

REQUEST FOR ADDITIONAL INFORMATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
2011 DECOMMISSIONING FUNDING STATUS REPORT  
COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

**RAI #1: Citation for real rate of returns:**

Please provide the basis for the assumptions used regarding rates of escalation in decommissioning costs, rate of earnings on decommissioning funds and rates of other factors assumed in your Decommissioning Funding Status (DFS) report.

By letter dated March 28, 2011, Luminant Generation Company, LLC (Luminant) reported the following:

2.5248% rate of escalation in decommissioning costs for Unit 1,  
2.5043% rate of escalation in decommissioning costs for Unit 2,  
4.83% rate of earnings on decommissioning funds for years 2011 through 2028,  
3.99% rate of earnings on decommissioning funds for years 2029 through 2059, and  
3.07% rate of earnings on decommissioning funds for years 2060 and thereafter.

As stated in Title 10 of the *Code of Federal Regulations* (10CFR) Paragraph 50.75(f)(1),

the information in [the DFS] report must include [ . . . ] the assumptions used regarding rates of escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in funding projections. . .

**RAI #2: Citation for Site-Specific Study:**

Please provide the site specific cost estimate for Comanche Peak Nuclear Power Plant (CPNPP), unless it was previously submitted to U.S. Nuclear Regulatory Commission (NRC). If the cost estimate was previously submitted to NRC, then provide a reference to its submittal. The site specific cost estimate should include a summary schedule of annual expenses, projected earnings, and end-of-year fund balances, expressed in 2010 dollars.

By letter dated March 28, 2011, Luminant provided a site-specific cost estimate for the minimum amount of decommissioning funds estimated to be required.

Per 10 CFR 50.75(e)(1)(i) and (ii), the licensee must specifically describe the safe storage period in order to take credit for projected future earnings when it uses a site-specific estimate as the basis for using the prepayment or external sinking fund methods of financial assurance.

**RAI#3: Citation for collection of non-bypassable charges:**

Please provide the citation (e.g., an Order by the rate-regulatory authority) by the regulatory authority that allows for the collection of non-bypassable charges that are to be credited to, among other things, a trust fund established for the collection of decommissioning funds estimated to be required under 10 CFR 50.75(b) and (c).

By letter dated March 28, 2011, Luminant included a schedule of annual amounts remaining to be collected for items in 10 CFR 50.75 (b) and (c); however, Luminant Power did not provide citation of non-bypassable charge collection authorization by the appropriate regulatory authority.

As stated in 10 CFR 50.75(f)(1),

the information in [the DFS] report must include [ . . . ] a schedule of the annual amounts remaining to be collected. . .

**RAI #4: Amounts accumulated:**

Please provide the after-tax amount of funds accumulated through December 31, 2010.

By letter dated March 28, Luminant did not state if the amount of decommissioning funds accumulated was an after-tax amount.

The provisions of 10 CFR 50.75(f)(1) and (2) require the licensee to report the amount of funds accumulated to the end of the calendar year preceding the report.