



Dianne M. Triplett
DEPUTY GENERAL COUNSEL

April 20, 2021

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 Annual and Quarterly Reports received from Accelerated Decommissioning Partners ("ADP") on April 19, 2021, for Year 2020 and the quarter ending March 2021. 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.

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmck
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 20th day of April, 2021.

/s/ Dianne M. Triplett

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</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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DOCKET NO. 20190140-EI

DECOMMISSIONING ANNUAL REPORT
FROM ADP FOR YEAR 2020



Billy E. Reid, Decommissioning Program Manager

c.865.384.6789

BReid@NorthStar.com

ADP21-0008

April 13, 2021

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

Subject: Materials for Annual Meeting

Dear Mr. Hobbs,

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 29, 2021.

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: Luke Self (ADP / NS)
Geoff Wilde (ADP / Orano)
Ivan Wilson (DEF)



ADP CR3, LLC

Decommissioning 2020 Annual Report

Contents

1.0	EXECUTIVE SUMMARY	3
2.0	SUMMARY OF REGULATORY EVENTS AND REPORTS	3
3.0	PAY ITEM DISPUTE SUMMARY.....	4
4.0	ADP CR3 NON-COMPLIANCE ITEMS.....	4
5.0	CONCERNS NEEDING MANAGEMENT ATTENTION	4
6.0	SUBMITTED AND PENDING REGULATORY SUBMITTALS.....	4
7.0	COMPLETED AND NEAR-TERM SCHEDULE MILESTONES.....	5
8.0	PROJECT SCHEDULE PERFORMANCE AND FORECAST ASSESSMENT	6
9.0	PAY ITEM SCHEDULE PERFORMANCE AND FORECAST ASSESSMENT.....	6

1.0 EXECUTIVE SUMMARY

This is the first 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, 2020.

This year commenced with the transfer of the NRC Operating License to ADP CR3; closure of the DSA; and ADP CR3 completing transition to active decommissioning. Significant progress was made in decommissioning planning activities with physical decommissioning activities commencing. No nuclear safety, environmental non-compliance, or significant industrial safety events occurred or were reported. An Application for Order Approving Indirect Transfers of Control of Licenses in Connection with Internal Corporate Reorganization was sent to the NRC to reflect internal organizational changes above NorthStar Nuclear Holdings LLC.

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:

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:

DEF was provided a written summary report of a transaction that modifies the corporate structure above the NorthStar Group Holdings, LLC level to maintain continuity of current controlling ownership of NorthStar Group Holdings, LLC while formally integrating NorthStar Group Holdings, LLC and Waste Control Specialists, LLC ("WCS") under a common corporate entity and into a common capital structure. A new entity—NGS-WCS Group Holdings, LLC—will be the common corporate entity.

An Application for Order Approving Indirect Transfers of Control of Licenses in Connection with Internal Corporate Reorganization was sent to the NRC

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

*ADP CR3 received and paid the DEF invoice for the NEIL premium

3.0 PAY ITEM DISPUTE SUMMARY

There are no pay items in dispute. DEF has communicated that, with two (2) exceptions, the quality of the documentation of Pay Item completion has been adequate, with progress of all Pay Item being validated. The two quality items identified have been addressed.

4.0 ADP CR3 NON-COMPLIANCE ITEMS

DEF notified ADP CR3 of two (2) non-compliance items: ADP CR3 did not attend a scheduled CREC interface meeting; and did not provide the monthly written notice of the estimated amount for withdrawals during the following calendar month by the twenty-fifth (25th) day of the month. Both of the items have been addressed with internal ADP CR3 processes adjusted to prevent reoccurrence.

5.0 CONCERNS NEEDING MANAGEMENT ATTENTION

A federal Department of Transportation (DOT) inspector attempted to make an unannounced visit to observe the ADP CR3 waste transportation operations, but was denied access to the site at the DEF controlled Access Control Point (ACP) when the inspector refused to provide his driver’s license (he did present DOT identification). ADP CR3 management worked with DEF management in real time to resolve the issue; with DEF security protocol for acceptable visitor identification prevailing. The DOT inspector left and documented the event.

6.0 SUBMITTED AND PENDING REGULATORY SUBMITTALS

NRC

NUMBER	DATE	FROM	SUBJECT	NRC ACCESSION #
3F1020-01	10/01/20	Hager	Crystal River 3 - License Transfer Completed and Signed Amendment No. 10 to CR3 Indemnity Agreement No. B-54	ML20275A098
3F1020-02	10/27/20	Hager	Crystal River 3 – Reviewing Officials per 10 CFR 37	ML20301A507
3F1020-03	10/28/20	Hager	Crystal River 3 – ISFSI Decommissioning Trust	ML20302A453
3F1120-01	11/03/20	Hager	Crystal River 3 – 10 CFR 71.95 Report on the 3-60B Cask (Docket 71-0332)	ML20309A975
3F1120-02	11/19/20	State	Application for Order Approving Indirect Transfers of Control of Licenses in Connection with Internal Corporate Reorganization	ML20324A058

FDEP

- MSGP Notice of Change (adding storm water outfalls, etc., to CR3) – submitted 11/24
- NPDES permit modification – to update references to revised CR3 MSGP permit – *pending approval notification on NOC – expected soon*
- Storage tank registrations – change in ownership (submitted 10/13/20)
- NPDES NOI (paper submittal, 10/15/20)
- Monthly NPDES reports (submitted electronically)

7.0 COMPLETED AND NEAR-TERM SCHEDULE MILESTONES

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
3.1.3.1	Planning & Site Preparation – LCR and RV/RVI Planning and Engineering - General Transition Planning/Engineering		Complete
3.1.1.1	Planning & Site Preparation – Utilities Reactivation (minus Aux Building Ventilation planned for 2022)		Complete
3.1.2	Planning & Site Preparation – Site Characterization		Complete
3.1.4.1	Planning & Site Preparation – Balance of Plant D&D Planning - Temporary Utilities, Site Preparation Planning		Complete
4.B.5.3	Site Decontamination Decontaminate Buildings Transfer Canal Sand Removal		Complete
3.1.1.2	Planning & Site Preparation – Containment Access, Waste Handling Areas		Complete
3.1.3.2	Planning & Site Preparation – LCR and RV/RVI Planning and Engineering - Site/Plant infrastructure Planning and Engineering		Complete
3.1.4.3	Planning & Site Preparation – Balance of Plant D&D Planning – <u>Steam Generator Removal Planning portion only</u>		Complete
3.1.4.2	Planning & Site Preparation – LCR Planning – Turbine Removal Work Package	1-13-21	20% Complete
4.A.7.1	Large Component Removal – Turbine & Generator Removal – Setup Work Area	2-3-21	75% Complete
4.A.6.4	Large Component Removal – Steam Generator Removal – SG Interference Removal	2-11-21	40% Complete
	Large Component Removal –Steam Generator Removal– Hot Leg Removal	2-18-21	0% Complete
	LCR Engineering & Procurement – LCR Lifting & Rigging Plan – Pressurizer Rigging & Lifting Plan (Final)	3-19-21	10% Complete
	Reactor Coolant System Pumps & Motors – Setup Work Area – LCR Interference	3-24-21	0% Complete

Notes:

- ADP CR3 has determined that the Steam Generators (SGs) will be removed earlier in the schedule, prior to Equipment Hatch Modifications and Large Component Removal (LCR), in the first half of 2021. Planning, scaffolding erection, and insulation removal activities have been completed.
- LCR activities will also commence later in 2021 commencing with the removal of the SG Hot Legs so support SG removal. Immediate following SG removal, Equipment Hatch Modifications and LCR will continue. Initial planning, scaffolding erection, insulation and interference removal activities for LCR have been completed.

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 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

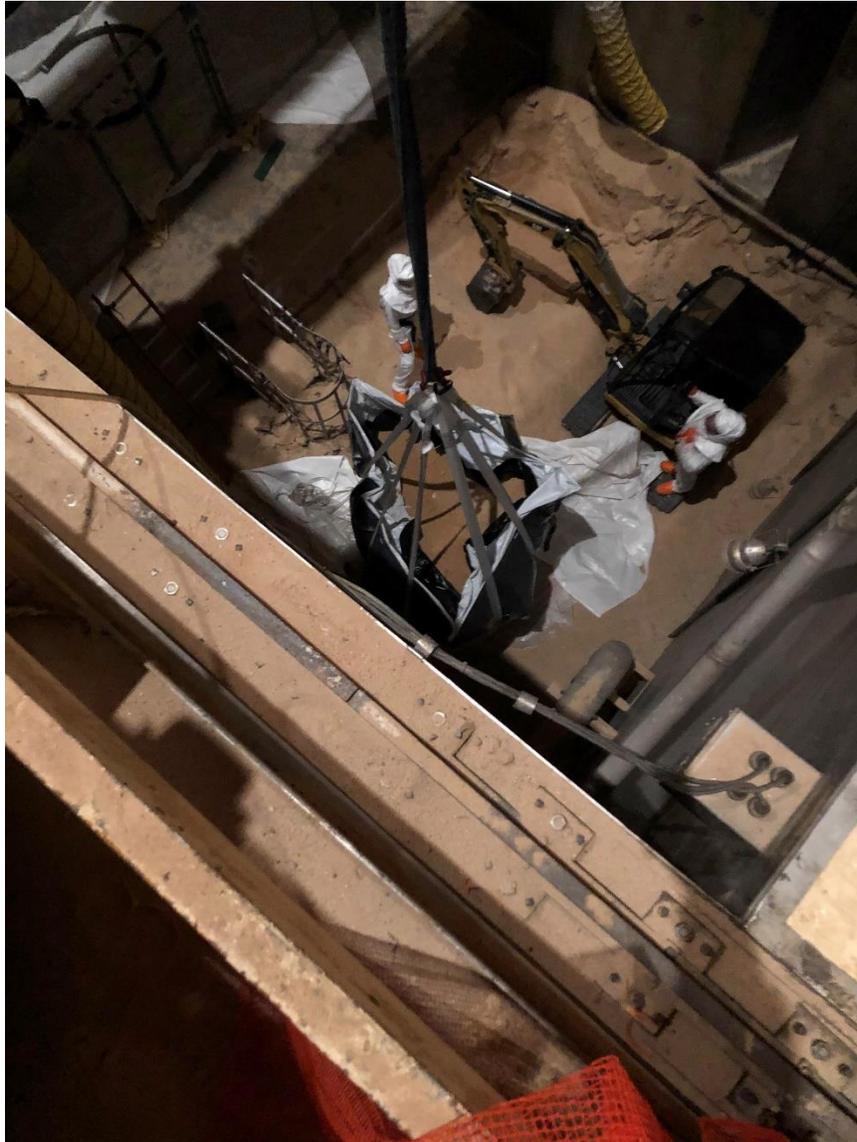
9.0 PAY ITEM SCHEDULE PERFORMANCE AND FORECAST ASSESSMENT

Project is currently performing within budget of the original pay item schedule. Below is the current annual forecast for the project.

2020	\$68,544
2021	\$101,746
2022	\$111,297
2023	\$105,001
2024	\$67,446
2025	\$48,787
2026	\$37,179
Total	\$540,000



Reactor Building Access and Roll-up Door



Sand Removal from Transfer Canal



Sand Removed from Transfer Canal

DOCKET NO. 20190140-EI

DECOMMISSIONING QUARTERLY REPORT
FROM ADP FOR QUARTER ENDING MARCH 2021



Billy E. Reid, Decommissioning Program Manager

c.865.384.6789

BReid@NorthStar.com

ADP21-0007

April 14, 2021

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

Subject: Materials for Quarterly Meeting

Dear Mr. Hobbs,

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 April 29, 2021. 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,

A handwritten signature in blue ink, appearing to read 'Billy E. Reid', is written over a faint blue line.

Billy E. Reid
Decommissioning Program Manager

Cc: Luke Self (ADP / NS)
Geoff Wilde (ADP / Orano)
Ivan Wilson (DEF)



ADP CR3, LLC

Decommissioning Quarterly Report

for quarter ending

March 2021

Contents

1.0	EXECUTIVE SUMMARY	3
2.0	SUMMARY OF REGULATORY EVENTS AND REPORTS	3
3.0	PAY ITEM DISPUTE SUMMARY.....	3
4.0	ADP CR3 NON-COMPLIANCE ITEMS.....	3
5.0	CONCERNS NEEDING MANAGEMENT ATTENTION	3
6.0	SUBMITTED AND PENDING REGULATORY SUBMITTALS.....	3
7.0	COMPLETED AND NEAR-TERM SCHEDULE MILESTONES.....	5

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 January 1, through March 31, 2021.

This quarter commenced with the finishing the planning to support Large Component Removal of the Steam Generators and Turbine. Significant progress was made in Steam Generator Removal and Turbine Removal activities. No nuclear safety, 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:

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

3.0 PAY ITEM DISPUTE SUMMARY

There are no pay items in dispute.

4.0 ADP CR3 NON-COMPLIANCE ITEMS

There have been no non-compliance items this quarter.

5.0 CONCERNS NEEDING MANAGEMENT ATTENTION

No concerns needing management attention at this time.

6.0 SUBMITTED AND PENDING REGULATORY SUBMITTALS

ADP CR3 Decommissioning Quarterly Report
1Q-2021

NRC

NUMBER	DATE	FROM PERSON	SUBJECT	NRC ACCESSION #
3F0121-01	01/19/21	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21019A458
3F0121-02	01/19/21	Dixon	Request for Exemption from 10 CFR 20, Appendix G, Section III.E.	ML21019A464
3F0221-01	02/02/21	Dixon	Crystal River Energy Complex – Environmental Protection Plan Report: 2020 Sea Turtle Rescue and Recovery Summary Report	ML21039A232
3F0221-02	02/17/21	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21048A033
NA	02/18/21	E. Miller	ADP CR3-Annual FFD Electronic Submittal (No letter sent)	ML21053A269
3F0221-03	02/23/21	White	DEF-Annual FFD Electronic Submittal (No letter sent)	ML21054A075
3F0321-01	03/17/21	Reid	Crystal River Unit 3 – License Amendment Request, Revision to Independent Spent Fuel Storage Installation (ISFSI)-Only Emergency Plan, Draft A, and ISFSI-Only Emergency Action Level Bases Manual	ML21076A386
3F0321-02	03/17/21	Reid	Crystal River Unit 3 – License Amendment Request, Revision 0, ISFSI Security Plan, Revision A.	ML21085A750
3F0321-03	03/09/21	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21068A115
3F0321-04	03/15/21	Dixon	Crystal River 3 – 2020 Individual Monitoring NRC Form 5 Report.	
3F0321-05	03/15/21	Dixon	Crystal River 3 – Onsite Property Insurance Coverage	ML21074A050
3F0321-06	03/29/21	State	Crystal River Unit 3 – Annual Decommissioning and Irradiated Fuel Management Financial Status Report for 2020	ML21088A290
3F0321-07	03/30/21	Dixon	Crystal River 3 (XEG) – DOE/NRC Forms 741, 742 and 743C (SNM Report)	ML21089A339

Environmental

Permits

- Received ERP modification for CR3 on 2/4/2021. Completed required routine inspections, documentation filed on site.
- NPDES Permit:
 - Notification to change CR3 contact information (role transition completed in EzDMR on 3/30/21, legal documentation in process, to be submitted week of 4/12/21)
 - Monthly reports (submitted electronically)
 - Quarterly Stormwater Sample collected, to be submitted electronically in April.
- Tier II Report (Duke submitted paperwork on printed 1/12/21).
- EPA ID No. Application. Submitted on February 26th (final application recv'd by FDEP and EPA ID # assigned, formal documentation pending)

Remediation

- Introduction Presentation, (14 Jan 2021)

ADP CR3 Decommissioning Quarterly Report
1Q-2021

- Submitted Current set of work plans stamped
 - Site Investigation Work Plan
 - Quality Assurance Project Plan
 - Site Investigation Report
 - Building Characterization Work Plan
 - Building Characterization Report
 - Waste Acceptance Group Work Plan
 - AOC 12 – Firing Range Remedial Action Plan
 - Interim Source Removal Plans, Submitted to FDEP on 2/9/21, Received Approval on 2/26/21
 - RCRA Treatment Application, Submitted to FDEP on 3/3/21, Approval not required per 3/9 phone communications with FDEP as material treated in-situ

7.0 COMPLETED AND NEAR-TERM SCHEDULE MILESTONES

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
3.1.1.1	Planning & Site Preparation Utilities Reactivation	4-31-21	95% 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	5-28-21	90% Complete
3.1.3.5	Planning & Site Preparation LCR and RV/RVI Planning and Engineering LCR Planning and Engineering	4-16-21	94% 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
4.A.6.4	Large Component Removal Steam Generators Steam Generator Removal	10-31-21	45% Complete
4.A.6.5	Large Component Removal Steam Generators Steam Generator Package, Transportation and Disposal	12-31-21	10% Complete
4.A.7.1	Large Component Removal Main Turbine/Generator/Condensers Turbine and Generator Removal	8-15-21	15% Complete
4.B.5.3	Site Decontamination Decontaminate Buildings Transfer Canal Sand Removal		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures – Alternate AC Diesel	4-30-21	50% Complete

ADP CR3 Decommissioning Quarterly Report
1Q-2021

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
	Generator Bldg		
5.2.1	Site Restoration Firing Range Closure	6-9-21	20% Complete

Notes:

1. ADP CR3 has determined that the Steam Generators (SGs) will be removed earlier in the schedule, prior to Equipment Hatch Modifications and Large Component Removal (LCR), in the first half of 2021. Planning, scaffolding erection, and insulation removal activities have been completed.
2. LCR activities will also commence later in 2021 commencing with the removal of the SG Hot Legs so support SG removal. Immediate following SG removal, Equipment Hatch Modifications and LCR will continue. Initial planning, scaffolding erection, insulation and interference removal activities for LCR have been completed.

Turbine and Legacy Turbine Removal



Steam Generator Removal





Building Demolition AC Diesel Generator Building





Firing Range Closure





#	Activity ID	Activity Name	Orig Dur	Rem Dur	% Comp	Start	Finish	Total Float	2021		2022				2023				2024				2025				2026				2027
									Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3
1	Crystal River #3 Decommissioning BL March 31, 2021 Schedule Update								0.0																						
2	A2800	Complete Milestone #1 Partial License Termination	0.0	0.0	0%		31-Dec-26*	0.0																							
3	3 - Planning / Site Preparation								929.0																						
4	D&D Planning & Preparations								929.0																						
5	Facility Modifications & Site Preparation								1482.0																						
6	Utilities Reactivation								1482.0																						
7	LCR & RV/RVI Planning & Engineering								928.8																						
8	Site/Plant Infrastructure Planning, Engineering, & Procurement								1390.1																						
9	RVI Planning, Engineering, & Procurements								251.3																						
10	RV Planning, Engineering, & Procurement								924.8																						
11	LCR Engineering & Procurement								174.0																						
12	Balance of Plant D&D Planning								1043.0																						
13	Systems Removal and Decontamination Planning								839.0																						
14	Demolition Planning								1043.0																						
15	4 - Decommissioning								130.0																						
16	4A - Large Component Removal								648.0																						
17	Reactor Internals Segmentation								833.8																						
18	Reactor Internals Mobilization, Setup, & Commissioning								56.0																						
19	Reactor Internals Segmentation (Plenum Assembly)								65.0																						
20	Reactor Internals Segmentation (Core Support Assembly/Remaining)								0.0																						
21	Reactor Internals Waste Packaging, Transportation & Disposal								833.8																						
22	Reactor Vessel Segmentation								833.8																						
23	Reactor Vessel Mobilization, Setup, & Commissioning								185.0																						
24	Reactor Vessel Segmentation								0.0																						
25	Reactor Vessel Waste Packaging, Transportation & Disposal								833.8																						
26	CRDMs, ICIs, Service Structure								1188.1																						
27	Remove, Transport, & Dispose Of CRDMs & Service Structure								1188.1																						
28	Remove, Transport, & Dispose Of ICIs								69.0																						
29	Reactor Coolant System								1348.1																						
30	Reactor Coolant System Piping								1348.1																						
31	Reactor Coolant System Pumps & Motors								1369.1																						
32	Pressurizer								1348.1																						
33	Steam Generators								1392.0																						
34	Steam Generators Removal								1392.0																						
35	Steam Generators Waste P,T,&D								1392.0																						
36	Main Turbine / Generator / Condensers								1287.0																						
37	Remove Turbines and Generator								1352.0																						
38	Remove Condensers								1287.0																						
39	Cascading Demo Costs								1022.0																						
40	Large Component Removal Additional Cost								648.0																						
41	Asbestos Abatement								368.0																						
42	Remedial Action Surveys								1382.0																						
43	Remove Contaminated Outdoor Piping								528.0																						
44	4B - Site Decontamination								334.0																						
45	Remove Plant Systems								714.0																						
46	Reactor Building								0.0																						
47	Auxiliary Building (95' Elev.)								343.0																						
48	Auxiliary Building (119' Elev. and Above)								343.0																						
49	Intermediate Building								343.0																						
50	Turbine Building								343.0																						
51	Remove Plant Systems Waste P,T,&D								714.0																						
52	Decontaminate Buildings								0.0																						
53	Reactor Building (95' Elev.)								0.0																						
54	Reactor Building (119' Elev.)								0.0																						
55	Reactor Building (160' Elev. and Above)								0.0																						
56	Auxiliary Building								285.0																						
57	Intermediate Building								285.0																						
58	Miscellaneous Site Structures								589.0																						
59	Decontaminate Buildings Waste P,T & D								334.0																						
60	Reactor Building Waste P,T,&D								334.0																						
61	Auxiliary, Intermediate, and Misc Building Waste P,T,&D								675.0																						

