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December 16, 2021

GO2-21-149

10 CFR 72.30

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

Subject: **COLUMBIA GENERATING STATION, INDEPENDENT SPENT FUEL
STORAGE INSTALLATION, DOCKET NO. 72-35
DECOMMISSIONING COST ESTIMATE AND DECOMMISSIONING
FUNDING PLAN - 2021 UPDATES**

- References:
- 1) Letter GO2-12-183, DW Gregoire (Energy Northwest) to NRC,
“Decommissioning Cost Estimate and Decommissioning Funding Plan
Submittals,” dated December 17, 2012
 - 2) Letter GO2-15-172, DW Gregoire (Energy Northwest) to NRC,
“Decommissioning Cost Estimate and Decommissioning Funding Plan
– 2015 Updates,” dated December 15, 2015
 - 3) Letter GO2-18-134, DM Wolfgramm (Energy Northwest) to NRC,
“Decommissioning Cost Estimate and Decommissioning Funding Plan
– 2018 Updates,” dated November 28, 2018

Dear Sir or Madam:

In accordance with 10 CFR §72.30(c) requirements on Decommissioning Planning, Energy Northwest is hereby submitting updates to the Decommissioning Funding Plan (DFP) and Decommissioning Cost Estimate (DCE) for the Independent Spent Fuel Storage Installation (ISFSI) located at the Columbia Generating Station (Columbia). These submittals update information originally provided to the NRC on December 17, 2012 (Reference 1), when the Decommissioning Planning Rule first became effective.

The ISFSI DFP (Attachment 1) and the DCE (Attachment 2) submittals are in response to specific requirements in regulations 10 CFR §72.30(b)(1) through (b)(4) and 10 CFR §72.30(c). Also submitted with the DFP (Attachment 1) is information on the financial instrument for the ISFSI decommissioning, in conformance with requirements in regulation 10 CFR §72.30(e). Attachment 3 is a copy of the letter received by Energy Northwest from Bonneville Power Administration (BPA), an agency of the United States

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Department of Energy (DOE), certifying the funding for decommissioning of Columbia as well as the ISFSI.

Costs for decommissioning the Columbia ISFSI have been estimated to total \$7.112 Million at present value. The estimated decommissioning funding schedule for the ISFSI, based on the updated decommissioning cost estimate, is presented as Attachment 4.

There are no commitments being made to the NRC by this letter.

Should you have any questions or desire additional information regarding this matter, please contact R.M. Garcia, Licensing Supervisor, at (509) 377- 8463.

Executed this 16 day of December, 2021.

Respectfully,

DocuSigned by:

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Desiree M. Wolfgramm
Manager, Regulatory Affairs

Attachment 1 - ISFSI Decommissioning Funding Plan - 2021 Update
Attachment 2 - ISFSI Decommissioning Cost Estimate - 2021 Update
Attachment 3 - Letter from Bonneville Power Administration to Columbia
Attachment 4 - ISFSI Decommissioning Funding Schedule as of June 30, 2021

cc: NRC RIV Regional Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
CD Sonoda - BPA/1399

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Attachment 1

ISFSI Decommissioning Funding Plan – 2021 Update

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1.0 Information on How Reasonable Assurance Will be Provided (10 CFR §72.30(b)(1))

Detailed information for the Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Cost Estimate (DCE) is presented in Attachment 2, ISFSI Decommissioning Cost Estimate – 2021 Update. The information in Attachment 2 is summarized in this attachment to conform to the order in which the requirements are listed in the regulations and to facilitate the flow of information that supports the presentation of the Decommissioning Funding Plan (DFP).

Energy Northwest, through the Bonneville Power Administration (BPA), has instituted a sinking fund that sets aside monies for decommissioning Columbia Generating Station (Columbia). Decommissioning funds set aside for the ISFSI decommissioning will be accomplished through a separate financial instrument as described in Section 2.4 of this attachment.

On July 11, 2005, Energy Northwest instituted an irrevocable trust fund (Trust) for the sole purpose to provide funding for the decommissioning of the ISFSI. As discussed in Sections 2.4 and 2.6 below, BPA is contractually obligated to pay the decommissioning costs for both Columbia and its ISFSI.

2.0 Detailed Cost Estimate Summary (10 CFR §72.30(b))

The ISFSI DCE is presented in Attachment 2. Cross-references to specific information in Attachment 2 are included in this section where appropriate.

2.1 Cost of ISFSI Decommissioning (10 CFR §72.30(b)(2)(i) and (ii))

The cost of decommissioning the ISFSI facility, with an independent contractor performing decommissioning activities, has been estimated as \$ 7.112 Million (2021 or present value). This estimate includes a contingency factor of 25 percent, considered adequate per criteria in NUREG-1757. Details for this cost estimate are provided in Attachment 2.

2.2 Compliance with 10 CFR §20.1402 (10 CFR §72.30(b)(2)(iii)) and 10 CFR §72.30(c)

The DCE information presented in Attachment 2 is based on the position that Columbia will meet the 10 CFR §20.1402 criteria for unrestricted release/use of the ISFSI area. This position assumes, considering the controls put in place at Columbia to monitor and control sources of potential radiological contamination and on the characteristics of the ISFSI design, that the site will be considered acceptable for unrestricted use based on expected levels of residual radioactivity after completion of decommissioning activities.

Monitoring for potential sources of radiological contamination over the last three years, and associated recordkeeping information, indicate that there have been no changes to the conditions of the ISFSI subsurface soils, pads, or any other associated structures

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that would impact the previous assessment of their radiological background levels. Specifically to the ISFSI, and in response to 10 CFR §72.30(c), it is reported that:

- There have been no reported spills of radioactive material;
- There has been one facility modification, Phase 2 Expansion pad for additional 18 casks (Pad 3);
- There have been no changes in authorized possession limits; and,
- There have been no actual remediation costs that exceed the previous cost estimate.

2.3 Key Assumptions Used in the DCE and Their Justification (10 CFR §72.30(b)(3))

The key assumptions for the Columbia ISFSI decommissioning, as summarized from DCE information presented in Attachment 2, are as follows:

- 2.3.1 It is not expected that the overpacks will have removable radioactive surface contamination, based on compliance with ISFSI Technical Specification 3.2.2 and Surveillance Requirement 3.2.2.1. These requirements ensure removable contamination on the accessible surfaces of the Multi-Purpose Canister (MPC) prior to transport does not exceed 1000 dpm/100 cm² from beta and gamma sources, and 20 dpm/100 cm² from alpha sources.
- 2.3.2 Neutron activation of the overpack steel and concrete is expected to be very low.
- 2.3.3 The HI-STORM 100 overpacks will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning. For purposes of the cost estimate, twelve (12) of the storage overpacks are designated for controlled disposal as low-level radioactive waste.
- 2.3.4 The ISFSI concrete pads will not be contaminated. It is not expected that there will be significant neutron-activated residual radioactivity in the concrete ISFSI pads because the overpack pedestals will shield most of the neutron flux from the spent fuel in the MPCs.
- 2.3.5 The subsurface materials under and in the proximity of the ISFSI pads contain no residual radioactivity that will require remediation to meet the criteria for license termination based on baseline soil samples of the ISFSI site fill materials (Reference), and on additional monitoring results during operations.
- 2.3.6 A Final Status Radiological Survey will be performed in support of an application for License Termination; this will include comprehensive surveys of the concrete overpack surfaces, a significant fraction of the ISFSI pads, and the immediate area surrounding the pads.
- 2.3.7 ISFSI decommissioning will be performed by an independent contractor.

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2.3.8 Low-level radioactive waste disposal is expected to be at the US Ecology Washington Low-Level Radioactive Waste site.

Additional justifications, as applicable, for the assumptions underlying the DCE are presented in Attachment 2, Section 2.1.

2.4 Method of Financial Assurance for ISFSI Decommissioning (10 CFR §72.30(b)(4) and §72.30(e))

After the Columbia ISFSI was originally built a cost estimate was developed based on the assumption that the decommissioning would start after the initial operating license ended in Fiscal Year 2023 and would continue for five years. Based on this cost estimate, Energy Northwest made an initial payment to the Trust and developed a schedule of annual payments through the then projected end of decommissioning in Fiscal Year 2029. The schedule of annual payments includes assumptions for inflation and the estimated earnings of the Trust that would be reinvested.

Energy Northwest develops an Annual Budget, in which the annual payment to the ISFSI Decommissioning Trust is included. The Annual Budget funding is approved by Energy Northwest's Executive Board of Directors and funded by the sale of 100% of Columbia's net electrical output to BPA. Pursuant to a contract between BPA and Washington Public Power Supply System (now operating as Energy Northwest) in 1970, and as indicated in Attachment 3, BPA is obligated to pay for Energy Northwest's operating and decommissioning costs of both Columbia and its ISFSI in return for receiving 100% of Columbia's net electrical output.

As changes to the ISFSI have occurred, the cost assumptions have been revisited to determine if changes to the cost estimate are required. If changes to the cost estimate are required the schedule of annual payments is modified accordingly. In addition, Energy Northwest revisits annually the inflation assumptions and the estimated earnings assumptions, which can result in an adjustment to the annual payment schedule.

In May of 2012, Energy Northwest received an extension of Columbia's operating license through December 2043. Energy Northwest has revised the annual payment schedule for the additional 20 years of operation, which is presented in Attachment 4.

2.5 Volume of Subsurface Material to be Remediated for Decommissioning (10 CFR §72.30(b)(5))

The volume of onsite subsurface material projected to contain residual radioactivity at the time of decommissioning of the ISFSI and that may require remediation to meet the criteria for license termination is estimated to be none. This position is based on information presented for Assumption 2.3.5 above. This position has not changed for the 2021 DCE submittal as stated in Section 2.2 above.

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2.6 Certification of Financial Assurance (10 CFR §72.30(b)(6))

As stated in Section 2.4 above, BPA is contractually obligated to pay for Energy Northwest's operating and decommissioning costs for Columbia and its ISFSI. The annual payments received from BPA for the ISFSI decommissioning are placed in an irrevocable trust fund. As indicated in Attachment 3, BPA is obligated to pay for decommissioning of the Columbia ISFSI.

3.0 Reference

Energy Northwest Independent Spent Fuel Storage Installation 10 CFR 72.212 Evaluation, Revision 13, Section 3.0.

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Attachment 2

ISFSI Decommissioning Cost Estimate – 2021 Update

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1. Background and Introduction

The Nuclear Regulatory Commission (NRC) issued its final rule on Decommissioning Planning on June 17, 2011,^[1] with the rule becoming effective on December 17, 2012. Subpart 72.30, "Financial assurance and recordkeeping for decommissioning," requires that each holder of, or applicant for, a license under this part must submit for NRC review and approval a decommissioning funding plan that contains information on how reasonable assurance will be provided that funds will be available to decommission the Independent Spent Fuel Storage Installation (ISFSI).

In accordance with the rule, this letter provides a detailed cost estimate for decommissioning the ISFSI at Columbia Generating Station (Columbia) in an amount reflecting:

1. The work is performed by an independent contractor;
2. An adequate contingency factor; and
3. Release of the facility and dry storage systems for unrestricted use, as specified in 10 CFR Part 20.1402

This letter also provides:

1. Identification of the key assumptions contained in the cost estimate; and
2. The volume of onsite subsurface material containing residual radioactivity, if any, that will require remediation to meet the criteria for license termination.

2. Spent Fuel Management Strategy

The operating license for Columbia is currently set to expire on December 20, 2043. Approximately 8,308 spent fuel assemblies are currently projected to be generated as a result of plant operations through the license expiration date. The ISFSI is operated under a Part 50 General License (in accordance with 10 CFR 72, Subpart K).

Assuming that the plant operates to the end of currently licensed life the spent fuel pool is expected to contain approximately 2,324 spent fuel assemblies after the final core offload. To facilitate immediate dismantling or safe-storage operations, the spent fuel is assumed to be packaged in dry storage casks for interim storage at the ISFSI.

¹ U.S. Code of Federal Regulations, Title 10, Parts 20, 30, 40, 50, 70 and 72 "Decommissioning Planning," Nuclear Regulatory Commission, Federal Register Volume 76, Number 117 (p 35512 et seq.), June 17, 2011

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Transferring the spent fuel from the pool to the ISFSI will permit decontamination and dismantling of the spent fuel pool systems and fuel pool areas, resulting in reduced operating expenses should the station be placed into a SAFSTOR dormancy configuration.

Completion of the ISFSI decommissioning process is dependent upon the Department of Energy's (DOE's) ability to remove spent fuel from the site. DOE's repository program assumes that spent fuel allocations will be accepted for disposal from the nation's commercial nuclear plants, with limited exceptions, in the order (the "queue") in which it was discharged from the reactor.^[2]

3. ISFSI Decommissioning Strategy

At the conclusion of the DOE spent fuel transfer process the ISFSI will be promptly decommissioned (similar to the power reactor DECON alternative) by removing and disposing of residual radioactivity and verifying that remaining materials satisfy NRC release criteria.

In this estimate the ISFSI decommissioning is considered an independent project, regardless of the decommissioning alternative identified for the nuclear power plant.

4. ISFSI Description

The Columbia ISFSI uses a Holtec International (Holtec) HI-STORM 100S (243) dry storage system. The HI-STORM 100S is comprised of a multi-purpose canister (MPC) and storage overpack. The multi-purpose canisters are assumed to be transferred directly to the DOE and not returned to the station. Some of the remaining overpacks are assumed to have residual radioactivity due to some minor level of neutron-induced activation as a result of the long-term storage of the spent fuel. The cost to dispose of residual radioactivity, and verify that the remaining facility and surrounding environs meet the NRC's radiological limits established for unrestricted use, form the basis of the ISFSI decommissioning estimate.

Energy Northwest's current spent fuel management plan for the Columbia spent fuel would result in 123 spent fuel storage casks (nominal 68 assemblies per cask) being placed on the storage pads at the site after all spent fuel has been removed from the spent fuel pool.

² U.S. Code of Federal Regulations, Title 10, Part 961.11, Article IV – Responsibilities of the Parties, B. DOE Responsibilities, 5.(a) ... DOE shall issue an annual acceptance priority ranking for receipt of SNF and/or HLW at the DOE repository. This priority ranking shall be based on the age of SNF and/or HLW as calculated from the date of discharge of such materials from the civilian nuclear power reactor. The oldest fuel or waste will have the highest priority for acceptance, except as ..."

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In addition to the spent fuel casks located on the ISFSI pad after shutdown there are projected to be additional casks that are expected to be used for Greater-than-Class-C (GTCC) storage. The storage overpacks used for the GTCC canisters (estimated quantity of 4) are not expected to have any interior contamination or residual activation and can be reused or disposed of by conventional means after a final status survey.

Table 1 provides the significant quantities and physical dimensions used as the basis in developing the ISFSI decommissioning estimate.

5. Key Assumptions / Estimating Approach

The decommissioning estimate is based on the configuration of the ISFSI expected after all spent fuel and GTCC material has been removed from the site. The configuration of the ISFSI is based on the unit operating until the end of its current license, December 20, 2043, and the assumptions associated with DOE's spent fuel acceptance, as previously described.

The final configuration of the ISFSI is assumed to consist of seven concrete pads. The current pads (three) are approximately 147 feet in length and 30 feet in width. The four future pads are assumed to be the same dimensions.

The dry storage vendor, Holtec International, does not expect the overpacks to have any interior or exterior radioactive surface contamination. Any neutron activation of the steel and concrete is expected to be extremely small.^[3] The decommissioning estimate is based on the premise that some of the inner steel-liners of the concrete overpacks will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning. As an allowance, 12 of the 123 overpack liners are assumed to be affected, i.e., contain residual radioactivity. The allowance quantity is based upon the number of casks required for the final core off-load (i.e., 764 offloaded assemblies, 68 assemblies per cask) which results in 12 overpacks. It is assumed that these are the final casks offloaded; consequently, they have the least time for radioactive decay of the neutron activation products.

The decommissioning estimate assumes that some residual contamination may be present within the HI-TRAC transfer cask. For purposes of this estimate, the transfer cask is shipped for controlled disposal as low-level radioactive waste along with the activated liners.

³ HI-STORM FSAR, Holtec International, Report HI-2002444, Rev. 13, at page 2-204 (Accession Number ML16138A100)

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The dry storage vendor, Holtec International, does not expect any residual contamination to be left on the concrete ISFSI pad.^[4] It is expected that this assumption would be confirmed as a result of the good radiological practice of surveying potentially impacted areas after each spent fuel transfer campaign. It is assumed for this analysis that the ISFSI pads will not be contaminated. As such, only verification surveys are included for the pad in the decommissioning estimate. An allowance is also included for surveying any transfer equipment.

The subsurface material of the ISFSI site is not expected to contain any significant residual radioactivity that will require remediation to meet the criteria for license termination.

Decommissioning is assumed to be performed by an independent contractor. As such, essentially all labor, equipment, and material costs are based on national averages, i.e., costs from national publications such as RSMeans Building Construction Cost Data (adjusted for regional variations), and laboratory service costs are based on vendor price lists. Craft labor positions are expected to be provided locally. Energy Northwest, as licensee, will oversee the site activities.

Low-level radioactive waste packaging, transport and disposal costs are based on Energy Northwest's current cost of disposal at the US Ecology Washington Low-Level Radioactive Waste site.

Costs are reported in 2021 dollars. Contingency has been added at an overall rate of 25%. This is consistent with the contingency evaluation criteria referenced by the NRC in NUREG-1757.^[5]

The estimate is limited to costs necessary to terminate the ISFSI's NRC license and meet the §20.1402 criteria for unrestricted use. Disposition of released material and structures is outside the scope of the estimate.

The effects, if any, since the last submittal of the ISFSI decommissioning funding plan of the following events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered in the decommissioning cost estimate:

(1) Spills of radioactive material producing additional residual radioactivity in onsite subsurface material: There have been no spills at the ISFSI.

(2) Facility modifications: There have been no facility modifications in the past three years that affect the decommissioning cost estimate.

⁴ HI-STORM FSAR, Holtec International, Report HI-2002444, Rev. 13, at page 2-205 (Accession Number ML16138A100)

⁵ "Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. Nuclear Regulatory Commission's Office of Federal and State Materials and Environmental Management Programs, NUREG-1757, Volume 3, Revision 1, February 2012

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(3) Changes in authorized possession limits: There are no changes in authorized possession limits that affect the decommissioning cost estimate.

(4) Actual remediation costs that exceed the previous cost estimate: No actual remediation costs have been incurred, so no actual remediation costs exceed the previous cost estimate.

6. Cost Estimate

The estimated cost to decommission the ISFSI and release the facility for unrestricted use is provided in Table 2. The cost has been organized into three phases, including:

- An initial planning phase - empty overpacks are characterized and the specifications and work procedures for the decontamination (liner removal) developed.
- The remediation phase - residual radioactivity is removed, packaged in certified waste containers, transported to the low-level waste site, and disposed of at low-level waste.
- The final phase - license termination surveys, independent surveys are completed, and an application for license termination submitted.

In addition to the direct costs associated with a contractor providing the decommissioning services, the estimate also contains costs for the NRC (and NRC contractor), Energy Northwest's oversight staff, site security (industrial), and other site operating costs.

For estimating purposes, it should be conservatively assumed that all expenditures will be incurred in the year following all spent fuel removal.

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Table 1
Significant Quantities and Physical Dimensions

ISFSI Pad

Item	Length (ft)	Width (ft)	Thickness (ft)	Residual Radioactivity
Three existing ISFSI Pads (dimensions are for each pad)	147	30	2	No
Four future ISFSI Pads (dimensions are for each pad)	147	30	2	No

ISFSI Overpack

Item	Value	Notes (all dimensions are nominal)
Overall Height (inches)	243	Final storage configuration with lid
Outside Diameter (inches)	132	Main cylindrical body of overpack
Inside Diameter (inches)	73.5	
Inner Liner Thickness (inches)	1.25	
Quantity (total)	127	Spent Fuel (123) + GTCC (4)
Quantity (with residual radioactivity)	12	Equivalent to the number of overpacks used to store last complete core offloads
Total Surface Area of Overpack Inner Liner with Residual Radioactivity (square feet)	4,417	
Low-Level Radioactive Waste (cubic feet)	4,537	
Low-Level Radioactive Waste (packaged density) (lbs/cubic foot)	80	Average weight density

Other Potentially Impacted Items

Item	Value	Notes
Transfer Cask (HI-TRAC 125D)	1	Small amount of residual activity
Number of Overpacks used for GTCC storage	4	No residual radioactivity

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Table 2
ISFSI Decommissioning Costs and Waste Volumes

	(thousands, 2021 dollars)					Waste Volume	Person-Hours	
	Removal	Packaging	Transport	Disposal	Other	Total	Craft	Oversight and Contractor
Decommissioning Contractor								
Planning (characterization, specs and procedures)	-	-	-	-	406	406	-	1,192
Remediation (activated disposition)	620	81	6	1,144	-	1,851	3,361	-
License Termination (radiological surveys)	-	-	-	-	1,926	1,926	14,094	-
Subtotal	620	81	6	1,144	2,332	4,183	17,455	1,192
Supporting Costs								
NRC and NRC Contractor Fees and Costs	-	-	-	-	545	545	-	1,153
Insurance	-	-	-	-	114	114	-	-
Plant Energy Budget	-	-	-	-	10	10	-	-
Security	-	-	-	-	359	359	-	8,758
Energy Northwest Oversight Staff	-	-	-	-	480	480	-	4,729
Subtotal	-	-	-	-	1,507	1,507	-	14,640
Total (w/o contingency)	620	81	6	1,144	3,839	5,690	17,455	15,832
Total (w/25% contingency)	775	101	7	1,430	4,798	7,112		

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Attachment 3

Letter from Bonneville Power Administration to Energy Northwest

(3 pages Including Cover Sheet)



Department of Energy

Bonneville Power Administration
Mail Drop 1399
P.O. Box 968
Richland, Washington 99352-0968

POWER SERVICES

November 16, 2018

In reply refer to: PGAC/Richland

Mr. Brad Sawatzke, Chief Executive Officer
Energy Northwest M/D 1023
P.O. Box 968
Richland, WA 99352-0968

Dear Mr. Sawatzke:

The Bonneville Power Administration (Bonneville) entered into a contract in 1970 with Energy Northwest then known as the Washington Public Power Supply System regarding Columbia Generating Station (Columbia). Under this contract, Bonneville provides the funding for Columbia's costs and in turn receives 100 percent share of its power. This contract remains in place until its termination at the end of all decommissioning activities. Bonneville has a commitment to pay any decommissioning costs attributable to Energy Northwest for both the Columbia Nuclear Plant and its Independent Spent Fuel Storage Installation (ISFSI). The Columbia costs including contributions into the trust funds for decommissioning of the plant and ISFSI are included in Bonneville's costs which are required by law to be recovered by Bonneville from its ratepayers.

If you have any questions concerning this correspondence, please contact Dana Sandlin at (509) 372 5751 or degrover@bpa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cherie Sonoda", is written over a horizontal line.

Cherie Sonoda, Nuclear Supervisor
Contract Generating Resources

cc:

Mr. Grover Hettel, Energy Northwest - PE08
Mr. Scott Vance, Energy Northwest - PE13
Mr. Donald Gregoire, Energy Northwest- PE20

bcc:

D. Sandlin - PGAC

Official File - PGAC (PM-14-23 WNP-1, 3 and Columbia)

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Attachment 4

ISFSI Decommissioning Funding Schedule as of June 30, 2021
(2 Pages Including Cover Sheet)

Funding Schedule

As of June 30, 2021

Fiscal Year	ISFSI		
	Payment	Interest Earned	Sub-Account Balance
FY 2009 Actual	\$ -	\$ -	\$ 680,700
FY 2010 Actual	\$ -	\$ -	\$ 782,800
FY 2011 Actual	\$ -	\$ -	\$ 888,300
FY 2012 Actual	\$ -	\$ -	\$ 996,300
FY 2013 Actual	\$ -	\$ -	\$ 1,062,800
FY 2014 Actual	\$ -	\$ -	\$ 1,226,000
FY 2015 Actual	\$ -	\$ -	\$ 1,363,200
FY 2016 Actual	\$ -	\$ -	\$ 1,523,900
FY 2017 Actual	\$ -	\$ -	\$ 1,709,237
FY 2018 Actual	\$ -	\$ -	\$ 1,913,302
FY 2019 Actual	\$ -	\$ -	\$ 2,167,696
FY 2020 Actual	\$ -	\$ -	\$ 2,427,100
FY 2021 Actual	\$ -	\$ -	\$ 2,687,735
FY 2022	\$ 250,000	\$ 26,877	\$ 2,964,612
FY 2023	\$ 265,000	\$ 29,646	\$ 3,259,258
FY 2024	\$ 280,000	\$ 32,593	\$ 3,571,851
FY 2025	\$ 295,000	\$ 35,719	\$ 3,902,570
FY 2026	\$ 310,000	\$ 39,026	\$ 4,251,595
FY 2027	\$ 325,000	\$ 42,516	\$ 4,619,111
FY 2028	\$ 340,000	\$ 46,191	\$ 5,005,302
FY 2029	\$ 355,000	\$ 50,053	\$ 5,410,355
FY 2030	\$ 363,875	\$ 54,104	\$ 5,828,334
FY 2031	\$ 372,972	\$ 58,283	\$ 6,259,589
FY 2032	\$ 382,296	\$ 62,596	\$ 6,704,481
FY 2033	\$ 391,854	\$ 67,045	\$ 7,163,380
FY 2034	\$ 401,650	\$ 71,634	\$ 7,636,663
FY 2035	\$ 411,691	\$ 76,367	\$ 8,124,721
FY 2036	\$ 421,983	\$ 81,247	\$ 8,627,952
FY 2037	\$ 432,533	\$ 86,280	\$ 9,146,764
FY 2038	\$ 443,346	\$ 91,468	\$ 9,681,578
FY 2039	\$ 454,430	\$ 96,816	\$ 10,232,824
FY 2040	\$ 465,791	\$ 102,328	\$ 10,800,943
FY 2041	\$ 477,436	\$ 108,009	\$ 11,386,388
FY 2042	\$ 489,371	\$ 113,864	\$ 11,989,623
FY 2043	\$ 501,606	\$ 119,896	\$ 12,611,125
FY 2044	\$ 514,146	\$ 126,111	\$ 13,251,382