



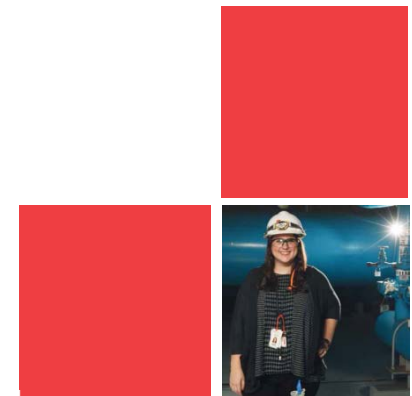
Licensing Action Submittal Plan - Decommissioning

June 20, 2017



Agenda

- Background
- Major Milestones and Decommissioning Transition Actions (PAL/PNP/IPEC)
- Integrated Submittal Schedule (PAL/PNP/IPEC)
- Vermont Yankee Submittals
- Summary





Background

Background

Vermont Yankee

- Permanently ceased operations on December 29, 2014 and permanently defueled on January 12, 2015
- Fuel transfer to dry storage expected to be completed by end of 2018
- Pursuing transfer of Part 50 license in order to facilitate accelerated decommissioning and license termination

Palisades

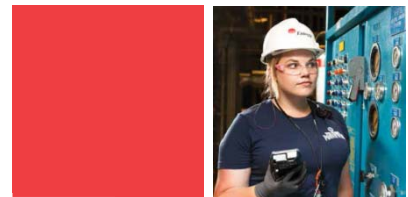
- Intend to permanently cease operations on October 1, 2018

Pilgrim

- Intend to permanently cease operations no later than June 1, 2019

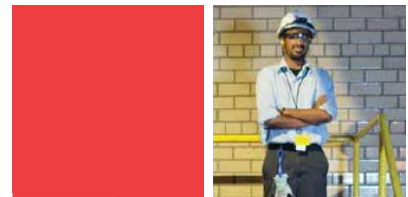
Indian Point

- Intend to permanently cease operations of Unit 2 by April 30, 2020 and Unit 3 by April 30, 2021
- Unit 1 is in SAFSTOR



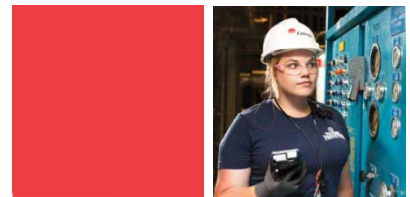
Background

- An integrated submittal plan for all 4 sites is provided to support NRC resource planning
- Overall goal is to provide for a safe and efficient transition from an operating site to a permanently defueled facility
- Two key milestone dates
 - Permanently shutdown and defueled
 - End of the zirc-fire period (assumed to be 18 months, for planning purposes)
- Need dates are 60 days in advance of key milestone dates
 - Enables efficient implementation while preserving the decommissioning trust fund
 - Provides certainty for employee transitions
 - Requested approval dates may be more than 60 days in advance of milestone for licensing action requests submitted with more than 12 months lead time



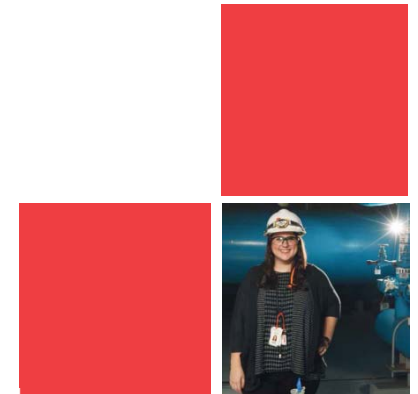
Background

- Licensing submittals are based on
 - Review of the regulations and guidance documents
 - Review of industry guidance (NEI Guidance)
 - Benchmarking and lessons learned from industry peers and within Entergy (e.g., Vermont Yankee and FitzPatrick), including review of RAIs
 - Licensing submittals will follow recent precedent
- Plan to use a staggered approach to submit the needed licensing actions, whenever practical



Background

- Goal is to submit licensing actions with 12-24 months lead time, whenever practical
- Requesting the staff to complete its review by the need date in order to implement the licensing action at the site in a predictable and timely manner
- Some initial licensing actions are critical in ensuring a smooth transition from an operating staff model to one that is appropriate for a decommissioning facility, based on the reduced risk profile
- Scope and schedule are subject to change





Major Milestones and Decommissioning Transition Actions (PAL/PNP/IPEC)

Major Milestones and Decommissioning Transition Actions

	PALISADES	PILGRIM	IP2	IP3
Planned Shutdown Date	On 10/1/18	By 6/1/19	By April 30, 2020	By April 30, 2021
Licensing Action Need Date for Permanent Defueling	8/1/18	4/1/19	January 2020	January 2021
Licensing Action Need Date for Post Zirc-Fire	February 2020	October 2020	August 2021	August 2022

SUBMITTAL

TARGET SUBMITTAL DATE

	Palisades	Pilgrim	IP2	IP3
Certified Fuel Handler Training and Retraining Program	3/28/17	Approved	4Q18	4Q19
License Amendment Request Supporting Staffing and Training Requirements Changes in Administrative Technical Specifications	7/15/17	2/14/17	4Q18	4Q19
License Amendment Request for Post Shutdown Emergency Plan	7/31/17	8/31/17	4Q18	4Q19
Exemption Request to Permit Suspension of Certain Security Measures During Severe Weather Conditions (10 CFR 73.55(p)(1)(i) and (ii))	7/15/17	2/7/17	4Q18	4Q19

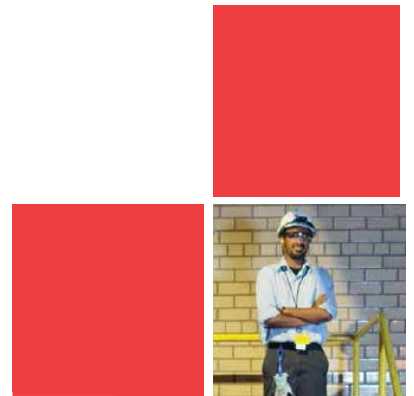
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Integrated Submittal Schedule (PAL/PNP/IPEC)

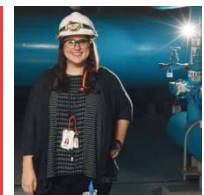
Integrated Submittal Schedule -24 Month Look Ahead

	2Q17	3Q17	4Q17	1Q18
Palisades	<ul style="list-style-type: none"> • CFH Program 	<ul style="list-style-type: none"> • Admin TS LAR • PSEP LAR • 73.55 Exemption 	<ul style="list-style-type: none"> • LAR to modify irradiated fuel handling TS • LAR to remove NFPA-805 license condition 	<ul style="list-style-type: none"> • PDEP LAR • EP Exemption • Records Exemption
Pilgrim		<ul style="list-style-type: none"> • PSEP LAR 		<ul style="list-style-type: none"> • Permanently Defueled TS LAR



Integrated Submittal Schedule -24 Month Look Ahead

	2Q18	3Q18	4Q18	1Q19
Palisades	<ul style="list-style-type: none"> • PDTS LAR • PSDAR/DCE • EA-02-026 Partial Rescission • Fukushima Orders Rescission 	<ul style="list-style-type: none"> • Site-specific QAPM 	<ul style="list-style-type: none"> • Certification of Permanent Removal of Fuel • Decommissioning QAPM 	<ul style="list-style-type: none"> • EA-03-009 Order Rescission (PWR RPV Head Inspection) • Onsite/Offsite Insurance/Liability Exemptions • Eliminate Cyber Security License Condition LAR
Pilgrim	<ul style="list-style-type: none"> • EA-06-137 Order Rescission • EA-02-026 Partial Rescission 		<ul style="list-style-type: none"> • PDEP LAR • EP Exemption • Records Exemption 	<ul style="list-style-type: none"> • Commingled Fund Exemption • PSDAR/DCE • Site-specific QAPM
IP2			<ul style="list-style-type: none"> • CFH Program • Admin TS LAR • PSEP LAR • 73.55 Exemption 	<ul style="list-style-type: none"> • PDTS LAR



Integrated Submittal Schedule

Item	Submittal	Target Submittal Date				Associated Decommissioning Milestone
		Palisades	Pilgrim	IP2	IP3	
1	Certification of Permanent Cessation of Power Operations	1/4/17	TBD	TBD	TBD	Permanent Shutdown
2	Certified Fuel Handler Training and Retraining Program	3/28/17	Approved	4Q18	4Q19	Permanent Removal of Fuel
3	License Amendment Request Supporting Staffing and Training Requirements Changes in Administrative Technical Specifications	7/15/17	2/14/17	4Q18	4Q19	Permanent Removal of Fuel
4	License Amendment Request for Post Shutdown Emergency Plan (ERO on-shift and augmented staff changes)	7/31/17	8/31/17	4Q18	4Q19	Permanent Removal of Fuel
5	Exemption Request to Permit Suspension of Certain Security Measures During Severe Weather Conditions (10 CFR 73.55(p)(1)(i) and (ii))	7/15/17	Approved	4Q18	4Q19	Permanent Removal of Fuel
6	License Amendment Request for Permanently Defueled Technical Specifications/Bases and Revised License Conditions	6/1/18	3/31/18	1Q19	1Q20	Permanent Removal of Fuel
7	License Amendment Request to Remove Irradiated Fuel Handling-related Tech Specs	10/31/17	N/A	N/A	N/A	Permanent Removal of Fuel
8	Exemption Request for Use of the Decommissioning Trust Fund for Spent Fuel Management Expenses	N/A	3/1/19	January 2020	January 2021	Permanent Removal of Fuel
9	Submittal of Post-Shutdown Decommissioning Activities Report (PSDAR)/Site Specific Decommissioning Cost Estimate	5/1/18	3/1/19	January 2020	January 2021	Permanent Removal of Fuel

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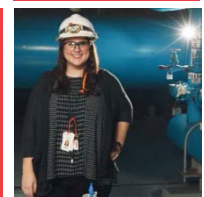
Integrated Submittal Schedule

Item	Submittal	Target Submittal Date				Associated Decommissioning Milestone
		Palisades	Pilgrim	IP2	IP3	
10	Irradiated Fuel Management Plan (10 CFR 50.54(bb))	10/1/20	3/1/19	January 2020	January 2021	Permanent Removal of Fuel
11	Certification of Permanent Removal of Fuel	10/31/18	6/30/19	May 2020	May 2021	Permanent Removal of Fuel
12	Modifications to parent company financial support arrangements	N/A	3/1/19	January 2020	N/A	Permanent Removal of Fuel
13	Exemption Request to Certain 10 CFR 50.47 and 10 CFR 50, Appendix E Emergency Preparedness Requirements	2/1/18	12/1/18	4Q19	4Q20	End of Zirc-fire Period
14	License Amendment Request for Permanently Defueled Emergency Plan	2/1/18	12/1/18	4Q19	4Q20	End of Zirc-fire Period
15	Exemption request for onsite property damage insurance (10 CFR 50.54(w)(1))	2/1/19	12/1/19	1Q20	1Q21	End of Zirc-fire Period
16	Exemption request for offsite liability insurance requirements (10 CFR 140.11(a)(4))	2/1/19	12/1/19	1Q20	1Q21	End of Zirc-fire Period
17	Exemption Request Regarding Maintenance of Records	1/31/18	10/31/18	3Q19	3Q20	Permanent Removal of Fuel
18	License Amendment Request to Delete Cyber Security License Condition	2/1/19	8/31/19	3Q20	3Q21	End of Zirc-fire Period
19	License Amendment Request to Delete NFPA-805 License Condition	10/15/17	N/A	N/A	N/A	Permanent Removal of Fuel



Integrated Submittal Schedule

Item	Submittal	Target Submittal Date				Associated Decommissioning Milestone
		Palisades	Pilgrim	IP2	IP3	
19	QA Program Change - Site-specific QAPM	7/1/18	3/1/19	March 2020	March 2021	N/A
20	QA Program Change – Decommissioning QAPM	10/31/18	6/30/19	May 2020	May 2021	Permanent Removal of Fuel
21	EA-06-137 Order Rescission* (BWR Radiological Mitigation Strategies)	N/A	6/1/18	N/A	N/A	Permanent Removal of Fuel
22	EA-02-026 Partial Order Rescission* (Mitigation Strategies)	4/1/18	6/1/18	4Q19	4Q20	Permanent Removal of Fuel
23	Fukushima Orders (EA-12-049, EA-12-051, EA-13-109 (Pilgrim))*	4/1/18	12/1/18	4Q19	4Q20	Permanent Removal of Fuel
24	EA-03-009 Order Rescission (PWR RPV Head Inspection)	3/31/19	N/A	4Q19	4Q20	Permanent Removal of Fuel





Vermont Yankee Submittals

Vermont Yankee

SUBMITTAL	SUBMITTAL DATE	REQUEST APPROVAL BY
License Transfer Application	2/9/17	12/31/17
License Amendment Request for ISFSI Physical Security Plan	3/29/17	6/30/18
License Amendment Request for ISFSI Emergency Plan and EALs	5/15/17	6/30/18
License Amendment Request for Tech Specs Permanent Removal of Fuel from SFP and Operating License Changes	6/30/17	5/31/18
QA Program Changes Involving Reduction in Commitments to Support ISFSI Operations	6/30/17	5/31/18
Exemption Request from certain requirements of 10 CFR 72.212 and 10 CFR 72.214 (Holtec CoC Cooling time \geq 2 years and higher DHR)	5/17/17	10/31/17
10 CFR 20.2002 Request for Alternate Disposal at U.S. Ecology – Idaho (Contaminated water disposal)	1/14/16	4/15/16
License Amendment Request for Cyber Security Milestone 8 Extension	5/1/17	12/15/17

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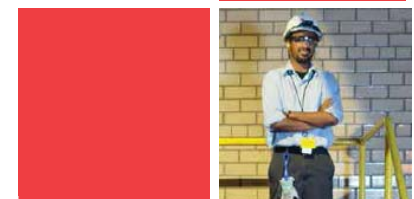




Summary

Summary

- Entergy announced closure of Palisades on October 1, 2018, Pilgrim no later than June 1, 2019, Indian Point Units 2 and 3 by April 30, 2020 and Unit 3 by April 30, 2021, respectively
- Priority is to have licensing actions needed to support efficient and timely staffing transition from operations to decommissioning approved at least 60 days prior to the planned closures of Palisades and Pilgrim
- Priority for Vermont Yankee is a timely review and approval of the licensing actions needed to support the accelerated fuel loading campaign and transfer of the Part 50 license
- A list of decommissioning licensing actions is being provided to the NRC for advance notice
- Dates and scope are best estimates and subject to change





QUESTIONS?

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