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August 10, 2015
U7-C-NINA-NRC-150011

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
Proposed License Condition on Financial Protection

On July 28, 2015 Nuclear Innovation North America (NINA) attended a public meeting with the NRC Staff to discuss financial protection for STP Units 3 & 4. At that meeting the Staff requested NINA to provide a draft license condition that would require NINA to provide evidence to the NRC that it maintains a guarantee of payment of deferred premium as specified in 10 CFR § 140.11(a)(4). Attached is the Nuclear Innovation North America, LLC (NINA) response to the NRC staff request.

No COLA changes are required by this response.

There are no commitments in this submittal.

If you have any questions, please contact myself 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 8/10/15

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

Attachment: Proposed License Condition on Financial Protection

DO91
NRD

Cc: w/o attachment except*
(paper copy)

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PROPOSED LICENSE CONDITION ON FINANCIAL PROTECTION**(Separate Condition for Each Unit)**

Within ninety (90) days after the NRC issues the Notice provided for in 10 CFR 52.103(a), the licensee shall provide evidence to the NRC that it maintains one of the following types of guarantee of payment of deferred premium in the amount of \$18,963,000, or such annual amount as may be specified in 10 CFR § 140.11(a)(4):

- (a) Surety bond,
- (b) Letter of credit,
- (c) Revolving credit/term loan arrangement,
- (d) Maintenance of escrow deposits of government securities, or
- (e) Annual certified financial statement showing either that a cash flow (i.e., cash available to a company after all operating expenses, taxes, interest charges, and dividends have been paid) can be generated and would be available for payment of retrospective premiums within three (3) months after submission of the statement, or a cash reserve or a combination of cash flow and cash reserve.

Thereafter, the licensee shall annually provide evidence of such guarantee in accordance with the provisions in 10 CFR 140.21.