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Vice President, Nuclear Safety,
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March 31, 2011

ENOC-11-0005

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

SUBJECT: Status of Decommissioning Funding for
Plants Operated by Entergy Nuclear Operations, Inc.
For Year Ending December 31, 2010 – 10 CFR 50.75(f)(1)
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
Palisades Nuclear Plant
Docket No. 50-255
Big Rock Point
Docket 50-155

- REFERENCES: 1. NUREG-1307, "Report on Waste Burial Charges," Revision 14, dated November 2010.
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 or Madam:

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), Entergy Nuclear FitzPatrick LLC, and Entergy Nuclear Palisades LLC (Palisades and Big Rock Point), Entergy Nuclear Operations, Inc. hereby submits the information requested for power reactors operated by Entergy Nuclear Operations, Inc. The reports, provided in Attachments 1 through 13, respectively, for the six

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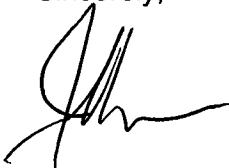
listed plants, were prepared in accordance with NUREG-1307 (Reference 1) and NRC Regulatory Issue Summary 2001-07 (Reference 2). Attachments 14 and 15 are updated site specific decommissioning cost estimates for IP 1 and 2. Attachment 16 includes Minimum Funding Assurance calculation worksheets for the plants (derived from LIC-205 Revision 4), provided for the convenience of the reviewer.

The aforementioned worksheets, using the December 31, 2010 trust fund balances and parent guarantee amounts, indicate that all of the plants covered by this submittal met or exceeded the NRC's funding requirements, except that Palisades was just under one percent below the requirement. Since December 31, 2010, the Palisades' decommissioning trust fund has experienced an increase (as have the available funds for all the plants in this submittal). Entergy Nuclear Operations, Inc. has recomputed the financial assurance for Palisades using the most recent month end and available balance information, i.e., for February 28, 2011, and provided a revised calculation worksheet for Palisades. The revised worksheet is included in Attachment 16, behind the worksheet for the December 31, 2010 balance for Palisades, indicating a March 1, 2011 date for the analysis (also removing two months from the escalation calculations). The revised worksheet indicates that the currently-available financial assurance for Palisades now exceeds the NRC's funding requirements. Accordingly, the licensee concludes that no further action is required at this time to demonstrate adequate funding assurance for decommissioning Palisades.

On March 21, 2011, the NRC issued a renewed operating license for Vermont Yankee (ML092110050), authorizing operation of that plant for an additional twenty years. As a result of this renewed license, Entergy Nuclear Operations, Inc. has calculated that Vermont Yankee now has an approximately \$211 million surplus over the NRC's minimum amount for financial assurance for decommissioning, rendering the existing parent company guarantee for additional financial assurance in the amount of \$40 million for that plant no longer necessary. Accordingly, Entergy Nuclear Operations, Inc. intends to take the necessary steps to cancel the aforementioned parent company guarantee.

There are no new commitments made in this letter. If you have any questions, please contact Mr. Bryan Ford at 601-368-5516.

Sincerely,



JFM/CDF/LAE

Attachments: As described above

cc: See next page.

cc: All Below with Attachments

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USNRC Project Manager, Indian Point 1
USNRC Project Manager, Indian Point 2
USNRC Project Manager, Indian Point 3
USNRC Project Manager, FitzPatrick
USNRC Project Manager, Vermont Yankee
USNRC Project Manager, Pilgrim
USNRC Project Manager, Palisades
USNRC Project Manager, Big Rock Point
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**Attachment 1
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Indian Point 1
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Indian Point Nuclear Generating Unit No. 1**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 464.84 million [Note]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 286.86 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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note: This amount is based upon total SAFSTOR expenditures set forth in the updated Decommissioning Funding Assurance Plan and SAFSTOR analysis that are provided in Attachment 14. (Calculation of the NRC Minimum Amount is provided in Attachment 4.)

**Attachment 2
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Indian Point 2
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Indian Point Nuclear Generating Unit No. 2**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 696.20 million [Note 1]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 374.74 million [Note 2]
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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note 1: This amount is based upon total SAFSTOR expenditures set forth in the updated Decommissioning Funding Assurance Plan and SAFSTOR analysis provided in Attachment 15. (Calculation of the NRC Minimum Amount is provided in Attachment 4.)

Note 2: Includes provisional fund balance of \$30.11 million.

**Attachment 3
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – Indian Point 3
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: Indian Point Nuclear Generating Unit No. 3

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 474.22 million [Note]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 493.33 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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note: Calculation of the NRC Minimum Amount is provided in Attachment 4.

**Attachment 4
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Calculation of Minimum Amount – Indian Point
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Entergy Nuclear Indian Point 2, LLC: 100% ownership interest of Indian Point 1 & 2
Entergy Nuclear Indian Point 3, LLC: 100% ownership interest of Indian Point 3
Plant Location: Buchanan, New York
Reactor Type: Pressurized Water Reactor (“PWR”)
Indian Point Unit 1 Power Level: <3,400 MWt (615 MWt)
Indian Point Unit 1 PWR Base Year 1986\$: \$85,560,000
Indian Point Unit 2 Power Level: <3,400 MWt (3,216 MWt)
Indian Point Unit 2 PWR Base Year 1986\$: \$103,300,800
Indian Point Unit 3 Power Level: <3,400 MWt (3,216 MWt)
Indian Point Unit 3 PWR Base Year 1986\$: \$103,300,800
Labor Region: North
Waste Burial Facility: Generic Disposal Site

10CFR50.75(c)(2) Escalation Factor Formula:

$$0.65(L) + 0.13(E) + 0.22(B)$$

	<u>Factor</u>
L=Labor (North)	2.45 ¹
E=Energy (PWR)	2.263 ²
B=Waste Burial-Vendor (PWR)	12.28 ³

PWR Escalation Factor:

$$0.65(L) + 0.13(E) + 0.22(B) = 4.590710$$

1986 PWR Base Year \$ Escalated:

Indian Point 1: \$85,560,000 * Factor=	<u>\$392,781,200</u>
Indian Point 2 & 3: \$103,300,800 * Factor=	<u>\$474,224,079</u>

¹ Bureau of Labor Statistics, Series Report ID: CIU201000000210i (4th Quarter 2010)

² Bureau of Labor Statistics, Series Report ID: wpu0543 and wpu0573 (December 2010)

³ Nuclear Regulatory Commission: NUREG-1307 Revision 14, Table 2.1 (2010)

**Attachment 5
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding Vermont Yankee
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Vermont Yankee Nuclear Power Station**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 564.25 million ^[Note 1]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 474.22 million ^[Note 2]
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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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	See Note 3
7. Any material changes to trust agreements	None

Note 1: Calculation of the NRC Minimum Amount is provided in Attachment 6.

Note 2: Does not include the Parent Guarantee amount as indicated in Note 3.

Note 3: A \$40 million Parent Guarantee is in place.

Attachment 6
ENOC-11-0005

Entergy Nuclear Operations, Inc.
Calculation of Minimum Amount – Vermont Yankee
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)

Entergy Nuclear Vermont Yankee LLC.: 100% ownership interest

Plant Location: Vernon, Vermont

Reactor Type: Boiling Water Reactor (“BWR”)

Power Level: <3,400 MWt (1912 MWt)

BWR Base Year 1986\$: \$121,208,000

Labor Region: North

Waste Burial Facility: Generic Disposal Site

10CFR50.75(c)(2) Escalation Factor Formula:

$$0.65(L) + 0.13(E) + 0.22(B)$$

	<u>Factor</u>
L=Labor (North)	2.45 ¹
E=Energy (BWR)	2.319 ²
B=Waste Burial-Vendor (BWR)	12.54 ³

BWR Escalation Factor:

$$0.65(L) + 0.13(E) + 0.22(B) = 4.655187$$

1986 BWR Base Year \$ Escalated:

$$\$121,208,000 * \text{Factor} = \$564,245,876$$

¹ Bureau of Labor Statistics, Series Report ID: CIU201000000210i (4th Quarter 2010)
² Bureau of Labor Statistics, Series Report ID: wpu0543 and wpu0573 (December 2010)
³ Nuclear Regulatory Commission: NUREG-1307 Revision 14, Table 2.1 (2010)

**Attachment 7
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Pilgrim
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Pilgrim Nuclear Power Station**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 569.11 million ^[Note]
3. Decommissioning Trust Fund Total as of 12/31/10	\$ 645.92 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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note: Calculation of the NRC Minimum Amount is provided in Attachment 8.

**Attachment 8
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Calculation of Minimum Amount - Pilgrim
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Entergy Nuclear Generation Co.: 100% ownership interest

Plant Location: Plymouth, Massachusetts

Reactor Type: Boiling Water Reactor ("BWR")

Power Level: <3,400 MWt (2028 MWt)

BWR Base Year 1986\$: \$122,252,000

Labor Region: North

Waste Burial Facility: Generic Disposal Site

10CFR50.75(c)(2) Escalation Factor Formula:

$$0.65(L) + 0.13(E) + 0.22(B)$$

	<u>Factor</u>
L=Labor (North)	2.45 ¹
E=Energy (BWR)	2.319 ²
B=Waste Burial-Vendor (BWR)	12.54 ³

BWR Escalation Factor:

$$0.65(L) + 0.13(E) + 0.22(B) = 4.655187$$

1986 BWR Base Year \$ Escalated:

$$\$122,252,000 * \text{Factor} = \$569,105,891$$

¹ Bureau of Labor Statistics, Series Report ID: CIU201000000210i (4th Quarter 2010)
² Bureau of Labor Statistics, Series Report ID: wpu0543 and wpu0573 (December 2010)
³ Nuclear Regulatory Commission: NUREG-1307 Revision 14, Table 2.1 (2010)

**Attachment 9
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – James A. Fitzpatrick
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **James A. Fitzpatrick Nuclear Power Plant**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 590.39 million ^[Note]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 538.31 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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note: Calculation of the NRC Minimum Amount is provided in Attachment 10.

Attachment 10
ENOC-11-0005

Entergy Nuclear Operations, Inc.
Calculation of Minimum Amount – James A. Fitzpatrick
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)

Entergy Nuclear FitzPatrick LLC: 100% ownership interest
Plant Location: Oswego, New York
Reactor Type: Boiling Water Reactor (“BWR”)
Power Level: <3,400 MWt (2536 MWt)
BWR Base Year 1986\$: \$126,824,000
Labor Region: North
Waste Burial Facility: Generic Disposal Site

10CFR50.75(c)(2) Escalation Factor Formula:

$$0.65(L) + 0.13(E) + 0.22(B)$$

	<u>Factor</u>
L=Labor (North)	2.45 ¹
E=Energy (BWR)	2.319 ²
B=Waste Burial-Vendor (BWR)	12.54 ³

BWR Escalation Factor:

$$0.65(L) + 0.13(E) + 0.22(B) = 4.655187$$

1986 BWR Base Year \$ Escalated:

$$\$126,824,000 * \text{Factor} = \$590,389,405$$

¹ Bureau of Labor Statistics, Series Report ID: CIU201000000210i (4th Quarter 2010)
² Bureau of Labor Statistics, Series Report ID: wpu0543 and wpu0573 (December 2010)
³ Nuclear Regulatory Commission: NUREG-1307 Revision 14, Table 2.1 (2010)

**Attachment 11
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – Palisades
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Palisades Nuclear Plant**

1. Minimum Financial Assurance (MFA) estimated per 10 CFR 50.75(b) and (c) (2010\$)	\$ 439.13 million ^[Note]
2. Decommissioning Trust Fund Total as of 12/31/10	\$ 271.16 million
Decommissioning Trust Fund Total as of 2/28/11	\$ 279.20 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	2% annual real rate of return per 10 CFR 50.75(e)(1)(i)
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

Note: Calculation of the NRC Minimum Amount is provided in Attachment 12.

**Attachment 12
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Calculation of Minimum Amount – Palisades
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Entergy Nuclear Palisades LLC.: 100% ownership interest
Plant Location: Covert, Michigan
Reactor Type: Pressure Water Reactor ("PWR")
Power Level: <3,400 MWt (2565 MWt)
PWR Base Year 1986\$: \$97,572,000
Labor Region: Midwest
Waste Burial Facility: Generic Disposal Site

**10CFR50.75(c)(2) Escalation Factor Formula:
0.65(L) +0.13(E) +0.22(B)**

	<u>Factor</u>
L=Labor (Midwest)	2.32 ¹
E=Energy (PWR)	2.263 ²
B=Waste Burial-Vendor (PWR)	12.28 ³

PWR Escalation Factor:
0.65(L) +0.13(E) +0.22(B)= 4.500543

1986 PWR Base Year \$ Escalated:
\$97,572,000 * Factor= \$439,126,944

¹ Bureau of Labor Statistics, Series Report ID: CIU201000000230i (4th Quarter 2010)
² Bureau of Labor Statistics, Series Report ID: wpu0543 and wpu0573 (December 2010)
³ Nuclear Regulatory Commission: NUREG-1307 Revision 14, Table 2.1 (2010)

**Attachment 13
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – Big Rock Point
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Plant Name: **Big Rock Point ISFSI**

- | | |
|---|--|
| 1. Amount of decommissioning funds required from most recent estimate (2003 dollars). | \$ 2.74 million |
| Decommissioning cost estimate escalated at 3% per year to 2010 dollars. | \$ 3.37 million |
| 2. Decommissioning Funding Assurance Method. | Parent Guarantee (\$5 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: n/a |
| 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 14
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

On October 23, 2008, Entergy Nuclear Indian Point 2, LLC (ENIP2) submitted a preliminary decommissioning cost analysis to the NRC in conjunction with its spent fuel management plan under 10 CFR 50.75(f)(3) and 10 CFR 50.54(bb) (Accession No. ML083040378, as supplemented by ENIP2's reply to RAIs on July 15, 2009 (Accession No. ML092050204). The preliminary decommissioning cost analysis contained separate site-specific decommissioning cost estimates for Indian Point 1 and Indian Point 2. The estimates were subsequently found to be reasonable by the NRC on March 17, 2010 (Accession No. ML100280544).

The Indian Point 1 site-specific decommissioning cost estimate that was submitted was based on a period of safe storage that is specifically described in the estimate, namely storage until 2066, at which time the plant will be decommissioned and the site released for alternative use without restriction. Table 7 in the Indian Point 1 site-specific estimate (page 34 of 36) provides the annual license termination phase expenditures for Indian Point 1 in 2007 dollars (excluding those costs expended to date and through the 3rd quarter of 2013 which are funded by operations). Table 9-1 below escalates those 2007 dollar figures to 2010 dollars using escalation values obtained from data provided by IHS Global Insight. The decommissioning trust fund (DTF) ending balance is escalated each year by the 2% real growth figure allowed pursuant to 10 CFR 50.75(e)(1)(i).

**Attachment 14
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Table 9-1			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 1 Radiological	2010\$ Unit 1 Radiological	Ending DTF Balance
2010			286.857
2011			292.594
2012			298.446
2013	1.059	1.119	303.296
2014	4.236	4.476	304.886
2015	4.236	4.476	306.508
2016	2.656	2.801	309.838
2017	2.649	2.793	313.242
2018	2.649	2.793	316.714
2019	2.649	2.793	320.255
2020	2.656	2.801	323.859
2021	2.649	2.793	327.543
2022	2.649	2.793	331.301
2023	2.649	2.793	335.134
2024	2.656	2.801	339.036
2025	2.649	2.793	343.024
2026	2.649	2.793	347.091
2027	2.649	2.793	351.240
2028	2.656	2.801	355.464
2029	2.649	2.793	359.780
2030	2.649	2.793	364.183
2031	2.649	2.793	368.674
2032	2.656	2.801	373.247
2033	2.649	2.793	377.919
2034	2.649	2.793	382.684
2035	2.649	2.793	387.545
2036	2.656	2.801	392.495
2037	2.649	2.793	397.552
2038	2.649	2.793	402.710
2039	2.649	2.793	407.971
2040	2.656	2.801	413.330
2041	2.649	2.793	418.804
2042	2.649	2.793	424.387
2043	2.649	2.793	430.082
2044	2.656	2.801	435.883
2045	2.611	2.752	441.848

**Attachment 14
ENOC-11-0005**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Table 9-1 (continued)			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 1 Radiological	2010\$ Unit 1 Radiological	Ending DTF Balance
2046	1.826	1.922	448.763
2047	1.826	1.922	455.816
2048	1.831	1.928	463.005
2049	1.826	1.922	470.343
2050	1.826	1.922	477.827
2051	1.826	1.922	485.461
2052	1.831	1.928	493.243
2053	1.826	1.922	501.185
2054	1.826	1.922	509.286
2055	1.826	1.922	517.549
2056	1.831	1.928	525.972
2057	1.826	1.922	534.569
2058	1.826	1.922	543.338
2059	1.826	1.922	552.282
2060	1.831	1.928	561.400
2061	1.826	1.922	570.706
2062	1.826	1.922	580.198
2063	1.826	1.922	589.880
2064	1.831	1.928	599.750
2065	1.826	1.922	609.823
2066	18.899	20.013	602.006
2067	68.313	71.807	542.239
2068	148.490	156.022	397.062
2069	17.216	18.143	386.861
2070	17.216	18.143	376.456
2071	17.216	18.143	365.842
2072	17.235	18.163	354.995
2073	11.400	12.054	350.041
Total	441.549	464.844	

The foregoing SAFSTOR analysis shows that when the December 31, 2010 DTF balance is escalated at the allowable rate and compared against the annual figures for the SAFSTOR period, that an approximately \$350.041 million surplus exists at the end of the decommissioning project. Accordingly, ENIP2 concludes that no further action is required at this time to demonstrate adequate funding assurance for decommissioning Indian Point 1.

Attachment 15
ENOC-11-0005

Entergy Nuclear Operations, Inc.
IP2 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)

On August 13, 2009, Entergy Nuclear Indian Point 2, LLC (ENIP2) submitted a decommissioning funding assurance plan for Indian Point Energy Center, Unit 2 (Indian Point 2) (Accession No. ML 092260720). The plan was in response to a projected decommissioning funding shortfall for ENIP2 and the subsequent need to describe how and when the licensee intends to make adjustments to its financial assurance mechanisms. This attachment provides an update to the August 13, 2009 funding plan.

ENIP2 has determined that use of a SAFSTOR analysis shows that there is presently reasonable assurance that adequate funds will be available for the decommissioning process in compliance with NRC decommissioning funding assurance rules.

Pursuant to 10 CFR 50.75(e)(1)(i), "A licensee that has prepaid funds based on a site-specific estimate under § 50.75(b)(1) of this section may take, credit for projected earnings on the prepaid decommissioning trust funds, using up to a 2 percent annual real rate of return from the time of future funds' collection through the projected decommissioning period, provided that the site-specific estimate is based on a period of safe storage that is specifically described in the estimate." ENIP2 understands that a facility specific analysis may be used for demonstrating the adequacy of decommissioning funds, provided that "the NRC-required cost estimate for decommissioning costs as defined in 10 CFR 50.2 is equal to or greater than the amount stated in the formulas in 10 CFR 50.75(c)(1) and (2) as the basis for justifying a higher than minimum funding level." (Regulatory Guide 1.159, section 1.1.1; Draft Regulatory Guide-1229, section 1.1.1.) ENIP2 also understands that NRC should be provided the analysis, and that the analysis should include data for each year of the analysis.

On October 23, 2008, ENIP2 submitted a site specific decommissioning cost estimate to the NRC in conjunction with its preliminary decommissioning cost estimate, and spent fuel management plan under 10 CFR 50.75(f)(3) and 10 CFR 50.54(bb) (Accession No. ML083040378, as supplemented by ENIP2's reply to RAIs on July 15, 2009 (Accession No. ML092050204). That submittal contained separate site-specific decommissioning cost estimates for Indian Point 1 and Indian Point 2. The Indian Point 2 site-specific decommissioning cost estimate that was submitted was based on a period of safe storage that is specifically described in the estimate, namely storage until 2064, at which time the plant will be decommissioned and the site released for alternative use without restriction. Table 4 in the Indian Point 2 site-specific estimate (page 31 of 38) provides the annual license termination phase expenditures for Indian Point 2 in 2007 dollars.

On December 10, 2010, ENIP3 submitted a site specific decommissioning cost estimate to the NRC in conjunction with its preliminary decommissioning cost estimate, and spent fuel management plan under 10 CFR 50.75(f)(3) and 10 CFR 50.54(bb) (Accession Nos. ML103540233 and ML103550608). In the ENIP3 estimate, the off-loading of the Indian Point 3 spent fuel storage pool was predicated on the availability of the Indian Point 2 spent fuel storage pool through the end of year 2023. This pool operating duration is 2½ years longer than what was assumed in the original 2007 Indian Point 2 estimate. For consistency, the 2007 Indian Point 2 estimate has been revised for the longer pool operating duration. This did not impact the

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overall Indian Point 2 estimate schedule length. The revised cost (in 2007 dollars) is shown in Table 10-1 along with the original cost.

Table 10-1 below escalates the revised 2007 dollar figures to 2010 dollars using escalation values obtained from data provided by IHS Global Insight. The decommissioning trust fund (DTF) ending balance is escalated each year by the 2% real growth figure allowed pursuant to 10 CFR 50.75(e)(1)(i).

Table 10-1 below uses the December 31, 2010 balance and indicates that there is now a \$163.467 million surplus in 2073 in decommissioning trust funds at the end of radiological decommissioning of Indian Point 2.

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Table 10-1				
NRC License Termination Cost				
(\$ millions)				
	2007\$ Unit 2 Radiological	2007\$ Unit 2 Updated Radiological	2010\$ Unit 2 Radiological	Ending DTF Balance
2010				374.738
2011				382.233
2012				389.878
2013	11.164	11.164	11.824	385.852
2014	49.271	49.271	52.116	341.453
2015	25.307	25.307	26.765	321.517
2016	3.711	3.711	3.921	324.026
2017	3.701	3.701	3.910	326.596
2018	3.701	3.701	3.910	329.218
2019	3.701	3.701	3.910	331.892
2020	3.711	3.711	3.921	334.609
2021	3.688	3.701	3.910	337.391
2022	3.676	3.701	3.910	340.229
2023	3.676	3.701	3.910	343.123
2024	3.686	3.686	3.895	346.091
2025	3.676	3.676	3.884	349.129
2026	3.676	3.676	3.884	352.227
2027	3.676	3.676	3.884	355.387
2028	3.686	3.686	3.895	358.600
2029	3.676	3.676	3.884	361.888
2030	3.676	3.676	3.884	365.242
2031	3.676	3.676	3.884	368.663
2032	3.686	3.686	3.895	372.141
2033	3.676	3.676	3.884	375.700
2034	3.676	3.676	3.884	379.330
2035	3.676	3.676	3.884	383.032
2036	3.686	3.686	3.895	386.798
2037	3.676	3.676	3.884	390.650
2038	3.676	3.676	3.884	394.579
2039	3.676	3.676	3.884	398.586
2040	3.686	3.686	3.895	402.663
2041	3.676	3.676	3.884	406.832
2042	3.676	3.676	3.884	411.084
2043	3.676	3.676	3.884	415.421
2044	3.686	3.686	3.895	419.835
2045	3.675	3.676	3.884	424.347
2046	3.668	3.676	3.884	428.950

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For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

Table 10-1 (continued)				
NRC License Termination Cost				
(\$ millions)				
	2007\$ Unit 2 Radiological	2007\$ Unit 2 Updated Radiological	2010\$ Unit 2 Radiological	Ending DTF Balance
2047	3.668	3.675	3.884	433.645
2048	3.678	3.678	3.887	438.431
2049	3.668	3.668	3.876	443.323
2050	3.668	3.668	3.876	448.313
2051	3.668	3.668	3.876	453.403
2052	3.678	3.678	3.887	458.584
2053	3.668	3.668	3.876	463.879
2054	3.668	3.668	3.876	469.280
2055	3.668	3.668	3.876	474.789
2056	3.678	3.678	3.887	480.398
2057	3.668	3.668	3.876	486.130
2058	3.668	3.668	3.876	491.976
2059	3.668	3.668	3.876	497.939
2060	3.678	3.678	3.887	504.011
2061	3.668	3.668	3.876	510.215
2062	3.668	3.668	3.876	516.543
2063	3.668	3.668	3.876	522.998
2064	24.751	24.751	26.199	507.259
2065	55.625	55.625	58.792	458.613
2066	168.560	168.560	177.452	290.334
2067	71.834	71.834	75.804	220.337
2068	25.113	25.113	26.507	198.237
2069	6.046	6.046	6.383	195.819
2070	6.046	6.046	6.383	193.352
2071	6.046	6.046	6.383	190.836
2072	6.547	6.547	6.913	187.740
2073	26.485	26.485	28.028	163.467
Total	659.351	659.430	696.201	

As can be seen from the information provided in Table 10-1, the required funding for SAFSTOR decommissioning, \$696.201 million, is greater than the NRC formula amount per 10 CFR 50.75(b) and 1(c) of \$474.22 million, therefore, the site-specific analysis complies with the requirement from Regulatory Guide 1.159 section 1.1.1 previously discussed. The foregoing SAFSTOR analysis shows that when the December 31, 2010 DTF balance is escalated at the allowable rate and compared against the annual figures for the SAFSTOR period, that an

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**Entergy Nuclear Operations, Inc.
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For Year Ending December 31, 2010 - 10 CFR 50.75(f)(1)**

approximately \$163.467 million surplus exists at the end of the decommissioning project. Accordingly, ENIP2 concludes that no further action is required at this time to demonstrate adequate funding assurance for decommissioning Indian Point 2.

**Attachment 16
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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Indian Point, Unit 1

Month **Day** **Year**

Year of Biennial: 1 1 2011

Termination of Operation: 9 28 2066 **SAFSTOR Site Specific**

	<u>MWth</u>	<u>1986\$</u>	ECI	Base Lx		<u>Lx</u>	Px	Fx		<u>Ex</u>		<u>Bx</u>
PWR	615	\$85,560,000	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.263	0.22	12.28

NRC Minimum: **\$392,781,200** **Site Specific:** **\$464,844,000**

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$464,840,000	\$286,860,000

NOTE: See Attachment 14 for the adequacy of the Trust Fund

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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Indian Point, Unit 2

	Month	Day	Year	
Year of Biennial:	1	1	2011	
Termination of Operation	9	28	2064	SAFSTOR Site Specific

	<u>MWth</u>	<u>1986\$</u>	ECI	Base Lx		<u>Lx</u>	Px	Fx		<u>Ex</u>		<u>Bx</u>
PWR	3216	\$103,300,800	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.263	0.22	12.28

NRC Minimum: \$474,224,079 Site Specific: \$696,201,000

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$696,201,000	\$374,740,000

NOTE: See Attachment 15 for the adequacy of the Trust Fund

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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Indian Point, Unit 3

	Month	Day	Year
Year of Biennial:	1	1	2011
Termination of Operation	12	12	2015

	<u>MWth</u>	<u>1986\$</u>	<u>ECI</u>	<u>Base Lx</u>		<u>Lx</u>	<u>Px</u>	<u>Fx</u>		<u>Ex</u>		<u>Bx</u>
PWR	3216	\$103,300,800	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.263	0.22	12.28

NRC Minimum: \$474,224,079 Site Specific:

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$474,224,079	\$493,330,000

**Step 1:
Earnings Credit:**

<u>Trust Fund Balance:</u>	<u>Real Rate of Return per</u>	<u>Years Left in License</u>	<u>Total Real Rate of</u>	<u>Total Earnings:</u>	
\$493,330,000	2%	4.95	1.10292	\$544,102,708	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

Step 2:

Accumulation:

<u>Value of Annuity per year</u>	<u>Real Rate of Return per</u>	<u>Years of Annuity:</u>	<u>Total Annuity:</u>
\$0	2%	0	\$0

Step 3:

Decom Period:

<u>Total Earnings:</u>	<u>Real Rate of Return per</u>	<u>Decom Period:</u>	<u>Total Real Rate of</u>	<u>Total Earnings for Decom:</u>	
\$544,102,708	2%	7	0.14869	\$40,450,137	Total Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom period]

<u>Total of Steps 1 - 3:</u>	
\$584,552,845	Total = Total Earnings + Total Earnings for Decom

Excess (Shortfall)	\$110,328,766 to NRC minimum
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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name:

Vermont Yankee Power Station

	Month	Day	Year	
Year of Biennial:	1	1	2011	
Termination of Operation	3	21	2032	License Renewal to NRC Min

	<u>MWth</u>	<u>1986\$</u>	<u>ECI</u>	<u>Base Lx</u>	<u>Lx</u>	<u>Px</u>	<u>Fx</u>	<u>Ex</u>	<u>Bx</u>			
BWR	1912	\$121,208,000	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.319	0.22	12.54

NRC Mimimum:

\$564,245,876

Site Specific:

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$564,245,876	\$474,220,000

Step 1:

Earnings Credit:

<u>Trust Fund Balance:</u>	<u>Real Rate of Return per</u>	<u>Years Left in License</u>	<u>Total Real Rate of</u>	<u>Total Earnings:</u>	
\$474,220,000	2%	21.22	1.52233	\$721,918,344	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

Step 2:

Accumulation:

<u>Value of Annuity per year</u>	<u>Real Rate of Return per</u>	<u>Years of Annuity:</u>	<u>Total Annuity:</u>
\$0	2%	0	\$0
<u>Total Annuity</u>	<u>Real Rate of Return per</u>	<u>Years remaining after annuity</u>	<u>Total Step 2</u>
\$0	2%	21.22146119	\$0
			Total Step 1 + Step 2
			\$721,918,344

Step 3:

Decom Period:

<u>Total Earnings:</u>	<u>Real Rate of Return per</u>	<u>Decom Period:</u>	<u>Total Real Rate of</u>	<u>Total Earnings for Decom:</u>	
\$721,918,344	2%	7	0.14869	\$53,669,455	Total Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom period - 1]
				Total of Steps 1 - 3:	
				\$775,587,800	Total = Total Earnings + Total Earnings for Decom
Excess (Shortfall)				211,341,923	to NRC minimum

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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Pilgrim

Year of Biennial: Month 1 Day 1 Year 2011

Termination of Operation: 6 8 2012

	MWth	1986\$	ECI	Base Lx		Lx	Px	Fx		Ex		Bx
BWR	2028	\$122,252,000	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.319	0.22	12.54

NRC Minimum: \$569,105,891 Site Specific:

Licensee:	% Owned:	Amount of NRC Minimum/Site Specific:	Amount in Trust Fund:
Entergy	100.00%	\$569,105,891	\$645,920,000

**Step 1:
Earnings Credit:**

Trust Fund Balance:	Real Rate of Return per	Years Left in License	Total Real Rate of	Total Earnings:	
\$645,920,000	2%	1.44	1.02884	\$664,549,359	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

Step 2:

Accumulation:

Value of Annuity per year	Real Rate of Return per	Years of Annuity:	Total Annuity:
\$0	2%	0	\$0

Step 3:

Decom Period:

Total Earnings:	Real Rate of Return per	Decom Period:	Total Real Rate of	Total Earnings for Decom:	
\$664,549,359	2%	7	0.14869	\$49,404,483	Total Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom peric

Total of Steps 1 - 3:	Total = Total Earnings + Total Earnings for Decom
\$713,953,842	

Excess (Shortfall)	144,847,950	to NRC minimum
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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: James A. Fitzpatrick

Year of Biennial: Month 1 Day 1 Year 2011

Termination of Operation: Month 10 Day 17 Year 2034

	MWth	1986\$	ECI	Base Lx		Lx	Px	Fx		Ex		Bx
BWR	2536	\$126,824,000	113.6	2.16	0.65	2.45	1.675	3.074	0.13	2.319	0.22	12.54

NRC Minimum: \$590,389,405

Licensee:	% Owned:	Amount of NRC Minimum/Site Specific:	Amount in Trust Fund:
Entergy	100.00%	\$590,389,405	\$538,310,000

**Step 1:
Earnings Credit:**

Trust Fund Balance:	Real Rate of Return per	Years Left in License	Total Real Rate of	Total Earnings:	
\$538,310,000	2%	23.79	1.60188	\$862,310,195	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

Step 2:

Accumulation:

Value of Annuity per year	Real Rate of Return per	Years of Annuity:	Total Annuity:
\$0	2%	0	\$0

Step 3:

Decom Period:

Total Earnings:	Real Rate of Return per	Decom Period:	Total Real Rate of	Total Earnings for Decom:	
\$862,310,195	2%	7	0.14869	\$64,106,584	Total Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom period - 1]

Total of Steps 1 - 3:	Total = Total Earnings + Total Earnings for Decom
\$926,416,779	

Excess (Shortfall)	\$336,027,373	to NRC minimum
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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Palisades Nuclear Plant

	Month	Day	Year
Year of Biennial:	1	1	2011
Termination of Operation	3	24	2031

	<u>MWth</u>	<u>1986\$</u>	<u>ECI</u>	<u>Base Lx</u>		<u>Lx</u>	<u>Px</u>	<u>Fx</u>		<u>Ex</u>		<u>Bx</u>
PWR	2565	\$97,572,000	111.3	2.08	0.65	2.32	1.675	3.074	0.13	2.263	0.22	12.28

NRC Minimum: \$439,126,944

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$439,126,944	\$271,160,000

**Step 1:
Earnings Credit:**

<u>Trust Fund Balance:</u>	<u>Real Rate of Return per</u>	<u>Years Left in License</u>	<u>Total Real Rate of</u>	<u>Total Earnings:</u>	
\$271,160,000	2%	20.23	1.49272	\$404,766,304	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

**Step 2:
Accumulation:**

<u>Value of Annuity per year</u>	<u>Real Rate of Return per</u>	<u>Years of Annuity:</u>	<u>Total Annuity:</u>
\$0	2%	0	\$0

**Step 3:
Decom Period:**

<u>Total Earnings:</u>	<u>Real Rate of Return per</u>	<u>Decom Period:</u>	<u>Total Real Rate of</u>	<u>Total Earnings for Decom:</u>	
\$404,766,304	2%	7	0.14869	\$30,091,474	Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom period]

<u>Total of Steps 1 - 3:</u>	
\$434,857,778	Total = Total Earnings + Total Earnings for Decom

Excess (Shortfall)	(\$4,269,166)	to NRC minimum
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**Entergy Nuclear Operations, Inc.
Minimum Financial Assurance Calculation Worksheets**

Plant name: Palisades Nuclear Plant

	Month	Day	Year
Year of Biennial:	3	1	2011
Termination of Operation	3	24	2031

	<u>MWth</u>	<u>1986\$</u>	<u>ECI</u>	<u>Base Lx</u>		<u>Lx</u>	<u>Px</u>	<u>Fx</u>		<u>Ex</u>		<u>Bx</u>
PWR	2565	\$97,572,000	111.3	2.08	0.65	2.32	1.675	3.074	0.13	2.263	0.22	12.28

NRC Mimimum: \$439,126,944

<u>Licensee:</u>	<u>% Owned:</u>	<u>Amount of NRC Minimum/Site Specific:</u>	<u>Amount in Trust Fund:</u>
Entergy	100.00%	\$439,126,944	\$279,202,935

**Step 1:
Earnings Credit:**

<u>Trust Fund Balance:</u>	<u>Real Rate of Return per</u>	<u>Years Left in License</u>	<u>Total Real Rate of</u>	<u>Total Earnings:</u>	
\$279,202,935	2%	20.06	1.48780	\$415,398,901	Total Earnings = Trust Fund balance x (1+RRR)^Years left in license

Step 2:

Accumulation:

<u>Value of Annuity per year</u>	<u>Real Rate of Return per</u>	<u>Years of Annuity:</u>	<u>Total Annuity:</u>
\$0	2%	0	\$0

Step 3:

Decom Period:

<u>Total Earnings:</u>	<u>Real Rate of Return per</u>	<u>Decom Period:</u>	<u>Total Real Rate of</u>	<u>Total Earnings for Decom:</u>	
\$415,398,901	2%	7	0.14869	\$30,881,931	Earnings for Decom = (1/2) x Total Earnings x [(1+RRR)^Decom period]

<u>Total of Steps 1 - 3:</u>	
\$446,280,832	Total = Total Earnings + Total Earnings for Decom

Excess (Shortfall)	\$7,153,889	to NRC minimum
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