

POLICY ISSUE **(Information)**

October 2, 2013

SECY-13-0105

FOR: The Commissioners

FROM: Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY FINDINGS RESULTING FROM THE STAFF REVIEW OF
THE 2013 DECOMMISSIONING FUNDING STATUS REPORTS FOR
OPERATING POWER REACTOR LICENSEES

PURPOSE:

This paper informs the Commission of the U.S. Nuclear Regulatory Commission (NRC) staff's findings from the review of the 2013 decommissioning funding status (DFS) reports for operating power reactor licensees. The DFS reports are required under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.75(f)(1). The 2013 DFS reports were due to the NRC by March 31, 2013, reflecting information as of December 31, 2012. This paper does not address any new commitments or resource implications.

BACKGROUND:

In 1988, the NRC established requirements to assure that decommissioning of all licensed facilities will be accomplished in a safe and timely manner and that adequate licensee funds will be available for this purpose. "Decommission" means to remove a facility or site safely from service and reduce residual radioactivity to a level that permits (1) release of the property for unrestricted use and termination of the license; or (2) release of the property under restricted conditions and termination of the license. For reactor licensees, the costs of spent fuel management, site restoration, and other costs not related to termination of the license are not included in the financial assurance for decommissioning.

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The requirements for reactor licensees are stated in 10 CFR §§ 50.33(k), 50.75, and 50.82. Reactor licensees must certify that they provide not less than a minimum prescribed amount of financial assurance for decommissioning. The amount to be provided must be adjusted annually to account for cost escalation.

In 1998, the NRC amended the financial assurance rules to respond to the anticipated rate deregulation of the power generating industry. The amendments provided additional methods and flexibility for reactor licensees to provide financial assurance. The NRC required licensees to periodically submit a DFS report to obtain the information necessary to monitor the status of decommissioning funds. The Office of Nuclear Reactor Regulation's Office Instruction LIC-205, Revision 4, "Procedures for NRC's Independent Analysis of Decommissioning Funding Assurance for Operating Power Reactors," dated December 2010, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML103410283) describes the analysis performed by the NRC staff to determine if a licensee has provided adequate decommissioning funding assurance.

DISCUSSION:

The NRC staff has reviewed the information in the 2013 DFS reports for all 104 operating nuclear power reactors¹, reflecting power reactor ownership by single or multiple licensees. A table summarizing the review performed by the NRC staff is enclosed and is also available at ADAMS Accession No. ML13266A084.

Results of NRC Staff's Review

The NRC staff's review resulted in the following findings:

- The amount accumulated, as of December 31, 2012, for all operating power reactor licensees totaled \$45.7 billion. The total amount accumulated represents a 13.1 percent increase from the total amount accumulated reported in the 2010 DFS reports (\$40.4 billion).
- As of December 31, 2012, 100 of the 104 operating nuclear power reactor licensees were providing decommissioning funding assurance, as stipulated in 10 CFR 50.75, "Reporting and Recordkeeping for Decommissioning Planning." The four power reactor licensees that were not providing the full amount of decommissioning funding assurance, as of December 31, 2012, were: Beaver Valley Power Station, Unit 1 (BVPS 1); Palisades Nuclear Plant (Palisades); Perry Nuclear Power Plant (Perry); and Point Beach Nuclear Plant, Unit 2 (Point Beach 2).
- BVPS 1, Palisades, Perry, and Point Beach 2 provided information to resolve their shortfalls in conjunction with their 2012 DFS reports. BVPS 1 and Perry committed to increase the amount of their supplemental parent company guarantees (PCGs); the

¹ As of 12/31/2012, all 104 referenced nuclear power reactors were considered to be in an operating status and reported as such in the 2013 DFS report submittals.

- PCGs were submitted within 90 days after the receipt of the DFS reports. Palisades and Point Beach 2 submitted information showing that their decommissioning trust fund balances increased sufficiently to meet the requirements as of the date of their DFS report submittals.

Resolution of issue not closed out in SECY-11-0149

- Limerick Generating Station, Unit 1 (Limerick 1), had an unresolved shortfall that was identified in SECY-11-0149, “2011 Summary of Decommissioning Funding Status Reports For Nuclear Power Reactors”, dated October 26, 2011, (ADAMS Accession No. ML112620046).
- The NRC staff has engaged with the licensee of Limerick 1 and the outstanding shortfall has been resolved. The unresolved shortfall was resolved with rate relief, supplemented with a PCG.

Additional information regarding the 2013 DFS Report Review

The NRC staff noted that many licensees had improved the quality of the information provided in their 2013 DFS report submittals. In particular, the NRC staff required fewer requests for additional information in evaluating the 2013 DFS reports.

CONCLUSION:

Based on the information provided by the licensees in the 2013 decommissioning funding status reports, licensees either did not have shortfalls as of December 31, 2012, or resolved the shortfalls as of the date of this summary.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection.

/RA/

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosure:
[2013 DFS Reports – Summary Table](#)

2013 Decommissioning Funding Status Reports - Summary Table

<u>Cat</u>	<u>Plant Name</u>		<u>MWth</u>	<u>Termination Date as of 3/31/2013</u>	<u>NRC Minimum Formula</u>	<u>Site Specific Cost Estimate</u>	<u>Certifying to Site Specific Cost Estimate (Note 1)</u>	<u>Projected Decommissioning Funding Amount including pro rata credit</u>	<u>Difference in NRC Minimum Formula and Projected Trust Fund Amount</u>	<u>How Potential Shortfall was resolved</u>
1	Arkansas Nuclear One, Unit 1	PWR	2568	05/21/2034	\$480,031,489	not provided	N/A	\$552,033,502	\$72,002,013	
1	Arkansas Nuclear One, Unit 2	PWR	3026	07/17/2038	\$499,854,754	not provided	N/A	\$658,473,004	\$158,618,250	
2H	Arnold (Duane) Energy Center	BWR	1912	02/21/2034	\$610,877,551	\$632,023,000	Yes	\$517,858,031	SAFSTOR	
2	Beaver Valley Power Station, Unit 1	PWR	2900	01/29/2036	\$508,396,592	not provided	N/A	\$493,815,305	(\$14,581,286)	Parent Company Guarantee
2H	Beaver Valley Power Station, Unit 2	PWR	2900	05/27/2047	\$508,396,592	not provided	N/A	\$679,913,707	\$171,517,116	
2	Braidwood Station, Unit 1	PWR	3586	10/17/2026	\$521,778,396	\$640,480,000	Yes	\$362,247,056	SAFSTOR	
2	Braidwood Station, Unit 2	PWR	3586	12/18/2027	\$521,778,396	\$699,929,000	Yes	\$406,677,057	SAFSTOR	
1	Brown's Ferry Nuclear Power Station, Unit 1	BWR	3458	12/20/2033	\$673,518,936	not provided	N/A	\$756,675,357	\$83,156,421	
1	Brown's Ferry Nuclear Power Station, Unit 2	BWR	3458	06/28/2034	\$673,518,936	not provided	N/A	\$750,995,772	\$77,476,836	
1	Brown's Ferry Nuclear Power Station, Unit 3	BWR	3458	06/02/2036	\$673,518,936	not provided	N/A	\$751,873,341	\$78,354,405	
1	Brunswick Steam Electric Plant, Unit 1	BWR	2923	09/08/2036	\$650,105,422	not provided	N/A	\$977,732,677	\$327,627,255	
1	Brunswick Steam Electric Plant, Unit 2	BWR	2923	12/27/2034	\$650,105,422	not provided	N/A	\$967,774,599	\$317,669,177	
2	Byron Station, Unit 1	PWR	3586	10/31/2024	\$521,778,396	\$628,047,000	Yes	\$387,820,047	SAFSTOR	
2	Byron Station, Unit 2	PWR	3586	11/06/2026	\$521,778,396	\$682,306,000	Yes	\$390,581,441	SAFSTOR	
1	Callaway Plant	PWR	3565	10/18/2024	\$521,778,396	\$617,214,000	No	\$879,290,402	\$357,512,006	
2	Calvert Cliffs Nuclear Power Plant, Unit 1	PWR	2737	07/31/2034	\$487,346,187	\$668,017,000	Yes	\$401,687,027	SAFSTOR	
2	Calvert Cliffs Nuclear Power Plant, Unit 2	PWR	2737	08/13/2036	\$487,346,187	\$667,066,000	Yes	\$543,567,871	SAFSTOR	
1	Catawba Nuclear Station, Unit 1	PWR	3411	12/05/2043	\$516,435,786	not provided	N/A	\$801,015,086	\$284,579,300	
1	Catawba Nuclear Station, Unit 2	PWR	3411	12/05/2043	\$516,435,786	not provided	N/A	\$802,035,538	\$285,599,752	
2	Clinton Power Station	BWR	3473	09/29/2026	\$680,388,006	\$960,325,000	Yes	\$614,612,616	SAFSTOR	
1	Columbia Generating Station	BWR	3486	12/20/2023	\$458,866,911	not provided	N/A	\$613,153,226	\$154,286,315	
1	Comanche Peak Steam Electric Station, Unit 1	PWR	3458	02/08/2030	\$516,435,786	not provided	N/A	\$602,722,407	\$86,286,622	
1	Comanche Peak Steam Electric Station, Unit 2	PWR	3458	02/02/2033	\$516,435,786	not provided	N/A	\$698,676,777	\$182,240,992	
1	Cook (Donald C.) Nuclear Power Plant, Unit 1	PWR	3304	10/25/2034	\$517,182,770	not provided	N/A	\$805,463,967	\$288,281,197	
1	Cook (Donald C.) Nuclear Power Plant, Unit 2	PWR	3468	12/23/2037	\$521,778,396	not provided	N/A	\$799,364,478	\$277,586,082	
1	Cooper Nuclear Station	BWR	2381	01/18/2034	\$632,151,016	not provided	N/A	\$981,626,836	\$349,475,820	
1	Crystal River Nuclear Plant, Unit 3	PWR	2609	12/03/2016	\$481,806,061	\$753,717,000	Yes	\$830,939,480	SAFSTOR	

2013 Decommissioning Funding Status Reports - Summary Table

<u>Cat</u>	<u>Plant Name</u>		<u>MWth</u>	<u>Termination Date as of 3/31/2013</u>	<u>NRC Minimum Formula</u>	<u>Site Specific Cost Estimate</u>	<u>Certifying to Site Specific Cost Estimate (Note 1)</u>	<u>Projected Decommissioning Funding Amount including pro rata credit</u>	<u>Difference in NRC Minimum Formula and Projected Trust Fund Amount</u>	<u>How Potential Shortfall was resolved</u>
2	Davis-Besse Nuclear Power Station	PWR	2772	04/22/2017	\$493,918,411	not provided	N/A	\$559,592,663	\$65,674,252	
1	Diablo Canyon Nuclear Power Plant, Unit 1	PWR	3411	11/02/2024	\$521,602,311	\$1,062,300,000	No	\$1,932,473,778	\$1,410,871,468	
1	Diablo Canyon Nuclear Power Plant, Unit 2	PWR	3411	08/26/2025	\$521,602,311	\$1,100,400,000	No	\$2,123,349,431	\$1,601,747,120	
2	Dresden Nuclear Power Station, Unit 2	BWR	2957	12/22/2029	\$658,277,915	not provided	N/A	\$800,116,319	\$141,838,404	
2	Dresden Nuclear Power Station, Unit 3	BWR	2957	01/02/2031	\$658,277,915	not provided	N/A	\$835,226,574	\$176,948,658	
1	Farley (Joseph M.) Nuclear Plant, Unit 1	PWR	2775	06/25/2037	\$488,990,912	not provided	N/A	\$625,324,513	\$136,333,601	
1	Farley (Joseph M.) Nuclear Plant, Unit 2	PWR	2775	03/31/2041	\$488,990,912	not provided	N/A	\$657,354,463	\$168,363,551	
1	Fermi (Enrico) Atomic Power Plant, Unit 2	BWR	3430	03/20/2025	\$1,070,497,506	not provided	N/A	\$1,506,566,296	\$436,068,791	
2	Fitzpatrick (James A.) Nuclear Power Plant	BWR	2536	10/17/2034	\$650,386,339	not provided	N/A	\$1,023,790,130	\$373,403,791	
1	Fort Calhoun Station	PWR	1500	08/09/2033	\$438,293,852	\$502,386,000	No	\$560,415,452	\$122,121,599	
2	Ginna (Robert E.) Nuclear Power Plant	PWR	1775	09/18/2029	\$458,325,698	\$688,612,000	Yes	\$453,730,180	SAFSTOR	
1	Grand Gulf Nuclear Station	BWR	4408	11/01/2024	\$673,518,936	not provided	N/A	\$964,780,344	\$291,261,408	
1	Harris (Shearon) Nuclear Power Plant	PWR	2948	10/24/2046	\$496,478,739	not provided	N/A	\$1,642,521,180	\$1,146,042,441	
1	Hatch (Edwin I.) Nuclear Plant, Unit 1	BWR	2804	08/06/2034	\$644,762,172	not provided	N/A	\$719,793,257	\$75,031,086	
1	Hatch (Edwin I.) Nuclear Plant, Unit 2	BWR	2804	06/13/2038	\$644,762,172	not provided	N/A	\$704,478,716	\$59,716,544	
2	Hope Creek Nuclear Power Station	BWR	3840	04/11/2026	\$673,518,936	\$832,555,600	No	\$908,552,217	\$235,033,281	
2	Indian Point, Unit 2	PWR	3216	09/28/2013	\$522,460,949	\$799,740,000	Yes	\$466,274,081	SAFSTOR	
2	Indian Point, Unit 3	PWR	3216	12/12/2015	\$522,460,949	not provided	N/A	\$645,987,764	\$123,526,814	
2	Kewaunee Nuclear Power Plant	PWR	1772	12/21/2033	\$450,188,412	not provided	N/A	\$941,649,557	\$491,461,145	
2	LaSalle County Station, Unit 1	BWR	3489	04/17/2022	\$680,388,006	\$711,587,000	Yes	\$505,349,976	SAFSTOR	
2	LaSalle County Station, Unit 2	BWR	3489	12/16/2023	\$680,388,006	\$697,445,000	Yes	\$454,932,541	SAFSTOR	
1	Limerick Generating Station, Unit 1	BWR	3515	10/26/2024	\$692,314,986	not provided	N/A	\$699,411,803	\$7,096,817	
1	Limerick Generating Station, Unit 2	BWR	3515	06/22/2029	\$692,314,986	not provided	N/A	\$850,711,140	\$158,396,154	
1	McGuire (William B.) Nuclear Station, Unit 1	PWR	3411	06/12/2041	\$516,435,786	not provided	N/A	\$1,143,403,420	\$626,967,635	
1	McGuire (William B.) Nuclear Station, Unit 2	PWR	3411	03/03/2043	\$516,435,786	not provided	N/A	\$824,038,930	\$307,603,144	
2	Millstone Nuclear Power Station, Unit 2	PWR	2700	11/25/2045	\$499,495,099	not provided	N/A	\$745,340,936	\$245,845,837	
2H	Millstone Nuclear Power Station, Unit 3	PWR	3411	09/08/2030	\$531,054,936	not provided	N/A	\$899,858,529	\$368,803,593	

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1	Monticello Nuclear Generating Plant	BWR	1775	09/08/2030	\$604,663,341	not provided	N/A	\$746,638,291	\$141,974,951	
2	Nine Mile Point Nuclear Station, Unit 1	BWR	1850	08/22/2029	\$618,724,467	\$847,215,000	Yes	\$646,786,494	SAFSTOR	
2H	Nine Mile Point Nuclear Station, Unit 2	BWR	3988	10/31/2046	\$692,314,986	\$982,696,000	Yes	\$573,022,161	SAFSTOR	
1	North Anna Power Station, Unit 1	PWR	2893	04/01/2038	\$494,098,216	not provided	N/A	\$519,912,128	\$25,813,912	
1	North Anna Power Station, Unit 2	PWR	2893	08/21/2040	\$494,098,216	not provided	N/A	\$521,708,623	\$27,610,407	
1	Oconee Nuclear Station, Unit 1	PWR	2568	02/06/2033	\$480,031,489	not provided	N/A	\$664,273,354	\$184,241,864	
1	Oconee Nuclear Station, Unit 2	PWR	2568	10/06/2033	\$480,031,489	not provided	N/A	\$639,419,349	\$159,387,859	
1	Oconee Nuclear Station, Unit 3	PWR	2568	07/19/2034	\$480,031,489	not provided	N/A	\$808,837,775	\$328,806,286	
2	Oyster Creek Nuclear Power Plant	BWR	1930	04/09/2029	\$622,416,813	not provided	N/A	\$1,207,128,805	\$584,711,992	
2	Palisades Nuclear Plant	PWR	2565	03/24/2031	\$484,866,301	not provided	N/A	\$474,580,345	(\$10,285,956)	Decommissioning Trust Fund increased prior to DFS report submittal
1	Palo Verde Nuclear Generating Station, Unit 1	PWR	3990	06/01/2025	\$521,602,311	not provided	N/A	\$1,539,825,021	\$1,018,222,710	
1	Palo Verde Nuclear Generating Station, Unit 2	PWR	3990	04/24/2026	\$521,602,311	not provided	N/A	\$1,732,333,610	\$1,210,731,300	
1	Palo Verde Nuclear Generating Station, Unit 3	PWR	3990	11/25/2027	\$521,602,311	not provided	N/A	\$1,668,347,818	\$1,146,745,508	
1	Peach Bottom Atomic Power Station, Unit 2	BWR	3514	08/08/2033	\$692,314,986	not provided	N/A	\$828,107,585	\$135,792,600	
1	Peach Bottom Atomic Power Station, Unit 3	BWR	3514	07/02/2034	\$692,314,986	not provided	N/A	\$859,930,995	\$167,616,010	
2H	Perry Nuclear Power Plant	BWR	3758	03/18/2026	\$680,388,006	not provided	N/A	\$667,270,346	(\$13,117,660)	Parent Company Guarantee
2	Pilgrim Station	BWR	2028	06/08/2012	\$626,939,938	not provided	N/A	\$1,145,131,918	\$518,191,980	
2	Point Beach Nuclear Plant, Unit 1	PWR	1800	10/05/2030	\$451,412,852	not provided	N/A	\$454,122,504	\$2,709,653	
2	Point Beach Nuclear Plant, Unit 2	PWR	1800	03/08/2033	\$451,412,852	not provided	N/A	\$448,936,466	(\$2,476,386)	Decommissioning Trust Fund increased prior to DFS report submittal
1	Prairie Island Nuclear Plant, Unit 1	PWR	1650	08/09/2013	\$444,853,352	not provided	N/A	\$449,833,873	\$4,980,521	
1	Prairie Island Nuclear Plant, Unit 2	PWR	1650	10/29/2014	\$444,853,352	not provided	N/A	\$583,000,981	\$138,147,629	
2H	Quad Cities Station, Unit 1	BWR	2957	12/14/2032	\$658,277,915	not provided	N/A	\$998,149,530	\$339,871,614	
2H	Quad Cities Station, Unit 2	BWR	2957	12/14/2032	\$658,277,915	not provided	N/A	\$891,346,808	\$233,068,893	
1	River Bend Station (Regulated)	BWR	3091	08/29/2025	\$460,354,184	not provided	N/A	\$539,844,932	\$79,490,748	
2	River Bend Station (Non-Regulated)	BWR	3091	08/29/2025	\$197,294,650	not provided	N/A	\$353,127,725	\$155,833,075	
1	Robinson (H.B.) Plant, Unit 2	PWR	2339	07/31/2030	\$470,119,857	not provided	N/A	\$862,122,219	\$392,002,362	
1	Salem Nuclear Generating Station, Unit 1	PWR	3459	08/13/2016	\$516,435,786	not provided	N/A	\$907,449,545	\$391,013,760	

2013 Decommissioning Funding Status Reports - Summary Table

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1	Salem Nuclear Generating Station, Unit 2	PWR	3459	04/18/2020	\$516,435,786	not provided	N/A	\$873,077,144	\$356,641,359	
1	San Onofre Nuclear Generating Station, Unit 2	PWR	3438	02/16/2022	\$521,602,311	\$1,214,400,000	No	\$1,618,217,404	\$1,096,615,094	
1	San Onofre Nuclear Generating Station, Unit 3	PWR	3438	11/15/2022	\$521,602,311	\$1,201,000,000	No	\$1,833,874,102	\$1,312,271,791	
2H	Seabrook Nuclear Power Station	PWR	3648	03/15/2030	\$531,054,936	not provided	N/A	\$633,118,755	\$102,063,820	
1	Sequoyah Nuclear Plant, Unit 1	PWR	3455	09/17/2020	\$516,435,786	not provided	N/A	\$549,491,758	\$33,055,973	
1	Sequoyah Nuclear Plant, Unit 2	PWR	3455	09/15/2021	\$516,435,786	not provided	N/A	\$635,783,576	\$119,347,790	
1	South Texas Project, Unit 1	PWR	3853	08/20/2027	\$516,435,786	not provided	N/A	\$571,587,121	\$55,151,335	
1	South Texas Project, Unit 2	PWR	3853	12/15/2028	\$516,435,786	not provided	N/A	\$663,908,809	\$147,473,023	
1	St. Lucie Plant, Unit 1	PWR	3020	03/01/2036	\$499,595,060	\$534,825,000	No	\$933,863,692	\$434,268,631	
1	St. Lucie Plant, Unit 2	PWR	3020	04/06/2043	\$499,595,060	\$517,410,000	No	\$932,793,072	\$433,198,012	
1	Summer (Virgil C.) Nuclear Station	PWR	2900	08/06/2042	\$494,401,192	not provided	N/A	\$591,719,449	\$97,318,257	
1	Surry Power Station, Unit 1	PWR	2546	05/25/2032	\$479,079,280	not provided	N/A	\$489,361,705	\$10,282,425	
1	Surry Power Station, Unit 2	PWR	2546	01/29/2033	\$479,079,280	not provided	N/A	\$497,411,583	\$18,332,303	
2H	Susquehanna Steam Electric Station, Unit 1	BWR	3952	07/17/2042	\$692,314,986	not provided	N/A	\$756,391,705	\$64,076,720	
2H	Susquehanna Steam Electric Station, Unit 2	BWR	3952	03/23/2044	\$692,314,986	not provided	N/A	\$858,414,532	\$166,099,547	
2	Three Mile Island Nuclear Station, Unit 1	PWR	2568	04/19/2034	\$493,620,114	not provided	N/A	\$869,526,182	\$375,906,068	
1	Turkey Point Station, Unit 3	PWR	2644	07/19/2032	\$483,320,939	not provided	N/A	\$717,727,869	\$234,406,930	
1	Turkey Point Station, Unit 4	PWR	2644	04/10/2033	\$483,320,939	not provided	N/A	\$787,230,244	\$303,909,305	
2	Vermont Yankee Power Station	BWR	1912	03/21/2012	\$621,586,035	not provided	N/A	\$854,020,520	\$232,434,485	
1	Vogtle (Alvin W.) Nuclear Plant, Unit 1	PWR	3625	01/16/2047	\$516,435,786	not provided	N/A	\$574,348,328	\$57,912,543	
1	Vogtle (Alvin W.) Nuclear Plant, Unit 2	PWR	3625	02/09/2049	\$516,435,786	not provided	N/A	\$582,769,547	\$66,333,762	
1	Waterford Generating Station, Unit 3	PWR	3716	12/18/2024	\$516,435,786	not provided	N/A	\$549,764,844	\$33,329,059	
1	Watts Bar Nuclear Plant, Unit 1	PWR	3459	11/09/2035	\$516,435,786	not provided	N/A	\$567,205,467	\$50,769,682	
1	Wolf Creek Generating Station	PWR	3565	03/11/2045	\$521,778,396	not provided	N/A	\$1,101,458,523	\$579,680,127	

Definition of Terms:

Cat = Category - the licensee is categorized with respect to their qualification to use an external sinking fund as its only financial assurance method. The circumstances necessary to achieve qualification are given in 10 CFR 50.75e(1)(ii). In general, the licensee may use an external sinking fund if it is allowed to collect funds for decommissioning through ratemaking regulation or non-bypassable charges.

Category 1 - Licensees are authorized to collect funds for decommissioning through ratemaking regulation or non-bypassable charges. Licensees who set their own rates are in this category. Investor owned utility licensees normally are in Category 1. Some merchant plant licensees may be placed in Category 1 if they are eligible to collect non-bypassable charges.

Category 2 - Licensees do not have access to funds from ratepayers or non-bypassable charges. Merchant plants normally fall into this category.

Category 2H - Licensees sell the output of their plant in both utility and merchant markets, and collect only part of the cost of decommissioning through ratemaking regulation or non-bypassable charges.

SAFSTOR - a licensee provided a site-specific cost estimate assuming a period of safe storage of the site before completing decommissioning

Notes:

Note 1 - A licensee is allowed to certify to a site-specific cost estimate as long as that amount is equal to or greater than the amount calculated in 10 CFR 50.75(c).