



March 16, 2016

In reply, please refer to LAC-14376

10 CFR 50.75(f)(2)  
10 CFR 50.82(a)(8)

DOCKET NO. 50-409 and 72-046

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

SUBJECT: Dairyland Power Cooperative  
La Crosse Boiling Water Reactor (LACBWR)  
Possession-Only License DPR-45  
Annual Decommissioning Funding Status Report

REFERENCES: 1) 10 CFR 50.75(f)(2)  
2) 10 CFR 50.82(a)(8)(v-vii)

In accordance with References 1 and 2, we are submitting our annual report on the status of decommissioning funding for the La Crosse Boiling Water Reactor.

If you have any questions concerning this information, please contact Robert Palmberg, Vice President, Generation, of my staff at 608-787-1483.

Sincerely,

Barbara A. Nick, President and CEO

BAN:CLO:tco

Attachment: 1) Decommissioning Funding Status Report for the La Crosse Boiling Water Reactor March 2, 2016

NM5901  
NM5526

Document Control Desk  
LAC-14376  
Page 2  
March 16, 2016

cc w/Attachment: Marlayna Vaaler  
Project Manager  
U.S. Nuclear Regulatory Commission

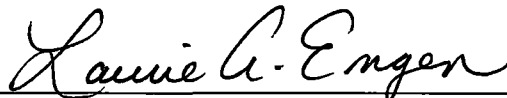
Cynthia Pederson  
Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission

---

STATE OF WISCONSIN )

COUNTY OF LA CROSSE )

Personally came before me this 16<sup>th</sup> day of March, 2016, the  
above named, Barbara A. Nick, to me known to be the person who executed the foregoing  
instrument and acknowledged the same.



Notary Public, La Crosse County Wisconsin

My commission expires 5-25-18

LAURIE A. ENGEN  
Notary Public  
State of Wisconsin

**DECOMMISSIONING FUNDING STATUS REPORT  
FOR THE  
LA CROSSE BOILING WATER REACTOR  
MARCH 2, 2016**

**1.0     STATUS REPORTING IN ACCORDANCE WITH 10 CFR 50.75(f)(2)**

- 1.1     The amount of funds estimated to be required for the LACBWR Plant decommissioning as of 12/31/2015 pursuant to 10 CFR 50.75(b) and (c) was \$128,315,120.

This formula decommissioning cost value is derived using guidance from NUREG-1307, Revision 15, and a 1986 Base Cost of \$22,472,000. As explained in the response to an NRC Request for Additional Information (RAI) dated 08/08/2012 (ADAMS Accession No. ML12235A299), based on a 1983 decommissioning cost estimate of \$20,000,000, Dairyland Power Cooperative (DPC) submitted to the NRC a decommissioning funding report for LACBWR dated 07/25/1990 in which DPC concluded that decommissioning would cost \$90.9 million if decontamination and dismantling could begin in 2010.

Furthermore, DPC recognized that the funding plan contained in the Decommissioning Plan submitted to the NRC 12/21/1987 contemplated that total decommissioning costs for LACBWR would be below the levels set forth in 10 CFR 50.75(c)(1). To the extent that such an exemption was deemed necessary by the NRC, DPC requested exemption from funding the Decommissioning Trust at the minimum amount established in 10 CFR 50.75(c)(1) and requested that the NRC approve the continued funding of the Decommissioning Trust at the level set forth in the previously filed Decommissioning Plan.

The NRC approved a decommissioning cost of \$92,000,000 in 2010 dollars in its Safety Evaluation of the Order to Authorize Decommissioning and Amendment No. 66 to Possession-Only License DPR-45 dated 08/07/1991 without exemption from 10 CFR 50.75(c)(1). The NRC cited the new decommissioning regulations as the basis for the approval (53 FR 24018, June 27, 1988, at page 24027, Column 1) stating that for reactors already shut down, "details concerning financial assurance . . . would be decided on a case-by-case basis."

This formula decommissioning cost value does not reflect funds spent for substantial LACBWR plant decommissioning activities completed to date and discussed further in Section 2.0 of this report.

- 1.2     The amount of funds accumulated in the DPC Nuclear Decommissioning Trust (DPC NDT) for the LACBWR Plant decommissioning as of 12/31/2015 was \$92,780,744.

- 1.3 A schedule of the annual amounts remaining to be collected for the LACBWR plant decommissioning is not included because no further amounts are scheduled to be collected.
- 1.4 The assumptions used regarding rates of escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in the funding projections are as follows:
  - 1.4.1 The average escalation rates applied in the decommissioning cost estimate are:
    - Labor 4.0%
    - Indirect 4.0%
    - Shipping 3.0%
    - Reprocessing 5.0%
    - Material 4.0%
    - Burial – Radwaste 5.0%
  - 1.4.2 The fixed rate of return is 1.55% for Money Market and Fixed Income Investments
  - 1.4.3 The current Board approved DPC NDT asset allocation goal is 0% to 30% in equity investments and the balance in fixed income investments.
- 1.5 There are no contracts upon which DPC is relying pursuant to paragraph (e)(1)(v) of 10 CFR 50.75.
- 1.6 There have been no modifications to DPC's method of providing financial assurance since the last submitted report.
- 1.7 There have been no changes to DPC's Nuclear Decommissioning Trust Agreement since the last submitted report.

## 2.0 **STATUS REPORTING IN ACCORDANCE WITH 10 CFR 50.82(a)(8)(v-vii)**

- 2.1 Funds spent to date for decommissioning the LACBWR Plant are \$55,443,429 (from total below) in year 2015 dollars. Table 1 provides information related to the cost of completed decommissioning activities.

<b>TABLE 1</b>			
<b>ACTIVITY</b>	<b>YEAR</b>	<b>COST</b>	<b>2015 COST<sup>1</sup></b>
Limited Dismantlement	1996	199,262	419,816
Limited Dismantlement	1997	81,780	165,671
Limited Dismantlement	1998	287,942	560,882
Limited Dismantlement	1999	288,244	539,875
Limited Dismantlement	2000	238,296	432,533
Limited Dismantlement	2001	559,116	968,207
Limited Dismantlement	2002	415,290	691,489
Limited Dismantlement	2003	565,579	905,510
Limited Dismantlement	2004	379,328	583,958
RPV and B/C Waste Removal	2005	3,729,985	5,521,289
RPV and B/C Waste Removal	2006	11,866,247	16,889,369
RPV and B/C Waste Removal	2007	8,531,106	11,675,407
Fuel Storage Rack Removal	2012	1,553,282	1,747,231
Post-Fuel Planning	2012	1,170,017	1,316,111
Metal Removal	2013	2,722,838	2,945,022
Metal Removal/LTP Development	2014	5,997,090	6,236,974
Resin Removal/LTP Development	2015	3,844,085	3,844,085
<b>Cost of Decommissioning Completed as of 12/31/2015<sup>1</sup></b>			<b>55,443,429</b>

<sup>1</sup>2015 Cost based on original cost realized escalated annually by 4%.

The amount of funds accumulated in the DPC NDT as of 12/31/2015 for decommissioning of the LACBWR Plant was \$92,780,744.

The amount of funds estimated to be required for the LACBWR Plant decommissioning as of 12/31/2015 pursuant to 10 CFR 50.75(b) and (c) was \$128,315,120. Subtracting funds spent as of 12/31/2015 from the formula amount leaves the remainder of \$72,871,691. Funds accumulated in the DPC NDT as of 12/31/2015 exceeded the remainder of the required formula amount.

- 2.2 As of 12/31/2015, the site specific cost estimate to complete decommissioning of the LACBWR Plant was \$84,672,474. This value is based upon the LACBWR

Decommissioning & Decontamination Cost Study Update that was performed in March 2013 and adjusted for work completed in 2013 thru 2015. As of 12/31/2015, the cost of LACBWR Plant decommissioning being carried on general ledger accounts was \$86,479,475.

During 2015, resin and sludge was removed from components remaining on-site and the license termination plan was completed. The actual cost of these decommissioning activities was \$3,844,085, approximately the estimated cost. Removal of the resin was not specifically called out in the LACBWR Decommissioning & Decontamination Cost Study Update as this was embedded in the costs associated with the waste treatment system removal.

As of 12/31/2015, decommissioning criteria for the LACBWR site have been assumed to be in accordance with 10 CFR 20.1402 for unrestricted use.

- 2.3 There have been no modifications to DPC's method of providing financial assurance since the last submitted report.
- 2.4 There have been no changes to DPC's Nuclear Decommissioning Trust Agreement since the last submitted report.
- 2.5 DPC's established 10 CFR 50.54(bb) spent fuel management funding plan is that ISFSI operating costs are funded from DPC's Operations & Maintenance (O&M) budget.
- 2.6 DPC has not projected the cost of managing irradiated fuel until title to the fuel and possession of the fuel is transferred to the Secretary of Energy because this cost is indeterminate. ISFSI operating costs are estimated to be \$2,200,000 per year and are funded from the O&M budget.
- 2.7 DPC has an established 10 CFR 50.54(bb) spent fuel management funding plan that was submitted to the NRC by letter LAC-13815 dated 09/26/2003 (ADAMS Accession No. ML032881008).

The DPC spent fuel management funding plan is described in Section 3.2, "Dry Cask Storage Cost Funding," of the LACBWR Decommissioning Plan/PSDAR (Revised March, 2014, ADAMS Accession No. ML14079A352).