



**Nebraska Public Power District**

*"Always there when you need us"*

NLS2008106  
December 23, 2008

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

Subject: Program for Maintenance of Irradiated Fuel  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- Reference:
1. Letter from Stewart B. Minahan (Nebraska Public Power District) to the U.S. Nuclear Regulatory Commission dated September 24, 2008, "License Renewal Application" (NLS2008071)
  2. Letter from David W. Van Der Kamp (Nebraska Public Power District) to the U.S. Nuclear Regulatory Commission dated December 15, 2008, "Decommissioning Cost Analysis" (NLS2008098)

Dear Sir or Madam:

The purpose of this correspondence is to submit the Nebraska Public Power District's (NPPD) Program for Maintenance of Irradiated Fuel. The report provides NPPD's intentions to manage and provide funding for the management of all irradiated fuel until title to the irradiated fuel is transferred to the Secretary of Energy. This report is pursuant to the requirements of 10 CFR 50.54(bb), "Conditions of Licenses."

NPPD submitted a License Renewal Application for Cooper Nuclear Station (CNS) (Reference 1). Although NPPD is seeking license renewal, the subject report is submitted based on the current operating license expiration date of January 18, 2014.

In addition, it should be noted that NPPD submitted, in accordance with 10 CFR 50.75(f)(3), the Decommissioning Cost Analysis (Reference 2) for CNS.

A001  
MRR

Should you have any questions concerning this matter, please contact me at (402) 825-2904.

Sincerely,



David W. Van Der Kamp  
Licensing Manager

/jo

Attachment

cc: Regional Administrator w/attachment  
USNRC - Region IV

Cooper Project Manager w/attachment  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/attachment  
USNRC - CNS

NPG Distribution w/attachment

CNS Records w/attachment

## **10 CFR 50.54(bb) Program for Maintenance of Irradiated Fuel**

### **1. Background and Introduction**

The Nebraska Public Power District (the "District") has applied for renewal of the operating license for the Cooper Nuclear Station,<sup>[1]</sup> currently set to expire on January 18, 2014. It is expected that the Nuclear Regulatory Commission's staff would complete its review of the application within 30 months from receipt if a hearing is required or within 22 months from receipt if no hearing is required. As such, action on the request would be within the five year period prior to the expiration of the current license. Pursuant to 10 CFR 50.54(bb), licensees of nuclear power plants that are within five years of the expiration of the reactor operating license shall submit written notification to the Nuclear Regulatory Commission (NRC) for its review and preliminary approval of the program by which the licensee intends to manage and provide funding for the management of all irradiated fuel at the reactor following permanent cessation of operation of the reactor until title to the irradiated fuel and possession of the fuel is transferred to the U.S. Department of Energy (DOE) for ultimate disposal.

Since the District has submitted an application for License Renewal pursuant to 10 CFR 54, the District requests that the NRC schedule the review of this information following a final decision on the License Renewal application.

The District is submitting this plan to comply with the requirements of 10 CFR 50.54(bb). The District has not determined or committed to a specific decommissioning approach for Cooper at this time. However, it is the District's current plan for purposes of demonstrating the adequacy of funding to meet regulatory requirements to use the SAFSTOR decommissioning option based on the current license expiration date, employing a SAFSTOR period as permitted in 10 CFR §50.82(a)(3) such that decommissioning is completed within 60 years of permanent cessation of operations. License renewal is likely to require a need to revise this preliminary plan.

### **2. Spent Fuel Management Strategy**

Completion of the decommissioning process is highly dependent upon the DOE's ability to remove spent fuel from the site in a timely manner. DOE's repository program assumes that spent fuel will be accepted for disposal from the nation's commercial nuclear plants, with limited exceptions, in the order (the "queue") in which it was removed from service. The District's current spent fuel management plan is based in general upon: 1) a 2020 start date for repository operations and 2) the DOE's expectations for spent fuel receipt as delineated in the "Acceptance Priority Ranking & Annual Capacity Report," DOE/RW-0567, last updated in July 2004. The District projects that fuel could be removed from the site as early as 2046, if the oldest fuel allocation receives the highest priority and the geologic repository is able to achieve the DOE's stated annual rate of transfer (3,000 metric tons of uranium per year).

The District has 1,054 spent fuel assemblies from Cooper in storage at General Electric's wet-pool Independent Spent Fuel Storage Installation (ISFSI) in Morris, Illinois. This analysis assumes that this inventory is preferentially transferred to the DOE, starting in 2022. The first assemblies removed from the Cooper site would then be in 2027. Interim storage of the spent fuel, until the DOE has completed the transfer, will be in the reactor building's storage pool and/or at an ISFSI located on the Cooper site.

The NRC requires (in 10 CFR 50.54(bb)) that licensees establish a program to manage and provide funding for the caretaking of all irradiated fuel at the reactor site until title of the fuel is transferred to the DOE. An ISFSI, which can be operated under a separate and independent license, is being constructed to support continued plant operations and future decommissioning. The facility is designed to accommodate the dry storage modules needed to off-load the wet storage pool at the end of currently scheduled plant operations so that decommissioning activities can proceed. Once the pool is emptied, the reactor building can be either decontaminated and dismantled or prepared for long-term storage.

Cooper is projected to generate 4,098 assemblies through the end of its currently licensed operations in 2014. Included within this total are the 1,054 assemblies in storage at Morris. The assemblies stored in the reactor building's spent fuel storage pool at the time of shutdown are assumed to be loaded into Multi-Purpose Canisters (MPCs) and moved into the concrete storage modules on the ISFSI pad by 2019.

Starting in 2022, the spent fuel is off-loaded from the Morris facility and transported to a DOE facility. This process is expected to be completed by 2027 at which time the fuel in storage in the Cooper ISFSI is off-loaded. The MPCs are assumed to be compatible with the DOE transport cask with no additional packaging or repackaging required. Based upon current projections, all fuel is expected to be removed from the Cooper site by the year 2046. The District's analysis conservatively assumes, for purposes only of this report, that it does not employ the DOE spent fuel disposal contract's allowances for up to 20% additional fuel designation for shipment to DOE each year.<sup>[2]</sup>

In the event that Cooper does cease operations in 2014, the District will continue to comply with existing NRC licensing requirements, including the operation and maintenance of the systems and structures needed to support continued operation of the spent fuel pool and ISFSI, as necessary, under the decommissioning scenario ultimately selected. In addition, the District will also comply with applicable license termination requirements in accordance with 10 CFR 50.82 with respect to plant shutdown and post-shutdown activities including seeking such NRC approvals and on such schedules as necessary to satisfy these requirements consistent with the continued storage of irradiated fuel.

### 3. Cost Considerations

The costs estimated to decommission Cooper under various scenarios are identified in the "Decommissioning Cost Analysis."<sup>[3]</sup> The spent fuel management plan presented herein is based upon Scenario 3 in the referenced document. In this scenario, the nuclear unit is placed into safe-storage at the expiration of its current operating license in 2014. Decommissioning is deferred such that termination of the license would occur within the required sixty-year period. Decommissioning costs for this scenario are allocated into the three major categories of license termination, spent fuel management, and site restoration. The allocations are reproduced in Table 1. Costs are reported in 2008 nominal dollars.

The timing of the spent fuel management expenditures (\$195.398 million) is shown in Table 2. The expenditures include direct costs (e.g., for handling, packaging, storing and transferring the spent fuel) as well as indirect cost such as program management and oversight, security, pool and ISFSI operating costs, fees, insurance, etc., projected to be incurred over the post-operations storage period.

The significant contributors to the direct cost of managing the spent fuel at the Cooper site are identified in Table 3. As shown, costs are included for the procurement of multi-purpose storage canisters as well as the loading and transfer costs associated with relocating the spent fuel from the pool to the ISFSI pad and the eventual transfer of the fuel at the ISFSI to the DOE. The direct cost of \$66.619 million is a subset of the \$195.398 million shown in Tables 1 and 2.

It must also be noted that these figures will vary based on actual DOE performance, including the actual cask provisions and requirements that DOE settles upon. At this time, DOE has not identified any transport casks or requirements. Therefore, there is considerable uncertainty as to the actual costs that may have to be incurred; and uncertainty as to whether the DOE will agree to bear certain of those costs. Major scheduling milestones are identified in Table 4.

At shutdown, the Cooper spent fuel pool is expected to contain freshly discharged assemblies from the most recent refueling cycles. Over the next five years the assemblies are packaged into MPCs for transfer to the ISFSI. It is assumed that this time period is sufficient to meet the decay heat requirements for dry storage.

The decommissioning scenario assumes that the existing ISFSI can accommodate the spent fuel remaining in the reactor building's storage pool at shutdown. To support decommissioning operations, the District anticipates loading 34 MPCs with the assemblies stored in the spent fuel pool. The MPCs will then be placed in storage modules on the ISFSI along with the 16 projected to be placed prior to shutdown.

In the absence of identifiable DOE cask requirements, the design and capacity of the MPCs is based upon a commercial dry cask storage system (the Transnuclear NUHOMS<sup>®</sup> system). The NUHOMS<sup>®</sup> multi-purpose canister has a capacity of 61 fuel assemblies at a

unit cost of approximately \$900,000, including the cost of the concrete storage module. It should be noted that the District's contract with the DOE requires DOE to provide shipping containers to the District, but for present purposes, this estimate includes those costs.

An average unit cost of \$500,000 was estimated for the labor and equipment to load, seal, and transfer each MPC from the storage pool to the ISFSI. A unit cost of \$250,000 was estimated for the final transfer of the MPC at the ISFSI into a DOE transport cask (50% of the cost incurred for transferring the spent fuel from the pool). This cost was also used for estimating the cost to unload the spent fuel from the Morris pool.

Operation of the reactor building's spent fuel storage pool is discontinued in 2019 once the fuel has been transferred to dry storage. ISFSI operations continue until such time that the DOE is able to complete the transfer of the fuel to a federal repository (currently anticipated to be in 2046).

#### **4. ISFSI Decommissioning**

With the spent fuel removed from the site, the ISFSI is available for decommissioning. It is assumed that once the MPCs containing the spent fuel assemblies have been removed, any required decontamination performed on the storage modules and the license for the facility terminated, the modules can be dismantled using conventional techniques for the demolition of reinforced concrete. The concrete storage pad can then be removed and the area regraded. The cost to decontaminate the ISFSI to the extent necessary to release the facilities for conventional demolition is estimated at \$2.29 million. Conventional demolition of the remaining overpacks and pads and restoration of the affected area of the site is estimated at \$0.611 million.

#### **5. Financial Assurance**

The District is a public corporation and political subdivision of the state of Nebraska. The District has the authority and is required to fix, establish, and collect adequate rates and other charges for electrical energy and any and all commodities or services sold or furnished by it. The District is accordingly authorized to establish its own rates and other charges through which it can recover its cost of service. The District is governed by an 11-member Board of Directors who are popularly elected from the District's chartered territory. The Board of Directors is the rate making authority for the District.

The District's financial statements indicate an external trust balance of \$403.437 million as of December 31, 2007.<sup>[4]</sup> In addition, the District will file its NRC Decommissioning funding status report in March 2009, in accordance with 10 CFR 50.75(f)(1).

As shown in Reference 3, the cost to decommission Cooper is estimated at approximately \$907.708 million (in 2008 dollars). The estimate is based upon a scenario under which the plant would be placed into safe-storage for a period such that decommissioning is

completed no later than 60 years after cessation of permanent operations. Approximately 74% of the total or \$674.964 million is estimated to be required for radiological decommissioning necessary to terminate the operating license and 22% of the total or \$195.398 million to manage the spent fuel until such time that it can be transferred to the DOE (the remaining 4% is associated with site restoration activities; the costs for which are excluded from the financial assurance calculation which addresses only NRC decommissioning and spent fuel management obligations).

The decommissioning funding plan is shown in Table 5. It uses a 2.5% real growth, as authorized by Board of Directors of the District,<sup>[5]</sup> in the trust fund over time to demonstrate that the identified scenario is financially viable (i.e., that a surplus is shown in the fund at the completion of decommissioning). Although the decommissioning trust fund is for radiological decommissioning cost only, to the extent that the trust fund balance exceeds costs required for radiological decommissioning, these funds would be available to address costs incurred by the licensee including spent fuel management costs.

It should be noted that the projected expenditures for spent fuel management identified in the decommissioning cost analysis do not consider the outcome of the litigation (including compensation for damages) with the DOE with regards to the delays incurred by the District in the timely removal of the spent fuel from the site. The District views the extended spent fuel management costs to be damages that should be paid by the government because of the DOE's breach of the spent fuel disposal contract.

In the event that the expected surplus funds from the decommissioning trust are insufficient to provide for fuel management costs and subject to application of funds realized from any spent fuel litigation settlement realized from the DOE; the District, would use other remaining reserve funds derived from the ownership and prior operation of Cooper Nuclear Station or utilize additional borrowings of the District to pay for any possible funding shortfalls to fulfill this obligation.

## **6. NRC Approvals**

This spent fuel management plan assumes withdrawals from the decommissioning trust for spent fuel management purposes. The District will make appropriate submittals for an exemption in accordance with 10 CFR §50.12 from the requirements of 10 CFR §50.82(a)(8)(i)(A) in order to use the decommissioning trust fund(s) for spent fuel management expenses. In the event of a permanent plant shutdown on January 18, 2014, the District will revalidate the status of the Decommissioning Trust to make certain that sufficient funds exist for decommissioning as required under 10 CFR 50.75. If deemed sufficient, the District will then periodically revisit the spent fuel management plan to ensure that withdrawals for spent fuel management do not inhibit the ability of the licensee to complete radiological decommissioning.

**7. References**

1. "License Renewal Application," Cooper Nuclear Station, NRC Docket 50-298, DPR-46, NLS2008071, September 24, 2008
2. "Contract for Disposal of Spent Nuclear Fuel and/or High-Level Radioactive Waste," Contract No. BE-CR01-83NE44397, dated June 24, 1983
3. "Decommissioning Cost Analysis for the Cooper Nuclear Station," Document No. N01-1590-002, Rev.1, TLG Services, Inc., December 2008
4. U.S. Bank Statement, Nebraska Public Power District Decommissioning Account, Market and Cost Reconciliation, Balance for Period Ending December 31, 2007
5. "Resolution of Nebraska Public Power District," No. 08-70, adopted June 13, 2008



**TABLE 1**  
**Cooper Nuclear Station**  
**Summary of Major Cost Contributors**  
(Thousands, 2008 dollars)

	License Termination	Spent Fuel Management	Site Restoration	Total
Decontamination	18,399	0	0	18,399
Removal	57,353	1,380	16,613	75,346
Packaging	9,572	4	0	9,577
Transportation	6,319	27	0	6,346
Waste Disposal	44,192	68	0	44,260
Off-site Waste Processing	42,743	0	0	42,743
Program Management <sup>[1]</sup>	383,951	85,578	20,525	490,053
Corporate A&G	10,100	0	0	10,100
Spent Fuel Management <sup>[2]</sup>	0	69,839	0	69,839
Insurance and Regulatory Fees	44,974	31,941	0	76,914
Energy	12,022	427	192	12,641
Characterization and Licensing Surveys	16,568	0	0	16,568
Miscellaneous Equipment	28,770	6,136	17	34,923
Total <sup>[3]</sup>	674,964	195,398	37,347	907,708

<sup>[1]</sup> Includes security and engineering

<sup>[2]</sup> Does not include costs spent to date and through the remaining years of operation

<sup>[3]</sup> May not add due to rounding

**TABLE 2**  
**Cooper Nuclear Station**  
**Schedule of Annual Expenditures**  
**Spent Fuel Management Allocation**  
**(Thousands, 2008 dollars)**

<b>Year</b>	<b>Labor</b>	<b>Equip &amp; Materials</b>	<b>Energy</b>	<b>Burial</b>	<b>Other</b>	<b>Yearly Totals</b>
2014	2,833	8,499	0	0	2,153	13,485
2015	5,289	5,644	49	0	2,122	13,104
2016	9,375	5,718	107	0	1,965	17,165
2017	9,349	5,703	107	0	1,960	17,118
2018	9,349	5,703	107	0	1,960	17,118
2019	6,087	3,353	58	0	1,540	11,038
2020	2,225	570	0	0	1,046	3,840
2021	2,219	568	0	0	1,043	3,830
2022	2,219	568	0	0	1,043	3,830
2023	2,219	568	0	0	1,043	3,830
2024	2,225	570	0	0	1,046	3,840
2025	2,219	568	0	0	1,043	3,830
2026	2,219	568	0	0	1,043	3,830
2027	2,219	568	0	0	1,043	3,830
2028	2,225	570	0	0	1,046	3,840
2029	2,219	568	0	0	1,043	3,830
2030	2,219	568	0	0	1,043	3,830
2031	2,219	568	0	0	1,043	3,830
2032	2,225	570	0	0	1,046	3,840
2033	2,219	568	0	0	1,043	3,830
2034	2,219	568	0	0	1,043	3,830
2035	2,219	568	0	0	1,043	3,830
2036	2,225	570	0	0	1,046	3,840
2037	2,219	568	0	0	1,043	3,830
2038	2,219	568	0	0	1,043	3,830
2039	2,219	568	0	0	1,043	3,830
2040	2,225	570	0	0	1,046	3,840
2041	2,219	568	0	0	1,043	3,830
2042	2,219	568	0	0	1,043	3,830
2043	2,219	568	0	0	1,043	3,830
2044	2,225	570	0	0	1,046	3,840

**TABLE 2 (continued)**  
**Cooper Nuclear Station**  
**Schedule of Annual Expenditures**  
**Spent Fuel Management Allocation**  
**(Thousands, 2008 dollars)**

<b>Year</b>	<b>Labor</b>	<b>Equip &amp; Materials</b>	<b>Energy</b>	<b>Burial</b>	<b>Other</b>	<b>Yearly Totals</b>
2045	2,219	568	0	0	1,043	3,830
2046	2,213	566	0	0	1,040	3,819
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
2055	0	0	0	0	0	0
2056	0	0	0	0	0	0
2057	0	0	0	0	0	0
2058	0	0	0	0	0	0
2059	0	0	0	0	0	0
2060	0	0	0	0	0	0
2061	0	0	0	0	0	0
2062	0	0	0	0	0	0
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2066	0	0	0	0	0	0
2067	0	0	0	0	0	0
2068	0	0	0	0	0	0
2069	0	0	0	0	0	0
2070	43	7	0	4	85	138
2071	293	44	0	28	571	936
2072	294	44	0	28	573	939
2073	87	13	0	8	169	277
2074	91	206	0	0	27	324

**TABLE 2 (continued)**  
**Cooper Nuclear Station**  
**Schedule of Annual Expenditures**  
**Spent Fuel Management Allocation**  
**(Thousands, 2008 dollars)**

<b>Year</b>	<b>Labor</b>	<b>Equip &amp; Materials</b>	<b>Energy</b>	<b>Burial</b>	<b>Other</b>	<b>Yearly Totals</b>
2075	81	183	0	0	24	287
Total	103,120	50,461	427	68	41,322	195,398

**TABLE 3**  
**Cooper Nuclear Station**  
**Significant Cost Contributors**

Spent Fuel Management - Direct Expenditures	(2008 dollars)*
Morris to DOE Loading and Transfer	6,072,000
Capital Costs of ISFSI MPCs and Storage Modules	30,693,500
MPC Loading and Transfer to the ISFSI	17,204,000
MPC Transfer from ISFSI to DOE	12,650,000
<b>Total</b>	<b>66,619,500</b>

\* Contingency has been added to all costs (15%)

**TABLE 4**  
**Cooper Nuclear Station**  
**Projected Schedule and Milestones**

Major Milestones and Fuel-Related Events	
Currently scheduled cessation of plant operations	January 2014
ISFSI available	Pre-shutdown
First MPC transferred post-shutdown from pool to ISFSI	2014
Last MPC transferred post-shutdown from pool to ISFSI	2019
End of wet storage pool operations	2019
DOE begins to receive commercial spent fuel	2020
1 <sup>st</sup> fuel assembly removed from Cooper ISFSI <sup>[1]</sup>	2027
Last fuel assembly leaves Cooper ISFSI	2046
ISFSI decommissioned <sup>[2]</sup>	2070 - 2073
ISFSI demolition <sup>[3]</sup>	2074 - 2075

- [1] Assemblies stored at Morris are shipped first, beginning in 2022
- [2] ISFSI decontaminated during this time period, in conjunction with the contaminated power block structures
- [3] ISFSI demolished during this time period along with the other structures on site

**TABLE 5**  
**Cooper Nuclear Station**  
**Decommissioning Funding Plan**  
**Scenario 3: 2014 Shutdown, SAFSTOR Alternative**  
(Thousands of dollars)

Basis Year	2008				
Beginning Fund Balance	\$403.437				
Annual Escalation	0.00%				
Annual Earnings	2.50%				
	A	B	C	D	E
Year	50.75 License Termination Cost (millions)	50.54(bb) Spent Fuel Management Cost (millions)	Total Cost (millions)	Total Cost Escalated at 0% (millions)	Decommissioning Trust Fund Escalated at 2.5% (minus expenses) (millions)
2007					403.437
2008					413.523
2009					423.861
2010					434.457
2011					445.319
2012					456.452
2013					467.863
2014	43.626	13.485	57.111	57.111	422.449
2015	50.453	13.104	63.557	63.557	369.453
2016	5.399	17.165	22.564	22.564	356.125
2017	5.385	17.118	22.503	22.503	342.526
2018	5.385	17.118	22.503	22.503	328.586
2019	4.830	11.038	15.869	15.869	320.932
2020	4.185	3.840	8.025	8.025	320.930
2021	4.174	3.830	8.003	8.003	320.950
2022	4.174	3.830	8.003	8.003	320.970
2023	4.174	3.830	8.003	8.003	320.991
2024	4.185	3.840	8.025	8.025	320.991
2025	4.174	3.830	8.003	8.003	321.012
2026	4.174	3.830	8.003	8.003	321.034
2027	4.174	3.830	8.003	8.003	321.056
2028	4.185	3.840	8.025	8.025	321.057
2029	4.174	3.830	8.003	8.003	321.080
2030	4.174	3.830	8.003	8.003	321.104
2031	4.174	3.830	8.003	8.003	321.128
2032	4.185	3.840	8.025	8.025	321.131

**TABLE 5 (continued)**  
**Cooper Nuclear Station**  
**Decommissioning Funding Plan**  
**Scenario 3: 2014 Shutdown, SAFSTOR Alternative**  
(Thousands of dollars)

Basis Year	2008				
Beginning Fund Balance	\$403.437				
Annual Escalation	0.00%				
Annual Earnings	2.50%				
	A	B	C	D	E
Year	50.75 License Termination Cost (millions)	50.54(bb) Spent Fuel Management Cost (millions)	Total Cost (millions)	Total Cost Escalated at 0% (millions)	Decommissioning Trust Fund Escalated at 2.5% (minus expenses) (millions)
2033	4.174	3.830	8.003	8.003	321.156
2034	4.174	3.830	8.003	8.003	321.181
2035	4.174	3.830	8.003	8.003	321.207
2036	4.185	3.840	8.025	8.025	321.212
2037	4.174	3.830	8.003	8.003	321.239
2038	4.174	3.830	8.003	8.003	321.267
2039	4.174	3.830	8.003	8.003	321.295
2040	4.185	3.840	8.025	8.025	321.302
2041	4.174	3.830	8.003	8.003	321.331
2042	4.174	3.830	8.003	8.003	321.361
2043	4.174	3.830	8.003	8.003	321.392
2044	4.185	3.840	8.025	8.025	321.401
2045	4.174	3.830	8.003	8.003	321.433
2046	4.173	3.819	7.993	7.993	321.476
2047	4.146	0.000	4.146	4.146	325.367
2048	4.157	0.000	4.157	4.157	329.344
2049	4.146	0.000	4.146	4.146	333.431
2050	4.146	0.000	4.146	4.146	337.621
2051	4.146	0.000	4.146	4.146	341.916
2052	4.157	0.000	4.157	4.157	346.307
2053	4.146	0.000	4.146	4.146	350.819
2054	4.146	0.000	4.146	4.146	355.443
2055	4.146	0.000	4.146	4.146	360.184
2056	4.157	0.000	4.157	4.157	365.031
2057	4.146	0.000	4.146	4.146	370.011
2058	4.146	0.000	4.146	4.146	375.115



**TABLE 5 (continued)**  
**Cooper Nuclear Station**  
**Decommissioning Funding Plan**  
**Scenario 3: 2014 Shutdown, SAFSTOR Alternative**  
(Thousands of dollars)

Basis Year	2008				
Beginning Fund Balance	\$403.437				
Annual Escalation	0.00%				
Annual Earnings	2.50%				
	A	B	C	D	E
Year	50.75 License Termination Cost (millions)	50.54(bb) Spent Fuel Management Cost (millions)	Total Cost (millions)	Total Cost Escalated at 0% (millions)	Decommissioning Trust Fund Escalated at 2.5% (minus expenses) (millions)
2059	4.146	0.000	4.146	4.146	380.347
2060	4.157	0.000	4.157	4.157	385.699
2061	4.146	0.000	4.146	4.146	391.195
2062	4.146	0.000	4.146	4.146	396.830
2063	4.146	0.000	4.146	4.146	402.604
2064	4.157	0.000	4.157	4.157	408.512
2065	4.146	0.000	4.146	4.146	414.579
2066	4.146	0.000	4.146	4.146	420.798
2067	4.146	0.000	4.146	4.146	427.172
2068	27.415	0.000	27.415	27.415	410.436
2069	63.494	0.000	63.494	63.494	357.203
2070	100.380	0.138	100.518	100.518	265.615
2071	63.571	0.936	64.507	64.507	207.748
2072	63.745	0.939	64.683	64.683	148.259
2073	39.826	0.277	40.103	40.103	111.862
2074	1.485	0.324	1.809	1.809	112.850
2075	0.084	0.287	0.372	0.372	115.299
	674.963	195.398	870.362	870.362	

Calculations:

Column C = A + B

Column D = (C)\*(1+.00)^(current year – 2008)

Column E = Column E = (Previous year's fund balance) \* (1 + .025) – D (current year's decommissioning expenditures)

Correspondence Number: NLS2008106

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		