 ML24090A004 ML24090A005 ML24090A006 ML24090A007	Package Accession Number is ML24093A153. 3F and REG0016 submitted to records
3F0324-04	3/27/2024	CR3	Van Sicklen	Crystal River 3 – 2022 Individual Monitoring NRC Form 5 Report	ML24087A186	3F submitted to records.
3F0424-01	4/12/2024	CR3	Reid	Late Received Radiological Shipment	ML24103A068	3F and REG0016 submitted to records
3F0424-02	4/29/2024	CR3	Reid	Crystal River 3 - 2023 Annual Radioactive Effluent Release Report (ARERR)	ML24120A336	3F and REG0016 submitted to records
3F0424-03	4/30/2024	CR3	Van Sicklen	Crystal River Unit 3 - 2023 Annual Radiological Environmental Operating Report (AREOR)	ML24121A121	3F Submitted to records
BF0524-01	5/10/2024	CR3	Reid	Response to Environmental RAIs with Encl 5 withheld from public disclosure	ML24131A075 ML24131A076- (proprietary)	3F and REG0016 submitted to records
3F0524-02	5/29/2024	CR3	Reid	Biennial DSAR - QAPM - 50.59 - 72.48 Change Report	ML24150A264	3F Submitted to records
BF0524-03	5/30/2024	CR3	Adix	Annual Corporate Financial Report (Att1 and Att2/Confidential)	ML24155A153 ML24155A154- (Confidential)	3F Submitted to records
8F0624-01	6/6/2024	CR3	Reid	Response to NRC Environmental Assessment, Florida Fish and Wildlife, Questions	ML24166A079 ML24166A080- (proprietary)	3F Submitted to records
F0624-02	6/14/2024	CR3	Reid	Late Received Radiological Shipment	ML24165A121	3F and REG0016 submitted to records
F0724-01		CR3		N/A - NOT USED		Not used
F0724-01	7/22/2024	CR3	Reid	CR3 LTP Technical Basis Documents, Use of Nal Detector and Guideline for Embedded and Buried Piping Detector	ML24205A158	3F and REG0016 submitted to records
F0824-01	8/21/2024	CR3	Reid	CR3 ISFSI Security Plan, Security Training and Qualificiation Plan, and Safeguards Contingency Plan, Rev. 5	11000 10000 1000	-Safeguards Information, hard copy mailed -Non SGI portion Submitted to records.
BF0824-02	8/12/2024	CR3	Reid	LTP Withdrawal	ML24225A207	3F Submitted to records
8F0924-01	9/3/2024	CR3	Reid	Late Received Radiological Shipment	ML24247A212	3F Submitted to records
F1224-01	12/31/2024	CR3	Reid	Performance Bond Letter per License Condition 2.C.19	ML24366A033	

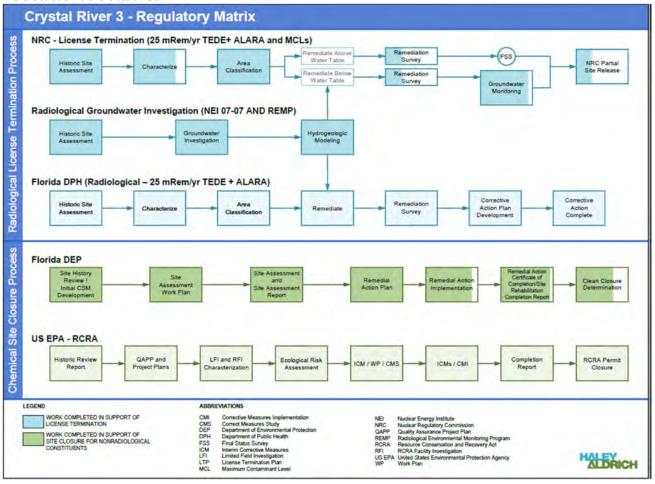
Submittal	Submittal to be Signed	Comments
Proof of Financial Protection, Financial Liability Policy Renewal (ANI)	January 31, 2024	10 CFR 140.15, 140.11(a)(4) Exempted, 10 CFR 140.17(b)
Annual Decommissioning and Irradiated Fuel Management Financial Status Report	March 31, 2024	10 CFR 50.82(a)(8)(v), (vi) and (vii) and 10 CFR 50.75(f)(1) and (2)
Copy of Material Balance Report and Physical Inventory Listing Report (12 month frequency requirement from last submittal)	March 31, 2024	10 CFR 74.13(a) and 10 CFR 74.15, 10 CFR 70.55, 10 CFR 72.76, 10 CFR 72.78, (Within 60 days following the start of the annual physical inventory of special nuclear material and/or source material)
Onsite Property Insurance Coverage (NEIL)	April 1, 2024	10 CFR 50.54(w)(3)
Radiation Exposure Report To Employees (RPCM initiates)	April 30, 2024	10 CFR 19.13(b) and 10 CFR 20.2206
Annual Radioactive Effluent Release Report and a copy of the ODCM	May 1, 2024	Submit report per 10 CFR 50.36a(a)(2) and ODCM; CP-500
Annual Radioactive Radiological Environmental Operating Report	May 15, 2024	10 CFR 50 Appendix I; Submit report per ODCM; CP-500
Annual Copy of Corporate Financial Report See 10 CFR 140.15 (a)	Annually (within 30 days of issuance of annual report)	10 CFR 50.71(b) 10 CFR 72.80(b)
Biennial DSAR - QAPM - 50.59 - 72.48 - Change Report	May 31, 2024	Submit report per 10 CFR 50.71(e), 10 CFR 50.54(a)(3), 10 CFR 50.59(d)(2) and 10 CFR 72.48(d)(2)
Crystal River Unit 3 – Reporting Related to the National Pollutant Discharge Elimination System (NPDES) Permit ID# FL0A00004-001-IW1S	As needed	CP-500
Crystal River 3 - Report of Investigation Pursuant to 10 CFR 20, Appendix G.	As needed	10 CFR 20, Appendix G, as exempted

Submittals	NRC Accession/ TAC Number	NRC Approval Requested	Next Expected Action	Comments
Response to Environmental RAIs	ML24018A151			
	ML24131A075			
	ML24131A076			
	ML24166A079			
	ML24166A080			
Crystal River 3 - Report of Investigation Pursuant to 10 CFR 20, Appendix G	ML24021A001			
And the second of the second o	ML24039A108			
	ML24053A388			
	ML24103A068			
	ML24165A121			
	ML24247A212			
Physical Security Plan, Rev. 4	ML24054A037			Received by NRC 2/22/24
Physical Security Plan, Rev. 5	tbd			Received by NRC 8/28/24
NPDES Permit Revision	ML24039A099			
				1

Submittals	NRC Accession/ TAC Number	NRC Approval Requested	Next Expected Action	Comments
Response to LTP RAIs	ML24089A036			
	ML24090A004 ML24090A005			
	ML24090A006			
	ML24090A007			
	ML24205A158 ML24225A207			
ISFSI Performance Bond	ML24366A033			

### **Environmental**

AOC Status Table attached.



### **8.0 COMPLETED AND NEAR-TERM SCHEDULE MILESTONES**

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
3.1.1.1	Planning & Site Preparation		100%
3.1.1.1	Utilities Reactivation		Complete
3.1.1.2	Planning & Site Preparation		100%
3.1.1.2	Containment Access, Waste Handling Areas		Complete
3.1.2	Planning & Site Preparation		100%
3.1.2	Site Characterization		Complete
	Planning & Site Preparation		4.000/
3.1.3.1	LCR and RV/RVI Planning and Engineering		100% Complete
	General transition Planning/Engineering		Complete

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
	Planning & Site Preparation		4.000/
3.1.3.2	LCR and RV/RVI Planning and Engineering		100% Complete
	Site/Plant infrastructure Planning and Engineering		Complete
	Planning & Site Preparation		
3.1.3.3	LCR and RV/RVI Planning and Engineering		100 %
	RVI Planning and Engineering		Complete
	Planning & Site Preparation		
3.1.3.4	LCR and RV/RVI Planning and Engineering		77% Complete
	RV Planning and Engineering		·
	Planning & Site Preparation		
3.1.3.5	LCR and RV/RVI Planning and Engineering		100%
3.1.3.3	LCR Planning and Engineering		Complete
2444	Planning & Site Preparation		100%
3.1.4.1	Balance of Plant D&D Planning		Complete
	Temporary Utilities, Site Preparation Planning		
	Planning & Site Preparation		100%
3.1.4.2	Balance of Plant D&D Planning		Complete
	Turbine, Condenser, Steam Generator Removal Planning		•
	Planning & Site Preparation		1000/
3.1.4.3	Balance of Plant D&D Planning		100% Complete
	Systems Removal and Decon Work Planning		Complete
	Planning & Site Preparation		
3.1.4.4	Balance of Plant D&D Planning		100%
	Demolition Work Planning		Complete
	Large Component Removal		1000/
4.A.1.1	Reactor Internals Segmentation		100% Complete
	Reactor Internals Mobilization, Setup & Commissioning		Complete
4 4 4 2	Large Component Removal		100%
4.A.1.2	Reactor Internals Segmentation Reactor Internals Segmentation (Plenum Assembly)		Complete
	Large Component Removal		
4.A.1.3	Reactor Internals Segmentation		100%
	Reactor Internals Segmentation (Core Support Assembly/Remaining)		Complete
	Large Component Removal		100%
4.A.1.4	Reactor Internals Segmentation		Complete
	Reactor Internals Waste Packaging, Transportation and Disposal Large Component Removal		
4.A.2.1	Reactor Vessel Segmentation		100%
	Reactor Vessel Mobilization		Complete
	Large Component Removal		100%
4.A.2.2	Reactor Vessel Segmentation		100% Complete
	Reactor Vessel Segmentation		Complete

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
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		100% Complete
4.B.1.1	Site Decontamination Remove Plant Systems Reactor Building	4/30/2025	85% Complete
4.B.1.2	Site Decontamination Remove Plant Systems Auxiliary Building elev 95'		100% Complete
4.B.1.3	Site Decontamination Remove Plant Systems Auxiliary Building elev 119'		100% Complete
4.B.1.4	Site Decontamination Remove Plant Systems Intermediate Building		100% Complete
4.B.1.5	Site Decontamination Remove Plant Systems Turbine Building		100% Complete
4.B.2.1- 3	Decontaminate Reactor Building	8/30/2025	22% Complete
4.B.2.4 4.B.2.5	Decontaminate Auxiliary Building  Decontaminate Intermediate Building	4/30/2025	91% Complete 100% Complete
4.B.4	Site Decontamination Decontaminate Buildings License Termination Planning		100% Complete

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
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
5.1.1	Site Restoration Demolish Turbine Building		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
5.1.2	Site Restoration Demolish Miscellaneous Site Structures RX Vessel Closure Head Storage Bldg Demo		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Hot and Cold Shop Bldg Demo		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures PAB Building Demo		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures BWST Building Demo	04/31/2025	0% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures NAB Building Demo		100% Complete
5.1.3	Site Restoration Demolish Miscellaneous Site Structures Auxiliary Building Demo		100% Complete
5.1.5	Site Restoration Demolish Miscellaneous Site Structures Intermediate Building Demo		100% Complete
5.2.1	Site Restoration Firing Range Closure		100% Complete

Notes:

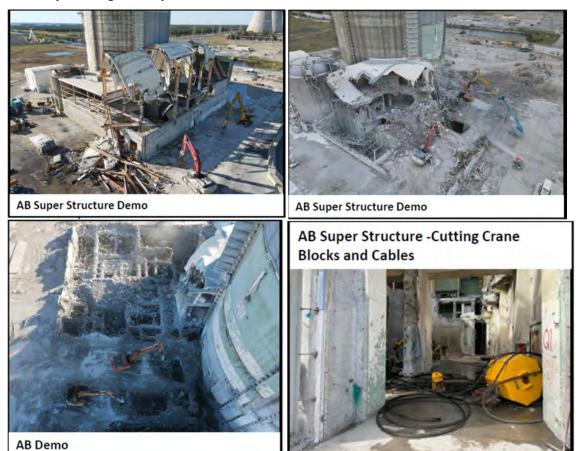
## **Progress Photos**

## Large Component Removal Work





## **Auxiliary Building Plant System Removal and Decon**





**AB Demo** 





