

**RODNEY MCCULLUM***Senior Director, Used Fuel and Decommissioning Programs*

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April 17, 2105

Mr. Scott Morris  
Director, Division of Inspection and Regional Support  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Guidance for Decommissioning Funding

**Project Number: 689**

Dear Mr. Morris:

As you are aware, there are currently a number of nuclear plants that have docketed the certifications required by 10 CFR 50.82 (a)(1) and are transitioning from operation to decommissioning. Prudent financial management of decommissioning funds and adherence to the agency's regulatory framework ensures that financial resources will be available to decontaminate and decommission nuclear power facilities in accordance with the Commission's requirements. The NRC's regulations provide decommissioning funding assurance through multiple layers of requirements and limitations, including facility decommissioning, spent fuel management and spent fuel storage obligations, which apply from the time of initial licensing through the time of license termination.

Although we continue to believe that the current regulatory framework is sound, it has come to our attention that there would be significant value in documenting the criteria used by nuclear power plant licensees to make decisions regarding the expenditure of decommissioning funds during decommissioning and decommissioning planning. Such a document could take the form of industry guidance that summarizes the criteria used by licensees to ensure compliance with existing agency regulations and conformance with existing agency guidance governing this topic. This decommissioning funding guidance would provide a consistent framework for future fund expenditure decisions and make the decision-making process more transparent to stakeholders. Such guidance would also benefit NRC staff as a useful tool to aid staff review of licensee site-specific decommissioning funding obligations.

Therefore, on behalf of the commercial nuclear industry, we are proposing to develop and provide decommissioning funding guidance for your consideration and endorsement. We would be interested in holding a public meeting at your earliest convenience to discuss the path forward for this proposal. It is our

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intention to focus this guidance on decision-making criteria, rather than on a specifically delineated list of acceptable expense categories, because many issues related to decommissioning funding are site-specific. We look forward to developing such guidance for NRC staff endorsement.

Please do not hesitate to contact me if you have any questions. I look forward to meeting with you to discuss this topic further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rodney McCullum', written over a light gray rectangular background.

Rodney McCullum

c: Mr. George A. Wilson, Jr., NRR/DORL, NRC  
Mr. Larry W. Camper, NMSS/DUWP, NRC  
Mr. Anthony R. Bowers III, NRR/DIRS/IFAIB, NRC  
Ms. Meena Khanna, NRR/DORL/LPL4-2, NRC  
Mr. William C. Huffman, NRR/DORL/LPL4-2, NRC