



Nuclear Innovation
North America LLC
122 West Way, Suite 405
Lake Jackson, Texas 77566

July 2, 2015
U7-C-NINA-NRC-150008

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Proof of Financial Protection

The purpose of this letter is to transmit proof of financial protection in accordance with 10 CFR 140.16. The attached letter certifies that South Texas Project Units 3 and 4 will be insured under nuclear energy liability Facility Form Policy No. NF-0307 concurrent with the effective date of issuance of a Combined Operating License by the Nuclear Regulatory Commission.

There are no commitments in this letter.

If you have any questions regarding this letter, please contact me at 979-316-3011 or Bill Mookhoek at 979-316-3014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7/2/15

Scott Head
Manager, Regulatory Affairs
NINA STP Units 3 & 4

rhs
Attachment:

Proof of Financial Protection

D091
M001
H20

cc: w/o attachment except*

(paper copy)

Director, Office of New Reactors
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 E. Lamar Blvd.
Arlington, Texas 76011-4511

Kathy C. Perkins, RN, MBA
Assistant Commissioner
Division for Regulatory Services
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

Robert Free
Radiation Inspections Branch Manager
Texas Department of State Health Services
P. O. Box 149347
Austin, Texas 78714-9347

*Steven P. Frantz, Esquire
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave. NW
Washington D.C. 20004

*Tom Tai
*Luis Betancourt
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

(electronic copy)

*Tom Tai

*Luis Betancourt

Fred Brown

U. S. Nuclear Regulatory Commission

Denise Wilson

Nuclear Innovation North America

Peter G. Nemeth

Crain, Caton and James, P.C.

Richard Peña

Kevin Pollo

L. D. Blaylock

CPS Energy



U7-C-NINA-NRC-150008

Attachment

UNDERWRITING DEPARTMENT

Gary S. Uricchio, CPCU, Vice President

July 1, 2015

Ms. Cheryl Glover
Supervisor, Treasury & Corporate Insurance
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

***Re: South Texas Project (STP) Units 3 and 4
Proof of Primary Financial Protection***

Dear Cheryl,

American Nuclear Insurers (ANI) confirms that it will write nuclear liability insurance for STP Nuclear Operating Company, City Public Service Board of San Antonio, Nuclear Innovation North America, LLC, and NINA 3 covering STP Unit 3 concurrent with the effective date that the NRC issues them a Combined License (COL). ANI also confirms that it will write nuclear liability insurance for STP Nuclear Operating Company, City Public Service Board of San Antonio, Nuclear Innovation North America, LLC, and NINA 4 covering STP Unit 4 concurrent with the effective date that the NRC issues them a Combined License (COL).

Currently, ANI insures STP Units 1 and 2 under nuclear energy liability Facility Form Policy No. NF -0307, issued to STP Nuclear Operating Company, NRG South Texas LP, City Public Service Board of San Antonio, City of Austin. The Facility Form policy has a limit of liability of \$375 million. This policy provides primary financial protection as required under Section 170 of the Atomic Energy Act of 1954, as amended. STP Units 3 and 4 would also be covered under this policy concurrent with the effective date that the NRC issues the COL.

Please feel free to contact me with any questions or comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read "JM", is placed above the printed name of the sender.

Jason Martinez, CPCU
Senior Underwriter

c: S. Head, Nuclear Innovation North America, LLC
M. Nadel, Aon Risk Services Southwest, Inc.