

Waples, Langston

From: Walpole, Robert W [rwalpol@entergy.com]
Sent: Thursday, April 01, 2010 3:03 PM
To: Cataldo, Paul; Haagensen, Brian
Subject: FW: ENNE Distribution of ENOC 10-00010 10 CFR 50.75(f)(1) Status of Decommissioning Funding submittal dated 3/31/2010
Attachments: Signed ENOC-10-00010 NRC.pdf

Attached for your information and use is a copy of a letter that Entergy provided to the NRC. The letter relates to the status of decommissioning funds at Entergy's sites, including IPEC.

Bob Walpole

<<Signed ENOC-10-00010 NRC.pdf>>

AB



Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601
914-272-3370

John F. McCann
Vice President, Nuclear Safety,
Emergency Planning and Licensing

ENOC-10-00010

March 31, 2010

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852-2738
(301) 415-7000

**SUBJECT: Status of Decommissioning Funding for
Plants Operated by Entergy Nuclear Operations, Inc.
For Year Ending December 31, 2009 – 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 No. 50-155

- References:
1. NUREG-1307, "Report on Waste Burial Charges," Revision 13, dated November 2008.
 2. NRC Regulatory Issue Summary 2001-07, "10 CFR 50.75(f)(1) Reports on the Status of Decommissioning Funds (Due March 31, 2001)."
 3. Entergy letter NL-09068, "Reply to Request for Additional Information Regarding Decommissioning Cost Estimate and Irradiated Fuel Management Program," dated July 15, 2009 (ML092050204).
 4. Entergy letter ENOC-09-00024, "Decommissioning Funding Assurance Plans," dated August 13, 2009 (ML092260720).

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. These reports are being provided as a result of our determination that Entergy's proposed indirect license transfer satisfies the "merger or acquisition" clause in 10 CFR 50.75(f)(1) and for plants within 5 years of the projected end of their operation. On behalf of Entergy Nuclear Indian Point 2 LLC (Indian Point 1&2), Entergy Nuclear Indian Point 3 LLC (Indian Point 3), Entergy Nuclear Vermont Yankee LLC (Vermont Yankee), Entergy Nuclear Generation Company (Pilgrim Station), Entergy Nuclear FitzPatrick LLC (James A. FitzPatrick), 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 thru 8 for the above listed facilities, were prepared in accordance with NUREG-1307 (Reference 1) and NRC Regulatory Issue Summary 2001-07 (Reference 2). Attachment 9 provides an updated Decommissioning Funding Assurance Plan for Indian Point 1, which updates the SAFSTOR analysis previously provided in Reference 3. Attachment 10 provides an updated Decommissioning Funding Assurance Plan for Indian Point 2, which updates the SAFSTOR analysis previously provided in Reference 4.

There are no new commitments made in this letter. If you have any questions, please contact Mr. Les England at 601-368-5766.

Sincerely,



JFM/CDF/LAE

Attachments: As described above

cc: Next page.

ENOC-10-00010

cc: all w/attachments

USNRC Regional Administrator, Region I
USNRC Regional Administrator, Region III
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
USNRC Resident Inspector, Indian Point 2
USNRC Resident Inspector, Indian Point 3
USNRC Resident Inspector, FitzPatrick
USNRC Resident Inspector, Vermont Yankee
USNRC Resident Inspector, Pilgrim
USNRC Resident Inspector, Palisades
Michigan Department of Environmental Quality
Michigan Public Service Commission

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

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

Mr. Francis J. Murray, Jr.
President
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Ms. Victoria J. Brown, Esq.
Primmer Piper Eggleston & Cramer, PC
150 S. Champlain Street
P.O. Box 1489
Burlington, VT 05402

Mr. L. Jager Smith, Esq.
1340 Echelon Parkway
Jackson, MS 39213-8298

**Attachment 1
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Indian Point 1
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

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

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 457.814 million ^[Note] |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 260.15 million |
| Fund balance and total expenditures with 2.0% annual growth based upon a SAFSTOR analysis. | See Attachment 9 (\$ 743.524 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 on funds 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 9.

**Attachment 2
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Indian Point 2
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

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

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 411.70 million or
\$ 682.74 million ^[Note 1] |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 342.23 million ^[Note 2] |
| Fund balance and total expenditures with 2.0% annual growth based upon a SAFSTOR analysis. | See Attachment 10 (\$ 780.202 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 on funds 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 10.

Note 2: Includes provisional fund balance of \$29.68 million.

**Attachment 3
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Indian Point 3
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Plant Name: **Indian Point Nuclear Generating Unit No. 3**

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 411.70 million |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 450.65 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on current operating license. | \$ 544.66 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on 20 year license renewal. | \$ 809.33 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 on funds 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. |

**Attachment 4
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding Vermont Yankee
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

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

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 518.91 million |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 428.37 million ^[Note 1] |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on current operating license. | \$ 480.91 million ^[Note 1] |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on 20 year license renewal. | \$ 714.61 million ^[Note 1] |
| 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 on funds 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. | Parent Guarantee (\$ 40 million) ^[Note 2] |
| 7. Any material changes to trust agreements. | None. |

Note 1: Does not include the Parent Guarantee amount as indicated in Note 2.

Note 2: A \$40 million Parent Guarantee is now in place, and the required certifications of the financial test establishing Entergy Corporation's qualifications to provide the guarantee based upon 2008 financial results were provided in an Entergy Nuclear Operations, Inc. submittal, BVY 10-008, January 28, 2010, "Decommissioning Funding Assurance Documentation," Vermont Yankee Nuclear Power Station (Accession No. ML 100470701). Updated certifications of the financial test establishing Entergy Corporation's qualifications to provide the guarantee based upon 2009 financial results are being provided separately.

**Attachment 5
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding - Pilgrim
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Plant Name: **Pilgrim Nuclear Power Station**

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 523.38 million |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 609.31 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on current operating license. | \$ 686.96 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on 20 year license renewal. | \$ 1,020.78 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 on funds 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. |

**Attachment 6
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – James A. Fitzpatrick
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

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

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 542.96 million |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 491.74 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning based on current operating license. | \$ 863.19 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 on funds 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. |

**Attachment 7
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – Palisades
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Plant Name: **Palisades Nuclear Plant**

- | | |
|--|--|
| 1. Amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). | \$ 380.07 million |
| 2. Amount accumulated to the end of the calendar year preceding the date of the report (December 31, 2009). | \$ 245.27 million |
| Fund balance with 2.0% annual growth to the midpoint of decommissioning. | \$ 401.20 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 on funds 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. |

**Attachment 8
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
Status of Decommissioning Funding – Big Rock Point
For Year Ending December 31, 2009 - 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 2009 dollars. | \$ 3.27 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 9
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 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 2009 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 9
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Table 9-1			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 1 Radiological	2009\$ Unit 1 Radiological	Ending DTF Balance
2009			260.149
2010			265.352
2011			270.659
2012			276.072
2013	1.059	1.096	280.497
2014	4.236	4.385	281.722
2015	4.236	4.385	282.971
2016	2.656	2.745	285.885
2017	2.649	2.738	288.865
2018	2.649	2.738	291.904
2019	2.649	2.738	295.004
2020	2.656	2.745	298.159
2021	2.649	2.738	301.384
2022	2.649	2.738	304.674
2023	2.649	2.738	308.029
2024	2.656	2.745	311.445
2025	2.649	2.738	314.936
2026	2.649	2.738	318.497
2027	2.649	2.738	322.129
2028	2.656	2.745	325.827
2029	2.649	2.738	329.606
2030	2.649	2.738	333.460
2031	2.649	2.738	337.391
2032	2.656	2.745	341.394
2033	2.649	2.738	345.484
2034	2.649	2.738	349.656
2035	2.649	2.738	353.911
2036	2.656	2.745	358.244
2037	2.649	2.738	362.671
2038	2.649	2.738	367.186
2039	2.649	2.738	371.792
2040	2.656	2.745	376.483
2041	2.649	2.738	381.275
2042	2.649	2.738	386.163
2043	2.649	2.738	391.148
2044	2.656	2.745	396.226
2045	2.611	2.697	401.454

**Attachment 9
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP1 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Table 9-1 (continued)			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 1 Radiological	2009\$ Unit 1 Radiological	Ending DTF Balance
2046	1.826	1.873	407.610
2047	1.826	1.873	413.889
2048	1.831	1.878	420.289
2049	1.826	1.873	426.822
2050	1.826	1.873	433.485
2051	1.826	1.873	440.282
2052	1.831	1.878	447.210
2053	1.826	1.873	454.281
2054	1.826	1.873	461.494
2055	1.826	1.873	468.851
2056	1.831	1.878	476.350
2057	1.826	1.873	484.004
2058	1.826	1.873	491.811
2059	1.826	1.873	499.774
2060	1.831	1.878	507.891
2061	1.826	1.873	516.176
2062	1.826	1.873	524.627
2063	1.826	1.873	533.247
2064	1.831	1.878	542.034
2065	1.826	1.873	551.002
2066	18.899	19.667	542.355
2067	68.313	70.906	482.296
2068	148.490	154.149	337.793
2069	17.216	17.911	326.638
2070	17.216	17.911	315.260
2071	17.216	17.911	303.654
2072	17.235	17.932	291.795
2073	11.400	11.921	285.710
	441.549	457.814	

The foregoing SAFSTOR analysis shows that when the December 31, 2009 DTF balance is escalated at the allowable rate and compared against the annual figures for the SAFSTOR period, that an approximately \$285.71 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 10
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP2 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 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. Table 10-1 below escalates those 2007 dollar figures to 2009 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, 2009 balance and indicates that there is now a \$97.462 million surplus in 2073 in decommissioning trust funds at the end of radiological decommissioning of Indian Point 2.

**Attachment 10
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP2 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Table 10-1			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 2 Radiological	2009\$ Unit 2 Radiological	Ending DTF Balance
2009			342.226
2010			349.071
2011			356.052
2012			363.173
2013	11.164	11.528	358.908
2014	49.271	50.920	315.166
2015	25.307	26.328	295.141
2016	3.711	3.828	297.216
2017	3.701	3.817	299.343
2018	3.701	3.817	301.513
2019	3.701	3.817	303.726
2020	3.711	3.828	305.973
2021	3.688	3.804	308.288
2022	3.676	3.791	310.663
2023	3.676	3.791	313.085
2024	3.686	3.802	315.545
2025	3.676	3.791	318.065
2026	3.676	3.791	320.635
2027	3.676	3.791	323.257
2028	3.686	3.802	325.920
2029	3.676	3.791	328.647
2030	3.676	3.791	331.429
2031	3.676	3.791	334.267
2032	3.686	3.802	337.150
2033	3.676	3.791	340.102
2034	3.676	3.791	343.113
2035	3.676	3.791	346.184
2036	3.686	3.802	349.306
2037	3.676	3.791	352.501
2038	3.676	3.791	355.760
2039	3.676	3.791	359.084
2040	3.686	3.802	362.464
2041	3.676	3.791	365.922
2042	3.676	3.791	369.449
2043	3.676	3.791	373.047
2044	3.686	3.802	376.706
2045	3.675	3.791	380.449
2046	3.668	3.783	384.275

**Attachment 10
ENOC-10-00010**

**Entergy Nuclear Operations, Inc.
IP2 DTF Balance Based on Decommissioning Funding Assurance Plan
For Year Ending December 31, 2009 - 10 CFR 50.75(f)(1)**

Table 10-1 (continued)			
NRC License Termination Cost			
(\$ millions)			
	2007\$ Unit 2 Radiological	2009\$ Unit 2 Radiological	Ending DTF Balance
2047	3.668	3.783	388.178
2048	3.678	3.794	392.148
2049	3.668	3.783	396.208
2050	3.668	3.783	400.349
2051	3.668	3.783	404.573
2052	3.678	3.794	408.870
2053	3.668	3.783	413.264
2054	3.668	3.783	417.746
2055	3.668	3.783	422.318
2056	3.678	3.794	426.970
2057	3.668	3.783	431.726
2058	3.668	3.783	436.578
2059	3.668	3.783	441.527
2060	3.678	3.794	446.564
2061	3.668	3.783	451.712
2062	3.668	3.783	456.963
2063	3.668	3.783	462.319
2064	24.751	25.534	446.031
2065	55.625	57.545	397.407
2066	168.560	174.850	230.505
2067	71.834	74.431	160.684
2068	25.113	26.019	137.879
2069	6.046	6.317	134.320
2070	6.046	6.317	130.689
2071	6.046	6.317	126.986
2072	6.547	6.840	122.686
2073	26.485	27.678	97.462
	659.351	682.740	

As can be seen from the information provided in Table 10-1, the required funding for SAFSTOR decommissioning, \$682.74 million, is greater than the NRC formula amount per 10 CFR 50.75(b) and 1(c) of \$411.70 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, 2009 DTF balance is escalated at the allowable rate and compared against the annual figures for the SAFSTOR period, that an approximately \$97.5 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.