



M. Christopher Nolan  
526 S. Church Street  
Charlotte, NC 28202

Mailing Address:  
EC2ZF / P.O. Box 1006  
Charlotte, NC 28202

704.382.7426  
Chris.Nolan@duke-energy.com

10 CFR 72.30  
10 CFR 72.4

Serial: RA-18-0008  
March 28, 2018

ATTN: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation,  
Office of Nuclear Material Safety and Safeguards,  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-3

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-60

BRUNSWICK STEAM ELECTRIC PLANT  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-6

CATAWBA NUCLEAR STATION  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-45

MCGUIRE NUCLEAR STATION  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-38

OCONEE NUCLEAR STATION  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-04

OCONEE NUCLEAR STATION  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-40

**SUBJECT:    RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
              DUKE ENERGY'S DECOMMISSIONING FUNDING PLAN UPDATE FOR  
              INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS (ISFSIs)**

**REFERENCES:**

1. Duke Energy letter, *Decommissioning Funding Plan for Independent Spent Fuel Storage Installations (ISFSIs)*, March 30, 2015.

2. NRC letter, *Request for Additional Information Regarding Duke Energy's Decommissioning Funding Plan Update for H.B. Robinson Steam Electric Plant, Unit 2, Brunswick Steam Electric Plant, Catawba Nuclear Station, McGuire Nuclear Station, and Oconee Nuclear Station Independent Spent Fuel Storage Installations*, February 23, 2018.
3. Duke Energy letter, *Decommissioning Funding Plan for Independent Spent Fuel Storage Installations (ISFSIs)*, dated March 29, 2017.

Ladies and Gentlemen:

By letter dated March 30, 2015 (Reference 1), Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (Duke Energy) submitted the required decommissioning funding plan updates covering the ISFSIs for H.B. Robinson Steam Electric Plant, Unit 2, Brunswick Steam Electric Plant, Catawba Nuclear Station, McGuire Nuclear Station and Oconee Nuclear Station.

The Nuclear Regulatory Commission (NRC) staff reviewed Duke Energy's decommissioning funding plan updates for each plant and concluded that additional information is necessary to meet the intent of the requirement in 10 CFR 72.30(c). Specifically, the NRC needs additional information to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically addressed with respect to the 2015 Duke Energy decommissioning funding plan updates submittal. By letter dated February 23, 2018 (Reference 2), the additional information was requested. The Duke Energy response to the request for additional information (RAI) is provided in the Enclosure to this letter.

By letter dated March 29, 2017 (Reference 3), Duke Energy again submitted required decommissioning funding plan updates covering the ISFSIs, which contains the same level of detail regarding the four events in 10 CFR 72.30(c) as the 2015 submittal (Reference 1). Therefore, the Duke Energy response to the RAI provided in the Enclosure to this letter also specifically addresses the events listed in 10 CFR 72.30(c)(1)-(4) with respect to the 2017 decommissioning funding plan updates.

There are no regulatory commitments associated with this letter. If you have additional questions, please contact Art Zaremba at (980) 373-2062.

Sincerely,



M. Christopher Nolan  
Director, Nuclear Regulatory Affairs

Enclosure: Duke Energy Response to Request for Additional Information

xc (with attachments):

C. Haney, USNRC Region II – Regional Administrator  
J. D. Austin, USNRC Senior Resident Inspector – CNS  
G. A. Hutto, USNRC Senior Resident Inspector - MNS  
M. Riches, USNRC Senior Resident Inspector – HNP  
J. Zeiler, USNRC Senior Resident Inspector – RNP  
G. Smith, USNRC Senior Resident Inspector - BNP  
E. L. Crowe, USNRC Senior Resident Inspector - ONS  
M. C. Barillas, NRR Project Manager – HNP  
D. Galvin, NRR Project Manager – RNP  
M. Mahoney, NRR Project Manager - CNS & MNS  
A. L. Hon, NRR Project Manager - BNP  
A. Klett, NRR Project Manager - ONS

bx (with attachments):

Chris Nolan  
Art Zaremba  
Rounette Nader  
Tracey LeRoy  
Carena Tate  
Chris Long  
Patrick Washington  
File: (Corporate)  
Electronic Licensing Library (ELL)

Ernie Kapopoulos  
Kevin Ellis  
Christine Caudell (For RNP Licensing/Nuclear Records Files)

Randy Gideon  
Lee Grzeck  
Bill Murray (For BNP Licensing/Nuclear Records Files)

Tom Simril  
Cecil Fletcher  
Tonya Lowery (For CNS Licensing/Nuclear Records Files)  
North Carolina Municipal Power Agency No. 1 (NCMPA)  
Electronic copy preferred: [CatawbaContracts@electricities.org](mailto:CatawbaContracts@electricities.org)  
Piedmont Municipal Power Agency (PMPA)  
Electronic copy preferred: [Catawba\\_RegulatoryDox@pmpa.com](mailto:Catawba_RegulatoryDox@pmpa.com)  
North Carolina Electric Membership Corporation (NCEMC)  
Electronic copy preferred: [Catawba.Manager@ncemcs.com](mailto:Catawba.Manager@ncemcs.com)

Ed Burchfield  
Chris Wasik  
Michele Shealy (For ONS Licensing/Nuclear Records Files)

Tom Ray  
Jeff Thomas  
P. T. Vu (For MNS Licensing/Nuclear Records Files)

ONS Master File – ON03DM (File OS 801.01)  
MNS Master File – MG02DM (file MC 801.01)  
CNS Master File – CN04DM (File CN 801.01)

Enclosure to  
RA-18-0008

**Enclosure**

**Duke Energy Response to Request for Additional Information**

**NRC Request for Additional Information (RAI):**

**Regulatory Requirement**

Pursuant to Title 10 of the *Code of Federal Regulations* (CFR) 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

**Background**

By letter dated March 30, 2015, Duke Energy submitted for U.S. Nuclear Regulatory Commission staff review and approval, a decommissioning funding plan update (DFP Update) for the Independent Spent Fuel Storage Installations at H.B. Robinson Steam Electric Plant, Brunswick Steam Electric Plant, Catawba Nuclear Station, McGuire Nuclear Station, and Oconee Nuclear Station (Agencywide Documents Access and Management System Accession No. ML15089A394). The NRC staff reviewed Duke Energy's DFP updates for each plant and believes Duke Energy's submittal was not sufficient to meet the intent of the requirement in 72.30(c). Specifically, the DFP updates do not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

**RAI 1:**

For each ISFSI, provide a revised DFP that includes information on the occurrence, and the effect on decommissioning costs, of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

**Duke Energy Response to RAI 1:**

With respect to the 2015 Duke Energy decommissioning funding plan updates for the H.B. Robinson Steam Electric Plant, Unit 2 (HBRSEP), Brunswick Steam Electric Plant (BNP), Catawba Nuclear Station (CNS), McGuire Nuclear Station (MNS) and Oconee Nuclear Station (ONS) ISFSIs submitted to the NRC by letter dated March 30, 2015 (Reference 1), the following statements specifically address the events defined in 10 CFR 72.30(c). Since the submittal of the original Decommissioning Funding Plan for the ISFSIs in December 2012 (Reference 2):

1. No spills of radioactive material producing additional residual radioactivity in onsite subsurface material have occurred.
2. Facility modifications have not had an effect on ISFSI decommissioning costs.
3. There were no changes in authorized possession limits.

Enclosure to  
RA-18-0008

4. No active decommissioning has occurred; thus, there have not been any actual remediation costs that exceed the previous cost estimate.

Duke Energy also submitted decommissioning funding plan updates for the HBRSEP, BNP, CNS, MNS and ONS ISFSIs to the NRC by letter dated March 29, 2017 (Reference 3). The following statements remain valid with respect to the 2017 Duke Energy submittal and specifically addresses the 10 CFR 72.30(c) events. Since the submittal of the original Decommissioning Funding Plan for the ISFSIs in December 2012 (Reference 2):

1. No spills of radioactive material producing additional residual radioactivity in onsite subsurface material have occurred.
2. Facility modifications have not had an effect on ISFSI decommissioning costs.
3. There were no changes in authorized possession limits.
4. No active decommissioning has occurred; thus, there have not been any actual remediation costs that exceed the previous cost estimate.

Therefore, based on the above information and the fact that the events defined in 10 CFR 72.30(c)(1)-(4) have had no effect on decommissioning costs, Duke Energy has concluded that the decommissioning funding plan updates (both 2015 and 2017) for each plant's ISFSI remain valid.

References:

1. Duke Energy letter, *Decommissioning Funding Plan for Independent Spent Fuel Storage Installations (ISFSIs)*, March 30, 2015.
2. Duke Energy letter, *Decommissioning Funding Plan for Interim Spent Fuel Storage Installations (ISFSIs)*, December 13, 2012.
3. Duke Energy letter, *Decommissioning Funding Plan for Independent Spent Fuel Storage Installations (ISFSIs)*, dated March 29, 2017.