



Nebraska Public Power District

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NLS2021024
March 30, 2021

50.75(f)(1)

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Decommissioning Funding
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir or Madam:

The purpose of this letter is to provide Nebraska Public Power District's Twelfth Biennial Report on Financial Assurance for Decommissioning for Cooper Nuclear Station in accordance with 10 CFR 50.75(f)(1), Reporting and Recordkeeping for Decommissioning Planning. The enclosed report contains the amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75(b) and (c), the amount accumulated to the end of the calendar year preceding the date of the report, a schedule of the annual amounts remaining to be collected if needed, the assumptions used regarding rates of escalation in decommissioning costs, and the rate of earnings on decommissioning funds.

This letter does not contain commitments.

Should you have any questions concerning this matter, please contact me at (402) 825-5416.

Sincerely,

Linda Dewhirst
Regulatory Affairs and Compliance Manager

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Enclosure: Twelfth Biennial Report on Financial Assurance for Decommissioning in
Accordance with 10 CFR 50.75(f)(1)

cc: Regional Administrator w/enclosure
USNRC – Region IV

Cooper Project Manager w/enclosure
USNRC – Plant Licensing Branch IV

Senior Resident Inspector w/enclosure
USNRC – CNS

NPG Distribution w/o enclosure

CNS Records w/enclosure

ADD1
NRR

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NEBRASKA PUBLIC POWER DISTRICT

Twelfth Biennial Report on Financial Assurance for Decommissioning in
Accordance with 10 CFR 50.75(f)(1)

NEBRASKA PUBLIC POWER DISTRICT

Twelfth Biennial Report on Financial Assurance for Decommissioning

In Accordance with 10 CFR 50.75(f)(1)

Date: February 23, 2021

Station: Cooper Nuclear Station

Owner/licensee making the report: Nebraska Public Power District

Nebraska Public Power District (the "District") is a public corporation and political subdivision of the state of Nebraska. The District has the power and is required to fix, establish, and collect adequate rates and other charges for electrical energy and any and all commodities or services sold or furnished by it. The District is accordingly authorized to establish its own rates and other charges through which it can recover its cost of service. The District is governed by an 11-member Board of Directors who are popularly elected from the District's chartered territory. The Board of Directors is the rate making authority for the District.

Percentage Ownership: 100

10 CFR 50.75(b) & (c) Decommissioning Estimate (2020 Dollars): \$629,126,000¹

Decommissioning Fund² Total as of 12/31/2020: \$706,200,165

Schedule of Future Annual Fund Projected Earnings and the NRC Minimum Decommissioning Cost in Constant 2020 dollars³

Year	Beginning Balance	Funding Contribution	Decommissioning Funding Requirement Year-Beginning	Projected Earnings Credit Applying Approved Real Rate of Return	Ending Balance	NRC Minimum 2020 Dollars
2021	\$706,200,165	-	0	\$7,062,002	\$713,262,167	\$629,126,000
2022	\$713,262,167	-	0	\$7,132,622	\$720,394,788	\$629,126,000
2023	\$720,394,788	-	0	\$7,203,948	\$727,598,736	\$629,126,000
2024	\$727,598,736	-	0	\$7,275,987	\$734,874,724	\$629,126,000
2025	\$734,874,724	-	0	\$7,348,747	\$742,223,471	\$629,126,000
2026	\$742,223,471	-	0	\$7,422,235	\$749,645,706	\$629,126,000
2027	\$749,645,706	-	0	\$7,496,457	\$757,142,163	\$629,126,000

¹ This updated estimate is based upon NRC decommissioning minimum certification escalation requirements in 10 CFR 50.75(c)(1) and (2) and guidance per NUREG 1307 for a BWR the size (2,419 MW thermal) of Cooper Nuclear Station. The calculation utilizes the waste burial factor for Unaffiliated and Compact-Affiliated States with no Disposal Facility in Revision 18 of NUREG 1307 and Labor (final) and Energy (preliminary) escalation factors derived from December 2020 Midwest regional data of the U.S. Department of Labor Bureau of Labor Statistics.

² This is the total amount (market value) in the external sinking fund (as described in 10 CFR 50.75) available to cover the costs of NRC-defined decommissioning.

³ These figures will be recalculated on an annual basis in accordance with 10 CFR 50.75 (b) and (c). The above amounts reflect the current projected annual contributions (including fund earnings), as necessary, to fully fund the decommissioning trust by the end of the operating license (license expiration January 18, 2034), and taking into account a pro rata credit during the dismantlement period (recognizing both cash expenditures and earnings) over the first seven years after shutdown on a constant dollar basis (see 10 CFR 50.75(e)(1)(ii)). Please note that all submissions by the District prior to 2015 in accordance with 10 CFR 50.75(f)(1) have been provided on a nominal dollar basis. This change is responsive to RAI #3 included in a May 23, 2013 email from Lynnea Wilkins, NRC Project Manager.

Year	Beginning Balance	Funding Contribution	Decommissioning Funding Requirement Year-Beginning	Projected Earnings Credit Applying Approved Real Rate of Return	Ending Balance	NRC Minimum 2020 Dollars
2028	\$757,142,163	-	0	\$7,571,422	\$764,713,584	\$629,126,000
2029	\$764,713,584	-	0	\$7,647,136	\$772,360,720	\$629,126,000
2030	\$772,360,720	-	0	\$7,723,607	\$780,084,327	\$629,126,000
2031	\$780,084,327	-	0	\$7,800,843	\$787,885,171	\$629,126,000
2032	\$787,885,171	-	0	\$7,878,852	\$795,764,022	\$629,126,000
2033	\$795,764,022	-	0	\$7,957,640	\$803,721,662	\$629,126,000
2034	\$803,721,662	-	\$89,875,142	\$7,138,465	\$720,984,986	
2035	\$720,984,986	-	\$89,875,143	\$6,311,098	\$637,420,941	
2036	\$637,420,941	-	\$89,875,143	\$5,475,458	\$553,021,256	
2037	\$553,021,256	-	\$89,875,143	\$4,631,461	\$467,777,574	
2038	\$467,777,574	-	\$89,875,143	\$3,779,024	\$381,681,455	
2039	\$381,681,455	-	\$89,875,143	\$2,918,063	\$294,724,376	
2040	\$294,724,376	-	\$89,875,143	\$2,048,492	\$206,897,725	

Rate Assumptions

Rates of escalation used in estimating future decommissioning costs

- 2%

Rates of Earnings on Decommissioning Funds Post-tax⁴

- 3%

Contracts Relied Upon to Demonstrate Decommissioning Funding Assurance [50.75(e) (1) (v)]: None

Modifications to the District's Current Method of Providing Financial Assurance: None

Material Changes to Decommissioning Trust Agreement: None

NOTE 1: The District continues to maintain its Decommissioning Trust Fund investments in fixed income securities as required by Nebraska State Statutes.

⁴ The assumed annual real rate of return is 1.0 percent. The District's Board of Directors (as the licensee's rate setting authority) has approved this assumption for the decommissioning funding plan for Cooper Nuclear Station through the adoption of a Board Resolution (20-35), dated October 8, 2020, as part of its official business. This does represent a change to the previous Board Resolution, which was submitted as part of the July 14, 2011, RAI response.