



Nuclear Management Company, LLC

November 30, 2005

L-HU-05-021
10 CFR 50.75
10 CFR 50.54

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

Point Beach Nuclear Plant Units 1 & 2
Docket Nos. 50-266 and 50-301
License Nos. DPR-24 and DPR-27

Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimates for
Point Beach Nuclear Plant Units 1 and 2

References: 1) Nuclear Management Company, LLC (NMC) letter to US Nuclear
Regulatory Commission (NRC), "Application for Renewed Operating
License," dated February 25, 2004. (ADAMS Accession No.
ML040580023)

2) Nuclear Management Company, LLC (NMC) letter to US Nuclear
Regulatory Commission (NRC), "Decommissioning Funding Status," dated
March 31, 2005. (ADAMS Accession No. ML051110731)

The enclosed Irradiated Fuel Management Plan (Enclosure 1) and Preliminary
Decommissioning Cost Estimate (Enclosure 2) are being submitted in accordance with Title
10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.54(bb) "Conditions of
Licenses," and 10 CFR 50.75(f)(2), "Reporting and Recordkeeping for Decommissioning
Planning," respectively, for the subject plant. As holder of the units' operating licenses,
Nuclear Management Company, LLC (NMC) is submitting these reports on behalf of the
plant owner, We Energies. The financial information presented herein, current as of
December 31, 2004, reflects information provided to NMC by the plant owner, We Energies.

Pursuant to 10 CFR 50.54(bb), a licensee shall "submit written notification to the
Commission for its review and preliminary approval of the program by which the
licensee intends to manage and provide funding for the management of all irradiated
fuel at the reactor following permanent cessation of operation of the reactor until title to
the irradiated fuel and possession of the fuel is transferred to the Secretary of Energy
for its ultimate disposal in a repository." Accordingly, the Irradiated Fuel Management
Plan (Enclosure 1) is provided for your review and preliminary approval.

Additionally, 10 CFR 50.75(f)(2), "Reporting and recordkeeping for decommissioning planning" states, "each power reactor licensee shall at or about 5 years prior to the projected end of operations submit a preliminary decommissioning cost estimate which includes an up-to-date assessment of the major factors that could affect the cost to decommission." Accordingly, the Preliminary Decommissioning Cost Estimate (Enclosure 2) is provided for your review and approval.

NMC submitted an application for renewal of operating licenses (Reference 1) and therefore, in accordance with 10 CFR 2.109, "Effect of Timely Renewal Application," "the existing license will not be deemed to have expired until the application has been finally determined." Although NMC is seeking license renewal, the Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimate are submitted based on the current operating license expiration dates for Point Beach Nuclear Plant Units 1 and 2 (October 5, 2010 and March 8, 2013, respectively). If license renewal for Point Beach Units 1 and 2 is granted, the Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimate will no longer be applicable and a new plan and cost estimate will be submitted in accordance with 10 CFR 50.54(bb) and 10 CFR 50.75(f)(2).

This letter contains no new commitments and no revisions to existing commitments.



Edward J. Weinkam
Director, Nuclear Licensing & Regulatory Services
Nuclear Management Company, LLC

Enclosures (2)

cc: Regional Administrator, USNRC, Region III
NRR Project Manager, Point Beach Nuclear Plant, USNRC
NRC Resident Inspector, Point Beach Nuclear Plant, USNRC
We Energies (ATTN: Dave Weaver)

Enclosure 1

Irradiated Fuel Management Plan For Point Beach Nuclear Plant Units 1 & 2

Background

The Preliminary Decommissioning Cost Estimate (see Enclosure 2) in accordance with 10 CFR 50.75(f)(2) for Point Beach Nuclear Plant (PBNP) Units 1 & 2 evaluates one option: operating license expirations of October 5, 2010 for Unit 1 and March 8, 2013 for Unit 2, and their consequent decommissioning. For the purpose of demonstrating the adequacy of funding to meet regulatory requirements, the DECON decommissioning option has been selected and evaluated based on the current license expiration dates for Units 1 & 2. This Irradiated Fuel Management Plan is also based on the DECON analysis and current operating license expiration dates. We Energies reserves the right to choose the ultimate decommissioning option in accordance with its business needs, recognizing the need to assure the chosen option meets NRC requirements for decommissioning funding.

Spent Fuel Management Strategy

The NRC requires (10 CFR 50.54(bb)) that licensees establish a program to manage and provide funding for the caretaking of all irradiated fuel at the reactor site until title of the fuel is transferred to the U. S. Department of Energy (DOE). Interim storage of the spent nuclear fuel includes temporary wet storage in the spent nuclear fuel storage pool for approximately 62 months and dry storage at the Independent Spent Fuel Storage Installation (ISFSI) located on the PBNP site.

The PBNP ISFSI was constructed to store spent nuclear fuel and "Greater than Class C" materials generated during plant operation. Transfer of spent nuclear fuel from the spent fuel pool to dry storage allows for early decontamination and dismantlement of plant structures. The ISFSI will remain operational and provide interim storage of spent fuel until such time that the DOE completes fuel acceptance. Consequently, costs are included within the estimate below for the long-term caretaking of the spent fuel at PBNP site through the year 2039.

The shipping of spent nuclear fuel assemblies during decommissioning is based upon several assumptions. First, the pickup of spent nuclear fuel is assumed to begin in the year 2015. Second, the DOE generator allocation/receipt schedules are based upon the oldest fuel receiving the highest priority. Third, the maximum rate at which the fuel is removed from the commercial sites is based upon an annual capacity at the geologic repository of 3,000 metric tons of uranium (MTU). Any delay in the startup of the repository or decrease in the rate of acceptance will correspondingly prolong the transfer process and result in the fuel remaining at the site longer. In the DECON scenario, the ISFSI will continue to operate until such time that the transfer of spent fuel to the DOE can be completed. Finally, assuming that the DOE commences repository operation in 2015, fuel is projected to be removed from the PBNP site by the end of the year 2039.

Operation and maintenance costs for the storage facilities (the ISFSI and the spent fuel pool for fuel cool-down) are included within the estimate below and address the cost for

staffing the facilities, maintenance of necessary operational requirements as well as security, insurance, and licensing fees. The estimate includes the costs to purchase, load, and transfer the fuel storage canisters to the ISFSI. A cost-estimate of site-specific considerations for the management of spent fuel at PBNP under the DECON scenario may be found in Table 1.

In the event that Unit 1 ceases operation in 2010 and Unit 2 ceases operation in 2013, PBNP will continue to comply with existing NRC licensing requirements, including the operation and maintenance of the systems and structures needed to support continued operation of the PBNP spent fuel pool and ISFSI, as necessary, under the decommissioning scenario ultimately selected. In addition, PBNP will also comply with applicable license termination requirements in accordance with 10 CFR 50.82 with respect to plant shutdown and post-shutdown activities including seeking such NRC approvals and on such schedules as necessary to satisfy these requirements consistent with the continued storage of irradiated fuel.

Cost Estimate and Funding For Spent Fuel Management Based on the DECON Decommissioning Option

As of December 31, 2004, the PBNP decommissioning trust fund balance was \$365.7 million for Unit 1 and \$372.6 million for Unit 2. The "2004 Decommissioning Cost Update for the Point Beach Nuclear Plant" developed by Sciencetech, LLC included cost estimates of approximately \$400 million for decommissioning costs, \$243 million for spent fuel management and \$69 million for greenfield remediation using a DECON scenario (Table 1). The NRC minimum decommissioning financial assurance requirement as reported in Reference 2 and set forth in 10 CFR 50.75(c) for PBNP is approximately \$316 million for each nuclear unit.

To the extent that the trust fund balance exceeds costs required for radiological decommissioning, trust fund monies, in conjunction with We Energies operating revenues, will be used to pay for spent fuel management. Annual costs for spent fuel management in the ISFSI range from approximately \$5 to \$9 million (Table 1).

The following items are key costs estimates:

- (1) The estimated cost to isolate the spent fuel pool and fuel handling systems is \$3.63 million. This cost is based on spent fuel pool isolation costs at other decommissioning facilities and engineering judgment. This cost is considered part of the activities necessary to maintain the spent fuel in a safe and controlled state both during the initial decommissioning activities and during the fuel cool-down period after the Unit 2 current license expires.
- (2) The estimated annual cost for the dry storage option at PBNP is \$4.5 million (Table 1). This cost is based on actual costs at decommissioned facilities, estimated costs for facilities similar to PBNP, and engineering judgment. These costs would be incurred annually, during the storage period, beginning in year 2015 and continuing through removal of all fuel and "Greater Than Class C" radioactive material.
- (3) The estimated cost for preparation, packaging and shipping of fuel to the Department of Energy (DOE) is \$45.2 million. This cost includes heavy equipment rental and decommissioning contractor staffing costs, which are based on estimated costs for other

facilities similar to PBNP and engineering judgment. This cost would be incurred throughout the wet and dry storage period, beginning in year 2015 and continuing through 2039.

(4) The ISFSI removal costs are estimated at \$6.05 million (Table 2, Period 8).

(5) The spent nuclear fuel will remain in the storage pool approximately 62 months following shutdown of Unit 2. During wet storage, the modified systems required to support the spent fuel storage pool will be operated and maintained by qualified personnel. Transfer of spent fuel from the pool to dry storage at the ISFSI will continue during this period. As transfer of fuel to the ISFSI continues, fuel shipments from the ISFSI to the DOE repository should commence in 2015 and end in approximately 2039.

The decommissioning schedule includes the following program periods and durations for a DECON with dry storage scenario:

Period #	Title	Period Duration, Mo.
1	Unit 1 & Unit 2 Decommissioning Plan	27
2	Post Shutdown Activities	12
3	Vessel Removal	28
4	Building Decontamination	33
5	Clean Removal	21
6	Restore Site	2
7	Dry Storage	220
8	ISFSI Removal	5
	Total	347*

* Minor variations caused by round-off results in mismatched values

Enclosure 2

Point Beach Nuclear Plant Units 1 & 2 Preliminary Decommissioning Cost Estimate

I. Introduction

This report presents a summary of the preliminary estimate of the cost to decommission Point Beach Nuclear Plant (PBNP) Units 1 & 2, as required by 10 CFR 50.75(f)(2). This cost estimate is premised on the assumption that the plant permanently ceases to operate at the expiration of the current operating licenses; i.e., on October 5, 2010 for Unit 1 and March 8, 2013 for Unit 2. The estimate assumes the eventual removal of all contaminated and activated plant components and structural materials, such that the PBNP operating licenses may be terminated to permit unrestricted use of the site. Although Nuclear Management Company, LLC (NMC) is currently seeking license renewal for PBNP, this cost estimate is being submitted based on the current operating license expiration dates for Units 1 & 2. If license renewal for PBNP is granted, this Preliminary Decommissioning Cost Estimate would no longer be applicable and a new estimate will be submitted in accordance with 10 CFR 50.75(f)(2).

II. Comparison of the Preliminary Cost Estimate to the Minimum Required Decommissioning Fund

The minimum decommissioning financial assurance requirement as reported in Reference 2 and set forth in 10 CFR 50.75(c) for PBNP, is approximately \$316 million for each nuclear unit. The total preliminary decommissioning cost estimate is approximately \$712 million in 2004 dollars. This estimate includes approximately \$400 million for decommissioning costs, \$243 million for spent fuel management and \$69 million for greenfield remediation (Table 1).

III. Assessment of Major Factors That Could Affect Preliminary Cost Estimate

A. Decommissioning Option/Method

This Preliminary Decommissioning Cost Estimate assumes a DECON decommissioning option with dry storage of spent nuclear fuel. This estimate assumes Unit 1 shutdown in October 2010 and Unit 2 shutdown in March 2013 and a Department of Energy (DOE) spent fuel repository open in 2015 with the first spent fuel assemblies leaving the plant the same year. The existing spent fuel pool system will be modified to reduce the operation and maintenance effort required for safe operation of the spent fuel pool. Following Unit 1 shutdown and continuing 5 years after Unit 2 shutdown, spent fuel will be transferred from the spent fuel pool to dry cask storage at the on-site Independent Spent Fuel Storage Installation (ISFSI). All spent fuel shall remain at the ISFSI until it can be transferred to a suitable DOE facility.

Decommissioning activities will commence upon removal of all fuel from the Unit 1 reactor vessel and modification of spent fuel pool system. This cost estimate scenario includes the decontamination and dismantlement of the facility and cessation of the operating license on October 5, 2010 for Unit 1 and March 8, 2013 for Unit 2.

B. Potential for Known or Suspected Contamination

The preliminary cost estimate does not assume the remediation of any significant volume of contaminated soil. This assumption may be affected by continued plant operations and/or future regulatory actions, such as the development of site-specific release criteria.

C. LLRW Disposition Plan

Low Level Radioactive Waste (LLRW) disposal costs include processing, packaging, shipping, and burial/vendor costs. This Preliminary Decommissioning Cost Estimate assumes vendors currently performing these LLRW disposal activities, or potentially other vendors, will be available throughout the decommissioning periods. It is also assumes burial facilities similar to the Barnwell facility in South Carolina and the Envirocare facility in Utah will be available to support the decommissioning of PBNP. As such, rate schedules for both facilities have been used to generate disposal costs. Due to the high cost per cubic foot of LLRW disposal, decontamination and metal processing techniques were incorporated into the decommissioning cost calculations in order to reduce the overall LLRW disposal costs.

D. Preliminary Schedule of Decommissioning Activities

A schedule of the decommissioning scenario is illustrated in Table 2. For each of the eight (8) decommissioning time periods identified in Table 2, the activity and period-dependent costs are estimated. These time periods are briefly described in Section IV, below.

E. Other Factors That Could Significantly Affect the Cost to Decommission

NMC is currently unaware of any major site-specific factors that could have a significant effect on the cost of decommissioning. In order to anticipate unknown or unplanned occurrences during decommissioning, e.g. increased radioactive waste volumes; equipment breakdowns; weather delays, labor strikes, etc., contingencies are applied to the cost estimates. The amount of contingency depends on the status of design, procurement and construction; and the complexity and uncertainties within the defined project scope. The average weighted contingency applied to PBNP decommissioning cost estimate is approximately 16.6%. Contingency factors included 13% to 50% for labor costs; 23% for material and equipment costs; 13% to 25% for packing shipping and burial; and 15% for energy and other costs. PBNP continues to look for ways to reduce the decommissioning burden through operational enhancements, disposal of replace equipment and disposal of stored equipment when cost beneficial.

IV. Preliminary Cost Estimate Considerations

The preliminary decommissioning cost estimate is based on costs associated with the entire decommissioning work scope, including those activities related to the following periods of the decommissioning project: (1) Unit 1 & 2 Decommissioning Planning, (2) Post-Shutdown Activities, (3) Vessel Removal, (4) Building Decontamination, (5) Clean Removal, (6) Restore Site, (7) Dry Storage, and (8) ISFSI Removal. The scope of each of those activities is described below. Disposition of LLRW is also accounted for in the preliminary decommissioning cost estimate, as described in Section III.C, above.

A summary of activities and time duration for each DECON period follows (see Table 2 for cost estimates for each period):

- (1) **Unit 1 & 2 Decommissioning Planning:** Includes planning for spent fuel modifications, planning for cold and dark, planning for primary systems flush, selection of Decommissioning General Contractor and other decommissioning activities. Period duration is estimated at 27 months.
- (2) **Post-Shutdown Activities:** Includes commencement of spent fuel transfer from spent fuel pool to ISFSI, modification of spent fuel pool systems, primary system decontamination flush, flushing and draining of non-essential systems, performance of baseline radiation survey, implementation of cold and dark, and vessel and internal removal preparations. Period duration is estimated at 12 months.
- (3) **Vessel Removal:** Includes continuation of spent fuel transfer from spent fuel pool to ISFSI, commencement of spent fuel shipments from ISFSI to DOE, Removal of Unit 1 & 2 reactor vessels, internals, and steam generators, start of Unit 1 & 2 non-essential systems removal, removal of Unit 1 essential systems, and start of Unit 1 & 2 structures decontamination. Period duration is estimated at 28 months.
- (4) **Building Decontamination:** Includes continued shipments of spent fuel from ISFSI to DOE, completion of spent fuel transfer from spent fuel pool to ISFSI, completion of Unit 1 & 2 non-essential systems removal, removal of Unit 2 essential systems, completion of Unit 1 & 2 structures decontamination, decontamination of spent fuel storage building, removal of spent fuel racks, and final site survey of reactor plant to confirm satisfactory removal. Period duration is estimated at 33 months.
- (5) **Clean Removal:** Includes continued spent fuel shipments from ISFSI to DOE and demolition of decontaminated Unit 1 and Unit 2 structures. Period duration is estimated at 21 months.
- (6) **Restore Site:** Includes continued spent fuel shipments from ISFSI to DOE, and backfill, grading and landscaping of Unit 1 & 2 sites. Period duration is estimated at 2 months.

- (7) **Dry Storage:** Includes continued on-site dry storage of spent fuel, completion of spent fuel shipments from spent fuel pool to DOE. Period duration is estimated at 220 months.
- (8) **ISFSI removal:** Includes completion of spent fuel shipment from dry storage to DOE, and a final survey of spent fuel storage building and removal. Period duration is estimated at 5 months.

V. Plans for Adjusting Levels of Funding

Until the end of the current PBNP operating license terms, or within 5 years of the end of the extended licenses, We Energies will provide an annual funding status report in accordance with 10 CFR 50.75(f)(1). Upon the assumed permanent shutdown at the end of the current PBNP operating licenses, We Energies will address the funding adjustment requirements of 10 CFR 50.75(f)(4) and 10 CFR 50.82(a)(8)(iv) to evaluate the status of decommissioning funding financial assurance for PBNP during the period of decommissioning. If necessary, We Energies will adjust its decommissioning funding in accordance with NRC decommissioning funding requirements. (See Table 3 for cost estimates as required by respective regulations).

VI. Summary

The total estimated decommissioning costs by period and decommissioning activity are provided in Tables 1 and 2. The total preliminary decommissioning cost is estimated to be \$712 million in 2004 dollars. The current balances in the PBNP decommissioning funds are approximately \$738 million. We Energies applied reasonable earnings rates to the decommissioning funds throughout the decommissioning periods described above. In addition, the preliminary decommissioning cost estimate includes reasonable escalation factors for the decommissioning activities. Based on a cash flow analysis for the decommissioning activities to be performed for the periods described above, PBNP believes that there is reasonable assurance that adequate decommissioning funds will be available to decommission PBNP Units 1 & 2 as described herein (assuming a 2010 shutdown of Unit 1 and a 2013 shutdown of Unit 2). We Energies plans to review the decommissioning fund status on a regular basis as described above.

Table 1
Summary of Annual Decommissioning, Spent Fuel, and Greenfield Costs with Contingency

Year	Decommissioning	Greenfield	Spent Fuel	Total
2010	\$ 2,163,138		\$ 82,669	\$ 2,245,807
2011	\$ 26,335,486		\$ 1,006,469	\$ 27,341,955
2012	\$ 26,335,486		\$ 1,006,469	\$ 27,341,955
2013	\$ 45,319,049		\$ 35,018,527	\$ 80,337,576
2014	\$ 83,674,523		\$ 29,521,493	\$ 113,196,016
2015	\$ 89,468,959		\$ 27,448,342	\$ 116,917,301
2016	\$ 58,958,873		\$ 17,888,870	\$ 76,847,743
2017	\$ 30,574,077		\$ 8,996,897	\$ 39,570,974
2018	\$ 30,574,077		\$ 8,996,897	\$ 39,570,974
2019	\$ 7,075,131	\$ 29,252,348	\$ 8,893,619	\$ 45,221,098
2020		\$ 39,581,052	\$ 9,961,148	\$ 49,542,200
2021			\$ 4,099,536	\$ 4,099,536
2022			\$ 4,814,516	\$ 4,814,516
2023			\$ 4,814,516	\$ 4,814,516
2024			\$ 4,814,516	\$ 4,814,516
2025			\$ 4,814,516	\$ 4,814,516
2026			\$ 4,814,516	\$ 4,814,516
2027			\$ 4,814,516	\$ 4,814,516
2028			\$ 4,814,516	\$ 4,814,516
2029			\$ 4,814,516	\$ 4,814,516
2030			\$ 4,814,516	\$ 4,814,516
2031			\$ 4,814,516	\$ 4,814,516
2032			\$ 4,814,516	\$ 4,814,516
2033			\$ 4,814,516	\$ 4,814,516
2034			\$ 4,814,516	\$ 4,814,516
2035			\$ 4,814,516	\$ 4,814,516
2036			\$ 4,814,516	\$ 4,814,516
2037			\$ 4,814,516	\$ 4,814,516
2038			\$ 4,814,516	\$ 4,814,516
2039		\$ 36,500	\$ 8,371,386	\$ 8,407,886
TOTAL*	\$ 400,478,800	\$ 68,869,900	\$ 243,139,100	\$ 712,487,800

*figures rounded and contingency included

--activities are estimated in 2004 dollars

Source:

Sciencetech, LLC. 2004 Decommissioning Cost Update for the Point Beach Nuclear Plant On-Site Dry Storage Scenarios. June 2005.

Table 2
Summary of DECON Cost Estimate by Period Cost and Activity Cost

	Labor Cost*	Material/ Equip Cost*	Packaging Transportation, Disposal*	Energy Cost*	Other Cost*	Subtotal w/o Contingency Cost*	Contingency Cost*	Total with Contingency Cost*
Period 1: U1/U2 Decommissioning Planning	\$ 35,750,000	\$15,766,200		\$ 385,900	\$ 1,527,700	\$ 53,429,800	\$ 8,329,900	\$ 61,759,700
Period 2: Post-Shutdown Activities Costs	\$ 49,831,700	\$12,624,400	\$ 8,797,200	\$1,160,800	\$ 3,718,700	\$ 76,132,800	\$ 12,376,100	\$ 88,508,900
Period 3: Vessel & Internals Removal Costs	\$103,742,300	\$46,702,100	\$ 71,018,300	\$3,046,100	\$ 7,456,000	\$231,964,800	\$ 41,409,900	\$273,374,700
Period 4: Building Decontamination Costs	\$ 64,223,200	\$ 3,028,000	\$ 17,570,100	\$ 938,900	\$ 7,646,800	\$ 93,407,000	\$ 15,477,100	\$108,884,100
Period 5: Clean Structure Demolition Costs	\$ 55,422,000	\$ 9,829,600	\$ 4,604,800	\$ 129,700	\$ 1,650,700	\$ 71,636,800	\$ 11,310,400	\$ 82,947,200
Period 6: Restore Site Costs	\$ 983,500	\$ 782,400		\$ 6,000	\$ 526,600	\$ 2,298,500	\$ 360,500	\$ 2,659,000
Period 7: Dry Storage Costs	\$ 27,247,800	\$ 5,522,400			\$43,920,600	\$ 76,690,800	\$ 11,614,000	\$ 88,304,800
Period 8: ISFSI Removal Costs	\$ 1,684,200	\$ 3,092,300	\$ 4,600	\$ 200	\$ 424,900	\$ 5,206,200	\$ 843,200	\$ 6,049,400
Total Unit 1, Unit 2 & Common Decon without Contingency						\$610,766,700		
Total Unit 1, Unit 2 & Common Decon with Contingency								\$712,487,800

*Activities are estimated in 2004 dollars

Source:

Sciencetech, LLC. 2004 Decommissioning Cost Update for the Point Beach Nuclear Plant On-Site Dry Storage Scenarios. June 2005.

Table 3
DECON Cost Estimate Segmented by Regulatory Requirements for Unit 1, Unit 2 and Common Costs

	Labor Cost*	Material/ Equip Cost*	Packaging Transportation, Disposal*	Energy Cost*	Other Cost*	Subtotal w/o Contingency Cost*	Contingency Cost*	Total with Contingency Cost*
UNIT 1 DECON PROGRAM FINANCIAL PLANNING SUBTOTALS:								
Cost for 10 CFR 50.75 (c)	\$ 27,418,300	\$ 13,359,000	\$ 44,279,100	\$ 385,900	\$ 542,100	\$ 85,984,400	\$ 16,707,000	\$ 102,691,400
Cost for 10 CFR 50.54 (bb)					\$ 985,600	\$ 985,600	\$ 147,800	\$ 1,133,400
Cost for Greenfield (g)	\$ 9,893,400	\$ 3,330,100	\$ 1,799,100			\$ 15,022,600	\$ 2,463,900	\$ 17,486,500
UNIT 2 DECON PROGRAM FINANCIAL PLANNING SUBTOTALS:								
Cost for 10 CFR 50.75 (c)	\$ 17,406,100	\$ 7,051,000	\$ 47,679,500			\$ 72,136,600	\$ 14,775,700	\$ 86,912,300
Cost for 10 CFR 50.54 (bb)								
Cost for Greenfield (g)	\$ 9,893,400	\$ 3,330,100	\$ 1,799,100			\$ 15,022,600	\$ 2,463,900	\$ 17,486,500
COMMON DECON PROGRAM FINANCIAL PLANNING SUBTOTALS:								
Cost for 10 CFR 50.75 (c)	\$ 147,306,600	\$ 23,099,100	\$ 3,946,500	\$ 938,900	\$ 7,402,200	\$ 182,693,300	\$ 28,181,800	\$ 210,875,100
Cost for 10 CFR 50.54 (bb)	\$ 103,163,400	\$ 43,322,700	\$ 1,480,500	\$ 4,342,800	\$ 57,274,000	\$ 209,583,400	\$ 32,422,300	\$ 242,005,700
Cost for Greenfield (g)	\$ 23,803,500	\$ 3,855,400	\$ 1,011,200		\$ 668,100	\$ 29,338,200	\$ 4,558,700	\$ 33,896,900
UNIT 1, UNIT 2 & COMMON DECON PROGRAM FINANCIAL PLANNING SUBTOTALS:								
Cost for 10 CFR 50.75 (c)	\$ 192,131,000	\$ 43,509,100	\$ 95,905,100	\$ 1,324,800	\$ 7,944,300	\$ 340,814,300	\$ 59,664,500	\$ 400,478,800
Cost for 10 CFR 50.54 (bb)	\$ 103,163,400	\$ 43,322,700	\$ 1,480,500	\$ 4,342,800	\$ 58,259,600	\$ 210,569,000	\$ 32,570,100	\$ 243,139,100
Cost for Greenfield (g)	\$ 43,590,300	\$ 10,515,600	\$ 4,609,400		\$ 668,100	\$ 59,383,400	\$ 9,486,500	\$ 68,869,900

(c) Decommissioning costs specific to license termination as allowed by 10 CFR 50.75 (c)

(bb) Decommissioning costs specific to spent fuel as allowed by 10 CFR 50.54 (bb)

(g) Decommissioning costs for removal of clean structures excluded by 10 CFR 50.75(c)

*Activities are estimated in 2004 dollars

Source: Sciencetech, LLC. 2004 Decommissioning Cost Update for the Point Beach Nuclear Plant On-Site Dry Storage Scenarios. June 2005.