



Stephanie A. Cuello
SENIOR COUNSEL

February 12, 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.*
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 DEF Owner’s Report for the Fourth Quarter 2024. Order No. PSC-2020-0289-FOF-EI, dated August 27, 2020, issued in the above-referenced docket, provides that “3. A quarterly DEF decommissioning report containing, at minimum, the NDT fund monthly payments and balances for the previous quarter, ADPCR3 schedule performance for the previous quarter, and an assessment of schedule and pay projections for the current quarter, should all be provided within one month following DEF’s quarterly meeting with ADPCR3.”

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

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 12th day of February, 2025.

/s/ Stephanie A. Cuello

Attorney

<p>Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us</p> <p>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</p>	<p>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</p> <p>James W. Brew / Laura Wynn Baker Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, NW Suite 800 West Washington, DC 20007-5201 jbrew@smxblaw.com lwb@smxblaw.com</p>
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DEF Owner's Report

4th Quarter 2024

<p>Owner Summary: ADP performed satisfactorily during the 4th quarter 2024 and the decommissioning activities were performed as planned. There were 0 OSHA recordable injury, 0 Personnel Contamination Events (PCE), 0 ISFSI operational or security events, and 0 reportable events to federal agencies. There were 0 environmental permit events requiring a report to a state agency.</p>	<p>4th Quarter 2024 Completed, and 1st Quarter 2025 Projected Milestones</p>	<p>Due Date</p>
<p>Cost and schedule summary (including disputed costs) ADP invoiced Duke Energy \$16,464,699 during the quarter. Duke Energy paid the invoices based upon the review of the supporting documentation that concluded the work was completed. \$15,476,818 was paid to ADP and \$987,881 was paid to the Milestone 1 Trust.</p>	<p>Complete Auxiliary Building Demolition</p>	<p>Completed</p>
	<p>Complete Auxiliary Building Systems Removal</p>	<p>Completed</p>
	<p>Complete Auxiliary Building Asbestos Abatement</p>	<p>Completed</p>
	<p>Commence Borated Water Storage Tank (BWST) Removal</p>	<p>March</p>
<p>At the end of this reporting period the project is 81% completed versus a baseline of 82%.</p> <p>There were no disputed costs.</p> <p>Duke Energy's costs during the quarter were \$162,306. These costs typically include direct costs, allocated costs, periodic tax and insurance costs.</p> <p>The current Milestone 1 date has pushed to 8/5/2027. This is based on recent actions by ADP to pull the License Termination Plan (LTP) from the Nuclear Regulatory Commission (NRC) to resolve comments. This assumption is based on past NRC reviews of similar LTP's. ADP is performing in process reviews of the current LTP development and applying lessons learned to minimize the effect on the current milestone date and will update Duke Energy on any effect the reviews have on the completion date. The change in the early finish date from 12/31/2026 to 8/5/2027 will not challenge the contractual Target Completion Date (Fall 2029).</p>	<p>Summary of quarterly meeting (section B of att. 9)</p> <ol style="list-style-type: none"> The safety focus for the ADP team during this reporting period centered around basic PPE usage, proper footwear and foot placement. The safety focus remains the same due to building component removal, concrete and steel separation. The activities make puncture wounds and eye particle intrusion more prevalent. The switch to a full heavy boot vice shoe cover and safety focus continues to be effective as shoe puncture related PCEs remained at zero this reporting period. Radiation exposure to workers continued to track with the work plans. There were 111 rail and 1 truck radioactive shipments to WCS during this reporting period. There have been a total of 435 radioactive waste shipments, with no Notice of Violations, during the project. Materials/Debris removed from the site to date: <ul style="list-style-type: none"> 51,549,036 lbs. of radioactive material 3,481,874 lbs. of hazardous waste material 37,333,417lbs. of scrap steel material 	
<p>Summary of attachment 9 reports (if any): None to report this period.</p>	<p>Approved: <i>Gene A Flavors, Jr.</i></p>	<p>02/04/2025</p>

DEF Owner's Report

4th Quarter 2024

4 th Quarter 2024	Invoice Payment	IOI Account Balance		Projected Schedule Completion	Actual Schedule Completion	Total Project Completion
						77.92%
October	\$5,064,251	\$139,882,457		.65%	.94%	78.86%
November	\$4,891,238	\$131,739,022		.68%	.91%	79.77%
December	\$6,509,210	\$132,189,412		1.32%	1.21%	80.98%
1 st Quarter 2025	Projected Invoice Payments			Projected Schedule Completion		Projected Total Project Completion
January	\$4,767,612			.88%		81.86%
February	\$4,767,612			.88%		82.74%
March	\$4,897,289			.91%		83.65%
Provisional Trust Fund Balances on 12/31/2024	Provisional Trust	Milestone 1 Trust				
	\$21,455,654	\$26,595,199				

DEF Owner's Report

4th Quarter 2024

4th Quarter	Owner Costs	Reserve Account Balance
October	\$49,399	\$194,894,656
November	\$32,943	\$204,121,622
December	\$404,576 (Taxes & Insurance)	\$198,600,163
1st Quarter	Projected Owner Costs	
January	\$91,809	
February	\$112,543 (Taxes & Insurance)	
March	\$95,161	