

Stephanie A. Cuello SENIOR COUNSEL

April 15, 2024

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 Materials for Annual Meeting received from Accelerated Decommissioning Partners ("ADP"). The information 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 (850) 521-1425 should you have any questions concerning this filing.

Respectfully,

/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 15th day of April, 2024.

| /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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15760 West Power Line Street | Crystal River, FL 34429

Billy E. Reid, Decommissioning Program Manager c.865.384.6789

BReid@NorthStar.com

ADP24-0006

April 02, 2024

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

Subject: Materials for Annual 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 Annual meeting scheduled for April 25, 2024.

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

Sincerely,

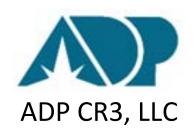
Billy E. Reid

Decommissioning Program Manager

Cc: Nelson Langub (ADP / NS)

Luke Self (ADP/NS)

David Pearson (ADP/NS)
Geoff Wilde (ADP / Orano)



Decommissioning 2023 Annual Report

ADP CR3 Decommissioning 2023 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, 2023.

Safety and Environmental Performance

- ADP Total Hours 2023 403,695MH, ADP Project to Date 1,102,422MH
- First Aid 3, OSHA Recordable 1, Lost Time Cases 0
- ALARA Actual exposure to date = 65717 mrem vs budget 77000 mrem
- Personnel Contamination = 1 Level 1 PCE
- No NRC violations for 2023

This year commenced with the continued segmentation, removal, and packaging of the RPV/RPVI, system removal, building demolition and site restoration. Reactor Vessel Removal completed in October. Reactor Vessel packages were stored onsite scheduled for shipment in January of 2024. Significant progress continued in the Reactor Building, Auxiliary Building, and Intermediate building. Turbine Building, Hot and Cold Shop and Plant Admin Building demolition completed this year. Planning and preparations for other sequences of work continued. Corrective actions continued with respect to the Safety Conscious Work Environment. 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

- Receipt of any correspondence from any Governmental Authority of violation or finding: None.
- 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

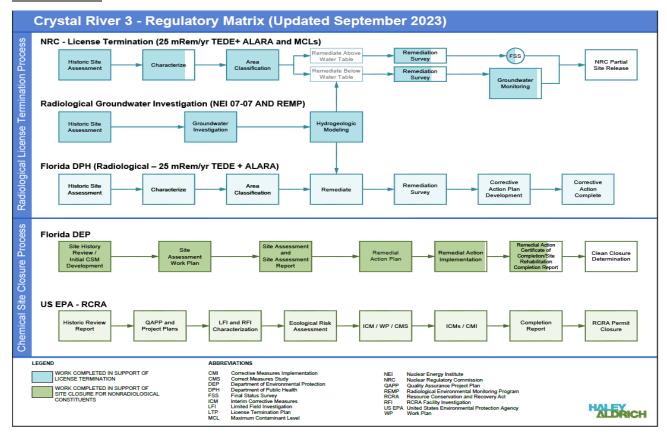
<u>NRC</u>

| NUMBER | DATE | FROM ORG | FROM PERSON | SUBJECT | NRC ACCESSION # |
|-----------|------------|----------|----------------|---|--|
| N/A | 1/23/2023 | CR3 | White | DEF-Annual FFD Electronic Submittal (Electronic Only Submittal -No letter sent - 1 Month of data, final submission) | ML23023A250 |
| 3F0123-01 | 1/26/2023 | CR3 | Dixon | Crystal River Unit 3 – Proof of Financial Protection | ML23026A004 |
| 3F0323-01 | 3/2/2023 | CR3 | Dixon | Crystal River Unit 3 - Onsite Property Insurance Coverage | ML23061A011 |
| 3F0323-02 | 3/29/2023 | CR3 | State | Annual Decommissioning and Irradiated Fuel Management Financial Status Report | ML23088A387 |
| 3F0323-03 | 3/31/2023 | CR3 | State | CR3 Decommissioning Funding Plan for Independent Spent Fuel Storage Installation | ML23090A235 |
| 3F0423-01 | 4/4/2023 | CR3 | Dixon | Crystal River 3 – 2022 Individual Monitoring NRC Form 5 Report | ML23094A079 |
| 3F0423-02 | 4/18/2023 | CR3 | Dixon | Crystal River 3 - 2022 Annual Radioactive Effluent Release Report | ML23108A264 |
| 3F0423-03 | 4/18/2023 | CR3 | Dixon | Crystal River 3 - 2022 Annual Radiological Environmental Operating Report | ML23108A266 |
| 3F0523-01 | 5/24/2023 | CR3 | Adix | Crystal River 3 – Annual Financial Report and Certified Financial Statement | ML23144A258 |
| 3F0623-01 | 6/1/2023 | CR3 | Reid | Late Received Radiological Shipment | ML23152A263 |
| 3F0623-02 | 6/9/2023 | CR3 | Reid | LTP Resubmittal | ML23160A296 ML23160A297 ML23160A298 ML23160A299 |
| 3F0923-01 | 9/6/2023 | CR3 | Dixon | Crystal River 3 - Request for User Registration of the CR3MP | ML23249A160 |
| 3F1223-01 | 12/19/2023 | CR3 | Reid | Crystal River 3 - Application to for Minor Revision to NPDES, FL0A00004 | ML23353A205 |

| 2023 Crystal River 3 – NRC Submittals | | | | |
|--|--|--|--|--|
| Submittal | Submittal to be Signed | Comments | | |
| License Termination Plan License Amendment | December 31, 2022 | 10CFR 50.82(a)(9) | | |
| Proof of Financial Protection, Financial Liability Policy Renewal (ANI) | January 31, 2023 | 10 CFR 140.15, 140.11(a)(4) Exempted, 10 CFR 140.17(b) | | |
| Annual Report for Drug and Alcohol Tests (Electronic Submittal by Security) | March 1, 2023 | 10 CFR 26.417(b)(2) and 26.717. (LIMITED REPORT FOR 1 MONTH OF 2022) NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests | | |
| ISFSI Triennial | March 31, 2023 | 10 CFR 72.30(c) | | |
| Annual Decommissioning and Irradiated Fuel Management Financial Status Report | March 31, 2023 | 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, 2023 | 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, 2023 | 10 CFR 50.54(w)(3) | | |
| Radiation Exposure Report To Employees (RPCM initiates) | April 30, 2023 | 10 CFR 19.13(b) and 10 CFR 20.2206 | | |
| Annual Radioactive Effluent Release Report and a copy of the ODCM | May 1, 2023 | Submit report per 10 CFR 50.36a(a)(2) and ODCM; 10 CFR 72.44(d)(3) | | |
| Annual Radioactive Radiological Environmental Operating Report | May 15, 2023 | 10 CFR 72.44(d)(3); Submit report per ODCM | | |
| 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) | | |
| | | | | |
| 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 | | |
| Shipment Notification of Irradiated Fuel or Wastes Across States or Tribal Reservations | As needed | 10 CFR 71.97 Postmarked at least 7 days before shipment or 4 days otherwise | | |

| Submittals | NRC Accession/ TAC Number | NRC Approval Requested | Next Expected Action | Comments |
|---|------------------------------|---------------------------|-------------------------|---------------------------------------|
| License Termination Plan License Amendment | ML22355A441 | | | |
| - Request for Supplemental Inform. for Acceptance Review | ML23103A189 | | | Response due June 1 |
| - Supplemental Information Submitted June 9 | ML23160A296 | | In NRC Review | |
| | ML23160A297 | | | |
| | ML23160A298 | | | |
| | ML23160A299 | | | |
| Report of Investigation Pursuant to 10 CFR 20, Appendix G | ML23152A263 | | | |
| User Registration of the CR3MP | ML23249A160 | | | In accordance with 10 CFR 71.17(c)(3) |
| Application for Minor Revision to NPDES, LFL0A00004 | ML23353A205 | | | In accordance with CP-500 Step 4.3.4 |

Environmental



7.0 COMPLETED AND NEAR-TERM SCHEDULE MILESTONES

| | PAY ITEM/MILESTONE | PLANNED COMPLETE | STATUS |
|---------|--|---------------------|-------------------|
| 2111 | Planning & Site Preparation | | 100% |
| 3.1.1.1 | Utilities Reactivation | | Complete |
| 2112 | Planning & Site Preparation | | 100% |
| 3.1.1.2 | Containment Access, Waste Handling Areas | | Complete |
| 2.1.2 | Planning & Site Preparation | | 100% |
| 3.1.2 | Site Characterization | | Complete |
| | Planning & Site Preparation | | |
| 3.1.3.1 | LCR and RV/RVI Planning and Engineering | | 100% Complete |
| | General transition Planning/Engineering | | Complete |
| | Planning & Site Preparation | | |
| 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 % Complete |
| | RVI Planning and Engineering | | complete |
| | Planning & Site Preparation | | 770/ |
| 3.1.3.4 | LCR and RV/RVI Planning and Engineering | | 77% Complete |
| | RV Planning and Engineering | | complete |
| | Planning & Site Preparation | | 1000/ |
| 3.1.3.5 | LCR and RV/RVI Planning and Engineering | | 100% Complete |
| | LCR Planning and Engineering | | Complete |
| | Planning & Site Preparation | | |
| 3.1.4.1 | Balance of Plant D&D Planning | | 100% Complete |
| | Temporary Utilities, Site Preparation Planning | | Complete |
| | Planning & Site Preparation | | |
| 3.1.4.2 | Balance of Plant D&D Planning | | 100% Complete |
| | Turbine, Condenser, Steam Generator Removal Planning | | Complete |
| | Planning & Site Preparation | | |
| 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 | 12/31/2023 | 49% |
| | Demolition Work Planning | | Complete |
| | Large Component Removal | | 100% |
| 4.A.1.1 | Reactor Internals Segmentation | | Complete |
| | Reactor Internals Mobilization, Setup & Commissioning | | p |
| 4.A.1.2 | Large Component Removal Reactor Internals Segmentation | | 100% |
| | Reactor Internals Segmentation (Plenum Assembly) | | Complete |

| | PAY ITEM/MILESTONE | PLANNED COMPLETE | STATUS |
|---------|---|---------------------|------------------|
| 4.A.1.3 | Large Component Removal Reactor Internals Segmentation Reactor Internals Segmentation (Core Support Assembly/Remaining) | | 100% Complete |
| 4.A.1.4 | Large Component Removal Reactor Internals Segmentation Reactor Internals Waste Packaging, Transportation and Disposal | 5/31/2024 | 20% Complete |
| 4.A.2.1 | Large Component Removal Reactor Vessel Segmentation Reactor Vessel Mobilization | | 100% Complete |
| 4.A.2.2 | Large Component Removal Reactor Vessel Segmentation Reactor Vessel Segmentation | | 100% Complete |
| 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 | 6/30/2024 | 33% Complete |
| 4.B.1.2 | Site Decontamination Remove Plant Systems Auxiliary Building elev 95' | 04/31/2024 | 88% Complete |
| 4.B.1.3 | Site Decontamination Remove Plant Systems Auxiliary Building elev 119' | 04/31/2024 | 91% Complete |
| 4.B.1.4 | Site Decontamination Remove Plant Systems Intermediate Building | | 100% Complete |

| | PAY ITEM/MILESTONE | PLANNED COMPLETE | STATUS |
|---------------|---|---------------------|------------------|
| 4.B.1.5 | Site Decontamination Remove Plant Systems Turbine Building | | 100% Complete |
| 4.B.2.1- 3 | Decontaminate Reactor Building | 6/30/2024 | 10% Complete |
| 4.B.2.4 | Decontaminate Auxiliary Building | 5/30/2024 | 33% Complete |
| 4.B.2.5 | Decontaminate Intermediate Building | 3/31/2024 | 70% Complete |
| 4.B.4 | Site Decontamination Decontaminate Buildings License Termination Planning | | 100% Complete |
| 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 | 01/31/2024 | 80% 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 | 01/31/2024 | 90% Complete |
| 5.1.2 | Site Restoration Demolish Miscellaneous Site Structures BWST Building Demo | 06/30/2024 | 0% Complete |

| | PAY ITEM/MILESTONE | PLANNED COMPLETE | STATUS |
|-------|--|---------------------|------------------|
| 5.1.2 | Site Restoration Demolish Miscellaneous Site Structures NAB Building Demo | 6/11/2024 | 0% Complete |
| 5.1.3 | Site Restoration Demolish Miscellaneous Site Structures Auxiliary Building Demo | 6/30/2024 | 0% Complete |
| 5.1.5 | Site Restoration Demolish Miscellaneous Site Structures Intermediate Building Demo | 6/1/2024 | 0% Complete |
| 5.2.1 | Site Restoration | | 100% Complete |

2023 Annual Summary CR3 ISFSI Operations and Maintenance

- Completed the Engineering Change, including owner acceptance documentation reviews, regulatory screens, and updates to site drawings and Licensing basis, required to allow placement of the two Radioactive Waste Containers (RWCs) containing CR3 greater than Class C (GTCC) waste within the CR3 ISFSI.
- Implemented changes to the ISFSI-only Security Program and implementing procedures required due to extensive 10 CFR 73 rule updates for program implementation and reporting of suspicious activity and security events (officially implemented January 8th, 2024).
- Established standalone training program and task analysis for ISFSI Staff that included a review of ISFSI-specific roles for managers, engineers, technicians, security officers, and radiation protection.
- Submitted all required regulatory submittals associated with the ISFSI and Part 50 License within their required timeframes.
- Executed the lease of the second floor of the CCB for long-term ISFSI staff facility and completed Phase I of required remodeling that created five (5) offices and required business IT infrastructure. Completed move-in for Orano TN staff.
- Established renewed contracts with vendors required for Access Authorization and Security Programs, including a renewed contract with Paragon for contracted Security services.
- Completed the 5-year GC-859 survey of spent nuclear fuel data required by DOE per the Standard Contract.
- Completed over 325 preventative and corrective maintenance and operations activities, including code-required and vendor-recommended maintenance, first-time performance of long period PMs for discrete SOC Fire Service components, and cleaning of intrusion detection system components.
- Successfully and safely implemented a storm plan and recovered from Hurricane Idalia with minimal impact to staffing and ISFSI equipment.
- Completed biennial QA audit of ISFSI Operations including biennial review of the Security Program and Emergency Planning Program with no Findings.
- Participated in Governmental Strategies' Decommissioning Plant Coalition industry meetings to
 provide site perspectives to governing bodies on rulemaking initiatives applicable to ISFSI operations
 and waste storage.
- Hosted a visit by the Nuclear Waste Technical Review Board (NWTRB) as part of their quarterly
 meeting agenda. The board interacts with several other government agencies to perform and
 evaluate the feasibility of DOE's efforts towards removal of spent fuel from reactor sites

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 99% Complete
- Period 4A 80% Complete
- Period 4B 39% Complete
- Period 5 32% Complete

| 2020 | \$68,523 |
|-------|-----------|
| 2021 | \$100,546 |
| 2022 | \$97,149 |
| 2023 | \$81,156 |
| 2024 | \$90,380 |
| 2025 | \$55,256 |
| 2026 | \$46,990 |
| Total | \$540,000 |

Progress Photos

Large Component Removal Work

GTCC waste transfer to dry storage on the ISFSI



Reactor Vessel Segmentation

Installation of Heavy Lifting and Rigging System in the Reactor Building





Completed Top RV Section Segmentation and Packaging







Middle RV Section Segmentation Removal





Top Package in Storage, Final Insulation Removal, Completed RV Bottom Horizontal Pre-Cut



Completed Bottom RV Section removal and transfer for staging in Mausoleum





Reactor Vessel and Internals Packaged Segments staged in Mausoleum



Completed Barge Dock Preparations and haul path upgrades in preparation for RV/RVI Packages off site shipment.





Reactor Building Plant System Removal







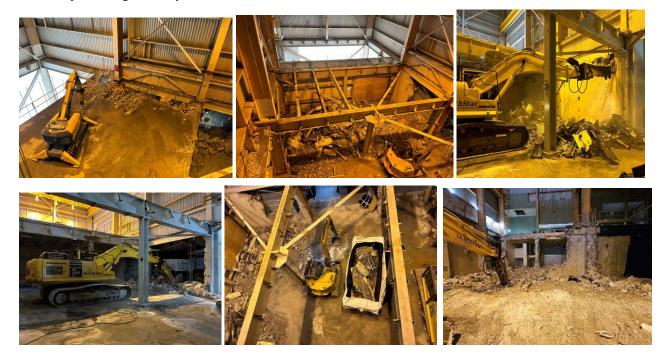








Auxilliary Building Plant System Removal and Decon

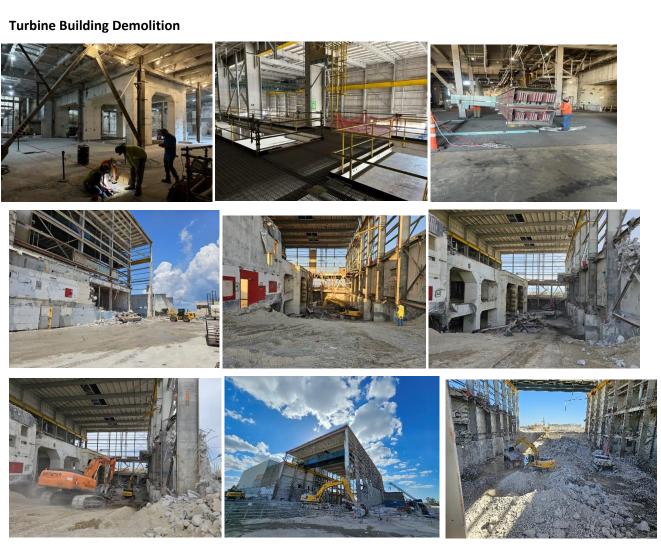


Intermediate Building and Control Complex Demolition





<u>Site Restoration – Misc Building Demolition</u>





Hot and Cold Shop Demolition









Plant Admin Building Demolition





RX Vessel Closure Head Storage Building Demolition



Emergency Feed Tank Building Demolition



Condensate Storage Tank Demolition



Transformer Separation Walls Demolition



CAS 2 Demolition



