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DEPUTY GENERAL COUNSEL

May 26, 2022

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 Revised Materials for Annual Meeting received from Accelerated Decommissioning Partners ("ADP"). The original report was previously submitted on April 20, 2022. The information is being revised to change the headers from 2020 to 2021 and 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 26th day of May, 2022.

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 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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ADP CR3, LLC

Decommissioning 2021 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, 2021.

Safety and Environmental Performance

- ADP Total Hours 2021 – 289,809MH
- First Aid – 5, OSHA Recordable – 0, Lost Time Cases – 0,
- COVID –52 total – 52 returned to work
- ALARA Actual exposure to date = 19.332 rem vs budget 23.630 rem
- Personnel Contamination = 8 level 1 PCE
- NRC Non cited violation for fire September 2021

This year commenced with the continued planning for Decommissioning to include RPVI/RPV segmentation, system removal, building demolition and site restoration. Significant progress was made in systems removal with the Reactor Coolant System being completely removed this year and Turbine building system removal progressing to approximately 60%. Decommissioning planning activities will continue to allow work to progress in all areas. Site restoration progress continues with the completion of Building Demolition of the AC Diesel Generator, Firing Range Closure Remediation and continued progress of interior demolition of the Turbine Building to approximately 50% Complete. West Settling Pond Remediation completed and FSS Survey work will continue into 2022. 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 September 2021 as noted in NRC 4th quarter inspection report.

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

ADP CR3 Decommissioning 2021 Annual Report

NUMBER	DATE	FROM ORG	FROM PERSON	SUBJECT	NRC ACCESSION #
3F0121-01	01/19/21	CR-3	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21019A458
3F0121-02	01/19/21	CR-3	Dixon	Request for Exemption from 10 CFR 20, Appendix G, Section III.E.	ML21019A464
3F0221-01	02/02/21	CR-3	Dixon	Crystal River Energy Complex – Environmental Protection Plan Report: 2020 Sea Turtle Rescue and Recovery Summary Report	ML21039A232
3F0221-02	02/17/21	CR-3	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21048A033
NA	02/18/21	DEF	E. Miller	ADP CR3-Annual FFD Electronic Submittal (No letter sent)	ML21053A269
3F0221-03	02/23/21	CR-3	White	DEF-Annual FFD Electronic Submittal (No letter sent)	ML21054A075
3F0321-01	03/17/21	CR-3	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	CR-3	Reid	Crystal River Unit 3 – License Amendment Request, Revision 0, ISFSI Security Plan, Revision A.	ML21085A750
3F0321-03	03/09/21	CR-3	Dixon	Report of Investigation Pursuant to 10 CFR 20, Appendix G.	ML21068A115
3F0321-04				3F0321-04 was NOT USED - CR3 2020 Individual Monitoring NRC Form 5 Report was delayed and sent under 3F0421-05	
3F0321-05	03/15/21	CR-3	Dixon	Crystal River 3 – Onsite Property Insurance Coverage	ML21074A050
3F0321-06	03/29/21	CR-3	State	Crystal River Unit 3 – Annual Decommissioning and Irradiated Fuel Management Financial Status Report for 2020	ML21088A290
3F0321-07	03/30/21	CR-3	Dixon	Crystal River 3 (XEG) – DOE/NRC Forms 741, 742 and 743C (SNM Report)	ML21089A339
3F0421-01	04/06/21	CR-3	Dixon	Crystal River Unit 3 – 2019 Annual Radioactive Effluent Release Report	ML21098A194
3F0421-02	04/06/21	CR-3	Dixon	Crystal River Unit 3 – 2019 Annual Radiological Environmental Operating Report	ML21098A196
3F0421-03	04/07/21	CR-3	Dixon	Crystal River Unit 3 – Proof of Financial Protection	ML21098A197
3F0421-04	04/13/21	CR-3	Dixon	Supplement to Application for Order Approving Indirect Transfers of Control of Licenses in Connection with Internal Corporate Reorganization	ML21103A415
3F0421-05	04/27/21	CR-3	Dixon	Crystal River 3 – 2020 Individual Monitoring NRC Form 5 Report.	ML21117A300
3F0521-01	05/24/21	CR-3	Adix	ADP Financial Report	ML21146A354 ML21145A263
3F0621-01	06/03/21	CR-3	Dixon	Crystal River 3 – 10 CFR 71.17 User Registration of RT-100 Type B Radioactive Material Shipping Packages	ML21154A074
3F0621-02	06/16/21	CR-3	Dixon	Crystal River Unit 3 - Reporting Related to the National Pollutant Discharge Elimination System (NPDES) Permit ID# FLOA00004-001-IW1S	ML21167A234
3F0721-01	07/13/21	CR-3	Dixon	Crystal River 3 – Report of Investigation Pursuant to 10 CFR 20, Appendix G	ML21194A133
3F0821-01	08/18/21	CR-3	Reid	Crystal River Unit 3 – Response to Requests for Additional Information and Supplement 1 to License Amendment Request, Revision to Independent Spent Fuel Storage Installation (ISFSI)-Only Emergency Plan, and ISFSI-Only Emergency Action Level Bases Manual.	ML21230A191
3F0921-01	09/14/21	CR-3	Reid	Crystal River Unit 3 – Supplement 1 to License Amendment Request, Revision 0, ISFSI Security Plan, Revision A.	ML21257A398
3F0921-02	09/29/21	CR-3	Dixon	Crystal River Unit 3 – Reporting Related to the National Pollutant Discharge Elimination System (NPDES) Permit ID# FLOA00004 (Minor) (Rev. C)	ML21272A144
3F1021-01	10/21/21	CR-3	Dixon	Crystal River 3 – Report of Investigation Pursuant to 10 CFR 20, Appendix G	ML21294A042

FDEP –

Presentation with DEP to introduce the team and provide a status update on our work to date. Presentation was held on 14 January 2021 via videoconference, followed by the submittal of the following draft reports on 5 February 2021, with signed/stamped reports submitted at DEP’s request on 17 February 2021.

- Non-Radiological Conceptual Site Model
- Quality Assurance Project Plan
- Limited Non-Radiological Site Sampling Plan
- Phase II Site Investigation Report
- Waste Acceptance Grouping Identification Plan
- Building Characterization Work Plan
- Building Characterization Report
- AOC 12 - Firing Range Closure Plan
- AOC 18 - Settling Pond Closure Plan

Following this initial submittal:

AOC 12 – Firing Range Interim Source Removal Action Plan, submitted to FDEP on 9 February 2021.

- Received approval from FDEP on 26 February 2021
- Removal action completed in Summer 2021
- AOC 12 – Firing Range Interim Source Removal Action Report, submitted to FDEP on 20 October 2021
- Received conditional approval from FDEP on 2 November 2021
- Collected additional groundwater samples in December in support of conditional approval. (Report submitted 2022)

AOC 18 - East Settling Pond Interim Storage Removal Action Plan, as s submitted to FDEP on 5 October 2021

- Received approval from DEP on 26 October
- Removal Action completed in November/December 2021
- Report pending.

ADP CR3 - Beneficial Reuse of Concrete, Letter dated 29 October 2021, with response/DEP's position provided on 18 November 2021.

Completed tasks that have not been submitted to FDEP

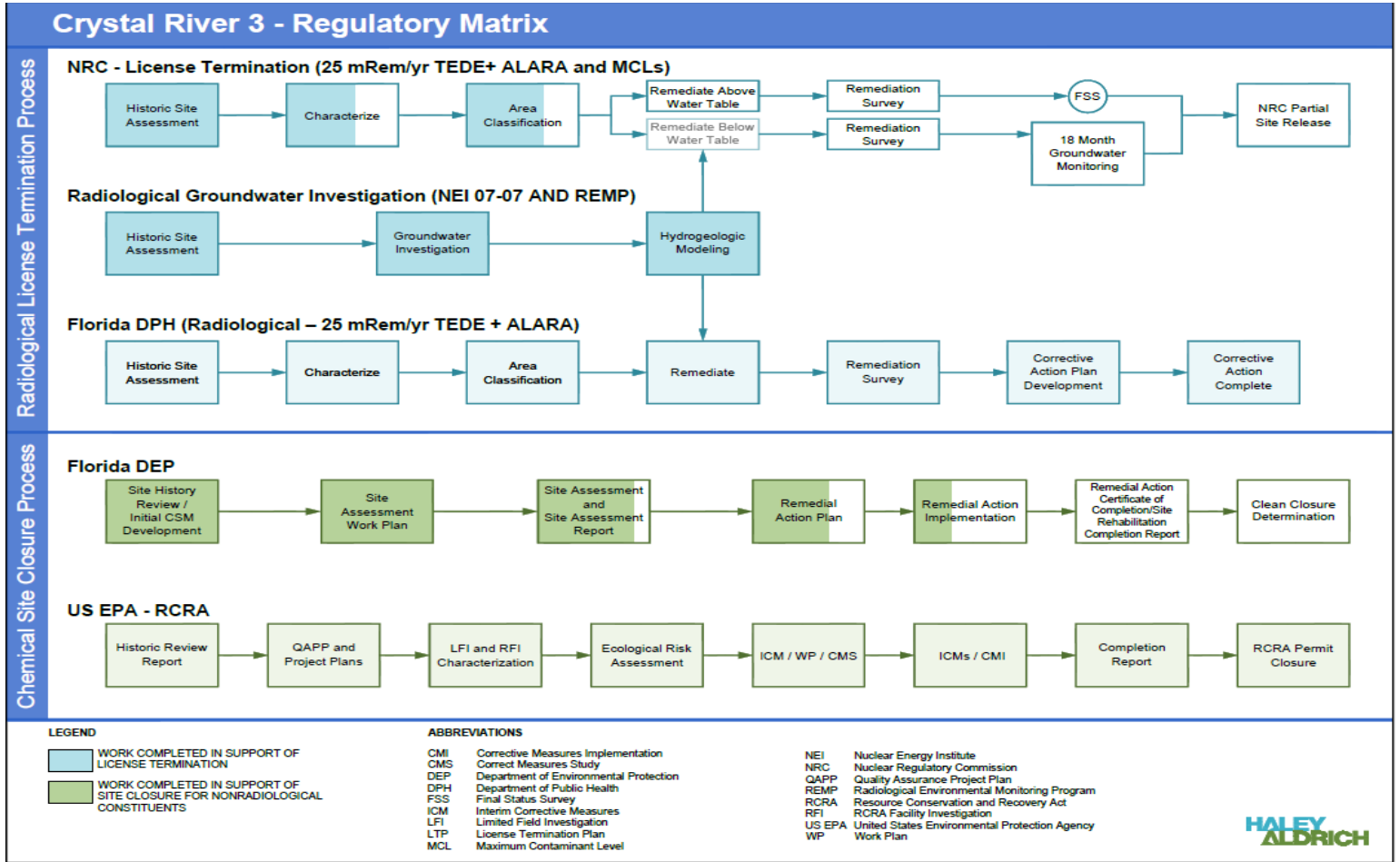
- Supplemental Phase II Site Investigation Work Plan
- Supplemental Phase II Field Investigation. Field activities completed in Summer 2021. Effort included the installation and development of several new wells, sitewide groundwater sampling, and soil sampling to address data gaps. Report completed but awaiting background evaluation prior to DEP submittal.
- Underground Storage Tank (UST) Removal Work Plan
- Developed RESRAD input parameters per the Hydrogeological CSM

Permitting

ADP CR3 Decommissioning 2021 Annual Report

- Completed the Spill Prevention, Control, and Countermeasures (SPCC) plan
- Completed the Stormwater pollution Prevention Plan (SWPPP)
- Obtained a unique EPA ID number from FDEP
- Maintained ADP CR3 Small Quantity Generator status.
- Completed the transfer of the Multi-Sector General Permit (MSGP) from DEF to ADP DR3
- Completed the transfer of the Environmental Resources Permit (ERP) from DEF to ADP.
- Obtained FzDMR access for monthly and annual NPDES reporting
- Completed the NPDES Modification to allow for additional sources for discharge.

Summary of Haley & Aldrich Submittals and Actions 2021					
Number	Date	From Org	From Person	Subject	Submitted To
Site Investigation/Remediation					
3S0221-03*	5-Feb-21	H&A	Glucksberg	Non-Radiological Conceptual Site Model	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Quality Assurance Project Plan	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Limited Non-Radiological Site Sampling Plan	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Phase II Site Investigation Report	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Waste Acceptance Grouping Identification Plan	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Building Characterization Work Plan	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	Building Characterization Report	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	AOC 12 - Firing Range Closure Plan	FDEP
3S0221-03*	5-Feb-21	H&A	Glucksberg	AOC 18 - Settling Pond Closure Plan	FDEP
3S0221-01	9-Feb-21	H&A	Glucksberg	AOC 12 - Firing Range Interim Source Removal Action Plan	FDEP
3S0221-06	26-Feb-21	FDEP	Mr. Serge Kiyali	AOC 12 - Conditional Interim Source Removal Plan Approval Order	ADP CR3
3S0321-05	3-Mar-21	H&A	Glucksberg	AOC 12 - Application for treating Impacted Soils	FDEP
				Completed removal action, summer 2021	
3S1020-02	20-Oct-21	H&A	Glucksberg	AOC 12 - Firing Range Interim Source Removal Action Report	FDEP
	2-Nov-21	FDEP	Mr. Serge Kiyali	AOC 12 - Firing Range Interim Source Removal Action Report. Conditional Approval	ADP CR3
				Collected additional groundwater samples (December 2021)	
3S1020-01	5-Oct-21	H&A	Glucksberg	AOC 18 - Settling Pond Interim Storage Removal Action Plan	FDEP
	26-Oct-21	FDEP	Mr. Serge Kiyali	AOC 18 - Settling Pond Interim Storage Removal Action Plan - Approval	ADP CR3
				Completed removal action, Nov/Dec 2021	
3S1021-03	29-Oct-21	H&A	Glucksberg	Proposal for Beneficial Reuse of Concrete	FDEP
	17-Nov-21	FDEP	Mr. Serge Kiyali	DEP Response to the Proposal for Beneficial Reuse of Concrete	ADP CR3
				Supplemental Phase II Site Investigation Field Activities (Summer 2021)	
NA	5/14/2021	H&A	Glucksberg	RESRAD input parameters for hydrogeological conditions	ADP CR3
NA	6/7/2021	H&A	Glucksberg	Supplemental Phase II Site Investigation Work Plan	ADP CR3
				UST Removal Preparation Support	
NA	2/3/2021	H&A	Anderson	UST Removal Drilling Plan and costs (for work package)	ADP CR3
NA	10/28/2021	H&A	Anderson	UST Removal Sampling Guidelines (for work package)	ADP CR3
Permitting Support					
	1/4/2021	FDEP	Ms. Cindy Mulkey	Approval for domestic wastewater amendment request	Duke
	2/4/2021	FDEP	Hager	Environmental Resources Permit (ERP); transfer from DEF to ADP approval	FDEP
3S0221-04	2/25/2021	H&A	Glucksberg	Application for an EPA ID No (request for CR3)	FDEP
	3/3/2021	H&A/ADP	Walker w/H&A support	Obtained revised EzDMR access (Pin request for M. Walked) for monthly and annual NPDES reporting	FDEP
	4/26/2021	H&A	Anderson	Courtesy UST Removal Notification	FDOH
	6/1/2021	H&A	Anderson	NPDES inspection compliance letter	ADP CR3
3S0621-01	6/16/2021	H&A	Davis	NPDES Permit Modification request Permit No. FLOA00004	FDEP
	6/23/2021	FDEP	NA	Notification of Regulated Waste Activity status (EPA ID No Received)	ADP CR3
	7/20/2021	H&A	Anderson	RAI Citrus County - Waste water	Citrus Co
	7/29/2021	H&A	Anderson	RAI Citrus County - Waste Water Response	Citrus Co
	9/28/2021	FDEP	Marc Harris	NPDES Permit Modification Approval	ADP CR3



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	9/13/2022	75% Complete
3.1.3.4	Planning & Site Preparation LCR and RV/RVI Planning and Engineering RV Planning and Engineering	5/10/2023	40% 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	7/31/2022	75% Complete
3.1.4.4	Planning & Site Preparation Balance of Plant D&D Planning Demolition Work Planning	3/31/2023	15% 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)	3/31/2022	5% Complete

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	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
4.A.1.3	Large Component Removal Reactor Internals Segmentation Reactor Internals Segmentation (Core Support Assembly/Remaining)	9/30/2022	0% Complete
4.A.3	Large Component Removal Reactor Vessel Segmentation Reactor CRDMs, ICIs, Services Structure	8/25/2022	20% 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	01/31/2022	85% Complete
4.A.7.1	Large Component Removal Condenser Removal	7/31/2022	5% Complete
4.B.1.2	Site Decontamination Remove Plant Systems Auxiliary Building elev 95'	4/06/2023	20% Complete
4.B.1.5	Site Decontamination Remove Plant Systems Turbine Building	6/30/2022	65% Complete
4.B.4	Site Decontamination Decontaminate Buildings License Termination Planning	7/31/2022	10% Complete
4.B.5.1	Site Decontamination Decontaminate Buildings West Settling Pond Remediation	3/31/2022	85% Complete
4.B.5.3	Site Decontamination Decontaminate Buildings Transfer Canal Sand Removal		100% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Diesel Generator Building	01/31/2022	65% Complete
5.1.2	Site Restoration Demolish Miscellaneous Site Structures Alternate AC Diesel Generator Bldg Demo		100% Complete
5.2.1	Site Restoration		100%

	PAY ITEM/MILESTONE	PLANNED COMPLETE	STATUS
	Firing Range Closure		Complete

Notes:

1. ADP CR3 determined that the Steam Generators (SGs) would be removed earlier in the schedule, prior to Equipment Hatch Modifications and Large Component Removal (LCR), in the first half of 2021.
2. RPVI Mobilization activities completed in 2021 approximately 2 months earlier from the baseline schedule to allow Segmentation activities to commence at the beginning of 2022

2021 Annual Summary CR3 ISFSI Operations and Maintenance

- Completed Horizontal Storage Module (HSM) annual inspections, which identified a few areas where minor cosmetic cracking/spalling were present. Worked with the dry fuel storage system vendor to develop a repair procedure and self-performed repairs to minimize the potential for further degradation in these areas.
- Performed required regulatory evaluations to assure demolition activities using explosives at a facility adjacent to the ISFSI would have no impact on ISFSI operations, maintenance, or security. Coordinated placement of seismographs near the ISFSI to collect data during conduct of the evolutions that confirmed the accuracy of the inputs used in the regulatory evaluations.
- Prepared and implemented an Engineering Change (EC) to abandon the ISFSI Temperature Monitoring System, eliminating the need for annual calibrations. Transitioned responsibility for performing daily visual observations to verify no blockage of vent or intake screens is present to the ISFSI Security organization as allowed by the NRC License.
- Supported development and implementation of an EC to modify the ISFSI facility to add two additional HSM-Ws to the pad for future storage of Greater than Class C (GTCC) waste. The two new HSM-Ws were successfully placed on the ISFSI pad.
- Submitted a License Amendment Request (LAR) for the ISFSI Only Emergency Plan to eliminate the Resource Manager position from the required Emergency Response Organization (ERO) positions, remove the State Hot Ringdown Phone (SHRD) from the Plan, and reduce the number of required communications drills. NRC approval was received in October of 2021 and the LAR was fully implemented in 2021.
- Submitted a LAR for the ISFSI Security Plan to implement changes to the Plant Access Authorization/Fitness for Duty Program, replace the Secondary Alarm Station (SAS) with Remote Monitoring, and transition Emergency Coordinator (EC) responsibilities to the ISFSI Security Organization. NRC approval was received in November of 2021 with implementation scheduled for the first quarter of 2022.
- Completed onsite vendor training with the ISFSI Security Computer software designer, Essential Systems, for four individuals to provide additional defense in depth for the ISFSI staff in terms of knowledge of the system and the ability to troubleshoot and coordinate future work activities.

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 – 88% Complete
- Period 4A – 34% Complete
- Period 4B – 5% Complete
- Period 5 – 7% Complete

2020	\$68,523
2021	\$101,546
2022	\$110,689
2023	\$105,387
2024	\$68,967
2025	\$48,848
2026	\$37,040
Total	\$540,000

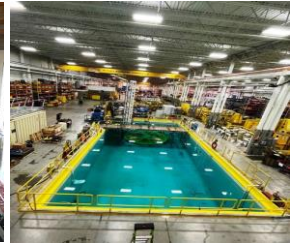
Reactor Internals Mobilization and Site Setup



Wass TCS Installed



Working Bridge Installed



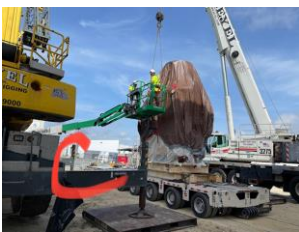
Training Facility

Reactor Coolant System Removal

Reactor Coolant Piping Removal



Reactor Coolant System Pumps and Motors



Reactor Coolant System Pressurizer and Relief Tank



Steam Generator Removal



Turbine Removal



System Removal

Turbine, Auxiliary & Diesel Generator Building



West Settling Pond Remediation



Site Restoration

Building Demolition & Firing Range Closure

