

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
Decon Pd 4 Plant Systems and Large Component Removal Distributed							
4.01	Upgrade Rail Spur	\$0	\$0	\$0	\$3,277	\$819	\$4,096
4.02	Install GARDIAN System	\$0	\$0	\$0	\$525	\$131	\$656
4.03	Scaffolding for Non-Essential System Removal	\$3,516	\$1,144	\$200	\$0	\$1,215	\$6,075
4.04	Asbestos Abatement and Hazardous Waste Disposal for Non-Essential Systems - Unit	\$0	\$0	\$0	\$1,050	\$525	\$1,575
4.05	Lead Abatement for Non-Essential Systems Removal - Unit 2	\$2,287	\$23	\$411	\$0	\$1,361	\$4,082
4.06	Remove, Package and Dispose of Non-Essential Systems - Unit 2	\$33,512	\$5,597	\$31,969	\$0	\$17,769	\$88,847
4.07	Asbestos Abatement and Hazardous Waste Disposal for Non-Essential Systems - Unit	\$0	\$0	\$0	\$1,050	\$525	\$1,575
4.08	Lead Abatement for Non-Essential Systems - Unit 3	\$2,287	\$399	\$411	\$0	\$1,549	\$4,647
4.09	Remove, Package and Dispose of Non-Essential Systems - Unit 3	\$36,851	\$6,313	\$36,610	\$0	\$19,944	\$99,718
4.10	Remove Underground Diesel Tank - Unit 2	\$111	\$45	\$0	\$41	\$49	\$247
4.11	Remove Underground Diesel Tank - Unit 3	\$111	\$45	\$0	\$41	\$49	\$247
4.12	Remove and Dispose of Spent Fuel Storage Racks - Unit 2	\$42	\$36	\$4,922	\$0	\$1,250	\$6,250
4.13	Remove and Dispose of Spent Fuel Storage Racks - Unit 3	\$42	\$36	\$4,922	\$0	\$1,250	\$6,250
4.14	Remove and Dispose of Legacy Class B and C Waste - Unit 2	\$0	\$0	\$500	\$0	\$125	\$625
4.15	Remove and Dispose of Legacy Class B and C Waste - Unit 3	\$0	\$0	\$500	\$0	\$125	\$625
4.16	Drain Spent Fuel Pool and Process Liquid Waste - Unit 2	\$557	\$703	\$0	\$0	\$315	\$1,575
4.17	Drain Spent Fuel Pool and Process Liquid Waste - Unit 3	\$557	\$703	\$0	\$0	\$315	\$1,575
4.18	Segment, Package and Dispose of Spent Fuel Pool Island Equipment	\$11	\$2	\$107	\$0	\$30	\$150
4.19	Segment and Dispose of Fuel Pool Bridge Crane - Unit 2	\$85	\$12	\$168	\$0	\$66	\$332
4.20	Segment and Dispose of Fuel Pool Bridge Crane - Unit 3	\$85	\$12	\$168	\$0	\$66	\$332
4.21	Flush and Drain Essential Systems Following Fuel Pool Closure	\$226	\$181	\$2,970	\$0	\$844	\$4,221
4.22	Scaffolding for Essential System Removal	\$989	\$322	\$56	\$0	\$342	\$1,708
4.23	Asbestos Abatement and Hazardous Waste Disposal for Essential Systems	\$0	\$0	\$0	\$788	\$394	\$1,181
4.24	Lead Abatement for Essential Systems Removal	\$332	\$58	\$59	\$0	\$225	\$674
4.25	Remove, Package and Dispose of Essential Systems	\$33,774	\$5,869	\$17,264	\$0	\$14,227	\$71,134
4.26	Remove and Dispose of Spent Resins, Filter Media and Tank Sludge	\$90	\$40	\$7,425	\$0	\$1,889	\$9,445
4.27	Reactor Vessel Insulation Removal and Disposal - Unit 2	\$105	\$12	\$147	\$0	\$66	\$331
4.28	Segment, Package and Dispose of Reactor Pressure Vessel - Unit 2	\$1,044	\$2,834	\$29,313	\$0	\$8,298	\$41,489
4.29	Transfer Rx Vessel Segmentation Equipment to Unit 3	\$122	\$18	\$0	\$0	\$35	\$175
4.30	Procure Replacement Non-Engineered Standard Equipment	\$0	\$454	\$0	\$0	\$114	\$568
4.31	Reactor Vessel Insulation Removal and Disposal - Unit 3	\$105	\$12	\$147	\$0	\$66	\$331

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No	Item Description	Labor	Equipment	Disposal	Other	Contingency
4.32	Segment, Package and Dispose of Reactor Pressure Vessel - Unit 3	\$1,044	\$2,834	\$29,313	\$0	\$8,298
4.33	Remove and Dispose of Steam Generators - Unit 2	\$2,789	\$1,288	\$18,154	\$0	\$5,558
4.34	Remove and Dispose of Pressurizer - Unit 2	\$462	\$70	\$2,620	\$0	\$788
4.35	Remove and Dispose of Steam Generators - Unit 3	\$2,789	\$1,288	\$18,154	\$0	\$5,558
4.36	Remove and Dispose of Pressurizer - Unit 3	\$462	\$70	\$2,620	\$0	\$788
4.37	Remove and Dispose of Turbine Gantry Crane - Unit 2	\$445	\$229	\$0	\$4	\$170
4.38	Remove and Dispose of Turbine Gantry Crane - Unit 3	\$445	\$229	\$0	\$4	\$170
4.39	Prepare License Termination Plan	\$1,646	\$149	\$0	\$0	\$449
Distributed Subtotal		\$126,926	\$31,029	\$209,131	\$6,779	\$95,755
\$469,620						
Undistributed						
1.01	Utility Staff	\$71,956	\$0	\$0	\$0	\$17,989
1.02	Utility Staff HP Supplies	\$0	\$2,715	\$0	\$0	\$679
1.03	Security Guard Force	\$4,638	\$0	\$0	\$0	\$1,159
1.04	Security Related Expenses	\$1,007	\$0	\$0	\$0	\$252
1.05	Insurance	\$0	\$0	\$0	\$3,653	\$913
1.06	Site Lease and Easement Expenses	\$0	\$0	\$0	\$1,044	\$157
1.07	NRC Decommissioning Fees	\$0	\$0	\$0	\$5,312	\$1,328
1.08	Materials and Services	\$0	\$4,204	\$0	\$0	\$1,051
1.09	DAW Disposal	\$0	\$0	\$1,568	\$0	\$392
1.10	Energy	\$0	\$0	\$0	\$7,568	\$1,892
1.11	Decommissioning General Contractor Staff	\$125,798	\$0	\$0	\$0	\$31,449
1.12	DGC HP Supplies	\$0	\$5,834	\$0	\$0	\$1,458
1.13	Craft Worker Training	\$7,788	\$0	\$0	\$0	\$1,947
1.14	Workers Compensation Insurance	\$0	\$0	\$0	\$628	\$157
1.15	Community Outreach	\$3,639	\$0	\$0	\$4,066	\$1,926
1.16	Property Tax	\$0	\$0	\$0	\$5,222	\$1,306
1.18	Utilities (Water, gas, phone)	\$0	\$1,007	\$0	\$0	\$252
1.19	Tools and Equipment	\$0	\$423	\$0	\$0	\$106
1.20	Non-Process Computers	\$0	\$348	\$0	\$0	\$87
1.21	Telecommunications	\$0	\$348	\$0	\$0	\$87
1.24	Environmental Permits and Fees	\$0	\$0	\$0	\$6,615	\$1,654
1.25	Decommissioning Advisor	\$0	\$0	\$0	\$2,611	\$653
						\$3,264

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:		1/1/2024	

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		License Status	POL	Unit 2 Shut Down:	6/7/2013		
		Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013		
		Repository Opening Date:	1/1/2024				
2014 Dollars in Thousands							
No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
Decon Pd 5 Building Decontamination							
Distributed							
5.01	Decon Containment Building - Unit 3	\$6,056	\$3,318	\$54,825	\$0	\$16,050	\$80,249
5.02	Decon Penetration Building - Unit 3	\$1,065	\$351	\$2,933	\$0	\$1,087	\$5,437
5.03	Decon Safety Equipment and MSIV Building - Unit 3	\$905	\$390	\$5,562	\$0	\$1,715	\$8,573
5.04	Decon Fuel Handling Building - Unit 3	\$1,275	\$577	\$16,101	\$0	\$4,488	\$22,442
5.05	Decon Turbine Building - Unit 3	\$100	\$95	\$3,925	\$0	\$1,030	\$5,150
5.06	Decon Containment Building - Unit 2	\$6,056	\$3,318	\$54,825	\$0	\$16,050	\$80,249
5.07	Decon Penetration Building - Unit 2	\$1,065	\$351	\$2,933	\$0	\$1,087	\$5,437
5.08	Decon Safety Equipment and MSIV Building - Unit 2	\$911	\$396	\$5,777	\$0	\$1,771	\$8,854
5.09	Decon Fuel Handling Building - Unit 2	\$1,275	\$577	\$16,101	\$0	\$4,488	\$22,442
5.10	Decon Turbine Building - Unit 2	\$100	\$95	\$3,925	\$0	\$1,030	\$5,150
5.11	Decon Auxiliary Radwaste Building - Common	\$943	\$691	\$17,999	\$0	\$4,908	\$24,541
5.12	Decon Auxiliary Control Building - Common	\$198	\$163	\$38	\$0	\$100	\$499
5.13	Decon Condensate Area and Tunnels - Units 2 & 3	\$375	\$316	\$403	\$0	\$274	\$1,368
5.14	Excavate, Remove and Dispose of Yard Area Drains	\$1,159	\$128	\$240	\$0	\$382	\$1,908
5.15	Remove and Dispose of Contaminated Sumps, Trenches and Pavement	\$185	\$21	\$746	\$0	\$238	\$1,191
5.16	Remove and Dispose of Radiologically Contaminated Soil	\$192	\$216	\$1,158	\$0	\$392	\$1,958
5.17	Segment, Package and Dispose of Contaminated Decon Equipment and Tooling	\$38	\$6	\$92	\$0	\$34	\$170
5.18	Radiological Survey of Structures During Decon	\$4,702	\$3,666	\$0	\$0	\$1,255	\$9,623
Distributed	Subtotal	\$26,600	\$14,676	\$187,585	\$0	\$56,379	\$285,240
Undistributed							
1.01	Utility Staff	\$29,516	\$0	\$0	\$0	\$7,379	\$36,895
1.02	Utility Staff HP Supplies	\$0	\$997	\$0	\$0	\$249	\$1,247
1.03	Security Guard Force	\$2,520	\$0	\$0	\$0	\$630	\$3,150
1.04	Security Related Expenses	\$560	\$0	\$0	\$0	\$140	\$701
1.05	Insurance	\$0	\$0	\$0	\$1,985	\$496	\$2,481
1.06	Site Lease and Easement Expenses	\$0	\$0	\$0	\$567	\$85	\$652
1.07	NRC Decommissioning Fees	\$0	\$0	\$0	\$2,886	\$722	\$3,608
1.08	Materials and Services	\$0	\$1,668	\$0	\$0	\$417	\$2,086
1.09	DAW Disposal	\$0	\$0	\$464	\$0	\$116	\$580
1.10	Energy	\$0	\$0	\$0	\$2,336	\$584	\$2,920

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No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
1.11	Decommissioning General Contractor Staff	\$56,286	\$0	\$0	\$0	\$14,071	\$70,357
1.12	DGC HP Supplies	\$0	\$3,170	\$0	\$0	\$792	\$3,962
1.13	Craft Worker Training	\$1,693	\$0	\$0	\$0	\$423	\$2,116
1.14	Workers Compensation Insurance	\$0	\$0	\$0	\$341	\$85	\$426
1.15	Community Outreach	\$862	\$0	\$0	\$964	\$457	\$2,283
1.16	Property Tax	\$0	\$0	\$0	\$2,837	\$709	\$3,547
1.18	Utilities (Water, gas, phone)	\$0	\$413	\$0	\$0	\$103	\$517
1.19	Tools and Equipment	\$0	\$204	\$0	\$0	\$51	\$255
1.20	Non-Process Computers	\$0	\$189	\$0	\$0	\$47	\$236
1.21	Telecommunications	\$0	\$189	\$0	\$0	\$47	\$236
1.22	Personal Computers	\$0	\$0	\$0	\$71	\$18	\$88
1.24	Environmental Permits and Fees	\$0	\$0	\$0	\$3,594	\$899	\$4,493
1.25	Decommissioning Advisor	\$0	\$0	\$0	\$825	\$206	\$1,031
Undistributed	Subtotal	\$91,437	\$6,832	\$464	\$16,406	\$28,728	\$143,866
Decon Pd 5	Subtotal	\$118,037	\$21,508	\$188,049	\$16,406	\$85,106	\$429,106

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2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
Decon Pd 6 License Termination During Demolition							
Distributed							
6.01	Final Status Survey	\$9,613	\$3,088	\$0	\$2,360	\$2,259	\$17,320
6.02	Prepare Final Report of Dismantling Program	\$164	\$4	\$0	\$0	\$42	\$210
Distributed Subtotal		\$9,777	\$3,091	\$0	\$2,360	\$2,301	\$17,530
Undistributed							
1.01	Utility Staff	\$1,378	\$0	\$0	\$0	\$345	\$1,723
1.04	Security Related Expenses	\$4	\$0	\$0	\$0	\$1	\$5
1.07	NRC Decommissioning Fees	\$0	\$0	\$0	\$13,535	\$3,384	\$16,919
1.08	Materials and Services	\$0	\$47	\$0	\$0	\$12	\$58
1.09	DAW Disposal	\$0	\$0	\$62	\$0	\$16	\$78
1.10	Energy	\$0	\$0	\$0	\$1,872	\$468	\$2,340
1.11	Decommissioning General Contractor Staff	\$651	\$0	\$0	\$0	\$163	\$814
1.12	DGC HP Supplies	\$0	\$301	\$0	\$0	\$75	\$376
1.15	Community Outreach	\$2,386	\$0	\$0	\$2,666	\$1,263	\$6,315
1.18	Utilities (Water, gas, phone)	\$0	\$10	\$0	\$0	\$3	\$13
Undistributed Subtotal		\$4,420	\$357	\$62	\$18,074	\$5,728	\$28,641
Decon Pd 6 Subtotal		\$14,197	\$3,449	\$62	\$20,434	\$8,029	\$46,171
A. License Termination Subtotal		\$812,119	\$150,936	\$566,266	\$171,959	\$410,965	\$2,112,246

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2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
B. Spent Fuel							
SNF Pd 1 Spent Fuel Management Transition							
Distributed							
7.01	Security Shut Down Strategy	\$0	\$0	\$0	\$8,388	\$0	\$8,388
7.02	Design and Fabricate Spent Fuel Canisters	\$0	\$0	\$0	\$8,842	\$0	\$8,842
7.03	Post Fukushima Modifications - Unit 2	\$0	\$0	\$0	\$126	\$0	\$126
7.05	Cyber Security Modifications	\$0	\$0	\$0	\$1,901	\$0	\$1,901
Distributed	Subtotal	\$0	\$0	\$0	\$19,258	\$0	\$19,258
Undistributed							
2.01	Utility Spent Fuel Staff	\$38,478	\$0	\$0	\$0	\$0	\$38,478
2.04	Security Guard Force	\$69,889	\$0	\$0	\$0	\$0	\$69,889
2.09	Emergency Preparedness Fees	\$0	\$0	\$0	\$2,340	\$0	\$2,340
2.10	Spent Fuel Maintenance	\$0	\$0	\$0	\$32	\$0	\$32
Undistributed	Subtotal	\$108,367	\$0	\$0	\$2,372	\$0	\$110,739
SNF Pd 1	Subtotal	\$108,367	\$0	\$0	\$21,630	\$0	\$129,997

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2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SNF Pd 2 Spent Fuel Transfer to Dry Storage							
Distributed							
8.01	Security Shut Down Strategy	\$0	\$0	\$0	\$2,855	\$714	\$3,569
8.02	Decay Heat Analysis	\$0	\$0	\$0	\$105	\$26	\$131
8.03	Zirconium Fire/ Shine Analysis	\$0	\$0	\$0	\$105	\$26	\$131
8.05	NRC Review of Irradiated Fuel Management Plan	\$0	\$0	\$0	\$105	\$26	\$131
8.07	ISFSI Pad Study	\$0	\$0	\$0	\$103	\$26	\$129
8.08	Design ISFSI Expansion	\$0	\$0	\$0	\$3,150	\$788	\$3,938
8.09	Construct ISFSI Expansion	\$0	\$0	\$0	\$33,600	\$8,400	\$42,000
8.10	Purchase and Fabrication of Spent Fuel Canisters and AHSMs - Unit 2	\$0	\$49,613	\$0	\$0	\$12,403	\$62,016
8.11	Purchase and Fabrication Spent Fuel Canisters and AHSMs - Unit 3	\$0	\$50,794	\$0	\$0	\$12,698	\$63,492
8.12	Deliver and Load Spent Fuel Canisters and Transfer to ISFSI - Unit 2	\$71,338	\$17,478	\$0	\$0	\$22,204	\$111,021
8.13	Deliver and Load Spent Fuel Canisters and Transfer to ISFSI - Unit 3	\$73,037	\$17,894	\$0	\$0	\$22,733	\$113,664
Distributed	Subtotal	\$144,375	\$135,779	\$0	\$40,023	\$80,044	\$400,221
Undistributed							
2.01	Utility Spent Fuel Staff	\$90,824	\$0	\$0	\$0	\$22,706	\$113,530
2.02	Utility Staff HP Supplies	\$0	\$6,590	\$0	\$0	\$1,647	\$8,237
2.04	Security Guard Force	\$112,313	\$0	\$0	\$0	\$28,078	\$140,391
2.05	Security Related Expenses	\$1,334	\$0	\$0	\$0	\$333	\$1,667
2.06	Insurance	\$0	\$0	\$0	\$4,408	\$1,102	\$5,510
2.08	NRC Spent Fuel Fees	\$0	\$0	\$0	\$1,107	\$277	\$1,383
2.09	Emergency Preparedness Fees	\$0	\$0	\$0	\$18,756	\$4,689	\$23,445
2.10	Spent Fuel Maintenance	\$0	\$0	\$0	\$2,131	\$533	\$2,664
2.11	Materials and Services	\$0	\$5,848	\$0	\$0	\$1,462	\$7,310
2.12	DAW Disposal	\$0	\$0	\$275	\$0	\$69	\$343
2.13	Energy	\$0	\$0	\$0	\$3,991	\$998	\$4,989
2.15	Craft Worker Training	\$2,119	\$0	\$0	\$0	\$530	\$2,649
2.18	Utilities (Water, gas, phone)	\$0	\$3,572	\$0	\$0	\$893	\$4,465
2.22	Personal Computers	\$0	\$0	\$0	\$14	\$3	\$17
Undistributed	Subtotal	\$206,590	\$16,010	\$275	\$30,406	\$63,320	\$316,601
SNF Pd 2	Subtotal	\$350,965	\$151,789	\$275	\$70,429	\$143,364	\$716,822

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2014 Dollars in Thousands						
No	Item Description	Labor	Equipment	Disposal	Other	Contingency
SNF Pd 3 Dry Storage During Decommissioning - Units 1, 2 and 3						
Undistributed						
2.01	Utility Spent Fuel Staff	\$39,894	\$0	\$0	\$0	\$9,973
2.02	Utility Staff HP Supplies	\$0	\$1,487	\$0	\$0	\$372
2.04	Security Guard Force	\$45,944	\$0	\$0	\$0	\$11,486
2.05	Security Related Expenses	\$2,556	\$0	\$0	\$0	\$639
2.08	NRC Spent Fuel Fees	\$0	\$0	\$0	\$2,302	\$576
2.10	Spent Fuel Maintenance	\$0	\$0	\$0	\$1,478	\$370
2.11	Materials and Services	\$0	\$2,017	\$0	\$0	\$504
2.13	Energy	\$0	\$0	\$0	\$1,209	\$302
2.18	Utilities (Water, gas, phone)	\$0	\$1,380	\$0	\$0	\$345
2.22	Personal Computers	\$0	\$0	\$0	\$12	\$3
Undistributed	Subtotal	\$88,393	\$4,884	\$0	\$5,001	\$24,570
SNF Pd 3	Subtotal	\$88,393	\$4,884	\$0	\$5,001	\$24,570
						\$122,849
						\$122,849

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No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SNF Pd 4 Dry Storage Only - Units 1, 2 and 3							
Undistributed							
2.01	Utility Spent Fuel Staff	\$12,687	\$0	\$0	\$0	\$3,172	\$15,859
2.02	Utility Staff HP Supplies	\$0	\$882	\$0	\$0	\$220	\$1,102
2.03	Additional Staff for Spent Fuel Shipping	\$1,119	\$0	\$0	\$0	\$280	\$1,398
2.04	Security Guard Force	\$14,949	\$0	\$0	\$0	\$3,737	\$18,687
2.05	Security Related Expenses	\$2,506	\$0	\$0	\$0	\$626	\$3,132
2.06	Insurance	\$0	\$0	\$0	\$2,538	\$634	\$3,172
2.07	Site Lease and Easement Expenses	\$0	\$0	\$0	\$1,154	\$173	\$1,327
2.08	NRC Spent Fuel Fees	\$0	\$0	\$0	\$1,638	\$409	\$2,047
2.10	Spent Fuel Maintenance	\$0	\$0	\$0	\$481	\$120	\$601
2.11	Materials and Services	\$0	\$778	\$0	\$0	\$194	\$972
2.13	Energy	\$0	\$0	\$0	\$393	\$98	\$492
2.16	Workers Compensation Insurance	\$0	\$0	\$0	\$694	\$173	\$867
2.17	Property Tax	\$0	\$0	\$0	\$6,412	\$1,603	\$8,015
2.18	Utilities (Water, gas, phone)	\$0	\$475	\$0	\$0	\$119	\$594
2.20	Non-Process Computers	\$0	\$192	\$0	\$0	\$48	\$240
2.21	Telecommunications	\$0	\$192	\$0	\$0	\$48	\$240
2.22	Personal Computers	\$0	\$0	\$0	\$15	\$4	\$18
Undistributed Subtotal		\$31,261	\$2,519	\$0	\$13,325	\$11,661	\$58,765
SNF Pd 4 Subtotal		\$31,261	\$2,519	\$0	\$13,325	\$11,661	\$58,765

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2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SNF Pd 5 Dry Storage Only - Units 2 and 3							
Undistributed							
2.01	Utility Spent Fuel Staff	\$48,480	\$0	\$0	\$0	\$12,120	\$60,601
2.02	Utility Staff HP Supplies	\$0	\$3,369	\$0	\$0	\$842	\$4,211
2.03	Additional Staff for Spent Fuel Shipping	\$4,275	\$0	\$0	\$0	\$1,069	\$5,344
2.04	Security Guard Force	\$57,126	\$0	\$0	\$0	\$14,281	\$71,407
2.05	Security Related Expenses	\$4,124	\$0	\$0	\$0	\$1,031	\$5,155
2.06	Insurance	\$0	\$0	\$0	\$9,698	\$2,425	\$12,123
2.07	Site Lease and Easement Expenses	\$0	\$0	\$0	\$4,409	\$661	\$5,071
2.08	NRC Spent Fuel Fees	\$0	\$0	\$0	\$6,259	\$1,565	\$7,823
2.10	Spent Fuel Maintenance	\$0	\$0	\$0	\$1,838	\$459	\$2,297
2.11	Materials and Services	\$0	\$2,972	\$0	\$0	\$743	\$3,715
2.13	Energy	\$0	\$0	\$0	\$1,503	\$376	\$1,879
2.16	Workers Compensation Insurance	\$0	\$0	\$0	\$2,651	\$663	\$3,314
2.17	Property Tax	\$0	\$0	\$0	\$22,053	\$5,513	\$27,566
2.18	Utilities (Water, gas, phone)	\$0	\$1,816	\$0	\$0	\$454	\$2,270
2.20	Non-Process Computers	\$0	\$735	\$0	\$0	\$184	\$919
2.21	Telecommunications	\$0	\$735	\$0	\$0	\$184	\$919
2.22	Personal Computers	\$0	\$0	\$0	\$32	\$8	\$40
Undistributed Subtotal		\$114,005	\$9,627	\$0	\$48,443	\$42,578	\$214,653
SNF Pd 5 Subtotal		\$114,005	\$9,627	\$0	\$48,443	\$42,578	\$214,653

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands						
No	Item Description	Labor	Equipment	Disposal	Other	Contingency
SNF D&D Pd 1 ISFSI License Termination						
Distributed						
12.01	Preparation and NRC Review of License Termination Plan	\$116	\$0	\$0	\$163	\$70
Distributed	Subtotal	\$116	\$0	\$0	\$163	\$70
Undistributed						
2.01	Utility Spent Fuel Staff	\$366	\$0	\$0	\$0	\$91
2.02	Utility Staff HP Supplies	\$0	\$11	\$0	\$0	\$3
2.04	Security Guard Force	\$181	\$0	\$0	\$0	\$45
2.05	Security Related Expenses	\$70	\$0	\$0	\$0	\$18
2.06	Insurance	\$0	\$0	\$0	\$215	\$54
2.07	Site Lease and Easement Expenses	\$0	\$0	\$0	\$98	\$15
2.08	NRC Spent Fuel Fees	\$0	\$0	\$0	\$75	\$19
2.11	Materials and Services	\$0	\$17	\$0	\$0	\$4
2.13	Energy	\$0	\$0	\$0	\$102	\$26
2.16	Workers Compensation Insurance	\$0	\$0	\$0	\$59	\$15
2.17	Property Tax	\$0	\$0	\$0	\$543	\$136
2.18	Utilities (Water, gas, phone)	\$0	\$7	\$0	\$0	\$2
Undistributed	Subtotal	\$617	\$36	\$0	\$1,092	\$426
SNF D&D Pd 1	Subtotal	\$733	\$36	\$0	\$1,255	\$496

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SNF D&D Pd 2 ISFSI Demolition							
Distributed							
13.01	Install GARDIAN Bulk Assay System	\$0	\$0	\$0	\$525	\$131	\$656
13.02	Decon AHSMs	\$339	\$147	\$443	\$0	\$232	\$1,161
13.03	Final Status Survey of ISFSI	\$1,589	\$256	\$0	\$0	\$277	\$2,122
13.04	Clean Demolition of ISFSI AHSMs and Pad	\$4,094	\$2,590	\$3,333	\$0	\$2,504	\$12,521
13.05	Clean Demolition of ISFSI Support Structures	\$1,126	\$458	\$1,372	\$0	\$739	\$3,696
13.06	Restore ISFSI Site	\$246	\$161	\$0	\$0	\$102	\$509
13.07	Preparation of Final Report on Decommissioning and NRC Review	\$52	\$0	\$0	\$0	\$13	\$65
Distributed	Subtotal	\$7,446	\$3,612	\$5,148	\$525	\$3,998	\$20,729
Undistributed							
2.01	Utility Spent Fuel Staff	\$1,801	\$0	\$0	\$0	\$450	\$2,251
2.02	Utility Staff HP Supplies	\$0	\$72	\$0	\$0	\$18	\$90
2.04	Security Guard Force	\$704	\$0	\$0	\$0	\$176	\$880
2.05	Security Related Expenses	\$37	\$0	\$0	\$0	\$9	\$46
2.11	Materials and Services	\$0	\$93	\$0	\$0	\$23	\$116
2.12	DAW Disposal	\$0	\$0	\$7	\$0	\$2	\$8
2.13	Energy	\$0	\$0	\$0	\$268	\$67	\$334
2.14	Decommissioning General Contractor Staff	\$4,525	\$0	\$0	\$0	\$1,131	\$5,656
2.15	Craft Worker Training	\$189	\$0	\$0	\$0	\$47	\$236
2.18	Utilities (Water, gas, phone)	\$0	\$35	\$0	\$0	\$9	\$43
2.24	DGC HP Supplies	\$0	\$159	\$0	\$0	\$40	\$199
Undistributed	Subtotal	\$7,255	\$359	\$7	\$268	\$1,972	\$9,861
SNF D&D Pd 2	Subtotal	\$14,701	\$3,972	\$5,154	\$793	\$5,970	\$30,590
B. Spent Fuel	Subtotal	\$708,425	\$172,826	\$5,429	\$160,876	\$228,639	\$1,276,196

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands						
No	Item Description	Labor	Equipment	Disposal	Other	Contingency
C. Site Restoration						
SR Pd 1	Transition to Site Restoration					
Distributed						
14.01	Mesa Site Phase I and II Site Assessment	\$0	\$0	\$0	\$42	\$11
14.02	Disposition Hazardous Waste from Mesa Site	\$0	\$0	\$0	\$211	\$106
14.03	Mesa Site Characterization Survey	\$988	\$261	\$0	\$0	\$312
14.04	Fuel Cancellation Expense	\$0	\$0	\$0	\$17,679	\$0
Distributed	Subtotal	\$988	\$261	\$0	\$17,932	\$428
Undistributed						
3.05	Site Lease and Easement Expenses	\$0	\$0	\$0	\$1,030	\$0
3.11	Severance	\$0	\$0	\$0	\$109,850	\$0
Undistributed	Subtotal	\$0	\$0	\$0	\$110,880	\$0
SR Pd 1	Subtotal	\$988	\$261	\$0	\$128,812	\$428
						\$130,489

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SR Pd 2 Building Demolition During Decommissioning							
Undistributed							
15.01	Prepare Site Restoration Demolition Plan and Schedule	\$684	\$10	\$0	\$0	\$173	\$866
15.02	Obtain Required Permits For Mesa, South Access and South Yard	\$209	\$4	\$0	\$0	\$53	\$266
15.03	Demolish Service Building (K-10, 20, 30)	\$250	\$189	\$481	\$0	\$230	\$1,150
15.04	Demolish South Security Processing Facility (K-70)	\$46	\$44	\$122	\$0	\$53	\$264
15.05	Demolish Staging Warehouse	\$67	\$55	\$126	\$0	\$62	\$311
15.06	Demolish Administration Building (K-40/50)	\$367	\$258	\$565	\$0	\$297	\$1,487
15.07	Demolish South Yard Area Buildings T-10, 20, 60 and Haz Mat.	\$670	\$590	\$1,370	\$0	\$658	\$3,288
15.08	Demolish REMS Staging Pad	\$98	\$184	\$549	\$0	\$208	\$1,038
15.09	Demolish Mesa Buildings	\$2,788	\$1,879	\$6,006	\$0	\$2,668	\$13,341
15.10	Remove Underground Fuel Storage Tanks	\$56	\$22	\$0	\$21	\$25	\$123
15.11	Demolish Mesa Roads and Parking Lots	\$582	\$400	\$0	\$0	\$245	\$1,227
15.12	Finish Grading and Re-vegetate Mesa Site	\$299	\$404	\$0	\$0	\$176	\$878
Distributed	Subtotal	\$6,114	\$4,038	\$9,219	\$21	\$4,848	\$24,239
Undistributed							
3.01	Utility Staff	\$2,563	\$0	\$0	\$0	\$641	\$3,204
3.03	Security Related Expenses	\$898	\$0	\$0	\$0	\$224	\$1,122
3.05	Site Lease and Easement Expenses	\$0	\$0	\$0	\$4,266	\$640	\$4,906
3.06	Materials and Services	\$0	\$134	\$0	\$0	\$34	\$168
3.08	Decommissioning General Contractor Staff	\$4,248	\$0	\$0	\$0	\$1,062	\$5,310
3.09	Craft Worker Training	\$318	\$0	\$0	\$0	\$80	\$398
3.11	Severance	\$0	\$0	\$0	\$8,688	\$2,172	\$10,860
3.13	Utilities (Water, gas, phone)	\$0	\$29	\$0	\$0	\$7	\$36
Undistributed	Subtotal	\$8,027	\$164	\$0	\$12,955	\$4,860	\$26,005
SR Pd 2	Subtotal	\$14,141	\$4,201	\$9,219	\$12,975	\$9,708	\$50,245

Table 1

SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SR Pd 3	Subsurface Demolition Engineering and Permitting						
Distributed							
16.01	Hydrogeologic Investigation and Outfall Conduit Survey	\$297	\$131	\$0	\$105	\$133	\$667
16.02	Subsurface Structure Removal Engineering Planning and Design	\$1,264	\$33	\$0	\$0	\$324	\$1,621
16.03	Environmental Impacts Analyses for Lease Termination Activities	\$581	\$50	\$0	\$525	\$289	\$1,445
16.04	Final Site Grading and Shoreline Protection Engineering Planning and Design	\$242	\$13	\$0	\$0	\$64	\$319
16.05	Obtain Required Permits and Approvals	\$1,856	\$20	\$0	\$263	\$535	\$2,673
Distributed	Subtotal	\$4,240	\$248	\$0	\$893	\$1,345	\$6,726
Undistributed							
3.03	Security Related Expenses	\$275	\$0	\$0	\$0	\$69	\$344
3.11	Severance	\$0	\$0	\$0	\$24,674	\$6,168	\$30,842
Undistributed	Subtotal	\$275	\$0	\$0	\$24,674	\$6,237	\$31,186
SR Pd 3	Subtotal	\$4,516	\$248	\$0	\$25,566	\$7,582	\$37,912

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SR Pd 4 Building Demolition to 3 Feet Below Grade							
Distributed							
17.01	Procure Clean Building Demolition Equipment	\$0	\$10,691	\$0	\$0	\$2,673	\$13,363
17.02	Install Temporary Structures	\$11	\$190	\$0	\$0	\$30	\$230
17.03	Install Erosion and Sediment Controls	\$123	\$14	\$0	\$0	\$34	\$172
17.04	Remove Cathodic Protection Trench	\$1,813	\$1,527	\$22	\$0	\$840	\$4,201
17.05	Remove Protected Area Security Fencing	\$57	\$18	\$0	\$0	\$19	\$95
17.06	Remove Protected Area Pavement	\$139	\$97	\$755	\$0	\$248	\$1,239
17.07	Detension and Remove Unit 3 Containment Building Tendons	\$0	\$0	\$0	\$4,200	\$1,050	\$5,250
17.08	Demolish Diesel Generator Building - Unit 3	\$618	\$245	\$794	\$0	\$414	\$2,072
17.09	Demolish Condensate Building and Transformer Pads - Unit 3	\$1,067	\$1,755	\$3,183	\$0	\$1,501	\$7,505
17.10	Demolish Full Flow Area and Turbine Building - Unit 3	\$3,221	\$1,149	\$3,444	\$0	\$1,953	\$9,767
17.11	Demolish Unit 3 Fuel Handling Building to 3-Feet Below Grade	\$306	\$354	\$1,470	\$0	\$533	\$2,663
17.12	Demolish Penetration Building - Unit 3	\$293	\$167	\$642	\$0	\$275	\$1,377
17.13	Demolish Safety Equipment and MSIV Building - Unit 3	\$336	\$403	\$1,858	\$0	\$649	\$3,246
17.14	Demolish Unit 3 Containment Building to 3-Feet Below Grade	\$2,418	\$1,351	\$6,198	\$0	\$2,492	\$12,459
17.15	Detension and Remove Unit 2 Containment Building Tendons	\$0	\$0	\$0	\$4,200	\$1,050	\$5,250
17.16	Demolish Diesel Generator Building - Unit 2	\$128	\$168	\$787	\$0	\$271	\$1,353
17.17	Demolish Condensate Building and Transformer Pads - Unit 2	\$1,067	\$1,755	\$3,183	\$0	\$1,501	\$7,505
17.18	Demolish Full Flow Area and Turbine Building - Unit 2	\$3,734	\$1,186	\$3,447	\$0	\$2,092	\$10,458
17.19	Demolish Unit 2 Fuel Handling Building to 3-Feet Below Grade	\$306	\$354	\$1,470	\$0	\$533	\$2,663
17.20	Demolish Penetration Building - Unit 2	\$99	\$136	\$639	\$0	\$219	\$1,093
17.21	Demolish Safety and MSIV Equipment Building - Unit 2	\$336	\$403	\$1,859	\$0	\$649	\$3,247
17.22	Demolish Unit 2 Containment Building to 3-Feet Below Grade	\$2,418	\$1,351	\$6,198	\$0	\$2,492	\$12,459
17.23	Demolish AWS Building	\$1,108	\$1,050	\$2,925	\$0	\$1,271	\$6,354
17.24	Demolish Building L-50	\$59	\$33	\$67	\$0	\$40	\$198
17.25	Demolish Maintenance Building 4 (B-64/B-65)	\$24	\$13	\$25	\$0	\$16	\$78
17.26	Demolish Maintenance Building 5 (B-62/B-63)	\$35	\$20	\$37	\$0	\$23	\$115
17.27	Demolish Outage Control Center	\$98	\$57	\$148	\$0	\$76	\$378
17.28	Demolish Maintenance Building 2 (B-49/B-50)	\$49	\$32	\$82	\$0	\$41	\$205
17.29	Demolish Maintenance Building 1 (B-43/B-44)	\$163	\$196	\$857	\$0	\$304	\$1,520
17.30	Demolish Auxiliary Radwaste Building - Common	\$1,521	\$1,984	\$9,214	\$0	\$3,180	\$15,898
17.31	Demolish Auxiliary Control Building - Common	\$1,491	\$811	\$3,219	\$0	\$1,380	\$6,901

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
17.32	Remove Systems and Demolish Make-Up Demineralizer Structures	\$737	\$122	\$471	\$0	\$332	\$1,662
17.33	Install Concrete Plugs in Intake and Discharge Structures	\$272	\$1,614	\$0	\$0	\$472	\$2,358
17.34	Demolish Intake and Discharge Structures to 3-Foot Below Grade	\$82	\$114	\$535	\$0	\$183	\$914
Distributed	Subtotal	\$24,128	\$29,358	\$53,530	\$8,400	\$28,834	\$144,249
Undistributed							
3.01	Utility Staff	\$12,553	\$0	\$0	\$0	\$3,138	\$15,691
3.02	Security Guard Force	\$2,480	\$0	\$0	\$0	\$620	\$3,100
3.03	Security Related Expenses	\$1,158	\$0	\$0	\$0	\$290	\$1,448
3.04	Insurance	\$0	\$0	\$0	\$3,995	\$999	\$4,993
3.05	Site Lease and Easement Expenses	\$0	\$0	\$0	\$1,340	\$201	\$1,541
3.06	Materials and Services	\$0	\$751	\$0	\$0	\$188	\$938
3.07	Energy	\$0	\$0	\$0	\$1,184	\$296	\$1,480
3.08	Decommissioning General Contractor Staff	\$50,906	\$0	\$0	\$0	\$12,727	\$63,633
3.09	Craft Worker Training	\$1,999	\$0	\$0	\$0	\$500	\$2,498
3.10	Workers Compensation Insurance	\$0	\$0	\$0	\$806	\$201	\$1,007
3.11	Severance	\$0	\$0	\$0	\$7,273	\$1,818	\$9,091
3.12	Property Tax	\$0	\$0	\$0	\$6,701	\$1,675	\$8,377
3.13	Utilities (Water, gas, phone)	\$0	\$214	\$0	\$0	\$53	\$267
3.14	Tools and Equipment	\$0	\$156	\$0	\$0	\$39	\$195
3.15	Non-Process Computers	\$0	\$223	\$0	\$0	\$56	\$279
3.16	Telecommunications	\$0	\$223	\$0	\$0	\$56	\$279
Undistributed	Subtotal	\$69,096	\$1,567	\$0	\$21,298	\$22,856	\$114,817
SR Pd 4	Subtotal	\$93,224	\$30,924	\$53,530	\$29,698	\$51,690	\$259,066

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SR Pd 5 Subgrade Structure Removal Below - 3 Feet							
Distributed							
18.01	Procure Subsurface Structure Demolition Equipment	\$0	\$6,630	\$0	\$0	\$1,658	\$8,288
18.02	Install Sheet Piling and Excavation Shoring	\$8,468	\$17,219	\$0	\$0	\$6,422	\$32,109
18.03	Install Dewatering System and Effluent Treatment and Discharge Controls	\$0	\$0	\$0	\$9,651	\$2,413	\$12,064
18.04	Demolish and Backfill Unit 3 Condensate Storage Area Below -3 Feet	\$179	\$305	\$912	\$0	\$349	\$1,746
18.05	Demolish and Backfill Unit 3 Diesel Generator Building Below -3 Feet	\$130	\$173	\$442	\$0	\$186	\$932
18.06	Demolish and Backfill Unit 3 Fuel Handling Building Below -3 Feet	\$271	\$696	\$1,170	\$0	\$534	\$2,671
18.07	Demolish and Backfill Unit 3 Radwaste and Control Building Below -3 Feet	\$1,367	\$3,268	\$5,249	\$0	\$2,471	\$12,355
18.08	Demolish and Backfill Unit 3 Turbine Building Structure Below 9 Ft Elevation	\$3,956	\$9,277	\$12,551	\$0	\$6,446	\$32,231
18.09	Demolish and Backfill Unit 3 Safety Equipment Building Below -3 Feet	\$717	\$1,883	\$2,713	\$0	\$1,328	\$6,641
18.10	Demolish and Backfill Unit 3 Penetration Area Below -3 Feet	\$294	\$586	\$1,285	\$0	\$541	\$2,706
18.11	Demolish and Backfill Unit 3 Full Flow Building Below -3 Feet	\$167	\$527	\$411	\$0	\$276	\$1,382
18.12	Demolish and Backfill Unit 3 Containment Building Below -3 Feet	\$1,211	\$2,214	\$4,636	\$0	\$2,015	\$10,077
18.13	Demolish and Backfill Unit 2 Condensate Storage Area Below -3 Feet	\$179	\$305	\$912	\$0	\$349	\$1,746
18.14	Demolish and Backfill Unit 2 Diesel Generator Building Below -3 Feet	\$130	\$173	\$442	\$0	\$186	\$932
18.15	Demolish and Backfill Unit 2 Fuel Handling Building Below -3 Feet	\$271	\$696	\$1,170	\$0	\$534	\$2,671
18.16	Demolish and Backfill Unit 2 Radwaste and Control Building Below -3 Feet	\$1,415	\$3,308	\$5,249	\$0	\$2,493	\$12,466
18.17	Demolish and Backfill Unit 2 Turbine Building Structure Below 9 Ft Elevation	\$3,959	\$9,277	\$12,551	\$0	\$6,447	\$32,234
18.18	Demolish and Backfill Unit 2 Safety Equipment Building Below -3 Feet	\$717	\$1,883	\$2,713	\$0	\$1,328	\$6,641
18.19	Demolish and Backfill Unit 2 Penetration Area Below -3 Feet	\$294	\$586	\$1,285	\$0	\$541	\$2,706
18.20	Demolish and Backfill Unit 2 Full Flow Building Below -3 Feet	\$167	\$527	\$411	\$0	\$276	\$1,382
18.21	Demolish and Backfill Unit 2 Containment Building Below -3 Feet	\$1,211	\$2,214	\$4,636	\$0	\$2,015	\$10,077
18.22	Demolish and Backfill Intake Structure Below -3 Feet	\$6,664	\$12,970	\$36,706	\$0	\$14,085	\$70,426
18.23	Remove Off Shore Intake and Outfall Conduits	\$12,406	\$44,308	\$19,580	\$0	\$19,073	\$95,367
18.24	Remove Sheet Piling and Excavation Shoring	\$11,776	\$0	\$0	\$0	\$2,944	\$14,721
18.25	Remove Dewatering System and Effluent Treatment	\$0	\$0	\$0	\$2,308	\$577	\$2,885
18.26	Finish Grading and Re-Vegetate Site	\$945	\$813	\$0	\$0	\$440	\$2,198
18.27	Remove Temporary Structures	\$58	\$48	\$0	\$0	\$16	\$122
Distributed	Subtotal	\$56,952	\$119,889	\$115,025	\$11,959	\$75,946	\$379,772
Undistributed							
3.01	Utility Staff	\$7,082	\$0	\$0	\$0	\$1,771	\$8,853

Table 1

SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
3.02	Security Guard Force	\$1,830	\$0	\$0	\$0	\$458	\$2,288
3.03	Security Related Expenses	\$139	\$0	\$0	\$0	\$35	\$173
3.04	Insurance	\$0	\$0	\$0	\$2,948	\$737	\$3,685
3.05	Site Lease and Easement Expenses	\$0	\$0	\$0	\$989	\$148	\$1,137
3.06	Materials and Services	\$0	\$415	\$0	\$0	\$104	\$519
3.07	Energy	\$0	\$0	\$0	\$814	\$204	\$1,018
3.08	Decommissioning General Contractor Staff	\$26,176	\$0	\$0	\$0	\$6,544	\$32,720
3.09	Craft Worker Training	\$983	\$0	\$0	\$0	\$246	\$1,229
3.10	Workers Compensation Insurance	\$0	\$0	\$0	\$595	\$149	\$743
3.11	Severance	\$0	\$0	\$0	\$2,050	\$513	\$2,563
3.12	Property Tax	\$0	\$0	\$0	\$4,946	\$1,237	\$6,183
3.13	Utilities (Water, gas, phone)	\$0	\$128	\$0	\$0	\$32	\$160
3.14	Tools and Equipment	\$0	\$73	\$0	\$0	\$18	\$91
3.15	Non-Process Computers	\$0	\$165	\$0	\$0	\$41	\$206
3.16	Telecommunications	\$0	\$165	\$0	\$0	\$41	\$206
Undistributed	Subtotal	\$36,211	\$946	\$0	\$12,343	\$12,276	\$61,775
SR Pd 5	Subtotal	\$93,163	\$120,834	\$115,025	\$24,302	\$88,222	\$441,547

Table 1

SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands

No	Item Description	Labor	Equipment	Disposal	Other	Contingency	Total
SR Pd 6 Final Site Restoration and Lease Termination							
Distributed							
19.01	Obtain Required Permits and Approvals	\$404	\$20	\$0	\$131	\$139	\$693
19.02	Install Temporary Structures	\$6	\$35	\$0	\$0	\$6	\$48
19.03	Procure Site Restoration Equipment	\$0	\$404	\$0	\$0	\$101	\$505
19.04	Install Temporary Seawall or Cofferdam	\$8,551	\$17,624	\$0	\$0	\$6,544	\$32,718
19.05	Install Dewatering System and Effluent Treatment and Discharge Controls	\$0	\$0	\$0	\$1,427	\$357	\$1,784
19.06	Remove and Stockpile Existing Seawall Erosion Protection	\$6	\$11	\$0	\$0	\$4	\$21
19.07	Remove Unit 2 and 3 Seawall and Pedestrian Walkway	\$3,206	\$3,060	\$4,558	\$0	\$2,706	\$13,530
19.08	Remove Remaining Intake and Outfall Box Culvert	\$336	\$468	\$2,188	\$0	\$748	\$3,739
19.09	Remove Temporary Seawall or Cofferdam	\$11,791	\$143	\$0	\$0	\$2,983	\$14,917
19.10	Backfill and Compaction of Excavation	\$1,471	\$2,238	\$0	\$0	\$556	\$4,265
19.11	Remove Dewatering System and Effluent Treatment	\$0	\$0	\$0	\$592	\$148	\$740
19.12	Install Shoreline Erosion Control and Restoration Features	\$10	\$144	\$0	\$0	\$38	\$192
19.13	Remove Railroad Tracks, Rails and Ballast	\$63	\$35	\$0	\$0	\$24	\$122
19.14	Remove Gunite Slope Protection	\$262	\$366	\$1,710	\$0	\$585	\$2,923
19.15	Remove Access Roads and Parking Lots	\$240	\$181	\$0	\$0	\$105	\$527
19.16	Finish Grading and Re-Vegetate Site	\$27	\$28	\$0	\$0	\$14	\$68
19.17	Remove Temporary Structures	\$8	\$7	\$0	\$0	\$2	\$18
Distributed Subtotal		\$26,380	\$24,763	\$8,456	\$2,151	\$15,061	\$76,810
Undistributed							
3.01	Utility Staff	\$2,219	\$0	\$0	\$0	\$555	\$2,773
3.04	Insurance	\$0	\$0	\$0	\$605	\$151	\$756
3.05	Site Lease and Easement Expenses	\$0	\$0	\$0	\$507	\$76	\$583
3.06	Materials and Services	\$0	\$142	\$0	\$0	\$35	\$177
3.07	Energy	\$0	\$0	\$0	\$418	\$104	\$522
3.08	Decommissioning General Contractor Staff	\$8,062	\$0	\$0	\$0	\$2,016	\$10,078
3.09	Craft Worker Training	\$504	\$0	\$0	\$0	\$126	\$630
3.10	Workers Compensation Insurance	\$0	\$0	\$0	\$305	\$76	\$381
3.11	Severance	\$0	\$0	\$0	\$6,077	\$1,519	\$7,596
3.12	Property Tax	\$0	\$0	\$0	\$2,536	\$634	\$3,169
3.13	Utilities (Water, gas, phone)	\$0	\$31	\$0	\$0	\$8	\$38

Table 1
SONGS Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Decommissioning Alternative	DECON	License Status	POL	Unit 2 Shut Down:	6/7/2013
Spent Fuel Alternative	Dry	Fuel Pool Systems	Modified	Unit 3 Shut Down:	6/7/2013
		Repository Opening Date:	1/1/2024		

2014 Dollars in Thousands						
No	Item Description	Labor	Equipment	Disposal	Other	Contingency
3.14	Tools and Equipment	\$0	\$24	\$0	\$0	\$6
Undistributed	Subtotal	\$10,785	\$197	\$0	\$10,446	\$5,307
SR Pd 6	Subtotal	\$37,165	\$24,960	\$8,456	\$12,597	\$20,367
C. Site Restoration	Subtotal	\$243,198	\$181,428	\$186,230	\$233,951	\$177,997
	Total	\$1,763,742	\$505,191	\$757,925	\$566,786	\$817,601
						\$4,411,246

Appendix E

Annual Cash Flow Table

SONGS Annual Cost By Account

Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Unit No: Unit 2

2014 Dollars in Thousands

Year	License Termination	Spent Fuel	Site Restoration	Total
2013	\$25,749	\$63,891	\$49,067	\$138,706
2014	\$79,799	\$35,719	\$15,089	\$130,607
2015	\$69,196	\$106,308	\$7,439	\$182,943
2016	\$54,541	\$59,308	\$3,730	\$117,579
2017	\$111,903	\$59,308	\$1,957	\$173,168
2018	\$47,520	\$59,308	\$0	\$106,828
2019	\$108,328	\$27,554	\$13,539	\$149,420
2020	\$185,482	\$4,908	\$36	\$190,426
2021	\$79,081	\$4,908	\$36	\$84,026
2022	\$54,785	\$4,908	\$1,927	\$61,621
2023	\$158,207	\$4,908	\$36	\$163,151
2024	\$37,930	\$4,908	\$16,848	\$59,687
2025	\$2,922	\$4,908	\$44,621	\$52,451
2026	\$2,922	\$4,908	\$19,412	\$27,243
2027	\$2,922	\$4,908	\$22,469	\$30,299
2028	\$2,922	\$4,908	\$31,688	\$39,518
2029	\$2,922	\$4,908	\$66,873	\$74,704
2030	\$2,922	\$4,908	\$71,867	\$79,697
2031	\$2,055	\$5,089	\$23,181	\$30,325
2032	\$2,122	\$7,214	\$0	\$9,336
2033	\$0	\$7,214	\$0	\$7,214
2034	\$0	\$7,214	\$0	\$7,214
2035	\$0	\$7,228	\$0	\$7,228
2036	\$0	\$7,665	\$0	\$7,665
2037	\$0	\$7,665	\$0	\$7,665
2038	\$0	\$7,665	\$0	\$7,665
2039	\$0	\$7,665	\$0	\$7,665
2040	\$0	\$7,665	\$0	\$7,665
2041	\$0	\$7,665	\$0	\$7,665
2042	\$0	\$7,665	\$0	\$7,665
2043	\$0	\$7,665	\$0	\$7,665
2044	\$0	\$7,665	\$0	\$7,665
2045	\$0	\$7,665	\$0	\$7,665
2046	\$0	\$7,665	\$0	\$7,665
2047	\$0	\$7,665	\$0	\$7,665
2048	\$0	\$7,665	\$0	\$7,665

SONGS Annual Cost By Account

Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Unit No: Unit 2

2014 Dollars in Thousands

Year	License Termination	Spent Fuel	Site Restoration	Total
2049	\$0	\$7,667	\$0	\$7,667
2050	\$0	\$9,974	\$20,177	\$30,151
2051	\$0	\$6,573	\$11,928	\$18,500
2052	\$0	\$0	\$1,377	\$1,377
Total	\$1,034,230	\$623,209	\$423,297	\$2,080,735

SONGS Annual Cost By Account

Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Unit No: Unit 3

2014 Dollars in Thousands

Year	License Termination	Spent Fuel	Site Restoration	Total
2013	\$26,566	\$66,105	\$49,067	\$141,739
2014	\$78,964	\$40,156	\$15,969	\$135,089
2015	\$74,096	\$112,024	\$9,390	\$195,509
2016	\$61,451	\$64,405	\$25,227	\$151,083
2017	\$40,631	\$64,405	\$3,799	\$108,835
2018	\$86,348	\$64,405	\$0	\$150,753
2019	\$96,521	\$29,675	\$13,908	\$140,104
2020	\$120,873	\$4,908	\$2,135	\$127,916
2021	\$194,090	\$4,908	\$575	\$199,574
2022	\$135,313	\$4,908	\$2,467	\$142,688
2023	\$114,581	\$4,908	\$1,511	\$121,000
2024	\$26,874	\$4,908	\$36,778	\$68,560
2025	\$2,922	\$4,908	\$40,655	\$48,485
2026	\$2,922	\$4,908	\$21,676	\$29,507
2027	\$2,922	\$4,908	\$25,848	\$33,678
2028	\$2,922	\$4,908	\$20,945	\$28,776
2029	\$2,922	\$4,908	\$117,321	\$125,151
2030	\$2,922	\$4,908	\$116,672	\$124,503
2031	\$2,055	\$5,089	\$25,501	\$32,645
2032	\$2,122	\$7,214	\$0	\$9,336
2033	\$0	\$7,214	\$0	\$7,214
2034	\$0	\$7,214	\$0	\$7,214
2035	\$0	\$7,228	\$0	\$7,228
2036	\$0	\$7,665	\$0	\$7,665
2037	\$0	\$7,665	\$0	\$7,665
2038	\$0	\$7,665	\$0	\$7,665
2039	\$0	\$7,665	\$0	\$7,665
2040	\$0	\$7,665	\$0	\$7,665
2041	\$0	\$7,665	\$0	\$7,665
2042	\$0	\$7,665	\$0	\$7,665
2043	\$0	\$7,665	\$0	\$7,665
2044	\$0	\$7,665	\$0	\$7,665
2045	\$0	\$7,665	\$0	\$7,665
2046	\$0	\$7,665	\$0	\$7,665
2047	\$0	\$7,665	\$0	\$7,665
2048	\$0	\$7,665	\$0	\$7,665

SONGS Annual Cost By Account

Prompt DECON Base Case, 2024 DOE Acceptance, Dry Storage

Unit No: Unit 3

2014 Dollars in Thousands

Year	License Termination	Spent Fuel	Site Restoration	Total
2049	\$0	\$7,667	\$0	\$7,667
2050	\$0	\$9,974	\$23,120	\$33,094
2051	\$0	\$6,573	\$45,566	\$52,139
2052	\$0	\$0	\$1,377	\$1,377
Total	\$1,078,016	\$652,987	\$599,507	\$2,330,511

Appendix F

SDG&E SONGS Decommissioning Costs (100%)

San Diego Gas & Electric Company (SDG&E) provides the following information regarding its internal decommissioning costs, which it expects to incur and to fund on its own behalf (100%) in addition to its 20% share of the Decommissioning Cost Estimate.

I. BACKGROUND

As the 20% minority owner, SDG&E is contractually obligated to pay its 20% ownership share of decommissioning expenses for SONGS. These costs, outlined in the DCE, will be incurred by the decommissioning agent and SDG&E will receive invoicing for its proportional share.

II. SDG&E COSTS

Table F-1			
SDG&E SONGS DECOMMISSIONING COSTS (1,000's, \$2014)			
Total Units 2 & 3	SDG&E Labor	Other/ Non-Labor	Total Costs
License Termination	\$3,832	\$1,047	\$4,879
Spent Fuel Management	\$2,729	\$417	\$3,147
Site Restoration	\$1,904	\$401	\$2,305
Total	\$8,465	\$1,865	\$10,330

In addition to SDG&E's 20% share of the costs outlined in the DCE, SDG&E also incurs internal costs related to its SONGS ownership. SDG&E incurs 100% of these Labor and Non-Labor costs related to SDG&E's oversight activities. These costs are apportioned into SCE's DCE categories of License Termination, Spent Fuel Management, and Site Restoration by determining the percentage of costs SCE allocated to each category and multiplying SDG&E's

costs by that same percentage for each category. SDG&E estimates that its total internal costs over the decommissioning period to be \$10.33 million (2014\$).

a. SDG&E LABOR

The first category, “SDG&E Labor” includes SDG&E staff who provide oversight of SONGS costs and activities. SDG&E’s internal staffing efforts are expected to mirror site staffing where the three (3) full-time equivalents (“FTEs”) are reduced after 2016 to two (2) FTEs, then to one (1) FTE after 2025, and eventually to zero (0) FTEs after 2032. After 2032, invoicing and oversight activities are anticipated to be minor during this period. Once ISFSI decommissioning is initiated on or around 2049, SDG&E plans to identify one (1) full-time equivalent through 2052.

These costs are shown in Table F-1 under the column heading of “SDG&E Labor” and are apportioned into SCE’s categories of License Termination, Spent Fuel Management, and Site Restoration.

b. OTHER/NON-LABOR

The second type of SDG&E-specific costs are “Other/Non-Labor”, which consist of outside decommissioning consultants and direct costs related to oversight activities.

To provide oversight of decommissioning activities, SDG&E has retained an external decommissioning consultant who has the expertise SDG&E requires. The external consultant is utilized to a greater extent through 2016 and then the consultant services are tapered off annually through 2025.

SDG&E also incurs direct costs related specifically to SDG&E’s oversight activities at SONGS. These costs, which include travel reimbursement, phone services, training, and wireless

communication from SONGS, will coincide with the number of SDG&E SONGS oversight personnel FTEs.

These costs are shown in Table F-1 under the column heading of Other/Non-labor and are apportioned into SCE's categories of License Termination, Spent Fuel Management, and Site Restoration.

III. CONCLUSION

All of SDG&E's internal decommissioning costs presented in Table F-1 are separate and distinct from the costs incurred by the decommissioning agent and invoiced to SDG&E.

SDG&E will seek authority to access its nuclear decommissioning trust funds to pay for its proportional share of SONGS related decommissioning expenses and for its internal decommissioning costs incurred through a Commission-approved advice letter process consistent with the terms of the SDG&E Master Trust Agreement, and relevant rules and regulations of the Internal Revenue Service and the Nuclear Regulatory Commission.

SDG&E SONGS Detailed Annual Expenditures
Base Case: Prompt DECON, Time Reasonable Schedule, DOE Repository Opening 2024, Utility and DGC, Dry Storage
(2014 Dollars in Thousands)

Account Totals

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
Total	\$8,431	\$0	\$1,544	\$0	\$0

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
Total	\$8,431	\$0	\$1,544	\$0	\$0

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
Total	\$8,431	\$0	\$1,544	\$0	\$0

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
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2017	\$4,016	\$0	\$823	\$0	\$0
Total	\$8,431	\$0	\$1,544	\$0	\$0

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
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Total	\$8,431	\$0	\$1,544	\$0	\$0

	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
Total	\$8,431	\$0	\$1,544	\$0	\$0

Unit 2

Year	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
2018	\$1,905	\$0	\$487	\$0	\$0
2019	\$1,349	\$0	\$184	\$0	\$0
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2023	\$1,349	\$0	\$184	\$0	\$0
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2025	\$4,016	\$0	\$823	\$0	\$0
2026	\$1,905	\$0	\$487	\$0	\$0
2027	\$1,349	\$0	\$184	\$0	\$0
2028	\$761	\$0	\$153	\$0	\$0
2029	\$4,016	\$0	\$823	\$0	\$0
2030	\$1,905	\$0	\$487	\$0	\$0
2031	\$1,349	\$0	\$184	\$0	\$0
2032	\$761	\$0	\$153	\$0	\$0
2033	\$4,016	\$0	\$823	\$0	\$0
2034	\$1,905	\$0	\$487	\$0	\$0
2035	\$1,349	\$0	\$184	\$0	\$0
2036	\$761	\$0	\$153	\$0	\$0
2037	\$4,016	\$0	\$823	\$0	\$0
2038	\$1,905	\$0	\$487	\$0	\$0
2039	\$1,349	\$0	\$184	\$0	\$0
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2041	\$4,016	\$0	\$823	\$0	\$0
2042	\$1,905	\$0	\$487	\$0	\$0
2043	\$1,349	\$0	\$184	\$0	\$0
2044	\$761	\$0	\$153	\$0	\$0
2045	\$4,016	\$0	\$823	\$0	\$0
2046	\$1,905	\$0	\$487	\$0	\$0
2047	\$1,349	\$0	\$184	\$0	\$0
2048	\$761	\$0	\$153	\$0	\$0
2049	\$4,016	\$0	\$823	\$0	\$0
2050	\$1,905	\$0	\$487	\$0	\$0
2051	\$1,349	\$0	\$184	\$0	\$0
2052	\$761	\$0	\$153	\$0	\$0
Total	\$1,905	\$0	\$487	\$0	\$0

Unit 3

Year	License Termination	Spent Fuel Management	Site Restoration	BSF SI D&D	Other
2014	\$1,905	\$0	\$487	\$0	\$0
2015	\$1,349	\$0	\$184	\$0	\$0
2016	\$761	\$0	\$153	\$0	\$0
2017	\$4,016	\$0	\$823	\$0	\$0
2018	\$1,905	\$0	\$487	\$0	\$0
2019	\$1,349	\$0	\$184	\$0	\$0
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2021	\$4,016	\$0	\$823	\$0	\$0
2022	\$1,905	\$0	\$487	\$0	\$0
2023	\$1,349	\$0	\$184	\$0	\$0
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2028	\$761	\$0	\$153	\$0	\$0
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2030	\$1,905	\$0	\$487	\$0	\$0
2031	\$1,349	\$0	\$184	\$0	\$0
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2033	\$4,016	\$0	\$823	\$0	\$0
2034	\$1,905	\$0	\$487	\$0	\$0
2035	\$1,349	\$0	\$184	\$0	\$0
2036	\$761	\$0	\$153	\$0	\$0
2037	\$4,016	\$0	\$823	\$0	\$0
2038	\$1,905	\$0	\$487	\$0	\$0
2039	\$1,349	\$0	\$184	\$0	\$0
2040	\$761	\$0	\$153	\$0	\$0
2041	\$4,016	\$0	\$823	\$0	\$0
2042	\$1,905	\$0	\$487	\$0	\$0
2043	\$1,349	\$0	\$184	\$0	\$0
2044	\$761	\$0	\$153	\$0	\$0
2045	\$4,016	\$0	\$823	\$0	\$0
2046	\$1,905	\$0	\$487	\$0	\$0
2047	\$1,349	\$0	\$184	\$0	\$0
2048	\$761	\$0	\$153	\$0	\$0
2049	\$4,016	\$0	\$823	\$0	\$0
2050	\$1,905	\$0	\$487	\$0	\$0
2051	\$1,349	\$0	\$184	\$0	\$0
2052	\$761	\$0	\$153	\$0	\$0
Total	\$1,905	\$0	\$487	\$0	\$0

EXHIBIT 4

March 3, 2010

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Atomic Safety and Licensing Board

Before Administrative Judges:
Thomas S. Moore, Chairman
Paul S. Ryerson
Richard E. Wardwell

_____)	
In the Matter of)	Docket No. 63-001
)	
U.S. DEPARTMENT OF ENERGY)	ASLBP No. 09-892-HLW-CAB04
)	
(High-Level Waste Repository))	
_____)	

U.S. DEPARTMENT OF ENERGY'S MOTION TO WITHDRAW

The United States Department of Energy ("DOE") hereby moves, pursuant to 10 C.F.R. § 2.107, to withdraw its pending license application for a permanent geologic repository at Yucca Mountain, Nevada. DOE asks the Board to dismiss its application with prejudice and to impose no additional terms of withdrawal.

While DOE reaffirms its obligation to take possession and dispose of the nation's spent nuclear fuel and high-level nuclear waste, the Secretary of Energy has decided that a geologic repository at Yucca Mountain is not a workable option for long-term disposition of these materials. Additionally, at the direction of the President, the Secretary has established the Blue Ribbon Commission on America's Nuclear Future, which will conduct a comprehensive review

and consider alternatives for such disposition.¹ And Congress has already appropriated \$5 million for the Blue Ribbon Commission to evaluate and recommend such “alternatives.” Energy and Water Development and Related Agencies Appropriations Act, 2010, Pub. L. No. 111-85, 123 Stat. 2845, 2864-65 (2009). In accord with those decisions, and to avoid further expenditure of funds on a licensing proceeding for a project that is being terminated, DOE has decided to discontinue the pending application in this docket,² and hereby moves to withdraw that application with prejudice.

Under the Nuclear Waste Policy Act of 1982, as amended, 42 U.S.C. §§ 10101 *et seq.* (“NWPA”), this licensing proceeding must be conducted “in accordance with the laws applicable to such applications” NWPA § 114(d), 42 U.S.C. § 10134(d). Those laws necessarily include the NRC’s regulations governing license applications, including, as this Board has already recognized, 10 C.F.R. § 2.107(a). *See* CAB Order (Concerning LSNA Memorandum), ASLBP No. 09-892-HLW-CAB04, at 2 (Dec. 22, 2009) (stating that “the parties are reminded that, pursuant to 10 C.F.R. § 2.107, withdrawal shall be on such terms as the Board may prescribe.”). That section provides in relevant part that “[w]ithdrawal of an application after the

¹ *See* Presidential Memorandum -- Blue Ribbon Commission on America’s Nuclear Future (Jan. 29, 2010) (“Presidential Memorandum”), *available at* <http://www.whitehouse.gov/the-press-office/presidential-memorandum-blue-ribbon-commission-americas-nuclear-future>; Department of Energy Press Release, Secretary Chu Announces Blue Ribbon Commission on America’s Nuclear Future (January 29, 2010), *available at* <http://www.energy.gov/news/8584.htm>; Charter, Blue Ribbon Commission on America’s Nuclear Future (filed March 1, 2010), *available at* http://www.energy.gov/news/documents/BRC_Charter.pdf. The Commission will conduct a comprehensive review of policies for managing the back end of the nuclear fuel cycle, including all alternatives for the storage, processing, and disposal of civilian and defense used nuclear fuel and materials derived from nuclear activities. *See id.*

² This decision was announced in the Administration’s Fiscal Year 2011 Budget, which states that “[i]n 2010, the Department will discontinue its application to the Nuclear Regulatory Commission (NRC) for a license to construct a high-level waste geologic repository at Yucca Mountain, Nevada.” Budget of the U.S. Government, Fiscal Year 2011: Terminations, Reductions, and Savings, at 62 (Feb. 1, 2010). The Department of Energy’s Fiscal Year 2011 Congressional Budget Request similarly states that “in 2010, Department will discontinue its application to the U.S. Nuclear Regulatory Commission for a license to construct a high-level waste geologic repository at Yucca Mountain.” Department of Energy, FY 2011 Congressional Budget Request, Vol. 7, at 163 (Feb. 2010).

issuance of a notice of hearing shall be on such terms as the presiding officer may prescribe.” 10 C.F.R. § 2.107(a).

Thus, applicable Commission regulations empower this Board to regulate the terms and conditions of withdrawal. *Philadelphia Electric Company* (Fulton Generating Station, Units 1 and 2), ALAB-657, 14 N.R.C. 967, 974 (1981). Any terms imposed for withdrawal must bear a rational relationship to the conduct and legal harm at issue. *Id.* And the record must support any findings concerning the conduct and harm in question to impose a term. *Id.*, citing *LeCompte v. Mr. Chip, Inc.*, 528 F.2d 601, 604-05 (5th Cir. 1976); 5 Moore's Federal Practice ¶ 41.05[1] at 41-58.

A. The Board Should Grant Dismissal With Prejudice

In this instance, the Board should prescribe only one term of withdrawal—that the pending application for a permanent geologic repository at the Yucca Mountain site shall be dismissed with prejudice.³

That action will provide finality in ending the Yucca Mountain project for a permanent geologic repository and will enable the Blue Ribbon Commission, as established by the Department and funded by Congress, to focus on alternative methods of meeting the federal government's obligation to take high-level waste and spent nuclear fuel. It is the Secretary of Energy's judgment that scientific and engineering knowledge on issues relevant to disposition of high-level waste and spent nuclear fuel has advanced dramatically over the twenty years since the Yucca Mountain project was initiated. *See also* Presidential Memorandum at 1. Future proposals for the disposition of such materials should thus be based on a comprehensive and

³ DOE seeks this form of dismissal because it does not intend ever to refile an application to construct a permanent geologic repository for spent nuclear fuel and high-level radioactive waste at Yucca Mountain.

careful evaluation of options supported by that knowledge, as well as other relevant factors, including the ability to secure broad public support, not on an approach that “has not proven effective” over several decades. *Id.*

The Board should defer to the Secretary’s judgment that dismissal of the pending application with prejudice is appropriate here. Settled law in this area directs the NRC to defer to the judgment of policymakers within the Executive Branch.⁴ And whether the public interest would be served by dismissing this application with prejudice is a matter within the purview of the Secretary.⁵ From public statements already made, we of course understand that some will nevertheless argue that dismissing this application is contrary to the NWPA. Although it is impossible to anticipate exactly what parties will argue at this point, at least one litigant seeking to raise these issues in federal court has said the NWPA obligation to file the pending application is inconsistent with the decision to withdraw the application. This is simply wrong.

Nothing in the text of the NWPA strips the Secretary of an applicant’s ordinary right to seek dismissal. In fact, the text of the statute cuts sharply in favor of the Secretary’s right to seek

⁴ *U.S. Department Of Energy* (Plutonium Export License), CLI-04-17, 59 N.R.C. 357, 374 (2004) (deferring, upon “balanc[ing] our statutory role in export licensing with the conduct of United States foreign relations, which is the responsibility of the Executive Branch,” to Executive Branch determination on an export license application). *See also Private Fuel Storage, L.L.C.* (Independent Spent Fuel Storage Installation), LBP-03-30, 58 N.R.C. 454, 472 (2003) (expressing “considerable doubt” about the NRC’s authority to “second-guess” the Bureau of Land Management on an issue relating to recommendations as to the wilderness status of land, and declining an invitation to do so); *see also Environmental Radiation Protection Standards for Nuclear Power Operations*, 40 CFR 190, CLI-81-4, 13 N.R.C. 298, 301 (1981) (deferring to EPA standards for radiation protection: “This agency does not sit as a reviewing court for a sister agency’s regulations....”). *See generally Pacific Gas & Electric Company* (Stanislaus Nuclear Project, Unit 1), LBP-83-2, 17 N.R.C. 45, 52 (1983) (“The law on withdrawal does not require a determination of whether [the applicant’s] decision [to withdraw] is sound.”).

⁵ The Atomic Energy Act (“AEA” or “Act”) gives the Secretary broad authority to carry out the Act’s purposes, including the authority to direct the Government’s “control of the possession, use, and production of atomic energy and special nuclear material, whether owned by the Government or others, so directed as to make the maximum contribution to the common defense and security and the national welfare.” AEA § 3(c), 42 U.S.C. § 2013(c). Indeed, as the D.C. Circuit has recognized, the AEA established “a regulatory scheme which is virtually unique in the degree to which broad responsibility is reposed in the administering agency, free of close prescription in its charter as to how it shall proceed in achieving the statutory objectives.” *Siegel v. AEC*, 400 F.2d 778, 783 (D.C. Cir. 1968). While *Siegel* concerned directly the branch of the then-Atomic Energy Commission that later became the NRC, its recognition that broad discretion is to be given to the governmental agencies charged with administering the AEA’s objectives applies equally to the Department of Energy, the other lineal descendant of the AEC.

dismissal. The statute simply requires that the Secretary “shall submit . . . an application for a construction authorization.” NWPA § 114(b), 42 U.S.C. § 10134(b). It neither directs nor circumscribes the Secretary’s actions on the application after that submission.⁶

Indeed, far from imposing special limitations on DOE after the submission, the NWPA expressly requires that the application be considered “in accordance with the laws applicable to such applications.” NWPA § 114(d), 42 U.S.C. § 10134(d). Those laws include 10 C.F.R. § 2.107, which, as this Board has recognized, authorizes withdrawals on terms the Board prescribes. Congress, when it enacted the NWPA in 1982, could have dictated that special rules applied to this proceeding to prevent withdrawal motions, or could have prescribed duties by DOE with respect to prosecution of the application after filing, but it chose not to do so.

Nor does the structure of the NWPA somehow override the plain textual indication in the statute that ordinary NRC rules govern here or dictate that the Secretary must continue with an application he has decided is contrary to the public interest. The NWPA does not prescribe a step-by-step process that leads inexorably to the opening of a repository at Yucca Mountain. Indeed, even if the NRC granted the pending application today, the Secretary would not have the authority to create an operational repository. That would require further action by DOE, other agencies, and Congress itself, yet none of those actions is either mandated or even mentioned by the NWPA. The NWPA does not require the Secretary to undertake the actions necessary to obtain the license to receive and possess materials that would be necessary to open a repository. 10 C.F.R. §§ 63.3, 63.32(d). Rather, the NWPA refers only to the need for a “construction

⁶ After filing the application, the only NWPA mandate imposed on the Secretary is a *reporting* requirement to Congress to note the “project decision schedule that portrays the optimum way to attain the operation of the repository, within the time periods specified in this part.” NWPA § 114(e)(1), 42 U.S.C. § 10134(e)(1).

authorization,” NWPA § 114(b), 42 U.S.C. § 10134(b) – and even there, as discussed, it mandates only the submission of an application. To open a facility, moreover, the Department would be required to obtain water rights, rights of way from the Bureau of Land Management for utilities and access roads, and Clean Water Act § 404 permits for repository construction, as well as all the state and federal approvals necessary for an approximately 300-mile rail line, among many other things. None of those actions is mandated by the NWPA. At least as important, as the prior Administration stressed, *Congress* would need to take further action not contained in the NWPA before any such repository could be opened.⁷ In short, there are many acts between the filing of the application and the actual use of the repository that the NWPA does not require.

Where, even if the NRC granted the pending application, Congress has not authorized the Secretary to make the Yucca Mountain site operational, or even mandated that he take the many required steps to make it operational, it would be bizarre to read the statute to impose a non-discretionary duty to continue with any particular intermediate step (here, prosecuting the application), absent clear statutory language mandating that result. More generally, it has not been the NRC’s practice to require any litigant to maintain a license application that the litigant does not wish to pursue. That deference to an applicant’s decisions should apply more strongly where a government official has decided not to pursue a license application because he believes that other courses would better serve the public interest.

Finally, the fact that Congress has approved Yucca Mountain as the site of a repository, *see* Pub. L. No. 107-200, 116 Stat. 735 (2002) (“there hereby is approved the site at Yucca Mountain, Nevada, for a repository, with respect to which a notice of disapproval was submitted

⁷ See January 2009 Project Decision Schedule at 1 (“This schedule is predicated upon the enactment of legislation ... [regarding] land withdrawal.”). *See also, e.g.*, Nuclear Fuel Management and Disposal Act, S.2589, 109th Congress, 2d Sess. § 3 (2006) (proposed legislation authorizing the withdrawal of lands necessary for the Yucca Mountain repository).

by the Governor of the State of Nevada on April 8, 2002”), means, in the D.C. Circuit’s words, simply that the Secretary is “permitted” to seek authority to open such a site and that challenges to the prior process to select that site are moot. *Nuclear Energy Institute, Inc. v. EPA*, 373 F.3d 1251, 1309-10 (D.C. Cir. 2004). It does *not* require the Secretary to continue with an application proceeding if the Secretary decides that action is contrary to the public interest. *See, e.g.*, S. Rep. No. 107-159, at 13 (2002) (“It bears repeating that enactment of the joint resolution will not authorize construction of the repository or allow DOE to put any radioactive waste or spent nuclear fuel in it or even allow DOE to begin transporting waste to it. Enactment of the joint resolution will only allow DOE to take the next step in the process laid out by the Nuclear Waste Policy Act and apply to the NRC for authorization to construct the repository at Yucca Mountain.”); H.R. Rep. No. 107-425, at 7 (2002) (“In accordance with the Nuclear Waste Policy Act (NWPA), such approval would allow the Department of Energy (DOE) to apply for a license with the Nuclear Regulatory Commission to construct a nuclear waste storage facility on the approved site.”).⁸ That conclusion is even more strongly compelled now, in light of Congress’s recent decision to provide funding to a Blue Ribbon Commission, whose explicit purpose is to propose “alternatives” for the disposal of high-level waste and spent nuclear fuel.

Even if there were any ambiguity on these points, the Secretary’s interpretation of the NWPA would be entitled to deference. *See Chevron, U.S.A., Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837 (1984); *Gen. Elec. Uranium Mgmt. Corp. v. DOE*, 764 F.2d 896, 907 (D.C. Cir. 1985) (applying *Chevron* deference to uphold DOE’s interpretation of the NWPA); *see also Skidmore v Swift Co.*, 323 U.S. 65 (1944); *Auer v. Robbins*, 519 U.S. 452 (1977); *Coeur*

⁸ *See also* 148 Cong. Rec. 7155 (2002) (Rep. Dingell) (stating that Yucca Mountain Site Approval Act “is just about a step in a process”); *id.* at 7166 (Rep. Norwood) (“The vote today does not lock us in forever and we are not committed forever to Yucca Mountain.”); *id.* at 12340 (Sen. Crapo) (“[T]his debate is not about whether to open the Yucca Mountain facility so much as it is about allowing the process of permitting to begin to take place.”).

Alaska, Inc. v. Southeastern Alaska Conservation Council, 129 S. Ct. 2458 (2009). Simply put, the text of the NWPA does not specify actions the Secretary can or must take once the application is filed. Accordingly, while some may disagree with the wisdom of the Secretary's underlying policy decision, the Secretary may fill this statutory "gap." The Secretary's interpretation is a reasonable one that should be given great weight and sustained. *See, e.g., Tennessee v. Herrington*, 806 F.2d 642, 653 (6th Cir. 1986) ("[W]e are mindful of the Supreme Court's statement in *Chevron, supra*, that: 'When a challenge to an agency construction of a statutory provision, fairly conceptualized, really centers on the wisdom of the agency's policy, rather than whether it is a reasonable choice within a gap left open by Congress, the challenge must fail.'").

B. No Conditions Are Necessary As to the Licensing Support Network

Finally, there is no reason to impose conditions relating to the Licensing Support Network ("LSN") as a term of withdrawal. As DOE's prior filings with this Board explain, DOE will, at a minimum, maintain the LSN throughout this proceeding, including any appeals, and then archive the LSN materials in accordance with the Federal Records Act and other relevant law. *See* Department of Energy's Answers to the Board's Questions at the January 27, 2010 Case Management Conference (filed Feb. 4, 2010); Department of Energy's Status Report on Its Archiving Plan (filed Feb. 19, 2010). Thus, DOE will retain the full LSN functionality throughout this proceeding, including appeal, and then follow well established legal requirements that already govern DOE's obligations regarding these documents. DOE is also considering whether sound public and fiscal policy, and the goal of preserving the knowledge gained both inside and outside of this proceeding, suggest going even further than those legal

requirements. There is thus no need for this Board to impose additional conditions concerning the preservation of records.

* * *

DOE counsel has communicated with counsel for the other parties commencing on February 24, 2010, in an effort to resolve any issues raised by them prior to filing this Motion, per 10 C.F.R. § 2.323(b). The State of Nevada and the State of California have stated that they agree with the relief requested here. The Nuclear Regulatory Commission Staff has stated that it takes no position at this time. The Nuclear Energy Institute has stated that it does not consent to the relief requested and will file its position in a response. All other parties that have responded have stated that they reserve their positions until they see the final text of the motion.⁹

⁹ These parties include: Clark County, Eureka County, Four Counties (Esmeralda, Lavender, Churchill, Mineral), Inyo County, Lincoln County, Native Community Action Council, Nye County, Timbisha Shoshone Tribal Group, White Pine County.

Respectfully submitted,

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March 3, 2010

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Atomic Safety and Licensing Board

Before Administrative Judges:
Thomas S. Moore, Chairman
Paul S. Ryerson
Richard E. Wardwell

In the Matter of)

) Docket No. 63-001

U.S. DEPARTMENT OF ENERGY)

) ASLBP No. 09-892-HLW-CAB04

(High-Level Waste Repository))
_____)

CERTIFICATE OF SERVICE

I hereby certify that copies of the **U.S. DEPARTMENT OF ENERGY'S MOTION TO WITHDRAW** have been served on the following persons on this 3rd day of March 2010 through the Nuclear Regulatory Commission's Electronic Information Exchange.

CAB 04

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EXHIBIT 5