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Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: PETITION FOR RULEMAKING TO AMEND 10 C.F.R. § 50.82

Dear Ms. Vietti-Cook:

Pursuant to 10 C.F.R. § 2.802, EnergySolutions, LLC, (EnergySolutions) submits the enclosed rulemaking petition (Petition) to the U.S. Nuclear Regulatory Commission (NRC) to amend 10 C.F.R. § 50.82, "Termination of License" to provide a regulatory framework that would allow funds from licensees' decommissioning trust funds to be used for the cost of disposal of "major radioactive components" that have been removed from reactors prior to the permanent cessation of operations. These components represent large capital assets and are defined by 10 C.F.R. § 50.2. EnergySolutions is submitting this petition on its own behalf as it has concluded that such a regulatory framework is in the public interest.

Thank you for your consideration of this Petition. If you have any questions concerning this Petition, please contact me at 703-412-2535 (email temagette@energysolutions.com) or Jim Lieberman at 301-299-3607 (email jlieberman@talisman-intl.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Magette". The signature is fluid and cursive, written over the typed name and title.

Thomas E. Magette, P.E.
Senior Vice President

Enclosure: Rulemaking Petition To Amend 10 C.F.R. § 50.82

cc:

L. Reyes, Executive Director for Operations, NRC
K. Cyr, General Counsel, NRC
J. Dyer, Director, Office of Nuclear Reactor Regulation, NRC
C. Miller, Director, Office of Federal and State Materials and Environmental Management Programs, NRC

RULEMAKING PETITION TO AMEND 10 C.F.R. § 50.82

I. Introduction and Rulemaking Request

Pursuant to 10 C.F.R. § 2.802, *EnergySolutions*, LLC, (*EnergySolutions*) submits this rulemaking petition (Petition) to the U.S. Nuclear Regulatory Commission (NRC) to amend 10 C.F.R. § 50.82, “Termination of License” to provide a process that would allow funds from licensees’ decommissioning trust funds to be used for the cost of disposal of “major radioactive components” which have been removed from reactors prior to the permanent cessation of operations. These components represent large capital assets and are defined by 10 C.F.R. § 50.2. Hereinafter these components are referred to as “MRC’s.”

This rulemaking is needed because current regulations define decommissioning in 10 C.F.R. § 50.2 as not beginning until the site or facility ceases operations. As a result, NRC regulations in 10 C.F.R. § 50.82(a)(8) only allows withdrawals from decommissioning trust funds for decommissioning expenses, and further limits withdrawals only for planning activities prior to the submittal of the post-shutdown decommissioning activities report (PSDAR) following cessation of operations. Thus, either an exemption or an amendment to 10 C.F.R. § 50.82(a)(8) is required to allow withdrawals of these funds for disposal of MRC’s during operations.

Consequently, rather than use limited operating funds, most licensees defer the disposal of the MRC’s until the time of decommissioning, when the disposal clearly will be part of decommissioning and the cost of disposal will be paid from the licensees’ decommissioning trust funds, as these MRC’s will need to be removed from the sites and disposed of to achieve the dose limits of the License Termination Rule, 10 C.F.R. Part 20, Subpart E. In fact, of the approximately 200 steam generators that have been removed or scheduled for removal from reactors, about 150 remain stored or are planned to be stored on sites in specially constructed structures. If future steam generators need to be removed, new storage buildings will need to be built. These contaminated MRC’s may remain stored on sites for decades as a result of current and future license extensions.

The purpose of this rulemaking petition is to provide a process framework in the NRC regulations to permit a licensee in advance of ceasing operation at a site to facilitate the decommissioning process by allowing decommissioning trust funds to be used for disposal of removed MRC’s so that:

- (1) the radioactive source term associated with the contaminated components at reactor sites will be reduced,
- (2) the site workers will be exposed to less radiation,
- (3) unnecessary regulatory burdens can be eliminated as the costs associated with maintaining the components on-sites and providing protection to the workers as a result of those components can be avoided,
- (4) the overall costs to decommission sites will be reduced, and
- (5) more funds will be available to decommission reactors at the time the reactors cease operation.

This rulemaking is not seeking approval to use decommissioning trust funds to cover the cost of removing the MRC's from the reactor.

II. Statement of Current Regulation

Current NRC regulations provide in 10 C.F.R. § 50.82(a)(8)(i) that decommissioning trust funds may be used by licensees if

- (A) The withdrawals are for expenses for legitimate decommissioning activities consistent with the definition of decommissioning in § 50.2;
- (B) The expenditure would not reduce the value of the decommissioning trust below an amount necessary to place and maintain the reactor in a safe storage condition if unforeseen conditions or expenses arise and;
- (C) The withdrawals would not inhibit the ability of the licensee to complete funding of any shortfalls in the decommissioning trust needed to ensure the availability of funds to ultimately release the site and terminate the license.

In addition, 10 C.F.R. § 50.82(a)(8)(ii) provides a limitation on use of decommissioning trust funds prior to the submittal of a PSDAR. Specifically:

- (ii) Initially, 3 percent of the generic amount specified in § 50.75 may be used for decommissioning planning. For licensees that have submitted the certifications required under § 50.82(a)(1) and commencing 90 days after the NRC has received the PSDAR, an additional 20 percent may be used. A site-specific decommissioning cost estimate must be submitted to the NRC prior to the licensee using any funding in excess of these amounts.

III. Statement of Proposed Amendment

The following proposed amendment to 10 C.F.R. § 50.82(a)(8) would add a new paragraph as § 50.82(a)(8)(iii) that would provide a process for NRC to allow funds to be withdrawn from decommissioning trust funds for the purpose of disposal of major radioactive components without the need for a licensee to seek an exemption. The proposed paragraph would read as follows:

- (iii) Notwithstanding the limitations of §§ 50.82 (a)(8)(i)(A) and 8(ii), a licensee may use decommissioning trust funds to dispose of major radioactive components that have been removed from the reactor provided:

A. The licensee has submitted to the NRC with a copy to the Federal or State Government agency (e.g., Federal Energy Regulatory Commission and State Public Utility Commissions), if any, which has rate regulation oversight responsibility for the licensee's decommissioning trust fund:

- (1) a request to allow it to withdraw a specified amount from its decommissioning trust fund for the purpose of disposing of specific major radioactive component(s);
- (2) a site-specific decommissioning cost estimate that includes the disposal costs for major components stored on site; and

(3) an analysis demonstrating that if the licensee withdraws funds for the costs of disposing of the particular component (s) from the decommissioning trust fund, the remaining funds in the licensee's decommissioning trust fund are sufficient to meet the provisions of §§ 50.82(a)(8)(i)(B) and (C); and

B. The NRC has concluded that there is reasonable assurance that the provisions of §§ 50.82(a)(8)(B) and (C) will be met if the licensee withdraws the funds requested under § 50.82(a)(8)(iii)(A)(1).

IV. Interest of the Petitioner

EnergySolutions is a nuclear services firm that provides services to private and government organizations involved in nuclear activities. *EnergySolutions* has broad experience and expertise with the NRC licensing process and the standards that apply to the regulation of nuclear facilities, the use of radioactive materials, the cleanup and decommissioning of nuclear facilities, and the disposal of radioactive waste. Its employees have significant experience in the nuclear industry. *EnergySolutions* values a safe, efficient, and cost effective nuclear industry. Accordingly, after discussions with individuals in the nuclear industry and based on the knowledge and experience of *EnergySolutions'* employees, *EnergySolutions* is submitting this petition on its own behalf as it has concluded that it is in the public interest to dispose of MRC's prior to cessation of operations thereby simplifying decommissioning and reducing sites' source terms. *EnergySolutions* also has a financial interest in having MRC's disposed of at its Clive facility in Utah.

Granting this petition will also provide flexibility for licensees to better use limited land areas on licensed sites. Recognizing the substantial costs involved to remove these components from sites and dispose of them, it is *EnergySolutions'* view, that where a licensee has sufficient funds available in its decommissioning trust funds to cover decommissioning consistent with 10 C.F.R. § § 50.82(a)(8)(i)(B)-(C), allowing funds to be withdrawn from the decommissioning trust funds would encourage licensees to remove these components from the site for disposal rather than waiting decades until cessation of site operations. As a result, the potential health and safety risk to site workers will be decreased as significant source terms are removed from sites and properly disposed of decades in advance of the time the MRC's would have been removed if licensees waited until their reactor ceases operation. In addition, as a result of the escalating cost of disposal, using funds now for disposal should improve the ability of the remaining decommissioning trust funds to cover the costs for the remainder of decommissioning activities at the time the reactor ceases operation, thereby improving the plant's cost effectiveness.

V. Justification For This Proposed Amendment

A. Background

The Commission in the Statements of Consideration for the 1996 amendments to 10 C.F.R. § 50.82 in responding to a comment stated that "allowing decommissioning trust funds withdrawals for disposals by nuclear power plants that continue to operate is not warranted. These activities are more appropriately considered operating activities and

should be financed that way.” 61 FR 39278, 39293 (July 29, 1996). Consequently, licensees, having been precluded from using decommissioning trust funds, have found it advantageous to store large components on site with the associated costs rather than expend limited operating funds to dispose of these components as a routine operating cost. However, the MRC’s at issue here, consistent with the definitions in 10 C.F.R. § 50.2, are “major radioactive components,” the dismantlement of which the NRC did not consider to be “routine operations.” 61 FR at 39286. The components considered to be “routine nuclear power reactor operation activities” were components not within the definition of “major radioactive components.” *Id.* The MRC’s which are the subject of this rulemaking petition were originally intended to be used for the life of the plant. In the *EnergySolutions*’ view, the disposals of such MRC’s are appropriately funded from decommissioning funds and are not operating expenses. Hence, this rulemaking petition is being submitted to set up a regulatory framework to allow funds to be withdrawn from decommissioning trust funds to dispose of these MRC’s prior to shutdown.

One clear advantage of the current approach is that by deferring the disposal of the MRC’s until the time of decommissioning, the disposal clearly will be part of decommissioning, and the cost of disposal will be paid from the decommissioning trust fund as these MRC’s will need to be removed from the site and disposed of to achieve the dose limits of the License Termination Rule, 10 C.F.R. Part 20, Subpart E. In fact, of the approximately 200 steam generators that have been removed at more than 60 nuclear units, about 150 remain stored on sites in specially constructed mausoleums. In addition to the costs to build these structures, these licensees are required to expend funds for maintenance of the structures and environmental monitoring in light of the potential contamination associated with the MRC’s.

B. Need for an Amendment

EnergySolutions considers the disposal of the MRC’s to be a decommissioning activity because the activity can be described as removal from service of major radioactive components that are large items of capital equipment. However, the NRC definition of “decommission” implies the entire facility must be removed from service as a prerequisite in order to consider an activity a legitimate decommissioning activity. 10 C.F.R. § 50.2. When the NRC promulgated the decommissioning rule in 1988, it noted in the Statements of Consideration to the final rule that “[d]ecommissioning activities are initiated when a licensee decides to terminate licensed activities.” 53 FR 24,018, 24,019 (June 27, 1988).

The MRC’s that are covered by this rulemaking have already been removed from service but await disposal. Absent a rule amendment or an exemption, the current regulations encourage licensees to delay disposal of the MRC’s until the facility ceases operation. Accordingly, an amendment with respect to 10 C.F.R. § 50.82(a)(8)(i)(A) is needed because the facility and site are not being removed from service and therefore under the definition of “decommission” the disposal activity requested to be paid from the decommissioning trust fund is not a “decommissioning activity.” It should be noted that by the literal language of the definitions in 10 C.F.R. § 50.2, the permanent removal of “major radioactive components” is considered as a “major decommissioning activity.” However, the NRC has not literally interpreted these definitions as the NRC staff has not

concluded that the removal of about 200 steam generators, which are defined as “major radioactive components,” during operations is a “major decommissioning activity.” In addition, an amendment is also needed because § 50.81(a)(8) (ii) allows only planning costs to be paid from decommissioning trust funds in advance of submittal of a PSDAR. As explained below, granting this petition will not result in creating a situation where there will be insufficient funds to fully decommission the Facility. The rulemaking would allow a process to authorize withdrawal of funds from a decommissioning trust fund for the purpose of removing the MRC’s from the plant sites and disposing of them irrespective of the 10 C.F.R. § 50.82 (a)(8)(ii) restrictions.

C. Justification

This Petition should be granted for the following reasons:

1. Granting this Petition is Consistent With the Purpose of the Rule

The underlying purpose of 10 C.F.R. § 50.82(a)(8) is to provide adequate funds for ultimate decommissioning of the site. The purpose of the restrictions on fund withdrawal is to protect the health and safety of the public by assuring that there will be adequate funds available to complete the NRC-required decommissioning activities following termination of the operating license. A blanket prohibition on the use of decommissioning trust funds to dispose of MRC’s is unnecessary to achieve the underlying purpose of the rule. The amended rule would require a current site-specific decommissioning cost estimate to be submitted to the NRC and a demonstration that the decommissioning trust fund is adequate to complete decommissioning even if funds are withdrawn for disposals of the MRC’s. The licensee’s analysis would be required to demonstrate that 10 C.F.R. §§ 50.82(a)(8)(i)(B) and (C) are met. Specifically:

(B) The expenditure would not reduce the value of the decommissioning trust below an amount necessary to place and maintain the reactor in a safe storage condition if unforeseen conditions or expenses arise and;

(C) The withdrawals would not inhibit the ability of the licensee to complete funding of any shortfalls in the decommissioning trust needed to ensure the availability of funds to ultimately release the site and terminate the license.

It is noteworthy that under the current rule, a licensee can exceed the 3 and 20 percent limitations of 10 C.F.R. § 50.82(a)(8)(ii) if a site-specific cost estimate is submitted to the NRC, though only after the reactor ceases operation in the case of the 20 percent limitation. Once this cost estimate is provided to the NRC, the licensee, according to the 1996 Statements of Consideration, may withdraw funds without obtaining additional approvals from the NRC. 61 FR 39278, 39285 (July 29, 1996).

Importantly, under the proposed amendment, the NRC would not only have received the licensee’s site-specific decommissioning cost estimate, NRC would need to make a finding that there was reasonable assurance that the provisions of §§ 50.82(a)(8)(B) and (C) will be met if the licensee withdraws the requested funds. In addition, before making that finding, the NRC while not bound to accept the views, would be able to consider the views from the appropriate Federal or State agency, if any, with oversight responsibility for the licensee’s decommissioning trust fund. Thus, this amendment continues the

assurance that adequate funds will be available for ultimate decommissioning of the site based on a site-specific analysis consistent with the purpose of the rule.

2. Granting this Petition Avoids a Conflict with the NRC Philosophy Underlying Other Rules

Application of the regulations in 10 C.F.R. § 50.82(a) is in conflict with the philosophy underlying the approach the Commission took for timeliness requirements set up for materials licensees as it may provide an unnecessary economic barrier for the removal of source terms from reactor sites. Material licensees of the NRC are subject to the 1994 Decommission Timeliness Rule, 10 C.F.R. §§ 30.36, 40.42, 70.38, and 72.54, which requires those licensees to decontaminate and decommission certain unused portions of operating nuclear materials facilities. Allowing contaminated land, buildings or equipment to remain on-site was seen as a possible public and environmental liability and the Commission looked for ways to achieve early decommissioning of unused portions of material facilities. For valid and sound reasons, reactor licensees are not subject to this rule and, in fact, are allowed the SAFSTOR option under 10 CFR 50.82. Nevertheless, NRC should not create economic barriers for the reactor licensees who seek to make prudent decisions to remove source terms from their sites.

In addition, application of the regulations in 10 C.F.R. § 50.82(a) is in conflict with the philosophy underlying the approach the Commission took for the license termination rule in modifications to its regulations in 1997. NRC added 10 CFR 20.1406 which reads:

Applicants for licenses, other than renewals, after August 20, 1997, shall describe in the application how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize to the extent practicable, the generation of radioactive waste.

The intent of 10 CFR 20.1406 is to diminish the occurrence and severity of site contamination by taking measures that will control contamination and facilitate eventual decommissioning. Consistent with this philosophy, early removal of large components would comply with the Commission's intent under 10 CFR 20.1406. We understand the NRC staff is working on plans to modify 10 CFR 20.1406 to apply to existing facilities.

Nuclear reactor licensees, though not required to do so, should be permitted to utilize decommissioning trust funds that are intended to cover the removal expense in advance of cessation of operations when such components have no longer a useful purpose. Early removal could take advantage of the current favorable disposal pricing in some cases. However, without a rule amendment or an exemption from the rule, such items could remain on-site for additional decades, particularly given current trends towards license renewal. Moreover, delaying disposal escalates disposal costs. For example, experience with non-reactor decommissioning sites indicates that clean up costs can escalate significantly when unmanaged contamination is left on-site for long periods of time.

3. Withdrawals Under This Petition Would be Permitted Only For Limited Activities

The requested amendment would only allow withdrawn funds to be used for the disposal of MRC's and associated costs such as preparation for and transportation to the disposal

site. It is limited to “major radioactive components” that were expected at the time of initial licensing to last the life of the plant. When initially licensed, it was not anticipated that MRC’s such as steam generators and reactor vessel heads would be need to be replaced during operations. These are the types of components that would clearly be covered as “legitimate decommissioning activities” if remained on-site until the reactor ceases operation. The proposed amendment does not apply to valves, pumps, and other components that at the time of initial licensing had the clear potential for replacement during operations. Consequently, granting this rulemaking petition does not create a “slippery slope” that may result in what clearly are ordinary operating expenditures to be taken out of decommissioning trust funds.

4. The Proposed Amendment Does Not Depend on the Adequacy of the Minimum Funding Requirement in 10 C.F.R. § 50.75

It is recognized that some have questioned the sufficiency of decommissioning trust funds based on the formula amount set forth in 10 C.F.R. § 50.75(c). Both the NRC Inspector General and the Government Accountability Office (GAO) have raised questions about the adequacy of some decommissioning trust funds. *Nuclear Regulation: NRC Needs More Effective Analysis to Ensure Accumulation of Funds to Decommission Nuclear Power Plants, GAO-04-032 (October 2003)*. However, as noted above, before funds can be withdrawn under the proposed amendment, the licensee will need to submit 1) a site-specific decommissioning cost estimate and 2) a demonstration of the adequacy of the amount of funds in the decommissioning trust fund. It would be expected that the licensee’s analysis for this demonstration would address factors such as:

- 1) the status of the decommissioning trust fund including the amount of current funds, a comparison of the current funds in the decommissioning trust fund to the site specific decommissioning cost estimate, the fund performance in relation to the 2% earning rate set forth in 10 C.F.R. § 50.75, the status of ongoing contributions, and the time available to accumulate additional funds;
- 2) the comprehensiveness of the site-specific decommissioning cost estimate including the basis for concluding that the licensee understands the elements impacting the cost for decommissioning and the estimate comprehensively addresses these elements; and
- 3) the reliability of the decommissioning cost estimate including how the site-specific decommissioning cost estimate factored in the lessons learned from recent reactor decommissioning cases.

The NRC would then need to make a finding that it had reasonable assurance concerning the adequacy of the funds. Thus, current concerns about the formula funding requirement in 10 C.F.R. § 50.75 should not affect the consideration of this rulemaking petition.

5. Using Decommissioning Trust Funds Now To Dispose of MRC’s At A Site Will Likely Result In More Funds Available To Decommission The Remainder Of That Site

A review of NUREG-1307, “Report on Waste Burial Charges” (February 2007) demonstrates that the cost of disposal is increasing. It appears that the cost of disposal is rising at a rate higher than the 2% rate of return allowed to be assumed by 10 C.F.R. § 50.75. By disposing of MRC’s that are now being stored on a site, the overall cost of

decommissioning the site will be reduced since that activity is already completed. As a result, disposing of MRC's now is equivalent to adding funds to cover future decommissioning expenses. In addition, permitting the use of the funds now removes the potential that future disposal costs for MRC's may go up more than currently anticipated. Thus, allowing the release of funds under the process proposed under this Petition should provide additional assurance that the trust fund will remain viable at the time of decommissioning by removing this disposal cost uncertainty. Moreover, this assurance should increase the longer is the period of time for fund accumulation. License extensions, therefore, contribute to the added assurance. *EnergySolutions* has not submitted detailed information to support this position because the Petition seeks only to establish a process. The analysis for any given site would be specific to that site and submitted as part of the demonstration required should the NRC grant this Petition.

6. Granting this Petition Improves Site Safety and Prevents Potential Environmental Impact

Granting this Petition will provide for a regulatory framework that will encourage licensees to remove MRC's from sites for disposal resulting in increased protection to the public health and safety at sites. Such disposal would occur decades in advance of the time they would otherwise be removed if the sites waited until the reactors cease operation. Prompt disposal by removing large source terms created by the contamination in these MRC's furthers the objective of maintaining radiation exposures as low as reasonably achievable pursuant to 10 C.F.R. § 20.1101(b) by minimizing the potential for long-term exposure. This is a clear safety benefit that can be implemented now as there is disposal capacity for these MRC's. In addition, disposing of waste prior to the permanent cessation of operations is consistent with the NRC policy to minimize the costs and complexity of decommissioning, which can only improve safety at the site.

Leaving large contaminated components onsite can give rise to adverse environmental impacts if not properly managed. Early removal avoids any potential environmental impact from storing these MRC's on sites and permits other uses of the land used for storage and the storage buildings.

7. Granting This Petition Would Prevent Unnecessary Regulatory Burdens

Granting this Petition will remove an unnecessary regulatory burden from licensees who have had to store MRC's on their sites due to their inability to use decommissioning trust funds.

To store these MRC's on sites, licensees have had to build large, dedicated structures to avoid spreading environmental contamination associated with storage of contaminated MRC's and to reduce exposures to workers. In addition to the costs associated with building these structures, which are in the order of a million dollars, there are operational costs for maintaining and monitoring releases and exposures from the sources contained within them. In addition, these structures take up limited site space within restricted areas that may reduce operational as well as decommissioning flexibility at various sites. These costs are unnecessary from a health and safety perspective if the licensee has sufficient funds in its decommissioning trust funds to meet the provisions of 10 C.F.R. §§ 50.82(a)(8)(i)(B) and (C). Moreover, the current regulatory process causes licensees to use operating funds to build and maintain mausoleums and monitor releases in order to

store these MRC's on site rather than to use decommissioning trust funds that were collected to cover the costs of disposing of these MRC's.

It should also be noted that when 10 C.F.R. § 50.82(a)(8) was adopted, the NRC might not have recognized that MRC's would be removed from reactors and stored onsite until permanent cessation of operation because decommissioning trust funds did not include sub-accounts to address the need for early disposal of large components. Apparently, the NRC anticipated that sub-accounts would be used to separate the funds collected for NRC-jurisdiction decommissioning from other decommissioning uses. 61 FR 39,278, 39,285 (1996). In fact, in many cases licensees commingle the funds for the NRC-jurisdictional decommissioning and the non-NRC jurisdictional decommissioning in their decommissioning trust funds. Under the current regulatory framework in §50.82(a)(8), the NRC regulations restricts the withdrawal of funds to dispose of these MRC's, even if the non-radiological portion of the decommissioning funds could clearly cover the costs without impacting achieving the purpose of the fund, because in the absence of sub-accounts these funds are commingled with the NRC-required funds in the decommissioning trust fund. Preventing the use of those funds solely because they are commingled creates an unnecessary regulatory burden as it does not have a corresponding safety benefit if the licensee has sufficient funds in its decommissioning trust funds to meet the provisions of 10 C.F.R. §§ 50.82(a)(8)(i)(B) and (C).

Thus, granting the petition will provide for a process that will encourage early disposal and allow licensees with adequate decommissioning trust funds to avoid an unnecessary regulatory burden.

VI. Conclusion

Granting this Petition is prudent and consistent with the underlying purpose of 10 C.F.R. § 50.82(a)(8) and 10 CFR 20.1406. In sum, it should facilitate the decommissioning process by providing the regulatory framework to allow removing the MRC's from sites resulting in (1) the source term at the site being reduced, (2) the site workers being exposed to less radiation, (3) eliminating an unnecessary regulatory burden as the costs associated with maintaining the MRC's on-site and providing protection to the workers as a result of those Components can be avoided, (4) the overall cost to decommission the site being reduced, and (5) more funds being available to decommission the reactor at the time the reactor ceases operation. Finally, the framework would provide the demonstration by a site-specific decommissioning cost estimate and the associated funding program that adequate funds are available to dispose of these components as well as complete site decommissioning for unrestricted release consistent with the NRC requirements.