



10 CFR 72.30

December 17, 2021

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

Oyster Creek Nuclear Generating Station
Renewed Facility Operating License No. DPR-16
NRC Docket No. 50-219 and 72-15

Pilgrim Nuclear Power Station
Renewed Facility Operating License No. DPR-35
NRC Docket No. 50-293 and 72-1044

Indian Point Nuclear Generating Stations 1, 2, & 3
Provisional Operating License No. DPR-5
Renewed Facility Operating License Nos. DPR-26 and DPR-64
Docket Nos. 50-3, 50-247, 50-286 and 72-051

Subject: Report on Status of Decommissioning Funding for Independent Spent Fuel Storage Installations

In accordance with 10 CFR 72.30, "Financial assurance and recordkeeping for decommissioning," Holtec Decommissioning International, LLC (HDI) is submitting a report on the status of decommissioning funding plans for the independent spent fuel storage installations (ISFSIs) for Oyster Creek Nuclear Station (Oyster Creek), Pilgrim Nuclear Station (Pilgrim), Indian Point Nuclear Stations Units 1, 2 and 3 (IPEC).

On July 1, 2019, Oyster Creek was transferred to Oyster Creek Environmental Protection, LLC (OCEP) as the licensed owner and HDI as the licensed operator for decommissioning. On August 27, 2019, Pilgrim was transferred to Holtec Pilgrim, LLC (Holtec Pilgrim) as the licensed owner and HDI as the licensed operator for decommissioning. On May 28, 2021, Indian Point was transferred to Holtec Indian Point 2, LLC and Holtec Indian Point 3, LLC as the licensed owners and HDI as the licensed operator for decommissioning. HDI prepared and submitted Post-Shutdown Decommissioning Activities Reports (PSDARs) including Site-Specific Decommissioning Cost Estimates (DCEs) for each of these sites (References 1, 2 & 3).

The HDI PSDARs and DCEs are based on a transition to the DECON decommissioning status. Utilizing the DECON method allows for the prompt decommissioning and unrestricted release of each site except for the ISFSI sooner than was planned by the previous owners. The HDI PSDARs and DCEs describe the selected methods and estimated costs for the decontamination, dismantlement, spent fuel management and site restoration of each site. The site-specific DCEs also include the estimated costs to decommission ISFSIs following the removal of spent fuel and Greater than Class C (GTCC) waste from the site.

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Enclosures 1, 2, & 3, show that the surpluses in the Decommissioning Trust Funds exceed the estimated costs of ISFSI decommissioning, as summarized in Table 1. The Trust Fund balances account for the 10 CFR Part 50 license expiration dates and the ISFSI DCE assumes all costs are incurred in the year following the year in which spent fuel has been fully removed from the ISFSI. All estimates have been escalated to 2020 dollars.

The estimates provided in Enclosures 1, 2, & 3, indicate that Oyster Creek, Pilgrim, and IPEC have met the NRC's funding requirements. Accordingly, HDI concludes that no further action is required at this time to demonstrate adequate funding assurance for decommissioning the Oyster Creek, Pilgrim, and IPEC sites.

Table 1

Plant Site	Trust Fund Surplus	ISFSI DCE
Oyster Creek	\$131M ¹	\$3.99M
Pilgrim	\$311M ¹	\$4.29M
Indian Point	Unit 1: \$19.9M ²	Units 1, 2 & 3: \$5.74M
	Unit 2: \$72.7M ²	
	Unit 3: \$170.6M ²	

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact me at (856) 797-0900, ext. 3578.

Sincerely,

Jean A. Fleming
Vice President, Regulatory and Environmental Affairs
Holtec Decommissioning International, LLC

¹ Trust Fund Surplus value taken from Letter, Holtec Decommissioning International, LLC to US NRC, "Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations," March 31, 2021 (ML21090A336)

² Trust Fund Surplus value taken from Letter, Holtec Decommissioning International, LLC to US NRC, "Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3," December 19, 2019 (ML19354A698)



Enclosures:

1. 10 CFR 72.30 ISFSI Decommissioning Funding Plan – Oyster Creek Nuclear Generating Station
2. 10 CFR 72.30 ISFSI Decommissioning Funding Plan - Pilgrim Nuclear Power Station
3. 10 CFR 72.30 ISFSI Decommissioning Funding Plan - Indian Point Nuclear Generating Station, Units 1, 2 & 3

References:

1. Letter, Holtec Decommissioning International, LLC to US NRC, "Notification of Revised Post-Shutdown Decommissioning Activities Report and Revised Site-Specific Decommissioning Cost Estimate for Oyster Creek Nuclear Generating Station," September 28, 2018 (ML18275A116)
2. Letter, Holtec Decommissioning International, LLC to US NRC, "Notification of Revised Post-Shutdown Decommissioning Activities Report and Revised Site-Specific Decommissioning Cost Estimate for Pilgrim Nuclear Power Station," November 16, 2018 (ML18320A040)
3. Letter, Holtec Decommissioning International, LLC to US NRC, "Post Shutdown Decommissioning Activities Report including Site-Specific Decommissioning Cost Estimate for Indian Point Nuclear Generating Units 1, 2, and 3," December 19, 2019 (ML19354A698)
4. Letter, Holtec Decommissioning International, LLC to US NRC, "Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations," March 31, 2021 (ML21090A336)
5. 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.

cc: NRC Region I Regional Administrator
NRC NMSS Senior Project Manager – Indian Point
NRC NMSS Senior Project Manager – Pilgrim
NRC NMSS Senior Project Manager – Oyster Creek
New York State Department of Public Service President and CEO, NYSERDA
Massachusetts Emergency Management Agency (MEMA), Director
Assistant Commissioner, Air Quality, Energy and Sustainability, NJ DEP
Assistant Director Radiation Protection Element, NJ Bureau of Nuclear Engineering

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ENCLOSURE 1

To

HDI-IPEC-21-039

HDI-OC-21-099

HDI-PIL-21-134

**10 CFR 72.30 ISFSI Decommissioning Funding Plan
Oyster Creek Nuclear Generating Station**

10 CFR 72.30 ISFSI Decommissioning Funding Plan **Oyster Creek Nuclear Generating Station**

Background and Introduction

The Nuclear Regulatory Commission (NRC) issued its final rule on Decommissioning Planning on June 17, 2011 (Reference 5) 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 ISFSI.

The rule also requires resubmittal of the decommissioning funding plan at intervals not to exceed 3 years, with adjustments as necessary to account for changes in costs and the extent of contamination. In accordance with the rule, this enclosure provides a detailed cost estimate for decommissioning the ISFSI constructed at Oyster Creek.

Key Assumptions / Estimating Approach

In accordance with 10 CFR §72.30, licensees must have a proposed decommissioning plan for the ISFSI site and facilities that includes a cost estimate for the plan. The plan should contain sufficient information on the proposed practices and procedures for the decontamination of the ISFSI and for the disposal of residual radioactive materials after all spent fuel, high-level radioactive waste, and reactor related GTCC waste have been removed.

A small number of the spent fuel storage canister overpack assemblies are assumed to have some level of neutron-induced activation as a result of the exposure to the fuel. Due to the leak-proof design of the spent fuel and GTCC canisters, it is assumed that there will be no contamination of ISFSI structures or components. The cost of the disposition of any material exceeding free release criteria, as well as the demolition of the ISFSI facility, is included in the cost estimate.

In accordance with the specific requirements of 10 CFR §72.30 for the ISFSI work scope, the cost estimate for decommissioning the ISFSI reflects: 1) the cost of performing the decommissioning activities; 2) a Contingency Allowance of 25%; and 3) the cost of meeting the criteria for unrestricted use.

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:
 - a. No impact. There have not been any spills of radioactive material producing additional residual radioactivity in onsite subsurface material at the ISFSI in

the past three years.

2. Facility modifications:

- a. No impact. There have not been any modifications to the ISFSI at the facility in the past three years that would materially change the latest decommissioning cost estimate.

Actual costs for modifications to the ISFSI are bounded by the costs assumed in the decommissioning cost estimate.

3. Changes in authorized possession limits:

- a. No impact. There have not been any changes in authorized possession limits at the ISFSI in the past three years that would materially change the decommissioning cost estimate.

4. Actual remediation costs that exceed the previous cost estimate:

- a. No impact. No actual remediation costs have incurred that exceed the latest cost estimate.

Cost Considerations

The estimated cost to decommission the ISFSI and release the facility for unrestricted use is provided in Table 1-1. The estimate includes costs for work planning, survey, and characterization work in preparation for decommissioning in addition to costs for demolition, packaging, transportation, and disposal of radioactive and non-radioactive waste. Costs are included for HDI's management staff, industrial security, and other site operating costs as well as the costs for the supporting equipment, materials, and supplies. Finally, costs are included for the final site survey, verification surveys and activities necessary to release the ISFSI site for unrestricted use and terminate the licenses.

For estimating purposes, it is conservatively assumed that all expenditures will be incurred in the year 2035, the year following all spent fuel removal.

Financial Assurance

ISFSI operations at Oyster Creek are in response to the DOE's failure to remove spent nuclear fuel from the site in a timely manner. It is therefore expected that, once the ISFSI is no longer needed, the cost to decommission the ISFSI would be a DOE-reimbursable expense.

Until such time that the costs can be recovered from the DOE, HDI will rely upon the money available in its decommissioning trust fund to terminate the ISFSI license and release the facility for unrestricted use.

Using the decommissioning trust fund is reasonable based on the following:

- Although the decommissioning trust fund is for radiological decommissioning costs only, the ISFSI decommissioning is a radiological cost. Also, to the extent that the trust fund balance exceeds costs required for 10 CFR Part 50 radiological decommissioning, these funds would be available to address costs incurred by HDI,

including ISFSI decommissioning costs.

- Based upon Oyster Creek's decommissioning trust fund balance as of December 31, 2020, the trust fund will contain a \$131 million surplus. This surplus is more than sufficient to complete the decommissioning of the ISFSI.

This certifies that, based on the trust fund balance and costs as shown as of the dates reflected in this report, financial assurance has been provided in the amount of the cost estimate for decommissioning of the ISFSI.

Table 1-1
Oyster Creek ISFSI Decommissioning Cost Estimate
(thousands of 2020 dollars)

Oyster Creek Activity	Removal Costs	Transport Costs	Disposal Costs	Other Costs	Burial Volume Class A (ft ³)	FTE	License Termination	Spent Fuel	Site Restoration	Total Costs
ISFSI Demolition Non-Radiological	664								664	664
ISFSI Clean Waste			78						78	78
ISFSI Final Site Survey				33			33			33
ISFSI NRC Confirmatory Survey				11			11			11
ISFSI Demolition Radiological	903						903			903
ISFSI Radiological Waste		76	304		6,000			380		380
NRC License Termination Support				228		1	228			228
Security Staff				317		3		317		317
Security Management				280		1		280		280
Property Tax				748				748		748
Insurance				130				130		130
NRC Regulatory Fees				224				224		224
Totals	1567	76	382	1972			1,175	2,080	742	3,997



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ENCLOSURE 2

To

HDI-IPEC-21-039

HDI-OC-21-099

HDI-PIL-21-134

**10 CFR 72.30 ISFSI Decommissioning Funding Plan
Pilgrim Nuclear Power Station**

10 CFR 72.30 ISFSI Decommissioning Funding Plan
Pilgrim Nuclear Power Station

Background and Introduction

The Nuclear Regulatory Commission (NRC) issued its final rule on Decommissioning Planning on June 17, 2011 (Reference 5) 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 ISFSI.

The rule also requires resubmittal of the decommissioning funding plan at intervals not to exceed 3 years, with adjustments as necessary to account for changes in costs and the extent of contamination. In accordance with the rule, this enclosure provides a detailed cost estimate for decommissioning the ISFSI constructed at Pilgrim.

Key Assumptions / Estimating Approach

In accordance with 10 CFR §72.30, licensees must have a proposed decommissioning plan for the ISFSI site and facilities that includes a cost estimate for the plan. The plan should contain sufficient information on the proposed practices and procedures for the decontamination of the ISFSI and for the disposal of residual radioactive materials after all spent fuel, high-level radioactive waste, and reactor related GTCC waste have been removed.

The canister overpack assemblies are not expected to have any interior or exterior radioactive surface contamination. Any neutron activation of the steel and concrete is expected to be extremely small. The decommissioning estimate assumes that some of the inner steel liners and the concrete overpacks will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning.

No contamination or activation of the ISFSI pads is assumed. As such, only verification surveys are included for the pad in the decommissioning estimate. The estimate is limited to costs necessary to terminate the ISFSI's NRC license and meet the §20.1402 criteria for unrestricted use.

In accordance with the specific requirements of 10 CFR §72.30 for the ISFSI work scope, the cost estimate for decommissioning the ISFSI reflects: 1) the cost of performing the decommissioning activities; 2) a Contingency Allowance of 25%; and 3) the cost of meeting the criteria for unrestricted use.

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:

- a. No impact. There have not been any spills of radioactive material producing additional residual radioactivity in onsite subsurface material at the ISFSIs in the past three years.
2. Facility modifications:
 - a. No impact. There have not been any modifications to the ISFSIs at the facility in the past three years that would materially change the latest decommissioning cost estimate.

The ISFSI facility design at the time the cost estimate was prepared was incorporated into the estimate. Also, any ISFSI modifications (i.e. ISFSI pad expansions) required to accommodate spent fuel storage after permanent shutdown were incorporated in the cost estimate.
3. Changes in authorized possession limits:
 - a. No impact. There have not been any changes in authorized possession limits at the ISFSIs in the past three years that would materially change the decommissioning cost estimate.
4. Actual remediation costs that exceed the previous cost estimate:
 - a. No impact. No actual remediation costs have incurred that exceed the latest cost estimate.

Cost Considerations

The estimated cost to decommission the ISFSI and release the facility for unrestricted use is provided in Table 2-1. The estimate includes costs for work planning, survey, and characterization work in preparation for decommissioning in addition to costs for demolition, packaging, transportation, and disposal of radioactive and non-radioactive waste. Costs are included for HDI's management staff, industrial security, and other site operating costs as well as the costs for the supporting equipment, materials, and supplies. Finally, costs are included for the final site survey, verification surveys and activities necessary to release the ISFSI site for unrestricted use and terminate the licenses.

For estimating purposes, it is conservatively assumed that all expenditures will be incurred in the year 2063, the year following all spent fuel removal.

Financial Assurance

ISFSI operations at Pilgrim are in response to the DOE's failure to remove spent nuclear fuel from the site in a timely manner. It is therefore expected that, once the ISFSI is no longer needed, the cost to decommission the ISFSI would be a DOE-reimbursable expense.

Until such time that the costs can be recovered from the DOE, HDI will rely upon the money available in its decommissioning trust fund to terminate the ISFSI license and release the facility for unrestricted use.

Using the decommissioning trust fund is reasonable based on the following:

- Although the decommissioning trust fund is for radiological decommissioning costs only, the ISFSI decommissioning is a radiological cost. Also, to the extent that the trust fund balance exceeds costs required for 10 CFR Part 50 radiological decommissioning, these funds would be available to address costs incurred by HDI, including ISFSI decommissioning costs.
- Based upon Pilgrim's decommissioning trust fund balance as of December 31, 2020, the trust fund will contain a \$311 million surplus. This surplus is more than sufficient to complete the decommissioning of the ISFSI.

This certifies that, based on the trust fund balance and costs as shown as of the dates reflected in this report, financial assurance has been provided in the amount of the cost estimate for decommissioning of the ISFSI.

Table 2-1
Pilgrim ISFSI Decommissioning Cost Estimate
(thousands of 2020 dollars)

Pilgrim Activity	Removal Costs	LLRW Disposal Costs	Other Costs	Burial Volume Class A (ft ³)	FTE	License Termination	Spent Fuel	Site Restoration	Total Costs
ISFSI Demolition Non-Radiological	640							640	640
ISFSI Final Site Survey			32			32			32
ISFSI NRC Confirmatory Survey			12			12			12
ISFSI Demolition Radiological	869					869			869
ISFSI Waste Class A/Hazardous/Exempt		482		6,000			400	82	482
NRC License Termination Support			163		0.5	163			163
Operations Staff			315		2.78		315		315
Operations Management			278		0.7		278		278
Property Tax			624				624		624
Insurance			647				647		647
NRC Regulatory Fees			234				234		234
Totals	1509	482	2306		3.98	1,076	2,499	722	4,297



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ENCLOSURE 3

To

HDI-IPEC-21-039

HDI-OC-21-099

HDI-PIL-21-134

**10 CFR 72.30 ISFSI Decommissioning Funding Plan
Indian Point Nuclear Generating Stations 1, 2, & 3**

10 CFR 72.30 ISFSI Decommissioning Funding Plan
Indian Point Nuclear Generating Stations 1, 2, & 3

Background and Introduction

The Nuclear Regulatory Commission (NRC) issued its final rule on Decommissioning Planning on June 17, 2011 (Reference 5), 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 ISFSI.

The rule also requires resubmittal of the decommissioning funding plan at intervals not to exceed 3 years, with adjustments as necessary to account for changes in costs and the extent of contamination. In accordance with the rule, this enclosure provides a detailed cost estimate for decommissioning the ISFSI constructed at IPEC.

Key Assumptions / Estimating Approach

In accordance with 10 CFR §72.30, licensees must have a proposed decommissioning plan for the ISFSI site and facilities that includes a cost estimate for the plan. The plan should contain sufficient information on the proposed practices and procedures for the decontamination of the ISFSI and for the disposal of residual radioactive materials after all spent fuel, high-level radioactive waste, and reactor related GTCC waste have been removed.

The canister overpack assemblies are not expected to have any interior or exterior radioactive surface contamination. Any neutron activation of the steel and concrete is expected to be extremely small. The decommissioning estimate assumes that some of the inner steel liners and the concrete overpacks will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning.

The storage overpacks used for the GTCC canisters are not expected to have any interior contamination of residual activation and can be reused or disposed of by conventional means after a radiological release survey.

No contamination or activation of the ISFSI pads is assumed. As such, only verification surveys are included for the pad in the decommissioning estimate. The estimate is limited to costs necessary to terminate the ISFSI's NRC license and meet the §20.1402 criteria for unrestricted use.

In accordance with the specific requirements of 10 CFR §72.30 for the ISFSI work scope, the cost estimate for decommissioning the ISFSI reflects: 1) the cost of performing the decommissioning activities; 2) a Contingency Allowance of 25%; and 3) the cost of meeting the criteria for unrestricted use.

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:

- a. No impact. There have not been any spills of radioactive material producing additional residual radioactivity in onsite subsurface material at the ISFSI in the past three years.

2. Facility modifications:

- a. No impact. There have not been any modifications to the ISFSI at the facility in the past three years that would materially change the latest decommissioning cost estimate.

The ISFSI facility design at the time the cost estimate was prepared was incorporated into the estimate. Also, any ISFSI modifications (i.e. ISFSI pad expansions) required to accommodate spent fuel storage after permanent shutdown were incorporated in the cost estimate.

3. Changes in authorized possession limits:

- a. No impact. There have not been any changes in authorized possession limits at the ISFSI in the past three years that would materially change the decommissioning cost estimate.

4. Actual remediation costs that exceed the previous cost estimate:

- a. No impact. No actual remediation costs have incurred that exceed the latest cost estimate.

Cost Considerations

The estimated cost to decommission the ISFSI and release the facility for unrestricted use is provided in Table 3-1. The estimate includes costs for work planning, survey, and characterization work in preparation for decommissioning in addition to costs for demolition, packaging, transportation, and disposal of radioactive and non-radioactive waste. Costs are included for HDI's management staff, industrial security, and other site operating costs as well as the costs for the supporting equipment, materials, and supplies. Finally, costs are included for the final site survey, verification surveys and activities necessary to release the ISFSI site for unrestricted use and terminate the licenses.

For estimating purposes, it is conservatively assumed that all expenditures will be incurred in the year 2062, the year following all spent fuel removal.

Financial Assurance

ISFSI operations at IPEC are in response to the DOE's failure to remove spent nuclear fuel from the site in a timely manner. It is therefore expected that, once the ISFSI is no longer needed, the cost to decommission the ISFSI would be a DOE-reimbursable expense.

Until such time that the costs can be recovered from the DOE, HDI will rely upon the money available in its decommissioning trust fund to terminate the ISFSI license and release the facility for unrestricted use.

Using the decommissioning trust fund is reasonable based on the following:

- Although the decommissioning trust fund is for radiological decommissioning costs only, the ISFSI decommissioning is a radiological cost. Also, to the extent that the trust fund balance exceeds costs required for 10 CFR Part 50 radiological decommissioning, these funds would be available to address costs incurred by HDI, including ISFSI decommissioning costs.
- Based upon IPEC's decommissioning trust fund balances taken from the IPEC PSDAR and DCE (Reference 3), the Unit 1, 2 & 3 trust funds will contain surpluses of \$19.9 million, \$72.7 million, and \$170.6 million respectively. These surpluses are more than sufficient to complete the decommissioning of the ISFSI.

This certifies that, based on the trust fund balance and costs as shown as of the dates reflected in this report, financial assurance has been provided in the amount of the cost estimate for decommissioning of the ISFSI.

Table 3-1
IPEC ISFSI Decommissioning Cost Estimate
(thousands of 2020 dollars)

IPEC Activity	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs
Decommissioning Contractor						
Planning (characterization, specs, and procedures)					72	72
Decontamination (Overpack disposition)	1,624	34	298	641		2,596
License Termination (radiological surveys)					129	129
Subtotal	1,624	34	298	641	201	2,797
Supporting Costs						
NRC and NRC Contractor Costs					11	11
Site O&M					1,718	1,718
Insurance					547	547
NRC Regulatory Fees					670	670
Subtotal					2,946	2,946
Totals	1,624	34	298	641	3,147	5,743