



March 28, 2005 BVY-05-033 NL-05-039 JPN-05-005 ENO Ltr. 2.05.023

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

SUBJECT:

Entergy Nuclear Operations, Inc.

Indian Point Nuclear Generating Stations 1, 2 and 3

Docket Nos. 50-3, 50-247 and 50-286 Vermont Yankee Nuclear Power Station

Docket No. 50-271

Pilgrim Nuclear Power Station

Docket No. 50-293

James A. FitzPatrick Nuclear Power Plant

Docket No. 50-333

Status of Decommissioning Funding for

Plants Operated by Entergy Nuclear Operations, Inc. For Year Ending December 31, 2004 – 10 CFR 50.75(f)(1)

References:

- 1. NUREG-1307, "Report on Waste Burial Charges," Revision 10, dated October 2002.
- 2. NRC Regulatory Issue Summary 2001-07, "10 CFR 50.75(f)(1) Reports on the Status of Decommissioning Funds (Due March 31, 2001)."

Dear Sir:

10 CFR 50.75(f)(1) requires each power reactor licensee to report to the NRC by March 31, 1999, and every two years thereafter, on the status of its decommissioning funding for each reactor, or share of a reactor, that it owns. On behalf of Entergy Nuclear Indian Point 2 LLC, Entergy Nuclear Indian Point 3 LLC, Entergy Nuclear Vermont Yankee LLC, Entergy Nuclear Generation Company (Pilgrim Station), and Entergy Nuclear FitzPatrick LLC, Entergy Nuclear Operations, Inc. hereby submits the information requested for power reactors operated by Entergy Nuclear Operations, Inc.

ADOI

The estimated minimum decommissioning fund values were determined using the NRC's methodology in NUREG-1307 (Reference 1) and does not include activities outside of the scope of decommissioning as defined by 10 CFR 50.2.

Entergy will continue to monitor the status of the funds and will assure that we meet all NRC regulations and implement NRC guidance, as appropriate, to assure adequate funding for the decommissioning when required.

The information provided in Attachment 1 is based on NRC Regulatory Issue Summary 2001-07 (Reference 2).

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours,

Fred R. Dacimo
Acting Senior Vice President and
Chief Operating Officer

Attachment:

- 1. Status of Decommissioning Funding for Plants Operated by Entergy Nuclear Operations, Inc. (Indian Point 1, Indian Point 2, Indian Point 3, Vermont Yankee, Pilgrim, and FitzPatrick) For Year Ending December 31, 2004 10 CFR 50.75(f)(1) (7 sheets)
- 2. NRC Minimum Funding Calculation (10 CFR 50.75(c)) for Indian Point 1, Indian Point 2, Indian Point 3, Vermont Yankee, Pilgrim, and FitzPatrick (6 sheets)

cc: Next page.

cc: all w/attachments

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Mr. David O'Brien, Commissioner Department of Public Service 120 State Street – Drawer 20 Montpelier, VT 05602

Mr. Paul Eddy NYS Department of Public Service 3 Empire State Plaza Albany, NY 12223

Plant Name: Indian Point Nuclear Generating Unit No. 1

1.	Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).	\$ 309.59 million ^{[1][3]}
	Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2016).	\$ 441.40 million
2.	Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).	\$ 227.43 million ^[2]
	Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2016).	\$ 408.43 million
3.	A schedule of the annual amounts remaining to be collected.	None.
4.	Assumptions used in determining rates of escalation in decommissioning costs, rates of	Escalation rate: 3.0%
	earnings on decommissioning funds, and rates of other factors used in funding projections.	Rate of earnings: 5.0%
5.	Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).	None.
6.	Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.	None.
7.	Any material changes to trust agreements.	None.

Plant Name: Indian Point Nuclear Generating Unit No. 2

1.	Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).	\$ 373.79 million ^[1]
	Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2016).	\$ 532.94 million
2.	Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).	\$ 272.04 million ^[2]
	Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2016).	\$ 488.54 million
3.	A schedule of the annual amounts remaining to be collected.	None.
4.	Assumptions used in determining rates of	Escalation rate: 3.0%
	escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in funding projections.	Rate of earnings: 5.0%
5.	Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).	None.
6.	Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.	None.
7.	Any material changes to trust agreements.	None.

Plant Name: Indian Point Nuclear Generating Unit No. 3

1.	Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).	\$ 369.06 million ^[1]
	Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2018).	\$ 558.24 million
2.	Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).	\$ 393.00 million
	Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2018).	\$ 778.11 million
3.	A schedule of the annual amounts remaining to be collected.	None.
4.	Assumptions used in determining rates of	Escalation rate: 3.0%
	escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in funding projections.	Rate of earnings: 5.0%
5.	Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).	None.
6.	Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.	None.
7.	Any material changes to trust agreements.	None.

Plant Name: Vermont Yankee Nuclear Power Station

1.	Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).	\$ 412.60 million ^[1]
	Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2015).	\$ 571.13 million
2.	Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).	\$ 372.80 million
	Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2015).	\$ 637.61 million
3.	A schedule of the annual amounts remaining to be collected.	None.
4.	Assumptions used in determining rates of escalation in decommissioning costs, rates of	Escalation rate: 3.0%
	earnings on decommissioning funds, and rates of other factors used in funding projections.	Rate of earnings: 5.0%
5.	Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).	None.
6.	Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.	None.
7.	Any material changes to trust agreements.	None.

Attachment 1 to BVY-05-033, NL-05-039, JPN-05-005, ENO Ltr. 2.05.023

Entergy Nuclear Operations, Inc. Status of Decommissioning Funding For Year Ending December 31, 2004 – 10 CFR 50.75(f)(1)

Plant Name: Pilgrim Nuclear Power Station

1.	Amount of decommissioning funds estimated
	to be required pursuant to 10 CFR 50.75 (b)
	and (c).

\$ 426.25 million [1]

Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2015).

\$ 590.03 million

2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).

\$ 528.74 million

Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2015).

\$ 904.32 million

3. A schedule of the annual amounts remaining to be collected.

None.

4. Assumptions used in determining rates of escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in funding projections.

Escalation rate: 3.0%

Rate of earnings: 5.0%

5. Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).

None.

6. Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.

None. [see item 7]

7. Any material changes to trust agreements.

In March 2003, Mellon Bank, the trustee of the Pilgrim Provisional Decommissioning Trust was given direction to contribute all assets remaining in the Provisional Trust to the non-qualified fund of the Pilgrim Master Trust. Later that month, Mellon Bank transferred approximately \$30 million of assets as directed. The Pilgrim Provisional Trust was then terminated.

Plant Name: James A. Fitzpatrick Nuclear Power Plant

1.	Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).	\$ 442.19 million ^[1]
	Decommissioning cost estimate escalated at 3.0% per year to the midpoint of decommissioning (December 2017).	\$ 649.37 million
2.	Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2004).	\$ 428.80 million
	Fund balance with 5.0% annual growth to the midpoint of decommissioning (December 2017).	\$ 808.57 million
3.	A schedule of the annual amounts remaining to be collected.	None.
4.	Assumptions used in determining rates of escalation in decommissioning costs, rates of	Escalation rate: 3.0%
	earnings on decommissioning funds, and rates of other factors used in funding projections.	Rate of earnings: 5.0%
5.	Any contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v).	None.
6.	Modifications occurring to a licensee's current method of providing financial assurance since the last submitted report.	None.
7.	Any material changes to trust agreements.	None.

Attachment 1 to BVY-05-033, NL-05-039, JPN-05-005, ENO Ltr. 2.05.023

Entergy Nuclear Operations, Inc. Status of Decommissioning Funding For Year Ending December 31, 2004 – 10 CFR 50.75(f)(1)

Notes:

- [1] The calculation of the NRC minimum value is provided in Attachment 2.
- [2] The current fund balances for Indian Point 1 and 2 do not include an additional \$25.91 million available in the provisional fund.
- [3] In accordance with 10 CFR 50.75(c)(i)(1) PWR reactors below 1200 MWt are to use this minimum value. Indian Point 1 had a thermal power level of 615 MWt. (Refer to Attachment 3, pg. 15, of June 8, 2001 letter, M. R. Kansler to USNRC regarding "Response to June 5, 2001 Letter, Indian Point Nuclear Generating Unit Nos. 1 and 2, Transfer of Facility Operating License (TAC Nos. MB0743 and MB0744).")

Plant Name: Indian Point Nuclear Generating Unit No. 1

Inputs:

Plant Characteristics

PWR Plant Type (PWR or BWR)

NE (Northeast) Region

Rated (in MWt) [1] 615 2004 Year Waste Vendor Used (Yes/No) Yes

South Carolina **Burial Site**

Atlantic Compact Member (Yes/No) No

Producer Price Index

147.9 (December 2004) wpu0543 (industrial electric power)

133.4 wpu0573 (light fuel oils)

Labor Adjustment Factors

174.2 (4th Quarter, 2004) ecu13102i (Northeast)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

18.732 (NUREG-1307, Rev. 10) PWR - direct disposal 9.467

PWR - w/waste vendors

Adjustment Factors

1.434 Energy (E) Labor (L) 2.076 9.467 Burial (B)

\$85.56 (size adjusted for megawatts) Minimum Amount (millions, \$1986) 3.618 (65% L, 13% E, 22% B) Escalation Factor (L, E, B)

NRC Minimum (millions, \$2004) w/waste vendor \$309.59

In accordance with 10 CFR 50.75(c)(i)(1) PWR reactors below 1200 MWt are to use this minimum value. Indian Point 1 [1] had a thermal power level of 615 MWt. (Refer to Attachment 3, pg. 15, of June 8, 2001 letter, M. R. Kansler to USNRC regarding "Response to June 5, 2001 Letter, Indian Point Nuclear Generating Unit Nos. 1 and 2, Transfer of Facility Operating License (TAC Nos. MB0743 and MB0744).")

Plant Name: Indian Point Nuclear Generating Unit No. 2

Inputs:

Plant Characteristics

Plant Type (PWR or BWR) PWR

Region NE (Northeast)

Rated (in MWt) 3216
Year 2004
Waste Vendor Used (Yes/No) Yes

Burial Site South Carolina

Atlantic Compact Member (Yes/No) No

<u>Producer Price Index</u>

wpu0543 (industrial electric power) 147.9 (December 2004)

wpu0573 (light fuel oils) 133.4

Labor Adjustment Factors

ecu13102i (Northeast) 174.2 (4th Quarter, 2004)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

PWR - direct disposal 18.732 (NUREG-1307, Rev. 10)

PWR - w/waste vendors 9.467

Adjustment Factors

Energy (E) 1.434 Labor (L) 2.076 Burial (B) 9.467

Minimum Amount (millions, \$1986) \$103.30 (size adjusted for megawatts)

Escalation Factor (L, E, B) 3.618 (65% L, 13% E, 22% B)

NRC Minimum (millions, \$2004) \$373.79 w/waste vendor

Attachment 2 to BVY-05-033, NL-05-039, JPN-05-005, ENO Ltr. 2.05.023

Entergy Nuclear Operations, Inc. NRC Minimum Funding Calculation (10 CFR 50.75(c)) For Year Ending December 31, 2004

Plant Name: Indian Point Nuclear Generating Unit No. 3

Inputs:

Plant Characteristics

Plant Type (PWR or BWR) PWR

Region NE (Northeast)

Rated (in MWt) 3067.4 Year 2004 Waste Vendor Used (Yes/No) Yes

Burial Site South Carolina

Atlantic Compact Member (Yes/No) No

Producer Price Index

wpu0543 (industrial electric power) 147.9 (December 2004)

wpu0573 (light fuel oils) 133.4

Labor Adjustment Factors

ecu13102i (Northeast) 174.2 (4th Quarter, 2004)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

PWR - direct disposal 18.732 (NUREG-1307, Rev. 10)

PWR - w/waste vendors 9.467

Adjustment Factors

Energy (E) 1.434 Labor (L) 2.076 Burial (B) 9.467

Minimum Amount (millions, \$1986) \$101.99 (size adjusted for megawatts)

Escalation Factor (L, E, B) 3.618 (65% L, 13% E, 22% B)

NRC Minimum (millions, \$2004) \$369.06 w/waste vendor

Plant Name: Vermont Yankee Nuclear Power Station

Inputs:

Plant Characteristics

Plant Type (PWR or BWR) BWR

Region NE (Northeast)

Rated (in MWt) 1593
Year 2004
Waste Vendor Used (Yes/No) Yes

Burial Site South Carolina

Atlantic Compact Member (Yes/No) No

Producer Price Index

wpu0543 (industrial electric power) 147.9 (December 2004)

wpu0573 (light fuel oils) 133.4

<u>Labor Adjustment Factors</u>

ecu13102i (Northeast) 174.2 (4th Quarter, 2004)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

BWR - direct disposal 16.705 (NUREG-1307, Rev. 10)

BWR - w/waste vendors 8.860

Adjustment Factors

Energy (E) 1.448 Labor (L) 2.076 Burial (B) 8.860

Minimum Amount (millions, \$1986) \$118.34 (size adjusted for megawatts)

Escalation Factor (L, E, B) 3.487 (65% L, 13% E, 22% B)

NRC Minimum (millions, \$2004) \$412.60 w/waste vendor

Plant Name: Pilgrim Nuclear Power Station

Inputs:

Plant Characteristics

Plant Type (PWR or BWR) BWR

Region NE (Northeast)

Rated (in MWt) 2028 Year 2004 Waste Vendor Used (Yes/No) Yes

Burial Site South Carolina

Atlantic Compact Member (Yes/No) No

Producer Price Index

wpu0543 (industrial electric power) 147.9 (December 2004)

wpu0573 (light fuel oils) 133.4

Labor Adjustment Factors

ecu13102i (Northeast) 174.2 (4th Quarter, 2004)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

BWR - direct disposal 16.705 (NUREG-1307, Rev. 10)

BWR - w/waste vendors 8.860

Adjustment Factors

Energy (E) 1.448
Labor (L) 2.076
Burial (B) 8.860

Minimum Amount (millions, \$1986) \$122.25 (size adjusted for megawatts)

Escalation Factor (L, E, B) 3.487 (65% L, 13% E, 22% B)

NRC Minimum (millions, \$2004) \$426.25 w/waste vendor

Plant Name: James A. Fitzpatrick Nuclear Power Plant

Inputs:

Plant Characteristics

Plant Type (PWR or BWR) BWR

Region NE (Northeast)

Rated (in MWt) 2536 Year 2004 Waste Vendor Used (Yes/No) Yes

Burial Site South Carolina

Atlantic Compact Member (Yes/No) No

Producer Price Index

wpu0543 (industrial electric power) 147.9 (December 2004)

wpu0573 (light fuel oils) 133.4

Labor Adjustment Factors

ecu13102i (Northeast) 174.2 (4th Quarter, 2004)

Burial Site Adjustments (South Carolina/non-Atlantic Compact Member)

BWR - direct disposal 16.705 (NUREG-1307, Rev. 10)

BWR - w/waste vendors 8.860

Adjustment Factors

Energy (E) 1.448 Labor (L) 2.076 Burial (B) 8.860

Minimum Amount (millions, \$1986) \$126.82 (size adjusted for megawatts) Escalation Factor (L, E, B) 3.487 (65% L, 13% E, 22% B)

NRC Minimum (millions, \$2004) \$442.19 w/waste vendor