

4300 Winfield Road Warrenville, L 60555 630 657 2000 Office

RS-15-094

10 CFR 50.75(f) 10 CFR 72.30(b)

March 31, 2015

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

> Braidwood Station, Units 1 and 2 Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

> Byron Station, Units 1 and 2 Facility Operating License Nos. NPF-37 and NPF-66 NRC Docket Nos. STN 50-454, STN 50-455, and 72-68

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. STN 50-317 and STN 50-318

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 1, 2 and 3 Facility Operating License No. DPR-2 Renewed Facility Operating License Nos. DPR-19 and DPR-25 NRC Docket Nos. 50-10, 50-237, 50-249, and 72-37

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374, and 72-70

Limerick Generating Station, Units 1 and 2 Renewed Facility Operating License Nos. NPF-39 and NPF-85 NRC Docket Nos. 50-352, 50-353, and 72-65

Nine Mile Point Nuclear Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-63 and DPR-69 NRC Docket Nos. 50-220, 50-410, and 72-1036

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> Oyster Creek Nuclear Generating Station Renewed Facility Operating License No. DPR-16 NRC Docket No. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 1, 2, and 3 Facility Operating License No. DPR-12 Renewed Facility Operating License Nos. DPR-44 and DPR-56 NRC Docket Nos. 50-171, 50-277, 50-278, and 72-29

Quad Cities Nuclear Power Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-29 and DPR-30 NRC Docket Nos. 50-254, 50-265, and 72-53

R.E. Ginna Nuclear Power Plant Renewed Facility Operating License No. DPR-18 NRC Docket Nos. 50-244 and 72-67

Salem Generating Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-70 and DPR-75 NRC Docket Nos. 50-272, 50-311, and 72-48

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Independent Spent Fuel Storage Installation Materials License No. SNM-2505 NRC Docket No. 72-08

Subject:

Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations

References:

- Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem," dated December 17, 2012
- Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Cancellation of Limerick Unit 1 Parent Company Guarantee," dated November 13, 2014
- Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Submittal of Updated Site-Specific SAFSTOR Decommissioning Cost Estimates for Braidwood Station, Byron Station, and LaSalle County Station," dated February 19, 2015

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In accordance with 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (f), Exelon Generation Company, LLC (EGC) is submitting a report on the status of decommissioning funding for the reactors owned by EGC. Additionally, in accordance with 10 CFR 72.30, "Financial assurance and recordkeeping for decommissioning," EGC is submitting a report on the status of decommissioning funding for the independent spent fuel storage installations (ISFSIs) owned by EGC. Updated decommissioning cost estimates for ISFSI decommissioning are provided in the attached report. With respect to the other information required by 10 CFR 72.30(b) and (c), there has been no change from the information provided in Reference 1.

In accordance with 10 CFR 50.75(b)(4), 50.75(c), and 50.75(f), the estimated cost of decommissioning for financial assurance is based on either the NRC formula cost amount calculated in accordance with 10 CFR 50.75(c) or on site-specific decommissioning cost estimates. If used in this report, the site-specific decommissioning cost estimates are based on a period of safe storage that is specifically described in the estimates. Site-specific cash flows from the site specific cost estimates are included, as applicable. Unless otherwise noted, the specific cash flow analysis for the site specific decommissioning cost estimates conservatively assumes all expenses in a year are incurred at the beginning of year (i.e., beginning of year convention) during the decommissioning period. The cash flow analysis for Peach Bottom Atomic Power Station, Unit 1 assumes that half of the current year contributions are included in the current year earnings to estimate payment of contributions throughout the year (i.e., a mid-year convention). EGC uses a mid-year convention in this instance because the contributions are made monthly at a constant rate throughout the year.

Nine Mile Point Nuclear Station, Unit 2 is co-owned by Constellation Energy Nuclear Group, LLC an EGC subsidiary (82%), and Long Island Power Authority (LIPA) (18%). The information provided in this letter for Nine Mile Point Nuclear Station, Unit 2 includes summary statements provided and verified by LIPA.

For shutdown units, the reporting requirements of 10 CFR 50.82(a)(8)(v) and (vii) are also included in this report.

EGC has not made a final determination of the decommissioning approach for any of its nuclear units. EGC uses the formula cost amount or the site-specific decommissioning cost estimates to demonstrate adequacy of funding to meet regulatory requirements. EGC may select a different decommissioning option in the future for any of its nuclear units, recognizing that the chosen option must meet NRC requirements for decommissioning funding.

As described in Reference 2, EGC has cancelled the parent company guarantee to provide additional decommissioning funding assurance for Limerick Generating Station, Unit 1. EGC has not obtained parent guarantees to provide financial assurance for any EGC units.

Due to increased costs, as reflected in the updated site-specific decommissioning cost estimates documented in Reference 3, Braidwood Station, Units 1 and 2, and Byron Station, Unit 2, do not currently meet the minimum funding assurance criteria under 10 CFR 50.75 as of December 31, 2014. EGC is currently evaluating the alternate funding mechanisms allowed by 10 CFR 50.75(e) and guidance provided in Regulatory Guide 1.159, "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2. Consistent with

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the guidance in Regulatory Guide 1.159, which provides that "shortfalls identified in a biennial report must be corrected by the time the next biennial report is due," EGC intends to monitor funding assurance and new developments for these units to assess the status of funding assurance and to take such actions as may be necessary to resolve any continuing funding shortfalls for these funds on or before March 31, 2017.

EGC remains confident that sufficient funds will be available to decommission all EGC sites when required. For the three units that have a funding shortfall, EGC is pursuing 20-year license extensions, which if granted would allow an additional 20 years of fund return before decommissioning commences. If license renewal had been granted as of December 31, 2014, Braidwood Units 1 and 2, and Byron Unit 2 would have met the minimum funding assurance requirements.

There were no disbursements from the decommissioning trust funds other than those for allowed administrative costs and other incidental expenses of the fund in connection with the operation of the fund per 10 CFR 50.75(h)(1)(iv).

There are no regulatory commitments contained within this letter.

If you have any questions concerning this letter, please contact Mr. Timothy A Byam at (630) 657-2818.

Respectfully,

Patrick R. Simpson Manager – Licensing

cc: Regional Administrator - NRC Region I

Regional Administrator - NRC Region III

NRC Senior Resident Inspector - Braidwood Station

NRC Senior Resident Inspector - Byron Station

NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant

NRC Senior Resident Inspector - Clinton Power Station

NRC Senior Resident Inspector - Dresden Nuclear Power Station

NRC Senior Resident Inspector - LaSalle County Station

NRC Senior Resident Inspector – Limerick Generating Station

NRC Senior Resident Inspector - Nine Mile Point Nuclear Station

NRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station

NRC Senior Resident Inspector – Peach Bottom Atomic Power Station

NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant

NRC Senior Resident Inspector - Salem Generating Station

NRC Senior Resident Inspector - Three Mile Island Nuclear Station

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#### Attachments:

- 1. Labor, Energy, and Burial Factors Used in Calculations (All Facilities)
- Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1
- 3. Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2
- Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1
- 5. Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2
- Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1
- 7. Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2
- 8. Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1
- Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1
- Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2
- Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3
- 12. Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1
- 13. Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2
- 14. Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1
- 15. Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2
- 16. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1
- 17. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 EGC Portion
- 18. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 LIPA Portion
- Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station
- 20. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1
- Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2
- 22. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3
- 23. Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1
- 24. Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2
- Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant

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- 26. Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1
- 27. Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2
- 28. Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1
- 29. ISFSI Decommissioning Funding Estimates

### Attachment 1

Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

## ATTACHMENT 1 Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The labor, energy, and burial indexes used are consistent with those described in NUREG-1307, Revision 15, issued January 2013.

The current labor cost indexes used are obtained from the Employment Cost Index, published by the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Specifically, EGC used the Employment Cost Index for total compensation for private industry workers by region. The labor adjustment factors were calculated according to Section 3.1 of NUREG-1307, Revision 15, using fourth quarter 2014 data. Table 1 shows the data used for this calculation.

**Table 1: Labor Adjustment Factors** 

Region	Applicable Sites	Series ID	4Q2014 Index Number	Base L <sub>x</sub>	Labor Adjustment Factor (L <sub>x</sub> )
Northeast	Limerick Nine Mile Point Oyster Creek Peach Bottom R.E. Ginna Salem TMI	CIU2010000000210I	123.2	2.16	2.661
South	Calvert Cliffs	CIU2010000000220I	122.7	1.98	2.429
Midwest	Braidwood Byron Clinton Dresden LaSalle Quad Cities	CIU2010000000230I	120.3	2.08	2.502

The current energy cost indexes used are obtained from Producer Price Indexes (PPI) – Commodities, published by the U.S. Department of Labor, BLS. Specifically, EGC used the PPI for industrial electric power (WPU0543) and light fuel oils (WPU0573). The energy adjustment factors were calculated according to Section 3.2 of NUREG-1307, Revision 15, using December 2014 data. Table 2 shows the data used for this calculation.

**Table 2: Energy Adjustment Factors** 

WPU0543 – January 1986 (base value)	114.2
WPU0573 – January 1986 (base value)	82.0
WPU0543 - December 2014 (preliminary value)	214.7
WPU0573 - December 2014 (preliminary value)	221.0
Industrial electric power adjustment factor - P <sub>x</sub>	1.880
Light fuel oil adjustment factor - F <sub>x</sub>	2.695
Energy Adjustment Factor (PWR) – $E_x(PWR)$	2.222
Energy Adjustment Factor (BWR) – E <sub>x</sub> (BWR)	2.255

## ATTACHMENT 1 (Continued) Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The waste burial adjustment factors used are taken from Table 2-1 of NUREG-1307, Revision 15, based on 2012 data. The adjustment factors EGC used assume a combination of compact-affiliated and non-compact facilities, consistent with current waste disposal practices at EGC and consistent with typical waste disposal practices during decommissioning. Table 3 summarizes the data used for the calculation of the waste adjustment factors.

**Table 3: Waste Adjustment Factors** 

LLW Burial Site	Reactor Type	Applicable Site	Combination of Compact- Affiliated and Non-Compact Facility Waste Adjustment Factor (B <sub>x</sub> )
South Carolina site Atlantic Compact	BWR	Oyster Creek	14.160
South Carolina site Atlantic Compact	PWR	Salem	13.885
Generic LLW Disposal Site	BWR	Clinton Dresden LaSalle Limerick Nine Mile Point Peach Bottom Quad Cities	14.160
Generic LLW Disposal Site	PWR	Braidwood Byron Calvert Cliffs R.E. Ginna TMI	13.885

The calculation methodology used for all adjustment factors is consistent with NUREG-1307, Revision 15.

### Attachment 2

Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1

#### **ATTACHMENT 2 Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1**

1	Formula cost amount per 10 CFR 50.75(c)	\$ 521,857
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$ 780,166 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,728 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$ 306,300 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).

- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-009, Revision 1, "Decommissioning Cost Analysis for the Braidwood Nuclear Power Station," September 2014). The costs have been escalated from the midyear 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015. (TLG Report E16-1640-009, Revision 1, "Decommissioning Cost Analysis for the Braidwood Nuclear Power Station," September 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 2 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) As discussed in the cover letter, EGC is currently evaluating the alternate funding mechanisms, as allowed by 10 CFR 50.75, to address the Braidwood Station, Unit 1 funding shortfall, and meet 10 CFR 50.75 funding assurance requirements consistent with the guidance in Regulatory Guide 1.159, "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on October 17, 2026.

# ATTACHMENT 2 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2026	\$10,587		\$386,544	\$375,956	\$1,880	\$377,836
2027	\$59,386	-	\$377,836	\$318,450	\$6,369	\$324,819
2028	\$26,247	•	\$324,819	\$298,572	\$5,971	\$304,543
2029	\$7,395	•	\$304,543	\$297,149	\$5,943	\$303,092
2030	\$7,395	-	\$303,092	\$295,697	\$5,914	\$301,611
2031	\$7,395	-	\$301,611	\$294,217	\$5,884	\$300,101
2032	\$7,415		\$300,101	\$292,686	\$5,854	\$298,540
2033	\$5,787		\$298,540	\$292,753	\$5,855	\$298,608
2034	\$4,417	-	\$298,608	\$294,191	\$5,884	\$300,074
2035	\$4,417	•	\$300,074	\$295,658	\$5,913	\$301,571
2036	\$4,429	•	\$301,571	\$297,142	\$5,943	\$303,084
2037	\$4,417	-	\$303,084	\$298,668	\$5,973	\$304,641
2038	\$4,417	-	\$304,641	\$300,224	\$6,004	\$306,228
2039	\$4,417	-	\$306,228	\$301,812	\$6,036	\$307,848
2040	\$4,429	-	\$307,848	\$303,419	\$6,068	\$309,487
2041	\$4,417	-	\$309,487	\$305,070	\$6,101	\$311,172
2042	\$4,417	-	\$311,172	\$306,755	\$6,135	\$312,890
2043	\$4,417	•	\$312,890	\$308,473	\$6,169	\$314,642
2044	\$4,429	-	\$314,642	\$310,213	\$6,204	\$316,417
2045	\$4,417	-	\$316,417	\$312,001	\$6,240	\$318,241
2046	\$4,417	<u>-</u>	\$318,241	\$313,824	\$6,276	\$320,100
2047	\$4,417	-	\$320,100	\$315,683	\$6,314	\$321,997
2048	\$4,429	-	\$321,997	\$317,568	\$6,351	\$323,919
2049	\$4,417	-	\$323,919	\$319,502	\$6,390	\$325,892
2050	\$4,417	-	\$325,892	\$321,475	\$6,430	\$327,905
2051	\$4,417	•	\$327,905	\$323,488	\$6,470	\$329,958
2052	\$4,429		\$329,958	\$325,529	\$6,511	\$332,039
2053	\$4,417	-	\$332,039	\$327,622	\$6,552	\$334,175
2054	\$4,417	-	\$334,175	\$329,758	\$6,595	\$336,353
2055	\$4,417	-	\$336,353	\$331,936	\$6,639	\$338,575
2056	\$4,429	-	\$338,575	\$334,146	\$6,683	\$340,829
2057	\$4,417	•	\$340,829	\$336,412	\$6,728	\$343,140
2058	\$4,417	•	\$343,140	\$338,723	\$6,774	\$345,497
2059	\$4,388	•	\$345,497	\$341,110	\$6,822	\$347,932
2060	\$4,400	-	\$347,932	\$343,532	\$6,871	\$350,403
2061	\$4,388	-	\$350,403	\$346,015	\$6,920	\$352,935
2062	\$4,388	-	\$352,935	\$348,547	\$6,971	\$355,518
2063	\$4,388	-	\$355,518	\$351,131	\$7,023	\$358,153
2064	\$4,400	-	\$358,153	\$353,753	\$7,075	\$360,829
2065	\$4,388	•	\$360,829	\$356,441	\$7,129	\$363,570

# ATTACHMENT 2 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1 (December 31, 2014 dollars, thousands)

	Site	ISFSI	BOY	BOY		EOY
	Radiological	Radiological	Trust	Trust Fund	Trust	Trust
	Decommissioning	Decommissioning	Fund	Value	Fund	Fund
Year	Cost	Cost	Value	Less Cost	Earnings	Value
2066	\$4,388	•	\$363,570	\$359,182	\$7,184	\$366,366
2067	\$4,388	-	\$366,366	\$361,978	\$7,240	\$369,217
2068	\$4,400	-	\$369,217	\$364,818	\$7,296	\$372,114
2069	\$4,388		\$372,114	\$367,726	\$7,355	\$375,081
2070	\$4,388	-	\$375,081	\$370,693	\$7,414	\$378,107
2071	\$4,388	-	\$378,107	\$373,719	\$7,474	\$381,193
2072	\$4,400	•	\$381,193	\$376,794	\$7,536	\$384,329
2073	\$4,388	-	\$384,329	\$379,942	\$7,599	\$387,541
2074	\$4,388	-	\$387,541	\$383,153	\$7,663	\$390,816
2075	\$4,388	•	\$390,816	\$386,428	\$7,729	\$394,157
2076	\$4,400	•	\$394,157	\$389,757	\$7,795	\$397,552
2077	\$4,388	-	\$397,552	\$393,164	\$7,863	\$401,028
2078	\$4,388	-	\$401,028	\$396,640	\$7,933	\$404,573
2079	\$33,613	•	\$404,573	\$370,960	\$7,419	\$378,379
2080	\$77,868	-	\$378,379	\$300,511	\$6,010	\$306,521
2081	\$143,743	-	\$306,521	\$162,778	\$3,256	\$166,034
2082	\$83,433	\$1,420	\$166,034	\$81,180	\$1,624	\$82,804
2083	\$53,154	\$2,133	\$82,804	\$27,517	\$550	\$28,067
2084	\$30,567	\$1,174	\$28,067	\$(3,675)	-	\$(3,675)
2085	\$2,868	-	\$(3,675)	\$(6,542)	-	\$(6,542)
2086	\$24,797	-	\$(6,542)	\$(31,339)	-	\$(31,339)
2087	\$91		\$(31,339)	\$(31,430)	-	\$(31,430)
2088	\$91	-	\$(31,430)	\$(31,521)	-	\$(31,521)
2089	\$24		\$(31,521)	\$(31,545)	-	\$(31,545)

Total\* \$780,166 \$4,728

<sup>\*</sup>Columns may not add due to rounding

## Attachment 3

Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2

#### **ATTACHMENT 3 Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2**

1	Formula cost amount per 10 CFR 50.75(c)	\$521,857
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$849,702 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,728 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$330,908 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).

- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-009, Revision 1, "Decommissioning Cost Analysis for the Braidwood Nuclear Power Station," September 2014). The costs have been escalated from the midyear 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC dated February 19, 2015, (TLG Report E16-1640-009, Revision 1, "Decommissioning Cost Analysis for the Braidwood Nuclear Power Station," September 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 3 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) As discussed in the cover letter, EGC is currently evaluating the alternate funding mechanisms, as allowed by 10 CFR 50.75, to address the Braidwood Station, Unit 2 funding shortfall, and meet 10 CFR 50.75 funding assurance requirements consistent with the guidance in Regulatory Guide 1.159, "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on December 18, 2027.

# ATTACHMENT 3 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2

	Site Radiological Decommissioning	ISFSI Radiological Decommissioning	BOY Trust Fund	BOY Trust Fund Value	Trust Fund	EOY Trust Fund
Year	Cost	Cost	Value	Less Cost	Earnings	Value
2027	\$2,191	•	\$427,359	\$425,168	\$709	\$425,876
2028	\$59,339	-	\$425,876	\$366,538	\$7,331	\$373,869
2029	\$61,358	-	\$373,869	\$312,511	\$6,250	\$318,761
2030	\$9,839	-	\$318,761	\$308,922	\$6,178	\$315,100
2031	\$9,839	-	\$315,100	\$305,261	\$6,105	\$311,366
2032	\$9,866	-	\$311,366	\$301,499	\$6,030	\$307,529
2033	\$6,942	-	\$307,529	\$300,587	\$6,012	\$306,599
2034	\$4,472	-	\$306,599	\$302,127	\$6,043	\$308,170
2035	\$4,472	-	\$308,170	\$303,698	\$6,074	\$309,772
2036	\$4,484	-	\$309,772	\$305,288	\$6,106	\$311,394
2037	\$4,472	-	\$311,394	\$306,922	\$6,138	\$313,060
2038	\$4,472	-	\$313,060	\$308,589	\$6,172	\$314,760
2039	\$4,472	-	\$314,760	\$310,289	\$6,206	\$316,495
2040	\$4,484	-	\$316,495	\$312,011	\$6,240	\$318,251
2041	\$4,472	•	\$318,251	\$313,779	\$6,276	\$320,055
2042	\$4,472	-	\$320,055	\$315,583	\$6,312	\$321,895
2043	\$4,472	-	\$321,895	\$317,423	\$6,348	\$323,771
2044	\$4,484		\$323,771	\$319,287	\$6,386	\$325,673
2045	\$4,472	•	\$325,673	\$321,201	\$6,424	\$327,625
2046	\$4,472	-	\$327,625	\$323,154	\$6,463	\$329,617
2047	\$4,472	*	\$329,617	\$325,145	\$6,503	\$331,648
2048	\$4,484	-	\$331,648	\$327,164	\$6,543	\$333,707
2049	\$4,472	-	\$333,707	\$329,236	\$6,585	\$335,820
2050	\$4,472		\$335,820	\$331,349	\$6,627	\$337,976
2051	\$4,472	-	\$337,976	\$333,504	\$6,670	\$340,174
2052	\$4,484	-	\$340,174	\$335,690	\$6,714	\$342,404
2053	\$4,472	-	\$342,404	\$337,932	\$6,759	\$344,691
2054	\$4,472	-	\$344,691	\$340,219	\$6,804	\$347,023
2055	\$4,472	-	\$347,023	\$342,552	\$6,851	\$349,403
_2056	\$4,484	-	\$349,403	\$344,919	\$6,898	\$351,817
2057	\$4,472	-	\$351,817	\$347,345	\$6,947	\$354,292
2058	\$4,472	•	\$354,292	\$349,821	\$6,996	\$356,817
2059	\$4,457	-	\$356,817	\$352,360	\$7,047	\$359,407
2060	\$4,469	-	\$359,407	\$354,938	\$7,099	\$362,037
2061	\$4,457	-	\$362,037	\$357,580	\$7,152	\$364,732
2062	\$4,457		\$364,732	\$360,275	\$7,206	\$367,481
2063	\$4,457	*	\$367,481	\$363,024	\$7,260	\$370,285
2064	\$4,469	-	\$370,285	\$365,816	\$7,316	\$373,132
2065	\$4,457	-	\$373,132	\$368,675	\$7,374	\$376,049
_2066	\$4,457	-	\$376,049	\$371,592	\$7,432	\$379,024

# ATTACHMENT 3 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2

(December 31, 2014 dollars, thousands)

	Site	ISFSI	BOY	BOY		EOY
	Radiological	Radiological	Trust	Trust Fund	Trust	Trust
	Decommissioning	Decommissioning	Fund	Value	Fund	Fund
Year	Cost	Cost	Value	Less Cost	Earnings	Value
2067	\$4,457	-	\$379,024	\$374,567	\$7,491	\$382,058
2068	\$4,469	•	\$382,058	\$377,589	\$7,552	\$385,141
2069	\$4,457	•	\$385,141	\$380,685	\$7,614	\$388,298
2070	\$4,457	•	\$388,298	\$383,841	\$7,677	\$391,518
2071	\$4,457	-	\$391,518	\$387,062	\$7,741	\$394,803
2072	\$4,469	-	\$394,803	\$390,334	\$7,807	\$398,141
2073	\$4,457	-	\$398,141	\$393,684	\$7,874	\$401,557
2074	\$4,457	-	\$401,557	\$397,101	\$7,942	\$405,043
2075	\$4,457	-	\$405,043	\$400,586	\$8,012	\$408,598
2076	\$4,469	•	\$408,598	\$404,129	\$8,083	\$412,211
2077	\$4,457	-	\$412,211	\$407,755	\$8,155	\$415,910
2078	\$4,457	-	\$415,910	\$411,453	\$8,229	\$419,682
2079	\$4,457		\$419,682	\$415,225	\$8,305	\$423,530
2080	\$23,018	-	\$423,530	\$400,511	\$8,010	\$408,522
2081	\$55,896	-	\$408,522	\$352,626	\$7,053	\$359,678
2082	\$130,092	•	\$359,678	\$229,586	\$4,592	\$234,178
2083	\$93,873	\$1,159	\$234,178	\$139,145	\$2,783	\$141,928
2084	\$75,671	\$1,753	\$141,928	\$64,504	\$1,290	\$65,794
2085	\$75,464	\$1,749	\$65,794	\$(11,419)	-	\$(11,419)
2086	\$30,706	\$67	\$(11,419)	\$(42,192)	-	\$(42,192)
2087	\$39	•	\$(42,192)	\$(42,231)	-	\$(42,231)
2088	\$39	-	\$(42,231)	\$(42,270)	-	\$(42,270)
2089	\$10	•	\$(42,270)	\$(42,280)		\$(42,280)

Total\* \$849,702 \$4,728

<sup>\*</sup>Columns may not add due to rounding

### Attachment 4

Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1

# ATTACHMENT 4 Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$521,857
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$780,504 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,604 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$336,095 (c)
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
-	There are no contracts welled one or noncontract to OCD 50.75(-)/d	14.1

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-012, Revision 1, "Decommissioning Cost Analysis for the Byron Nuclear Power Station," September 2014). The costs have been escalated from the mid-year 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-012, Revision 1, "Decommissioning Cost Analysis for the Byron Nuclear Power Station," September 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 4 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2024.

# ATTACHMENT 4 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2024	\$8,696	•	\$407,675	\$398,979	\$1,995	\$400,974
2025	\$58,354	-	\$400,974	\$342,620	\$6,852	\$349,473
2026	\$31,217	-	\$349,473	\$318,255	\$6,365	\$324,621
2027	\$8,119	•	\$324,621	\$316,502	\$6,330	\$322,832
2028	\$8,141	-	\$322,832	\$314,691	\$6,294	\$320,984
2029	\$8,119	-	\$320,984	\$312,865	\$6,257	\$319,123
2030	\$8,119	-	\$319,123	\$311,004	\$6,220	\$317,224
2031	\$8,119	-	\$317,224	\$309,105	\$6,182	\$315,287
2032	\$5,693	-	\$315,287	\$309,594	\$6,192	\$315,786
2033	\$4,395		\$315,786	\$311,391	\$6,228	\$317,619
2034	\$4,395	-	\$317,619	\$313,223	\$6,264	\$319,487
2035	\$4,395	-	\$319,487	\$315,092	\$6,302	\$321,394
2036	\$4,408	-	\$321,394	\$316,986	\$6,340	\$323,326
2037	\$4,395	-	\$323,326	\$318,931	\$6,379	\$325,309
2038	\$4,395	-	\$325,309	\$320,914	\$6,418	\$327,332
2039	\$4,395	-	\$327,332	\$322,936	\$6,459	\$329,395
2040	\$4,408	-	\$329,395	\$324,988	\$6,500	\$331,487
2041	\$4,395	-	\$331,487	\$327,092	\$6,542	\$333,634
2042	\$4,395	-	\$333,634	\$329,238	\$6,585	\$335,823
2043	\$4,395	-	\$335,823	\$331,428	\$6,629	\$338,056
2044	\$4,408	-	\$338,056	\$333,649	\$6,673	\$340,322
2045	\$4,395	-	\$340,322	\$335,926	\$6,719	\$342,645
2046	\$4,395	-	\$342,645	\$338,249	\$6,765	\$345,014
2047	\$4,395	-	\$345,014	\$340,619	\$6,812	\$347,431
2048	\$4,408	-	\$347,431	\$343,023	\$6,860	\$349,884
2049	\$4,395		\$349,884	\$345,488	\$6,910	\$352,398
2050	\$4,395	-	\$352,398	\$348,003	\$6,960	\$354,963
2051	\$4,367	-	\$354,963	\$350,596	\$7,012	\$357,608
2052	\$4,379	-	\$357,608	\$353,230	\$7,065	\$360,294
2053	\$4,367	-	\$360,294	\$355,928	\$7,119	\$363,046
2054	\$4,367	-	\$363,046	\$358,680	\$7,174	\$365,853
2055	\$4,367	-	\$365,853	\$361,487	\$7,230	\$368,716
2056	\$4,379	-	\$368,716	\$364,338	\$7,287	\$371,625
2057	\$4,367	-	\$371,625	\$367,258	\$7,345	\$374,603
2058	\$4,367	-	\$374,603	\$370,237	\$7,405	\$377,641
2059	\$4,367	<b>H</b>	\$377,641	\$373,275	\$7,465	\$380,740
2060	\$4,379	-	\$380,740	\$376,362	\$7,527	\$383,889
2061	\$4,367	-	\$383,889	\$379,522	\$7,590	\$387,113
2062	\$4,367	-	\$387,113	\$382,746	\$7,655	\$390,401
_2063	\$4,367		\$390,401	\$386,035	\$7,721	\$393,755

# ATTACHMENT 4 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1 (December 31, 2014 dollars, thousands)

Year_	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2064	\$4,379	-	\$393,755	\$389,377	\$7,788	\$397,164
2065	\$4,367	•	\$397,164	\$392,798	\$7,856	\$400,654
2066	\$4,367	-	\$400,654	\$396,287	\$7,926	\$404,213
2067	\$4,367	-	\$404,213	\$399,846	\$7,997	\$407,843
2068	\$4,379	•	\$407,843	\$403,465	\$8,069	\$411,534
2069	\$4,367		\$411,534	\$407,168	\$8,143	\$415,311
2070	\$4,367	-	\$415,311	\$410,944	\$8,219	\$419,163
2071	\$4,367	•	\$419,163	\$414,797	\$8,296	\$423,093
2072	\$4,379	-	\$423,093	\$418,714	\$8,374	\$427,088
2073	\$4,367	-	\$427,088	\$422,722	\$8,454	\$431,176
2074	\$4,367	-	\$431,176	\$426,810	\$8,536	\$435,346
2075	\$4,367	-	\$435,346	\$430,979	\$8,620	\$439,599
2076	\$4,379	-	\$439,599	\$435,220	\$8,704	\$443,925
2077	\$32,042	•	\$443,925	\$411,883	\$8,238	\$420,120
2078	\$74,011	-	\$420,120	\$346,109	\$6,922	\$353,031
2079	\$142,093	-	\$353,031	\$210,939	\$4,219	\$215,158
2080	\$85,249	\$1,303	\$215,158	\$128,605	\$2,572	\$131,177
2081	\$51,491	\$2,077	\$131,177	\$77,608	\$1,552	\$79,161
2082	\$31,523	\$1,224	\$79,161	\$46,414	\$928	\$47,342
2083	\$2,902	-	\$47,342	\$44,440	\$889	\$45,329
2084	\$23,619	-	\$45,329	\$21,709	\$434	\$22,143
2085	\$93	-	\$22,143	\$22,050	\$441	\$22,491
2086	\$93	-	\$22,491	\$22,398	\$448	\$22,846
2087	\$29	•	\$22,846	\$22,817	\$456	\$23,273

Total\* \$780,504 \$4,604

<sup>\*</sup>Columns may not add due to rounding

### Attachment 5

Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2

# ATTACHMENT 5 Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$521,857
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$839,566 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,604 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$323,772 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CED 50 75(a)(:	1164

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR (e) 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-012, Revision 1, "Decommissioning Cost Analysis for the Byron Nuclear Power Station," September 2014). The costs have been escalated from the mid-year 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-012, Revision 1, "Decommissioning Cost Analysis for the Byron Nuclear Power Station," September 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 5 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) As discussed in the cover letter, EGC is currently evaluating the alternate funding mechanisms, as allowed by 10 CFR 50.75, to address the Byron Station, Unit 2 funding shortfall, and meet 10 CFR 50.75 funding assurance requirements consistent with the guidance in Regulatory Guide 1.159, "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on November 6, 2026.

# ATTACHMENT 5 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2026	\$8,737	-	\$409,268	\$400,532	\$1,335	\$401,867
2027	\$65,169	-	\$401,867	\$336,698	\$6,734	\$343,432
2028	\$52,270	-	\$343,432	\$291,161	\$5,823	\$296,985
2029	\$11,616	-	\$296,985	\$285,369	\$5,707	\$291,076
2030	\$11,616	-	\$291,076	\$279,460	\$5,589	\$285,050
2031	\$11,616	-	\$285,050	\$273,434	\$5,469	\$278,903
2032	\$6,894	-	\$278,903	\$272,008	\$5,440	\$277,448
2033	\$4,387	-	\$277,448	\$273,062	\$5,461	\$278,523
2034	\$4,387		\$278,523	\$274,136	\$5,483	\$279,619
2035	\$4,387	-	\$279,619	\$275,232	\$5,505	\$280,737
2036	\$4,399	-	\$280,737	\$276,338	\$5,527	\$281,865
2037	\$4,387	-	\$281,865	\$277,478	\$5,550	\$283,027
2038	\$4,387	-	\$283,027	\$278,640	\$5,573	\$284,213
2039	\$4,387	-	\$284,213	\$279,826	\$5,597	\$285,423
2040	\$4,399	-	\$285,423	\$281,024	\$5,620	\$286,645
2041	\$4,387	-	\$286,645	\$282,258	\$5,645	\$287,903
2042	\$4,387	-	\$287,903	\$283,516	\$5,670	\$289,187
2043	\$4,387	<u> </u>	\$289,187	\$284,800	\$5,696	\$290,496
2044	\$4,399	-	\$290,496	\$286,097	\$5,722	\$291,819
2045	\$4,387	-	\$291,819	\$287,432	\$5,749	\$293,181
2046	\$4,387	-	\$293,181	\$288,794	\$5,776	\$294,570
2047	\$4,387	-	\$294,570	\$290,183	\$5,804	\$295,987
2048	\$4,399	-	\$295,987	\$291,588	\$5,832	\$297,420
2049	\$4,387		\$297,420	\$293,033	\$5,861	\$298,893
2050	\$4,387	-	\$298,893	\$294,507	\$5,890	\$300,397
2051	\$4,372	-	\$300,397	\$296,025	\$5,920	\$301,945
2052	\$4,384	•	\$301,945	\$297,561	\$5,951	\$303,512
2053	\$4,372	-	\$303,512	\$299,140	\$5,983	\$305,123
2054	\$4,372	-	\$305,123	\$300,751	\$6,015	\$306,766
_2055	\$4,372		\$306,766	\$302,394	\$6,048	\$308,442
2056	\$4,384	-	\$308,442	\$304,058	\$6,081	\$310,139
2057	\$4,372	-	\$310,139	\$305,767	\$6,115	\$311,882
2058	\$4,372	•	\$311,882	\$307,510	\$6,150	\$313,660
2059	\$4,372	•	\$313,660	\$309,288	\$6,186	\$315,474
2060	\$4,384	-	\$315,474	\$311,090	\$6,222	\$317,312
2061	\$4,372		\$317,312	\$312,939	\$6,259	\$319,198
2062	\$4,372	-	\$319,198	\$314,826	\$6,297	\$321,123
2063	\$4,372	-	\$321,123	\$316,751	\$6,335	\$323,086
2064	\$4,384	-	\$323,086	\$318,702	\$6,374	\$325,076
2065	\$4,372	**	\$325,076	\$320,704	\$6,414	\$327,118

# ATTACHMENT 5 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2

(December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2066	\$4,372		\$327,118	\$322,746	\$6,455	\$329,200
2067	\$4,372	-	\$329,200	\$324,828	\$6,497	\$331,325
2068	\$4,384	-	\$331,325	\$326,941	\$6,539	\$333,480
2069	\$4,372	**	\$333,480	\$329,108	\$6,582	\$335,690
2070	\$4,372	-	\$335,690	\$331,318	\$6,626	\$337,944
2071	\$4,372	-	\$337,944	\$333,572	\$6,671	\$340,243
2072	\$4,384		\$340,243	\$335,859	\$6,717	\$342,576
2073	\$4,372	-	\$342,576	\$338,204	\$6,764	\$344,968
2074	\$4,372	-	\$344,968	\$340,596	\$6,812	\$347,408
2075	\$4,372	-	\$347,408	\$343,036	\$6,861	\$349,897
2076	\$4,384	-	\$349,897	\$345,513	\$6,910	\$352,423
2077	\$4,372	-	\$352,423	\$348,051	\$6,961	\$355,012
2078	\$22,011	-	\$355,012	\$333,001	\$6,660	\$339,661
2079	\$51,953	-	\$339,661	\$287,708	\$5,754	\$293,462
2080	\$128,622	-	\$293,462	\$164,840	\$3,297	\$168,137
2081	\$93,813	\$1,064	\$168,137	\$73,261	\$1,465	\$74,726
2082	\$72,897	\$1,703	\$74,726	\$126	\$3	\$129
2083	\$72,897	\$1,703	\$129	\$(74,471)	-	\$(74,471)
2084	\$32,223	\$135	\$(74,471)	\$(106,829)	•	\$(106,829)
2085	\$40	-	\$(106,829)	\$(106,869)		\$(106,869)
2086	\$40	-	\$(106,869)	\$(106,909)	-	\$(106,909)
2087	\$12	•	\$(106,909)	\$(106,921)	-	\$(106,921)

Total\* \$839,556 \$4,604

<sup>\*</sup>Columns may not add due to rounding

## Attachment 6

Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1

#### **ATTACHMENT 6**

## Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$487,775
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,486 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$341,609 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U. S. NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a site specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on July 31, 2034.

#### Attachment 7

Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2

## ATTACHMENT 7

## Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2

(December 31, 2014 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$487,775	
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A	
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,486 (a)	
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$437,386 (b)	
5	Schedule of the annual amounts remaining to be collected.	\$0	
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)	
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment		

method, coupled with an external trust fund, in accordance with 10 CFR

9 There are no material changes to the trust fund agreements.

50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- (a) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U. S. NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a site specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on August 13, 2036.

### Attachment 8

Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1

#### **ATTACHMENT 8**

## Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$679,698
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$996,672 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$500,932 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
-	There are no contracte valied upon nursuant to 10 CED 50 75/a)/	4 \ /\

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated March 1, 2013 (TLG Report E16-1640-006, Revision 0, "Decommissioning Cost Analysis for the Clinton Power Station," December 2012). The costs have been escalated from 2012 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) Clinton, Unit 1 does not have an ISFSI. Therefore, 10 CFR 72 does not apply to Clinton, Unit 1.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on September 29, 2026.

# ATTACHMENT 8 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2026	\$16,626	\$631,123	\$614,496	\$4,097	\$618,593
2027	\$98,213	\$618,593	\$520,380	\$10,408	\$530,787
2028	\$25,592	\$530,787	\$505,196	\$10,104	\$515,300
2029	\$7,197	\$515,300	\$508,102	\$10,162	\$518,264
2030	\$7,197	\$518,264	\$511,067	\$10,221	\$521,288
2031	\$7,197	\$521,288	\$514,091	\$10,282	\$524,373
2032	\$4,883	\$524,373	\$519,490	\$10,390	\$529,879
2033	\$4,133	\$529,879	\$525,746	\$10,515	\$536,261
2034	\$4,133	\$536,261	\$532,128	\$10,643	\$542,771
2035	\$4,133	\$542,771	\$538,638	\$10,773	\$549,410
2036	\$4,144	\$549,410	\$545,266	\$10,905	\$556,171
2037	\$4,133	\$556,171	\$552,038	\$11,041	\$563,079
2038	\$4,133	\$563,079	\$558,946	\$11,179	\$570,125
2039	\$4,133	\$570,125	\$565,992	\$11,320	\$577,312
2040	\$4,144	\$577,312	\$573,167	\$11,463	\$584,630
2041	\$4,133	\$584,630	\$580,497	\$11,610	\$592,107
2042	\$4,133	\$592,107	\$587,974	\$11,759	\$599,734
2043	\$4,133	\$599,734	\$595,601	\$11,912	\$607,513
2044	\$4,152	\$607,513	\$603,360	\$12,067	\$615,428
2045	\$7,018	\$615,428	\$608,410	\$12,168	\$620,578
2046	\$7,018	\$620,578	\$613,560	\$12,271	\$625,831
2047	\$7,018	\$625,831	\$618,813	\$12,376	\$631,189
2048	\$7,037	\$631,189	\$624,152	\$12,483	\$636,635
2049	\$7,018	\$636,635	\$629,617	\$12,592	\$642,209
2050	\$7,018	\$642,209	\$635,191	\$12,704	\$647,895
2051	\$7,018	\$647,895	\$640,877	\$12,818	\$653,695
2052	\$7,037	\$653,695	\$646,657	\$12,933	\$659,590
2053	\$7,018	\$659,590	\$652,572	\$13,051	\$665,624
2054	\$7,018	\$665,624	\$658,606	\$13,172	\$671,778
2055	\$7,018	\$671,778	\$664,760	\$13,295	\$678,055
2056	\$7,037	\$678,055	\$671,018	\$13,420	\$684,438
2057	\$7,018	\$684,438	\$677,420	\$13,548	\$690,969
2058	\$7,018	\$690,969	\$683,951	\$13,679	\$697,630
2059	\$7,018	\$697,630	\$690,612	\$13,812	\$704,424
2060	\$7,037	\$704,424	\$697,387	\$13,948	\$711,334
2061	\$7,018	\$711,334	\$704,316	\$14,086	\$718,403
2062	\$7,018	\$718,403	\$711,385	\$14,228	\$725,612
2063	\$7,018	\$725,612	\$718,594	\$14,372	\$732,966
2064	\$7,037	\$732,966	\$725,929	\$14,519	\$740,448
2065	\$7,018	\$740,448	\$733,430	\$14,669	\$748,098

# ATTACHMENT 8 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2066	\$7,018	\$748,098	\$741,080	\$14,822	\$755,902
2067	\$7,018	\$755,902	\$748,884	\$14,978	\$763,861
2068	\$7,037	\$763,861	\$756,824	\$15,136	\$771,961
2069	\$7,018	\$771,961	\$764,943	\$15,299	\$780,241
2070	\$7,018	\$780,241	\$773,223	\$15,464	\$788,688
2071	\$7,018	\$788,688	\$781,670	\$15,633	\$797,303
2072	\$7,037	\$797,303	\$790,266	\$15,805	\$806,071
2073	\$7,018	\$806,071	\$799,053	\$15,981	\$815,034
2074	\$7,018	\$815,034	\$808,016	\$16,160	\$824,177
2075	\$7,018	\$824,177	\$817,159	\$16,343	\$833,502
2076	\$7,037	\$833,502	\$826,465	\$16,529	\$842,994
2077	\$7,018	\$842,994	\$835,976	\$16,720	\$852,695
2078	\$7,018	\$852,695	\$845,677	\$16,914	\$862,591
2079	\$7,018	\$862,591	\$855,573	\$17,111	\$872,684
2080	\$21,714	\$872,684	\$850,971	\$17,019	\$867,990
2081	\$62,618	\$867,990	\$805,372	\$16,107	\$821,479
2082	\$123,258	\$821,479	\$698,222	\$13,964	\$712,186
2083	\$114,762	\$712,186	\$597,424	\$11,948	\$609,373
2084	\$86,362	\$609,373	\$523,011	\$10,460	\$533,471
2085	\$86,035	\$533,471	\$447,435	\$8,949	\$456,384
2086	\$39,384	\$456,384	\$417,000	\$8,340	\$425,340
2087	\$104	\$425,340	\$425,236	\$8,505	\$433,741
2088	\$104	\$433,741	\$433,636	\$8,673	\$442,309
2089	\$1	\$442,309	\$442,309	\$8,846	\$451,155

Total\* \$996,672

<sup>\*</sup>Column may not add due to rounding

#### Attachment 9

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

#### **ATTACHMENT 9**

#### Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)			
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$398,668 (a)			
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)			
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$354,697 (c)			
5	Schedule of the annual amounts remaining to be collected.	\$0			
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	2% (d)			
7	There are no contracts relied upon pursuant to 10 CFR 50.75	(e)(1)(v).			
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i).				
9	Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of Ne York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.				
10	2014 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$5,225 (e)			
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$114,481 (f)			
	Reimbursed from the decommissioning trust fund	\$86,848 (f)			
	Not yet reimbursed from the decommissioning trust fund	\$27,633			
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2014.	\$12,963			
13	Projected cost of managing irradiated fuel based on site- specific estimate per 10 CFR 50.82(a)(8)(vii)(B).	\$14,569(a)			

# ATTACHMENT 9 (Continued) Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for

Dresden Nuclear Power Station, Unit 1

(December 31, 2014 dollars, thousands)

(a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Dresden Unit 1 has been shutdown since October 31, 1978 and some decommissioning activities have already occurred on this unit. However, the amount to decommission Dresden Unit 1 was calculated pursuant to 10 CFR 50.75(c) to be \$578.0 million (as of December 31, 2014). Dresden Unit 1 was a BWR reactor that operated at a maximum power level of 700 MWt (< 1200 MWt as specified in 10 CFR 50.75(c)). This amount assumes Dresden Unit 1 was a BWR reactor type rated at a power capacity of 1200 MWt as required by the formula in 10 CFR 50.75(c). The calculation of this value assumes the labor, energy, and burial factors described in Attachment 1 and does not account for decommissioning activities that have occurred for Dresden Unit 1.</p>

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1640-004, Revision 0, "Decommissioning Cost Analysis for the Dresden Nuclear Power Station Unit 1," August 2012). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Dresden Nuclear Power Station, Unit 1, Post-Shutdown Decommissioning Activities Report (PSDAR), as most recently updated in a letter from K.R. Jury (EGC) to U.S. NRC on January 5, 2007. The costs have been escalated from the 2012 dollars reflected in the 2012 decommissioning cost estimate to estimated costs as of December 31, 2014.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE estimate for the 2012, 2013, and 2014 annual radiological cost because EGC considers the SSCE estimated cost for 2012, 2013, and 2014 decommissioning activities to be historical expenditures at the time the 2015 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Dresden Nuclear Power Station, Unit 1, will take place beginning in 2029, coinciding with the decommissioning of Dresden Nuclear Power Station, Unit 2.

(b) ISFSI decommissioning cost is included in the Dresden Nuclear Power Station, Unit 2 and Unit 3 site-specific cost estimates.

# ATTACHMENT 9 (Continued) Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2014 is consistent with the amount budgeted at the station. Even though the amount exceeds the projected 2014 expense total of \$2,975 (December 31, 2013 thousands of dollars) from the site-specific cost estimate, it is immaterial to the overall funding assurance analysis. The \$2,250 (thousands of dollars) difference between actual and projected is the result of two major projects to remove the DAW pit (completed) and to remove T-104 A/B tank and pump house concrete (partial demolition occurred in 2013, demolition was completed in 2014) that were scoped in and approved above baseline budget. These costs are accounted for in the SSCE but projected to occur later in the SSCE and will be removed during the next update so costs will only be over predicted in the short-term.
- (f) Not all historical data was available, and therefore, the cumulative amounts spent on decommissioning are estimates based on the best information obtainable at this time.

# ATTACHMENT 9 (Continued) Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

(December 31, 2014 dollars, thousands)

	Radiological Decommissioning	BOY Trust Fund	BOY Trust Fund Value	Trust Fund	EOY Trust Fund
Year	Cost	Value	Less Cost	Earnings	Value
2015	\$3,031	\$354,697	\$351,666	\$7,033	\$358,700
2016	\$3,039	\$358,700	\$355,660	\$7,113	\$362,774
2017	\$3,031	\$362,774	\$359,743	\$7,195	\$366,938
2018	\$3,031	\$366,938	\$363,907	\$7,278	\$371,185
2019	\$3,031	\$371,185	\$368,154	\$7,363	\$375,517
2020	\$3,039	\$375,517	\$372,478	\$7,450	\$379,928
2021	\$3,031	\$379,928	\$376,897	\$7,538	\$384,435
2022	\$3,031	\$384,435	\$381,404	\$7,628	\$389,032
2023	\$3,031	\$389,032	\$386,001	\$7,720	\$393,721
2024	\$3,039	\$393,721	\$390,682	\$7,814	\$398,495
2025	\$3,031	\$398,495	\$395,465	\$7,909	\$403,374
2026	\$3,031	\$403,374	\$400,343	\$8,007	\$408,350
2027	\$3,031	\$408,350	\$405,319	\$8,106	\$413,425
2028	\$3,039	\$413,425	\$410,386	\$8,208	\$418,594
2029	\$38,103	\$418,594	\$380,491	\$7,610	\$388,101
2030	\$81,035	\$388,101	\$307,066	\$6,141	\$313,207
2031	\$88,082	\$313,207	\$225,125	\$4,503	\$229,628
2032	\$64,116	\$229,628	\$165,512	\$3,310	\$168,822
2033	\$48,220	\$168,822	\$120,602	\$2,412	\$123,014
2034	\$2,240	\$123,014	\$120,774	\$2,415	\$123,189
2035	\$2,240	\$123,189	\$120,949	\$2,419	\$123,368
2036	\$2,246	\$123,368	\$121,122	\$2,422	\$123,544
2037	\$18,228	\$123,544	\$105,317	\$2,106	\$107,423
2038	\$6,645	\$107,423	\$100,777	\$2,016	\$102,793
2039	\$92	\$102,793	\$102,701	\$2,054	\$104,755
2040	\$52	\$104,755	\$104,702	\$2,094	\$106,797
2041	-	\$106,797	\$106,797	\$2,136	\$108,932
2042	\$4,903	\$108,932	\$104,030	\$2,081	\$106,110

Total\* \$398,668

<sup>\*</sup>Column may not add due to rounding

## ATTACHMENT 9 (Continued) Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

(December 31, 2014 dollars, thousands)

Year	Irradiated Fuel Cost	BOY Irradiated Fuel Trust Fund Value	BOY Irradiated Fuel Trust Fund Less Cost	Irradiated Fuel Trust Fund Earnings	EOY Irradiated Fuel Trust Fund Value
2015		\$12,963	\$12,963	\$259	\$13,222
2016	_	\$13,222	\$13,222	\$264	\$13,486
2017	_	\$13,486	\$13,486	\$270	\$13,756
2018		\$13,756	\$13,756	\$275	\$14,031
2019	_	\$14,031	\$14,031	\$281	\$14,312
2020	_	\$14,312	\$14,312	\$286	\$14,598
2021	=	\$14,598	\$14,598	\$292	\$14,890
2022	_	\$14,890	\$14,890	\$298	\$15,188
2023	_	\$15,188	\$15,188	\$304	\$15,491
2024	-	\$15,491	\$15,491	\$310	\$15,801
2025	-	\$15,801	\$15,801	\$316	\$16,117
2026	-	\$16,117	\$16,117	\$322	\$16,440
2027	-	\$16,440	\$16,440	\$329	\$16,768
2028	-	\$16,768	\$16,768	\$335	\$17,104
2029	\$815	\$17,104	\$16,288	\$326	\$16,614
2030	\$581	\$16,614	\$16,033	\$321	\$16,354
2031	\$499	\$16,354	\$15,854	\$317	\$16,172
2032	\$501	\$16,172	\$15,671	\$313	\$15,984
2033	\$499	\$15,984	\$15,485	\$310	\$15,795
2034	\$499	\$15,795	\$15,296	\$306	\$15,602
2035	\$499	\$15,602	\$15,103	\$302	\$15,405
2036	\$501	\$15,405	\$14,904	\$298	\$15,202
2037	\$2,008	\$15,202	\$13,194	\$264	\$13,458
2038	\$683	\$13,458	\$12,775	\$255	\$13,030
2039	\$731	\$13,030	\$12,299	\$246	\$12,545
2040	\$1,453	\$12,545	\$11,092	\$222	\$11,314
2041	\$2,373	\$11,314	\$8,941	\$179	\$9,120
2042	\$2,370	\$9,120	\$6,751	\$135	\$6,886
2043	\$557	\$6,886	\$6,328	\$127	\$6,455

Total\* \$14,569

<sup>\*</sup>Column may not add due to rounding

#### Attachment 10

Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2

#### **ATTACHMENT 10**

#### Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$657,611
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$2,291 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$619,880 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on December 22, 2029.

#### Attachment 11

Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3

#### **ATTACHMENT 11**

#### Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3

1	Formula cost amount per 10 CFR 50.75(c)	\$657,611
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$2,290 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$633,769 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracte relied upon nursuant to 40 OFD 50 75/c//	437.3

- There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on January 12, 2031.

#### Attachment 12

Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1

# ATTACHMENT 12 Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$679,698
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$910,428 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,253 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$453,349 (c)
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
	The second of th	137.3

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-014, Revision 0, "Decommissioning Cost Analysis for the LaSalle County Station Units 1 and 2," December 2014). The costs have been escalated from the mid-year 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-014, Revision 0, "Decommissioning Cost Analysis for the LaSalle County Station Units 1 and 2," December 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 12 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on April 17, 2022.

# ATTACHMENT 12 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2022	\$48,323	-	\$523,340	\$475,017	\$7,125	\$482,142
2023	\$68,988		\$482,142	\$413,154	\$8,263	\$421,417
2024	\$9,904	•	\$421,417	\$411,513	\$8,230	\$419,743
2025	\$9,877		\$419,743	\$409,866	\$8,197	\$418,063
2026	\$9,877	-	\$418,063	\$408,186	\$8,164	\$416,350
2027	\$8,794	-	\$416,350	\$407,556	\$8,151	\$415,707
2028	\$4,687	-	\$415,707	\$411,020	\$8,220	\$419,240
2029	\$4,675	•	\$419,240	\$414,565	\$8,291	\$422,857
2030	\$4,675	-	\$422,857	\$418,182	\$8,364	\$426,546
2031	\$4,675	-	\$426,546	\$421,871	\$8,437	\$430,308
2032	\$4,687	-	\$430,308	\$425,621	\$8,512	\$434,133
2033	\$4,675	-	\$434,133	\$429,459	\$8,589	\$438,048
2034	\$4,675		\$438,048	\$433,373	\$8,667	\$442,041
2035	\$4,675	-	\$442,041	\$437,366	\$8,747	\$446,113
2036	\$4,687	-	\$446,113	\$441,426	\$8,829	\$450,254
2037	\$4,675	-	\$450,254	\$445,580	\$8,912	\$454,491
2038	\$4,675	-	\$454,491	\$449,817	\$8,996	\$458,813
2039	\$4,675	-	\$458,813	\$454,138	\$9,083	\$463,221
2040	\$4,687		\$463,221	\$458,534	\$9,171	\$467,704
2041	\$4,675	-	\$467,704	\$463,030	\$9,261	\$472,290
2042	\$4,646	_	\$472,290	\$467,645	\$9,353	\$476,998
2043	\$4,646	-	\$476,998	\$472,352	\$9,447	\$481,799
2044	\$4,658	-	\$481,799	\$477,140	\$9,543	\$486,683
2045	\$4,646	-	\$486,683	\$482,037	\$9,641	\$491,678
2046	\$4,646	-	\$491,678	\$487,032	\$9,741	\$496,773
2047	\$4,646	•	\$496,773	\$492,127	\$9,843	\$501,970
2048	\$4,658	<u>.</u>	\$501,970	\$497,311	\$9,946	\$507,258
2049	\$4,646	•	\$507,258	\$502,612	\$10,052	\$512,664
2050	\$4,646		\$512,664	\$508,019	\$10,160	\$518,179
2051	\$4,646		\$518,179	\$513,533	\$10,271	\$523,804
2052	\$4,658	-	\$523,804	\$519,145	\$10,383	\$529,528
2053	\$4,646	•	\$529,528	\$524,883	\$10,498	\$535,380
2054	\$4,646		\$535,380	\$530,734	\$10,615	\$541,349
2055	\$4,646	-	\$541,349	\$536,703	\$10,734	\$547,437
2056	\$4,658	-	\$547,437	\$542,779	\$10,856	\$553,635
2057	\$4,646	_	\$553,635	\$548,989	\$10,980	\$559,969
2058	\$4,646	-	\$559,969	\$555,323	\$11,106	\$566,429
2059	\$4,646	-	\$566,429	\$561,784	\$11,236	\$573,019
2060	\$4,658	-	\$573,019	\$568,361	\$11,367	\$579,728
2061	\$4,646		\$579,728	\$575,082	\$11,502	\$586,584

# ATTACHMENT 12 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1

(December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2062	\$4,646	-	\$586,584	\$581,938	\$11,639	\$593,577
2063	\$4,646	•	\$593,577	\$588,931	\$11,779	\$600,710
2064	\$4,658	-	\$600,710	\$596,051	\$11,921	\$607,972
2065	\$4,646		\$607,972	\$603,327	\$12,067	\$615,393
2066	\$4,646	-	\$615,393	\$610,748	\$12,215	\$622,962
2067	\$4,646	-	\$622,962	\$618,317	\$12,366	\$630,683
2068	\$4,658	-	\$630,683	\$626,025	\$12,520	\$638,545
2069	\$4,646	-	\$638,545	\$633,899	\$12,678	\$646,577
2070	\$4,646		\$646,577	\$641,932	\$12,839	\$654,770
2071	\$4,646	_	\$654,770	\$650,125	\$13,002	\$663,127
2072	\$4,658	-	\$663,127	\$658,469	\$13,169	\$671,638
2073	\$4,646	*	\$671,638	\$666,992	\$13,340	\$680,332
2074	\$25,911	-	\$680,332	\$654,421	\$13,088	\$667,510
2075	\$64,958	-	\$667,510	\$602,551	\$12,051	\$614,602
2076	\$147,936	\$4,121	\$614,602	\$462,546	\$9,251	\$471,797
2077	\$111,833	\$2,132	\$471,797	\$357,832	\$7,157	\$364,989
2078	\$73,759	-	\$364,989	\$291,229	\$5,825	\$297,054
2079	\$73,759		\$297,054	\$223,294	\$4,466	\$227,760
2080	\$7,617	-	\$227,760	\$220,143	\$4,403	\$224,546
2081	\$21,956	-	\$224,546	\$202,590	\$4,052	\$206,642
2082	\$12,518		\$206,642	\$194,124	\$3,882	\$198,007
2083	\$121	-	\$198,007	\$197,886	\$3,958	\$201,843
2084	\$35	•	\$201,843	\$201,808	\$4,036	\$205,845

Total\* \$910,428 \$6,253

<sup>\*</sup>Columns may not add due to rounding

#### Attachment 13

Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2

# ATTACHMENT 13 Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$679,698
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$954,631 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,253 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$453,726 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
_		

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-014, Revision 0, "Decommissioning Cost Analysis for the LaSalle County Station Units 1 and 2," December 2014). The costs have been escalated from the mid-year 2014 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC dated February 19, 2015, (TLG Report E16-1640-014, Revision 0, "Decommissioning Cost Analysis for the LaSalle County Station Units 1 and 2," December 2014). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 13 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 16, 2023.

# ATTACHMENT 13 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2023	\$3,031	-	\$541,350	\$538,319	\$897	\$539,217
2024	\$72,454	-	\$539,217	\$466,763	\$9,335	\$476,098
2025	\$53,542	-	\$476,098	\$422,556	\$8,451	\$431,007
2026	\$10,012	-	\$431,007	\$420,995	\$8,420	\$429,415
2027	\$10,012	-	\$429,415	\$419,404	\$8,388	\$427,792
2028	\$10,039	-	\$427,792	\$417,753	\$8,355	\$426,108
2029	\$7,177	-	\$426,108	\$418,930	\$8,379	\$427,309
2030	\$4,813	-	\$427,309	\$422,495	\$8,450	\$430,945
2031	\$4,813	-	\$430,945	\$426,132	\$8,523	\$434,655
2032	\$4,826	=	\$434,655	\$429,828	\$8,597	\$438,425
2033	\$4,813	-	\$438,425	\$433,612	\$8,672	\$442,284
2034	\$4,813	-	\$442,284	\$437,471	\$8,749	\$446,220
2035	\$4,813	-	\$446,220	\$441,407	\$8,828	\$450,235
2036	\$4,826	-	\$450,235	\$445,409	\$8,908	\$454,317
2037	\$4,813	•	\$454,317	\$449,503	\$8,990	\$458,494
2038	\$4,813	-	\$458,494	\$453,680	\$9,074	\$462,754
2039	\$4,813	-	\$462,754	\$457,941	\$9,159	\$467,099
2040	\$4,826	-	\$467,099	\$462,273	\$9,245	\$471,519
2041	\$4,813	-	\$471,519	\$466,705	\$9,334	\$476,039
2042	\$4,799	-	\$476,039	\$471,241	\$9,425	\$480,666
2043	\$4,799	-	\$480,666	\$475,867	\$9,517	\$485,384
2044	\$4,812	-	\$485,384	\$480,573	\$9,611	\$490,184
2045	\$4,799	-	\$490,184	\$485,386	\$9,708	\$495,093
2046	\$4,799	•	\$495,093	\$490,295	\$9,806	\$500,101
2047	\$4,799	-	\$500,101	\$495,302	\$9,906	\$505,208
2048	\$4,812	-	\$505,208	\$500,397	\$10,008	\$510,405
2049	\$4,799	-	\$510,405	\$505,606	\$10,112	\$515,718
2050	\$4,799	-	\$515,718	\$510,920	\$10,218	\$521,138
2051	\$4,799	-	\$521,138	\$516,339	\$10,327	\$526,666
2052	\$4,812	-	\$526,666	\$521,855	\$10,437	\$532,292
2053	\$4,799	-	\$532,292	\$527,493	\$10,550	\$538,043
2054	\$4,799	•	\$538,043	\$533,244	\$10,665	\$543,909
2055	\$4,799	•	\$543,909	\$539,111	\$10,782	\$549,893
2056	\$4,812	-	\$549,893	\$545,081	\$10,902	\$555,983
2057	\$4,799	-	\$555,983	\$551,184	\$11,024	\$562,208
2058	\$4,799	*	\$562,208	\$557,410	\$11,148	\$568,558
2059	\$4,799	•	\$568,558	\$563,759	\$11,275	\$575,034
2060	\$4,812	-	\$575,034	\$570,223	\$11,404	\$581,627
2061	\$4,799	-	\$581,627	\$576,829	\$11,537	\$588,365
2062	\$4,799	•	\$588,365	\$583,567	\$11,671	\$595,238

# ATTACHMENT 13 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2 (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2063	\$4,799	-	\$595,238	\$590,440	\$11,809	\$602,248
2064	\$4,812	•	\$602,248	\$597,437	\$11,949	\$609,385
2065	\$4,799	-	\$609,385	\$604,587	\$12,092	\$616,679
2066	\$4,799	-	\$616,679	\$611,880	\$12,238	\$624,118
2067	\$4,799	-	\$624,118	\$619,319	\$12,386	\$631,706
2068	\$4,812	-	\$631,706	\$626,894	\$12,538	\$639,432
2069	\$4,799	-	\$639,432	\$634,633	\$12,693	\$647,326
2070	\$4,799	-	\$647,326	\$642,527	\$12,851	\$655,378
2071	\$4,799	-	\$655,378	\$650,579	\$13,012	\$663,591
2072	\$4,812	-	\$663,591	\$658,779	\$13,176	\$671,955
2073	\$4,799	-	\$671,955	\$667,156	\$13,343	\$680,499
2074	\$4,799	-	\$680,499	\$675,701	\$13,514	\$689,215
2075	\$5,047	-	\$689,215	\$684,168	\$13,683	\$697,851
2076	\$35,329	•	\$697,851	\$662,522	\$13,250	\$675,772
2077	\$106,472	-	\$675,772	\$569,300	\$11,386	\$580,686
2078	\$155,637	\$152	\$580,686	\$424,897	\$8,498	\$433,395
2079	\$92,858	\$2,413	\$433,395	\$338,124	\$6,762	\$344,887
2080	\$92,858	\$2,413	\$344,887	\$249,616	\$4,992	\$254,609
2081	\$70,573	\$1,276	\$254,609	\$182,760	\$3,655	\$186,415
2082	\$13,269	-	\$186,415	\$173,146	\$3,463	\$176,609
2083	\$51	•	\$176,609	\$176,558	\$3,531	\$180,089
2084	\$15	-	\$180,089	\$180,075	\$3,601	\$183,676

Total\* \$954,631 \$6,253

<sup>\*</sup>Columns may not add due to rounding

#### Attachment 14

Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1

#### **ATTACHMENT 14**

#### **Annual Radiological Decommissioning Funding Assurance Report for** Limerick Generating Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$693,640
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$3,572 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$372,731 (b)
5	Schedule of the annual amounts remaining to be collected.	\$8,232 (c)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
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- Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

## ATTACHMENT 14 (continued) Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1

- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013 and allows for the collection of annual payments from ratepayers of \$8,232K through 2023. It is possible that when the impact of the recently approved license renewal is factored into the PaPUC's next cost adjustment calculation (effective January 1, 2018), the collections will be adjusted downward, and potentially could go to \$0, beginning in 2018 through 2043.
- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 26, 2044.

#### Attachment 15

Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2

#### ATTACHMENT 15

### Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$693,640
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$3,572 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$384,612 (b)
5	Schedule of the annual amounts remaining to be collected.	\$13,105 (c)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (d)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

## ATTACHMENT 15 (continued) Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2

- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$13,105K through 2028. It is possible that when the impact of the recently approved license renewal is factored into the PaPUC's next cost adjustment calculation (effective January 1, 2018), the collections will be adjusted downward, and potentially could go to \$0, beginning in 2018 through 2048.
- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on June 22, 2049.

#### Attachment 16

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1

#### **ATTACHMENT 16**

### Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$619,909
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,126 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$561,708 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1	)(v).
8	Financial assurance for decommissioning is provided by the preparenthod, coupled with an external trust fund, in accordance with 10 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	

- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U.S.NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a site specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on August 22, 2029.

#### Attachment 17

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 EGC Portion

#### **ATTACHMENT 17**

#### Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2, EGC Portion

1	Formula cost amount per 10 CFR 50.75(c)	\$568,785 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,024 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$352,797 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepared	avment

- method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- There are no material changes to the trust fund agreements.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Nine Mile Point Nuclear Station, Unit 2 of 82%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U.S. NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The sitespecific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a site specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden. LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2046.

#### Attachment 18

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 LIPA Portion

#### **ATTACHMENT 18**

### Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2, LIPA Portion

1	Formula cost amount per 10 CFR 50.75(c)	\$124,855 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$1,103 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$89,986 (c)
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracte relied upon pursuant to 10 CER 50.75(a)(	1)(1)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 There are no material changes to the trust fund agreements.
- (a) Value is based on the Long Island Power Authority (LIPA) ownership share of Nine Mile Point Nuclear Station, Unit 2 of 18%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U. S. NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a site specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. This amount was provided by the Nine Mile Point Nuclear Station, Unit 2 coowner LIPA. LIPA has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014. EGC has not independently verified or assessed the trust fund amount.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2046.

#### Attachment 19

Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station

#### **ATTACHMENT 19**

#### Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station

1	Formula cost amount per 10 CFR 50.75(c)	\$623,608
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$939,447(a)
3	Site-specific cost amount per 10 CFR 72.30(b)	\$7,340 (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$861,564 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from James Barstow (EGC) to U. S. NRC, dated December 30, 2014 (TLG Report E16-1640-002, Revision 4, "Decommissioning Cost Analysis for the Oyster Creek Nuclear Generating Station," December 2014). The costs have been escalated from the 2011 dollars in the decommissioning cost estimate to December 31, 2014.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated and provided in a letter from James Barstow (EGC) to U. S. NRC, dated December 30, 2014 (TLG Report E16-1640-002, Revision 4, "Decommissioning Cost Analysis for the Oyster Creek Nuclear Generating Station," December 2014). The costs have been escalated from 2011 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.

# ATTACHMENT 19 (continued) Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 31, 2019. This date is based on the State of New Jersey Administrative Consent Order, dated December 9, 2010.

## ATTACHMENT 19 (continued) Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2019	\$177		\$949,668	\$949,490	\$1,582	\$951,073
2020	\$65,511	-	\$951,073	\$885,562	\$17,711	\$903,273
2021	\$62,943	-	\$903,273	\$840,330	\$16,807	\$857,136
2022	\$7,318	-	\$857,136	\$849,818	\$16,996	\$866,815
2023	\$7,318	-	\$866,815	\$859,497	\$17,190	\$876,687
2024	\$7,338	-	\$876,687	\$869,349	\$17,387	\$886,736
2025	\$7,245	-	\$886,736	\$879,491	\$17,590	\$897,081
2026	\$7,173	-	\$897,081	\$889,908	\$17,798	\$907,706
2027	\$7,173	<b>-</b>	\$907,706	\$900,533	\$18,011	\$918,544
2028	\$7,193	•	\$918,544	\$911,351	\$18,227	\$929,578
2029	\$7,173	•	\$929,578	\$922,405	\$18,448	\$940,853
2030	\$7,173	-	\$940,853	\$933,680	\$18,674	\$952,354
2031	\$7,173	=	\$952,354	\$945,181	\$18,904	\$964,085
2032	\$7,193	•	\$964,085	\$956,892	\$19,138	\$976,030
2033	\$7,173	-	\$976,030	\$968,857	\$19,377	\$988,234
2034	\$7,173	-	\$988,234	\$981,061	\$19,621	\$1,000,683
2035	\$7,173	-	\$1,000,683	\$993,510	\$19,870	\$1,013,380
2036	\$7,192	-	\$1,013,380	\$1,006,187	\$20,124	\$1,026,311
2037	\$7,140	-	\$1,026,311	\$1,019,171	\$20,383	\$1,039,555
2038	\$7,140	-	\$1,039,555	\$1,032,415	\$20,648	\$1,053,063
2039	\$7,140	**	\$1,053,063	\$1,045,923	\$20,918	\$1,066,841
2040	\$7,160	-	\$1,066,841	\$1,059,682	\$21,194	\$1,080,875
2041	\$7,140	-	\$1,080,875	\$1,073,735	\$21,475	\$1,095,210
2042	\$7,140	-	\$1,095,210	\$1,088,070	\$21,761	\$1,109,831
2043	\$7,140	-	\$1,109,831	\$1,102,691	\$22,054	\$1,124,745
2044	\$7,160	-	\$1,124,745	\$1,117,585	\$22,352	\$1,139,937
2045	\$7,140	-	\$1,139,937	\$1,132,797	\$22,656	\$1,155,453
2046	\$7,140	-	\$1,155,453	\$1,148,313	\$22,966	\$1,171,279
2047	\$7,140	-	\$1,171,279	\$1,164,139	\$23,283	\$1,187,422
2048	\$7,160	-	\$1,187,422	\$1,180,262	\$23,605	\$1,203,868
2049	\$7,140	-	\$1,203,868	\$1,196,728	\$23,935	\$1,220,662
2050	\$7,140	-	\$1,220,662	\$1,213,522	\$24,270	\$1,237,793
2051	\$7,140		\$1,237,793	\$1,230,653	\$24,613	\$1,255,266
2052	\$7,160 \$7,160	•	\$1,255,266	\$1,248,106	\$24,962	\$1,273,068
2053	\$7,140 \$7,140	-	\$1,273,068	\$1,265,928	\$25,319	\$1,291,247
2054	\$7,140	•	\$1,291,247	\$1,284,107	\$25,682	\$1,309,789
2055	\$7,140	•	\$1,309,789	\$1,302,649	\$26,053	\$1,328,702
2056	\$7,160 \$7,140	-	\$1,328,702	\$1,321,542	\$26,431	\$1,347,973
2057	\$7,140 \$7,140	-	\$1,347,973	\$1,340,833	\$26,817	\$1,367,649
2058	\$7,140	<b></b>	\$1,367,649	\$1,360,509	\$27,210	\$1,387,720

## ATTACHMENT 19 (continued) Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station (December 31, 2014 dollars, thousands)

Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2059	\$7,140	•	\$1,387,720	\$1,380,580	\$27,612	\$1,408,191
2060	\$7,160	•	\$1,408,191	\$1,401,032	\$28,021	\$1,429,052
2061	\$7,140	-	\$1,429,052	\$1,421,912	\$28,438	\$1,450,350
2062	\$7,140	-	\$1,450,350	\$1,443,210	\$28,864	\$1,472,075
2063	\$7,140	-	\$1,472,075	\$1,464,935	\$29,299	\$1,494,233
2064	\$7,160	-	\$1,494,233	\$1,487,074	\$29,741	\$1,516,815
2065	\$7,140	•	\$1,516,815	\$1,509,675	\$30,194	\$1,539,869
2066	\$7,140	-	\$1,539,869	\$1,532,728	\$30,655	\$1,563,383
2067	\$7,140	-	\$1,563,383	\$1,556,243	\$31,125	\$1,587,368
2068	\$7,160	•	\$1,587,368	\$1,580,208	\$31,604	\$1,611,812
2069	\$7,140	-	\$1,611,812	\$1,604,672	\$32,093	\$1,636,766
2070	\$7,140	-	\$1,636,766	\$1,629,626	\$32,593	\$1,662,218
2071	\$7,140	-	\$1,662,218	\$1,655,078	\$33,102	\$1,688,180
2072	\$7,160	-	\$1,688,180	\$1,681,020	\$33,620	\$1,714,641
2073	\$7,140	-	\$1,714,641	\$1,707,501	\$34,150	\$1,741,651
2074	\$7,140	-	\$1,741,651	\$1,734,511	\$34,690	\$1,769,201
2075	\$38,187	-	\$1,769,201	\$1,731,014	\$34,620	\$1,765,634
2076	\$104,068	-	\$1,765,634	\$1,661,566	\$33,231	\$1,694,798
2077	\$122,889	\$1,180	\$1,694,798	\$1,570,728	\$31,415	\$1,602,142
2078	\$107,199	\$4,952	\$1,602,142	\$1,489,992	\$29,800	\$1,519,792
2079	\$58,565	\$1,207	\$1,519,792	\$1,460,020	\$29,200	\$1,489,220
2080	\$149	-	\$1,489,220	\$1,489,071	\$29,781	\$1,518,852
2081	\$81	-	\$1,518,852	\$1,518,771	\$30,375	\$1,549,146

Total\* \$939,447 \$7,340

<sup>\*</sup>Columns may not add due to rounding

#### Attachment 20

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

## ATTACHMENT 20 Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1 (December 31, 2014 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)		
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$209,824 (a)		
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (f)		
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$91,417 (b)		
5	Schedule of the annual amounts remaining to be collected.	\$2,118 (c)		
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	3% (d)		
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e	)(1)(v).		
8	Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii).			
9	Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.			
10	2014 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$1,169 (e)		
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$2,559		
	Reimbursed from the decommissioning trust fund	\$0		
	Not yet reimbursed from the decommissioning trust fund	\$2,559		
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2014.	N/A (f)		
13	Projected cost of managing irradiated fuel based on site- specific estimate per 10 CFR 50.82(a)(8)(vii)(B).	N/A (f)		

### ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

(December 31, 2014 dollars, thousands)

(a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Peach Bottom Unit 1 has been shutdown since October 31, 1974 and some decommissioning activities have already occurred on this unit. Furthermore, Peach Bottom Unit 1 was a High Temperature Gas Cooled Reactor (HTGR), which does not translate to a BWR or PWR as specified in the formula for calculating the formula cost amount, and hence a formula cost amount per 10 CFR 50.75(c) cannot be calculated for Peach Bottom Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(ii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1555-015, Revision 0, "Decommissioning Cost Analysis for the Peach Bottom Atomic Power Station Unit 1," June 2010). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Peach Bottom, Unit 1, Decommissioning Plan. The costs have been escalated from the 2010 dollars reflected in the 2010 decommissioning cost estimate to estimated costs as of December 31, 2014.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. The Peach Bottom Unit 1 SSCE estimated the annual radiological costs for years 2010 through 2032 to be \$0.

Decontamination and dismantlement of Peach Bottom Atomic Power Station, Unit 1, will take place beginning in 2033, coinciding with the decommissioning of Peach Bottom Atomic Power Station, Unit 2.

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$2,118K through 2032.

## ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) The most recent Peach Bottom Unit 1 SSCE estimated the 2014 cost (radiological decommissioning costs only) to be \$0. The \$1,169 (thousands of dollars) difference between actual and projected is the result of two major projects, roof repair/replacement and discharge pipe removal, that were scoped in and approved above baseline budget. This amount is considered to be immaterial to the overall funding assurance analysis.
- (f) Peach Bottom Atomic Power Station, Unit 1 was shut down in October of 1974, with defueling of the core completed by the following June. Starting in 1975, the spent fuel was shipped by truck to Idaho. The final of 44 shipments was completed in February of 1977. Consequently, no irradiated fuel for Peach Bottom Unit 1 remains on-site, and therefore 10 CFR 50.82(a)(8)(vii) and 10 CFR 72.30(b) do not apply.

## ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

(December 31, 2014 dollars, thousands)

_ Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost**	First Half Contributions	Trust Fund Earnings	Second Half Contributions	EOY Trust Fund Value
2015	-	\$91,417	\$91,417	\$1,059	\$2,774	\$1,059	\$96,309
2016	-	\$96,309	\$96,309	\$1,059	\$2,921	\$1,059	\$101,348
2017	-	\$101,348	\$101,348	\$1,059	\$3,072	\$1,059	\$106,538
2018		\$106,538	\$106,538	\$1,059	\$3,228	\$1,059	\$111,884
2019	-	\$111,884	\$111,884	\$1,059	\$3,388	\$1,059	\$117,390
2020	-	\$117,390	\$117,390	\$1,059	\$3,553	\$1,059	\$123,061
2021	<b>=</b>	\$123,061	\$123,061	\$1,059	\$3,724	\$1,059	\$128,903
2022	-	\$128,903	\$128,903	\$1,059	\$3,899	\$1,059	\$134,919
2023	-	\$134,919	\$134,919	\$1,059	\$4,079	\$1,059	\$141,116
2024	=	\$141,116	\$141,116	\$1,059	\$4,265	\$1,059	\$147,499
2025	-	\$147,499	\$147,499	\$1,059	\$4,457	\$1,059	\$154,074
2026	-	\$154,074	\$154,074	\$1,059	\$4,654	\$1,059	\$160,846
2027	-	\$160,846	\$160,846	\$1,059	\$4,857	\$1,059	\$167,821
2028	•	\$167,821	\$167,821	\$1,059	\$5,066	\$1,059	\$175,005
2029	-	\$175,005	\$175,005	\$1,059	\$5,282	\$1,059	\$182,405
2030	-	\$182,405	\$182,405	\$1,059	\$5,504	\$1,059	\$190,026
2031		\$190,026	\$190,026	\$1,059	\$5,733	\$1,059	\$197,877
2032	-	\$197,877	\$197,877	\$1,059	\$5,968	\$1,059	\$205,962
2033	\$35,334	\$205,962	\$170,628	-	\$5,119	_	\$175,747
2034	\$53,853	\$175,747	\$121,895	-	\$3,657	-	\$125,552
2035	\$53,858	\$125,552	\$71,694	-	\$2,151	-	\$73,844
2036	\$42,409	\$73,844	\$31,435	-	\$943	-	\$32,378
2037	\$24,370	\$32,378	\$8,008	-	\$240	-	\$8,248

Total\* \$209,824

<sup>\*</sup> Column may not add due to rounding

<sup>\*\*</sup> Annual contributions added to individual years - Earnings of half of contributions are included in current year to estimate payment of contributions throughout the year

#### Attachment 21

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2

#### **ATTACHMENT 21**

#### Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2

(December 31, 2014 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$346,820 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$879 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$241,999 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Peach Bottom Atomic Power Station, Unit 2 of 50%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

## ATTACHMENT 21 (continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2032.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on August 8, 2033.

#### Attachment 22

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3

#### **ATTACHMENT 22**

#### Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3

1	Formula cost amount per 10 CFR 50.75(c)	\$346,820 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$878 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$261,861 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)
7	There are no contracts relied upon pursuant to 10 CFB 50 75(e)(1	1)(v).

- There are no contracts relied upon pursuant to 10 CFH 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Peach Bottom Atomic Power Station, Unit 3 of 50%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

### ATTACHMENT 22 (continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2033.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on July 2, 2034.

#### Attachment 23

Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1

#### **ATTACHMENT 23**

#### Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$493,208 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$1,408 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$392,769 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Quad Cities Nuclear Power Station, Unit 1 of 75%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 14, 2032.

#### Attachment 24

Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2

#### **ATTACHMENT 24**

#### Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$493,208 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$1,408 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$440,141 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
	There are no contracts relied upon number to 40 OFD 50 75(a)/d	11/. 1

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Quad Cities Nuclear Power Station, Unit 2 of 75%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 14, 2032.

#### Attachment 25

Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant

### ATTACHMENT 25 Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant

1	Formula cost amount per 10 CFR 50.75(c)	\$459,746
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,264 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$403,940 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1	I)(v).
8	Financial assurance for decommissioning is provided by the preparethod, coupled with an external trust fund, in accordance with 10 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	

- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Stephen A. Mormann (Constellation Energy Nuclear Group, LLC) to U. S. NRC, dated December 17, 2012 ("ISFSI Decommissioning Funding Plans"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed site-specific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2014 dollars using a unit specific escalation rate. Excluding the site-specific cost and escalation of the cost, the decommissioning funding plan is consistent with the decommissioning funding plan for the other EGC sites as detailed in the previously provided letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem").
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on September 18, 2029.

#### Attachment 26

Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1

#### **ATTACHMENT 26**

#### Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$226,877 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$955 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$223,329 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Salem Generating Station, Unit 1 of 42.59%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

## ATTACHMENT 26 (continued) Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2035.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on August 13, 2036.

#### Attachment 27

Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2

#### **ATTACHMENT 27**

#### Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2

1	Formula cost amount per 10 CFR 50.75(c)	\$226,877 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$954 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$185,837 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)
7	There are no contracte relied upon pursuant to 10 CER 50 75/eV/	4 \ 7\

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) All values are based on the Exelon Generation Company, LLC (EGC) ownership share of Salem Generating Station, Unit 2 of 42.59%.
- (b) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U. S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2014 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the December 17, 2012 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.

## ATTACHMENT 27 (continued) Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost
  - Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2039.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on April 18, 2040.

#### Attachment 28

Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1

#### **ATTACHMENT 28**

#### Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1

1	Formula cost amount per 10 CFR 50.75(c)	\$495,150
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2014	\$604,856 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i).
- Effective October 29, 2013, the existing trust fund agreements were consolidated and a Subordinate Trust Agreement established that creates a "trustee" relationship between Northern Trust Company and The Bank of New York Mellon (BNYM), as detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Executed Trust Fund Agreement Amendments and Subordinate Trust Agreement," dated October 29, 2013.
- (a) Three Mile Island does not have an ISFSI. Therefore, 10CFR72 does not apply to Three Mile Island.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2014. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2014.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on April 19, 2034.

#### Attachment 29

ISFSI Decommissioning Funding Estimates

# ATTACHMENT 29 ISFSI Decommissioning Funding Estimates

## Calvert Cliffs Nuclear Power Plant (December 31, 2014 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$340.1	\$340.1			1,264
Decontamination (activated liner and concrete removal)	\$372.1	\$4.7	\$977.2	\$1,849.4	\$604.6	\$3,808.0	26,160	3,393	
License Termination (radiological surveys)					\$1,604.8	\$1,604.8		12,950	
Subtotal	\$372.1	\$4.7	\$977.2	\$1,849.4	\$2,549.5	\$5,752.9	26,160	16,343	1,264
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$388.2	\$388.2			776
Property taxes					\$329.6	\$329.6			
Security Staff Cost					\$366.0	\$366.0			4,937
Oversight Staff					\$341.1	\$341.1		***************************************	3,740
Subtotai					\$1,424.9	\$1,424.9			9,453
Total (w/o contingency)	\$372.1	\$4.7	\$977.2	\$1,849.4	\$3,974.4	\$7,177.7	26,160	16,343	10,717
Total (w/25% contingency)						\$8,972.2			

Costs for ISFSI decommissioning are equally split between units at dual-unit sites.

ATTACHMENT 29 (Continued)
ISFSI Decommissioning Funding Estimates

Limerick Generating Station (December 31, 2014 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Utility and Contractor Manhours
ISFSI License Termination	\$762	\$12	\$45	\$149	\$2,858	\$956	\$4,785	2,310	41,194	
Insurance					\$124	\$12	\$136			
Property Taxes					\$531	\$54	\$584			
NRC ISFSI Fees					\$138	\$14	\$153			
PA DEP Fees					\$293	\$43	\$337			
Security Staff Cost					\$489	\$74	\$562			7,800
Utility Staff Costs					\$512	\$76	\$589			5,908
Total	\$292	\$12	\$45	\$149	\$4,944	\$1,231	\$7,143	2,310	41,194	13,708

Costs for ISFSI decommissioning are equally split between units at dual-unit sites.

## ATTACHMENT 29 (Continued) ISFSI Decommissioning Funding Estimates

## Nine Mile Point Nuclear Station (December 31, 2014 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Pianning (characterization, specs and procedures)					\$396	96E\$			1,360
Decontamination (activated HSM disposition)	\$517	9\$	\$1,472	\$2,779	\$787	\$5,562	40,659	4,565	
License Termination (radiological surveys)					\$2,256	\$2,256		18,592	
Subtotal	\$517	9\$	\$1,472	\$2,779	\$3,440	\$8,214	40,659	23,157	1,360
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$388	\$388			776
Insurance					\$147	\$147			
Property taxes					\$330	088\$			
Security Staff Cost					\$386	\$386			4,937
Oversight Staff Cost					\$337	\$337			3,740
Subtotal					\$1,587	\$1,587			9,453
Total (w/o contingency)	\$517	\$\$	\$1,472	\$2,779	\$5,028	\$9,802	40,659	23,157	10,813
Total (w/25% contingency)						\$12,253			

Costs for ISFSI decommissioning are equally split between units at dual-unit sites. Unit costs are then pro-rated based on ownership share.

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ATTACHMENT 29 (Continued)
ISFSI Decommissioning Funding Estimates

R.E. Ginna Nuclear Power Plant (December 31, 2014 dollars, thousands)

Artivity Description	Removal	Packaging	Transport	LLRW	100		Burial Volume	Craft	Oversight and
in the second second	Costs	Costs	Costs	Costs	Other Costs	i otal Costs	Class A (ft3)	Manhours	Contractor
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$188	\$188			1,024
Decontamination (activated HSM disposition)	\$238	\$2	\$381	\$734	\$449	\$1,804	8,722	2,127	
License Termination (radiological surveys)					\$747	\$747		5,686	
Subtotal	\$238	\$2	\$381	\$734	\$1,384	\$2,739	8,722	7,813	1,024
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$389	\$389			776
Insurance					\$147	\$147			
Property taxes					\$333	\$333			
Security Staff Cost					\$261	\$261			4,971
Oversight Staff Cost					\$343	\$343			3,771
Subtotal					\$1,472	\$1,472			9,519
Total (w/o contingency)	\$238	\$2	\$381	\$734	\$2,856	\$4,211	8,722	7,813	10,543
Total (w/25% contingency)						\$5,264			

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