



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

September 27, 2021  
NOC-AE-21003831  
10 CFR 72.30(c)  
STI: 35206780

Attention: Document Control Desk  
Director, Division of Spent Fuel Management  
Office of Nuclear Materials Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

South Texas Project ISFSI  
Docket No. 72-1041  
Decommissioning Funding Plan for the Independent Spent Fuel Storage Installation

Reference: Letter; M. Murray to U.S. NRC Document Control Desk; "Decommissioning Funding Plan for the Independent Spent Fuel Storage Installation"; September 26, 2018; NOC-AE-18003592; ML18269A258.

Pursuant to 10 CFR 72.30(b), STP Nuclear Operating Company (STPNOC) submitted a decommissioning funding plan for the South Texas Project (STP) Independent Spent Fuel Storage Installation (ISFSI) on September 26, 2018. 10 CFR 72.30(c) requires each holder of a license under Part 72 to resubmit the decommissioning funding plan at the time of license renewal and at intervals not to exceed three years, with adjustments as necessary to account for changes in costs and the extent of contamination. In accordance with 10 CFR 72.30(c), the information provided in the Enclosure contains STPNOC's periodic update to the STP ISFSI decommissioning funding plan. The enclosure addresses each of the six criteria contained in 10 CFR 72.30(b) and the four criteria in 10 CFR 72.30(c).

The information assembled is for the individual co-owners (owners) of the South Texas Project:

- NRG South Texas LP;
- City Public Service Board of San Antonio; and
- City of Austin - Austin Energy.

There are no commitments in this letter. If there are any questions, please contact Ali Albaaj at (361) 972-8949 or me at (361) 972-7666.

A handwritten signature in blue ink, appearing to read "AMR", is positioned above the printed name of the signatory.

Andrew M. Richards, Jr.  
Manager, Regulatory Affairs

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Enclosure: STP Decommissioning Funding Plan for STP Independent Spent Fuel Storage Installation (ISFSI)

cc:  
Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

## **STP Decommissioning Funding Plan for STP Independent Spent Fuel Storage Installation (ISFSI)**

The South Texas Project (STP) owners are providing the following information required by 10 CFR 72.30(b) to be included in the Decommissioning Funding Plan (DFP):

### **Requirement 1:**

*(1) Information on how reasonable assurance will be provided that funds will be available to decommission the ISFSI or MRS.*

### **Information for Requirement 1:**

Pursuant to 10 CFR 72.30(e)(5), since STP Units 1 and 2 are power reactor licensees under 10 CFR 50, STP owners use the methods of 10 CFR 50.75(b), (e), and (h) to provide financial assurance associated with their respective ownership shares of the STP Units 1 and 2 ISFSI. The STP owners are using trust funds to ensure financial assurance.

### **Requirement 2:**

*(2) A detailed cost estimate for decommissioning, in an amount reflecting:*

- (i) The cost of an independent contractor to perform all decommissioning activities;*
- (ii) An adequate contingency factor; and*
- (iii) The cost of meeting the § 20.1402 of this chapter criteria for unrestricted use, provided that, if the applicant or licensee can demonstrate its ability to meet the provisions of § 20.1403 of this chapter, the cost estimate may be based on meeting the § 20.1403 criteria.*

### **Information for Requirement 2:**

STP completed a decommissioning study in May 2018 for STP Units 1 and 2. This study included costs associated with the ISFSI decommissioning. Enclosure 2 of Reference 1 includes information from that report specific to the ISFSI. Table 1 in this Enclosure provides an updated cost estimate for ISFSI decommissioning.

### **Requirement 3:**

*(3) Identification of and justification for using the key assumptions contained in the DCE.*

### **Information for Requirement 3:**

Key assumptions are described in Enclosure 2 of Reference 1. No key assumptions from the DFP have been changed in this letter.

### **Requirement 4:**

*(4) A description of the method of assuring funds for decommissioning from paragraph (e) of this section, including means for adjusting cost estimates and associated funding levels periodically over the life of the facility.*

### **Information for Requirement 4:**

The decommissioning cost estimate will be adjusted as necessary every three years, as required by 10 CFR 72.30(c). As indicated in the information for Requirement 1, STP owners use the methods of 10 CFR 50.75(b), (e), and (h) to provide financial assurance associated with its ownership share of the ISFSI. STP owners adjust their share of the amount of financial assurance required by 10 CFR 50.75(b) annually in accordance with paragraph (2) of that section, and further adjustment as required by 10 CFR 50.75(f)(3) and (5) at or about five years prior to the projected end of reactor operations.



In Table 1, STP updated the ISFSI decommissioning funding plan using a composite average annual escalation rate as provided in Appendix F of the 2018 Decommissioning Cost Analysis and considered the need for any further adjustments based on the factors in 10 CFR 72.30(c)(1) – (4).

**Requirement 5:**

*(5) The volume of onsite subsurface material containing residual radioactivity that will require remediation to meet the criteria for license termination.*

**Information for Requirement 5:**

There is no known subsurface material containing residual radioactivity in the proximity of the ISFSI that will require remediation to meet the criteria for license termination.

**Requirement 6:**

*(6) A certification that financial assurance for decommissioning has been provided in the amount of the cost estimate for decommissioning.*

**Information for Requirement 6:**

STP Units 1 and 2 owners have provided financial assurance for decommissioning the ISFSI site in an amount that meets or exceeds their respective ownership shares of the amount required by 10 CFR 50.75(b), which pursuant to 10 CFR 72.30(e)(5) provides the requisite financial assurance for the ISFSI decommissioning cost.

**Information Required by 10 CFR 72.30(c):**

10 CFR 72.30(c) requires the updated decommissioning funding plan to specifically consider the effect of the following events on decommissioning costs:

1. *Spills of radioactive material producing additional residual radioactivity in onsite subsurface material.*
  - a. Response: There have been no reported spills at the ISFSI.
2. *Facility Modifications*
  - a. Response: There have been no facility modifications affecting the ISFSI.
3. *Changes in authorized possession limits.*
  - a. Response: There are no changes in authorized possession limits affecting STP or the ISFSI.
4. *Actual remediation costs that exceed the previous cost estimate.*
  - a. Response: No actual remediation costs have been incurred.

**References:**

1. Letter; M. Murray to U.S. NRC Document Control Desk; "Decommissioning Funding Plan for the Independent Spent Fuel Storage Installation"; September 26, 2018; (NOC-AE-18003592); ML18269A258.

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