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December 17, 2012
GO2-12-183

10 CFR 72.30

U.S. Nuclear Regulatory Commission
Director, Division of Spent Fuel Storage and Transportation, Office of Nuclear Material
Safety and Safeguards
ATTN: Document Control Desk
Washington, D.C. 20555-0001

**Subject: COLUMBIA GENERATING STATION, DOCKET NO. 50-397
INDEPENDENT FUEL STORAGE INSTALLATION, DOCKET NO. 72-35
DECOMMISSIONING COST ESTIMATE AND DECOMMISSIONING
FUNDING PLAN SUBMITTALS**

References Letter GO2-11-055 dated March 22, 2011, DW Gregoire (Energy
Northwest) to NRC, "Decommissioning Fund Status Report."

Dear Sir or Madam:

In accordance with revised and new requirements of 10 CFR 72.30 on
Decommissioning Planning effective December 17, 2012, Energy Northwest is hereby
submitting a Decommissioning Funding Plan (DFP), a Decommissioning Plan (DP), and
a Decommissioning Cost Estimate (DCE) for the Independent Spent Fuel Storage
Installation (ISFSI) located at the Columbia Generating Station (CGS).

The ISFSI DFP (Attachment 1) and the DP and DCE (Attachment 2) submittals are in
response to specific requirements in revised regulations 10 CFR 72.30(a) and (b)(1)
through (b)(4). Also submitted with the DFP (Attachment 1) is information on the
financial instrument for the ISFSI decommissioning, in conformance with requirements
in revised regulation 10 CFR 72.30(e). Attachment 3 is a copy of the letter received by
Energy Northwest from Bonneville Power Administration (BPA), an agency of the US
Department of Energy (DOE), certifying the funding for decommissioning of CGS as
well as the ISFSI.

Energy Northwest submitted to the NRC the most recent biennial Decommissioning
Fund Status Report on March 22, 2011 (as referenced above). That report included an
Estimated Decommissioning Cost of \$459.7 Million, which represents an estimate for
decommissioning the nuclear power plant only. Costs for decommissioning the CGS
ISFSI were not included in that report.

NM5524
NM5526

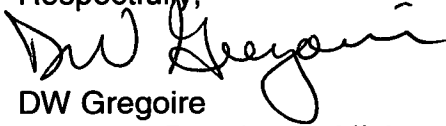
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There are no commitments being made to the NRC by this letter.

Should you have any questions or desire additional information regarding this matter, please contact ZK Dunham, Licensing Supervisor, at (509) 377- 4735.

Respectfully,



DW Gregoire
Manager, Regulatory Affairs

Attachment 1 –Decommissioning Funding Plan - ISFSI

Attachment 2 –Decommissioning Plan and Decommissioning Cost Estimate – ISFSI

Attachment 3 –Letter from BPA to CGS, dated December 6, 2012

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
AJ Rapacz - BPA/1399
WA Horin - Winston & Strawn

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DECOMMISSIONING FUNDING PLAN – ISFSI

1.0 Information on How Reasonable Assurance Will be Provided (10 CFR 72.30(b)(1))

Detailed information for the ISFSI Decommissioning Plan (DP) and the ISFSI Decommissioning Cost Estimate (DCE) is presented in Attachment 2. The information in Attachment 2 is summarized in this attachment to conform to the order in which the requirements are listed in the Final Rule and to facilitate the flow of information that supports the presentation of the DFP.

Energy Northwest, through the Bonneville Power Administration (BPA) an agency of the Department of Energy, has instituted a sinking fund that sets aside monies for decommissioning Columbia Generating Station (CGS). Decommissioning funds set aside for the ISFSI decommissioning will be accomplished through a separate financial instrument as described in Section 2.4 of this attachment.

On July 11, 2005, Energy Northwest instituted an irrevocable trust fund (Trust) for the sole purpose to provide funding for the decommissioning of the ISFSI. As discussed in Sections 2.4 and 2.6 below, BPA is contractually obligated to pay the decommissioning costs for both CGS and its ISFSI.

2.0 Detailed Cost Estimate Summary (10 CFR 72.30(b))

The ISFSI DP and DCE are presented in Attachment 2. Cross-references to specific information in Attachment 2 are included in this section where appropriate.

2.1 Cost of ISFSI Decommissioning (10 CFR 72.30(b)(2)(i) and (ii))

The cost of decommissioning the ISFSI facility, with an independent contractor performing decommissioning activities, has been estimated as \$ 4.6 Million (2012 or present value). This estimate includes a contingency factor of 25 percent, considered adequate per criteria in NUREG-1757. Details for this cost estimate are provided in Attachment 2.

2.2 Compliance with 10 CFR 20.1402 (10 CFR 72.30(b)(2)(iii))

The DP and DCE information presented in Attachment 2 is based on the position that CGS will meet the 10 CFR 20.1402 criteria for unrestricted release/use of the ISFSI area. This position assumes, considering the controls put in place by CGS to monitor and control sources of potential radiological contamination and on the characteristics of the ISFSI design, that the site will be considered acceptable for unrestricted use based

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on expected levels of residual radioactivity after completion of decommissioning activities.

2.3 Key Assumptions Used in the DCE and Their Justification (10 CFR 72.30(b)(3))

The key assumptions for the CGS ISFSI decommissioning, as summarized from DCE information presented in Attachment 2, are as follows:

2.3.1 It is not expected that the overpacks will have removable radioactive surface contamination, based on compliance with ISFSI Technical Specification 3.2.2 and Surveillance Requirement 3.2.2.1. These requirements ensure removable contamination on the accessible surfaces of the Multi-Purpose Canister (MPC) prior to transport does not exceed 1000 dpm/100cm² from beta and gamma sources, and 20 dpm/100 cm² from alpha sources.

2.3.2 Neutron activation of the overpack steel and concrete is expected to be very low.

2.3.3 The storage overpacks, excluding those used for Greater-than-Class-C (GTCC) waste containers will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning. For purposes of the cost estimate, twelve of the storage overpacks are designated for controlled disposal as low-level radioactive waste.

2.3.4 The ISFSI concrete pads will not be contaminated. It is not expected that there will be significant neutron-activated residual radioactivity in the concrete ISFSI pads because the overpack pedestals will shield most of the neutron flux from the spent fuel in the MPCs.

2.3.5 The subsurface materials under and in the proximity of the ISFSI pads contain no residual radioactivity that will require remediation to meet the criteria for license termination based on baseline soil samples of the ISFSI site fill materials (Reference 3.1).

2.3.6 A Final Status Radiological Survey will be performed in support of an application for License Termination; this will include comprehensive surveys of the concrete overpack surfaces, a significant fraction of the ISFSI pads, and the immediate area surrounding the pads.

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2.3.7 ISFSI decommissioning will be performed by an independent contractor.

2.3.8 Low-level radioactive waste disposal is expected to be at the US Ecology Washington Low-Level Radioactive Waste site.

Additional justifications, as applicable, for the assumptions underlying the DCE are presented in Attachment 2, Section 2.1.

2.4 Method of Financial Assurance for ISFSI Decommissioning (10 CFR 72.30(b)(4) and 72.30(e))

After the Energy Northwest ISFSI was originally built a cost estimate was developed based on the assumption that the decommissioning would start after the initial operating license ended in Fiscal Year 2023 and would continue for five years. Based on this cost estimate, Energy Northwest made an initial payment to the Trust and developed a schedule of annual payments through the end of decommissioning in Fiscal Year 2029. The schedule of annual payments includes assumptions for inflation and the estimated earnings of the Trust that would be reinvested.

Energy Northwest develops an Annual Budget, in which the annual payment to the ISFSI Decommissioning Trust is included. The Annual Budget funding is approved by Energy Northwest's Executive Board of Directors and funded by the sale of 100% of CGS's net electrical output to BPA. Pursuant to a contract between BPA and Washington Public Power Supply System (now operating as Energy Northwest) in 1970, and as indicated in Attachment 3, BPA is obligated to pay for Energy Northwest's operating and decommissioning costs of both CGS and its ISFSI in return for receiving 100% of CGS's net electrical output.

As changes to the ISFSI have occurred, the cost assumptions have been revisited to determine if changes to the cost estimate are required. If changes to the cost estimate are required the schedule of annual payments is modified accordingly. In addition, Energy Northwest revisits annually the inflation assumptions and the estimated earnings assumptions, which can result in an adjustment to the annual payment schedule.

In May of 2012, Energy Northwest received an extension of CGS's operating license through December 2043. Energy Northwest has revised the annual payment schedule for the additional twenty years of operation.

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2.5 Volume of Subsurface Material to be Remediated for Decommissioning (10 CFR 72.30(b)(5))

The volume of onsite subsurface material projected to contain residual radioactivity at the time of decommissioning of the ISFSI and that may require remediation to meet the criteria for license termination is estimated to be none. This position is based on information presented for Assumption 2.3.5 above. This position could change for future DCE submittals contingent on results of future radiological surveys and characterization.

2.6 Certification of Financial Assurance (10 CFR 72.30(b)(6))

As stated in Section 2.4 above, BPA is contractually obligated to pay for Energy Northwest's operating and decommissioning costs for CGS and its ISFSI. The annual payments received from BPA for the ISFSI decommissioning are placed in an irrevocable trust fund. As indicated in Attachment 3, BPA is obligated to pay for decommissioning of the CGS ISFSI.

3.0 References

3.1 Energy Northwest Independent Spent Fuel Storage Installation 10 CFR 72.212 Evaluation, Revision 7, pages 3-2 to 3-4.

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1.0 ISFSI Decommissioning Plan

The Nuclear Regulatory Commission (NRC) issued its Final Rule on Decommissioning Planning¹ on June 17, 2011, with the rule becoming effective on December 17, 2012. In accordance with the Final Rule, this attachment provides a detailed cost estimate for decommissioning the ISFSI at Columbia Generating Station (CGS) based on a Decommissioning Plan (DP) presented herein.

This section presents a summary of information requested in the Final Rule that affects 10 CFR 72.30(a).

Energy Northwest has recently received authorization from the NRC on its application to operate the Columbia Generating Station (CGS) for 20 additional years, which renews the operating license until December 2043. Decommissioning of the Independent Spent Fuel Storage Installation (ISFSI) site would not commence until some years after 2043. In the interim, Energy Northwest intends to operate the ISFSI facility in a way that minimizes the costs of decommissioning by promoting and implementing practices that minimize radioactive waste generation and prevent radiological material releases, control spread of contamination, and monitor the facility to detect and mitigate potential increases in residual radiological contamination resulting from operation of the facility. To that effect, and in conformance with the Decommissioning Final Rule modifications to 10 CFR 20.1406 and 20.1501, guidance presented in Draft Regulatory Guide DG-4014, Decommissioning Planning During Operations, will be followed as applicable to meet those goals.

This section summarizes the proposed practices and procedures for the decontamination of the ISFSI site and ancillary facilities and for disposal of residual radioactive materials above allowable limits after all spent fuel has been removed. This is to provide reasonable assurance that the decontamination and decommissioning of the ISFSI at the end of its useful life will provide adequate protection to the health and safety of the public. The plan also identifies and describes those design features of the ISFSI that facilitate its decontamination and decommissioning at the end of its useful life.

¹ U.S. Code of Federal Regulations, Title 10, Parts 20, 30, 40, 50, 70 and 72 "Decommissioning Planning," Nuclear Regulatory Commission, Federal Register Volume 76, Number 117 (p 35512 et seq.), June 17, 2011

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1.1 Spent Fuel Management Strategy

Approximately 124 spent fuel Multi-Purpose Canisters (MPCs) are currently projected to be generated as a result of plant operations through the license expiration date on December 20, 2043. The ISFSI facility is operated under a 10 CFR Part 50 General License. To facilitate immediate dismantling or safe-storage operations, the spent fuel that cannot be transferred directly to the US Department of Energy (DOE) from the spent fuel pool will be packaged in dry storage casks for interim storage at the ISFSI. Transferring the spent fuel from the spent fuel pool to the ISFSI will permit decontamination and dismantling of the spent fuel pool systems and fuel pool areas or result in reduced operating expenses should the station be placed into a SAFSTOR dormancy configuration.

Completion of the ISFSI decommissioning process is dependent upon the DOE's ability to remove spent fuel from the site. DOE's geologic repository program assumes that spent fuel allocations will be accepted for disposal from the nation's commercial nuclear plants, with limited exceptions, in the order (the "queue") in which it was discharged from the reactor.²

Energy Northwest's current spent fuel management plan for CGS spent fuel is based in general upon: 1) a start date for DOE initiating transfer of commercial spent fuel to a federal facility such that all CGS spent fuel can be removed from the CGS ISFSI within a reasonable timeframe prior to initiation of decommissioning activities; and 2) completion of spent fuel receipt by DOE by 2049 allowing for time beyond the end of plant operations to load MPCs with the remaining fuel in the reactor and the spent fuel pool, and for a three to five year cooling period on site for the last fuel removed from the reactor. Decommissioning activities are also anticipated to be completed in 2049. The completion date is based upon the DOE's generator allocation/receipt schedules which are based upon the oldest fuel receiving the highest priority. The end date assumes a maximum rate of transfer of 3,000 metric tons of uranium/year.³

² U.S. Code of Federal Regulations, Title 10, Part 961.11, Article IV – Responsibilities of the Parties, B. DOE Responsibilities, 5.(a) ... DOE shall issue an annual acceptance priority ranking for receipt of SNF and/or HLW at the DOE repository. This priority ranking shall be based on the age of SNF and/or HLW as calculated from the date of discharge of such materials from the civilian nuclear power reactor. The oldest fuel or waste will have the highest priority for acceptance, except as ..."

³ "Acceptance Priority Ranking & Annual Capacity Report," DOE/RW-0567, July 2004.

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1.2 ISFSI Decommissioning Strategy

At the conclusion of the spent fuel transfer process it is anticipated the ISFSI will be promptly decommissioned (similar to the power reactor DECON alternative) by removing and disposing of residual radioactivity and verifying that remaining materials satisfy NRC release criteria.

For purposes of providing an estimate for a funding plan, financial assurance is expected to be provided on the basis of a prompt ISFSI decommissioning scenario. In this estimate the ISFSI decommissioning is considered an independent project regardless of the decommissioning alternative identified for the nuclear power plant.

1.3 ISFSI Description

The CGS ISFSI uses a Holtec International (Holtec) HI-STORM 100 dry storage system. The HI-STORM 100 is comprised of an MPC and a storage overpack. The MPCs are assumed to be transferred directly to the DOE and not returned to the ISFSI or CGS. For purposes of the estimate, it is assumed that the last twelve (12) storage overpacks will contain residual radioactivity above release limits. The remaining storage overpacks are assumed not to have residual radioactivity after removal of the steel liners and other decontamination efforts. The cost to dispose of residual radioactivity, and the verification that the remaining facility and surrounding environs meet the NRC's radiological limits established for unrestricted use, form the basis of the ISFSI decommissioning estimate.

Energy Northwest's current spent fuel management plan for the CGS spent fuel would result in 124 spent fuel MPCs (nominal 68 BWR fuel assemblies per MPC), contained in storage overpacks, being placed on storage pads at the site after all spent fuel has been removed from the spent fuel pool and the reactor. This represents approximately 100% of the total spent fuel projected to be generated during the currently licensed operating period.

In addition to the spent fuel storage overpacks located on the ISFSI pads after cessation of CGS operations there are projected to be additional storage overpacks that will be used for Greater-than-Class-C (GTCC) waste container storage. The storage overpacks used for the GTCC canisters are not expected to have any interior contamination or residual activation and can be reused or disposed of by conventional means after a final status survey.

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1.4 Decommissioning Planning During Operations – Support Programs

Energy Northwest has implemented environmental and radiological monitoring programs and processes as a result of its operating license for CGS, its general license for the ISFSI, and in compliance with requirements in 10 CFR Parts 50 and 72 that suffice to comply, during operations, with revised requirements in 10 CFR 20.1406(c) and 10 CFR 20.1501(a) and (b). This section summarizes the programs and processes that Energy Northwest has in place for the ISFSI facility to:

- Minimize residual radioactivity;
- Implement radiation protection and As Low As Reasonably Achievable (ALARA) principles; and
- Radiological monitoring that meets the intent of guidance in NEI 07-07, *Industry Ground Water Protection Initiative – Final Guidance Document*.

The design features of the HI-STORM 100 System are such that all radioactive material will be contained within the MPC throughout the lifetime of the ISFSI. No releases of radioactive particulate, or of gaseous or liquid effluents are expected under credible conditions, and there are no radioactive waste treatment systems within the ISFSI; therefore, radiological environmental monitoring of the ISFSI is sufficiently limited to direct radiation monitoring by environmental thermo-luminescent dosimeters to satisfy 10 CFR 72.44(d)(2) environmental monitoring requirements for the ISFSI. The radiological environmental monitoring results are reported in the CGS Annual Radiological Environmental Operating Report to meet 10 CFR 72.44(d)(3) requirements.

The ISFSI is maintained as a Radiological Controlled Area (RCA) under the auspices of the CGS 10 CFR Part 20 Radiation Protection Program (RPP). Through the application of RPP contamination control practices and procedures, and surveillance requirements for MPC transport operations, no loose surface contamination of the ISFSI structures or subsurface contamination of the ISFSI site are expected. Nevertheless, as part of its routine radiological surveys of RCAs and the CGS site, the Energy Northwest RPP collects radiological data for structures and the ISFSI pads to eventually demonstrate that there is no loose surface or subsurface residual radioactivity that exceeds action limits or regulatory limits for unrestricted release of the ISFSI area.

2.0 ISFSI Decommissioning Cost Estimate (10 CFR 72.30(b)(2)(i) through (iii), 10 CFR 72.30(b)(3), and 10 CFR 72.30(b)(5))

The detailed cost estimate for decommissioning the ISFSI at CGS reflects the following general premises:

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1. The work is performed by an independent contractor; and
2. Release of the facility and dry storage systems is for unrestricted use, as specified in 10 CFR 20.1402.

2.1 Key Assumptions and Cost Estimating Approach

This section presents a summary of information required by 10 CFR 72.30(b)(3).

The ISFSI decommissioning estimate is based on the configuration of the ISFSI expected after all spent fuel and GTCC material has been removed from the site. The configuration of the ISFSI is based on CGS operating until the end of its current license, December 20, 2043, and the assumptions associated with DOE's spent fuel acceptance, as described in Section 1.1.

The nominal size of the ISFSI pads (existing and future pads combined) is sufficient to store the projected amount of spent fuel. The approximate dimensions for the existing and future pads are provided in Table 1.

The ISFSI pads have a concrete thickness of 2 feet throughout, and are built on engineered subgrade of compacted soils and imported materials to a depth of 4 feet below the pads (Reference 3.1).

The characteristics of the MPC storage overpacks (HI-STORM 100 system) are listed in Table 2.

It is not expected that the overpacks will have any removable radioactive surface contamination. This assumption would be confirmed through normal RPP practices and procedures of surveying potentially impacted areas after each spent fuel transfer campaign and prior to decommissioning. Any residual radioactivity of the storage overpacks above the unrestricted release limit is expected to be due solely to neutron activation of the steel and concrete.

The decommissioning estimate is based on the premise that some of the inner steel-liners of the concrete overpacks will contain low levels of neutron-induced residual radioactivity that would necessitate remediation at the time of decommissioning. As an allowance, 12 of the 124 overpack liners are assumed to contain residual radioactivity. The allowance quantity is based upon the number of casks required for the final core off-load (i.e., 764 offloaded assemblies, 68 assemblies per cask) that results in 12 overpacks. It is assumed that these are the final casks offloaded; consequently they have the least time for radioactive decay of the neutron activation products.

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It is assumed for this analysis that the ISFSI pads will not contain any residual radioactivity. This assumption would be confirmed through normal RPP practices of surveying potentially impacted areas after each spent fuel transfer campaign and prior to decommissioning. As such, only verification surveys are included for the pads in the decommissioning estimate.

The subsurface material of the ISFSI site is not expected to contain any residual radioactivity above the unrestricted release limit that will require remediation to meet the criteria for license termination.

To support an application for License Termination, the estimate assumes that a Final Status Survey will be performed; this will include a 100% survey of the concrete overpack surfaces, a significant fraction of the ISFSI pad, and the immediate area surrounding the pad.

Decommissioning is assumed to be performed by an independent contractor. Labor, equipment, and material costs are based on national averages, i.e., costs from national publications such as R.S. Means' Building Construction Cost Data (adjusted for regional variations), and laboratory service costs are based on vendor price lists. The craft labor positions are expected to be provided locally. Energy Northwest, as licensee, will oversee the site activities; the estimate includes Energy Northwest's labor and overhead costs.

Low-level radioactive waste packaging, transport and disposal costs are based on Energy Northwest's current cost of disposal at the US Ecology Washington Low-Level Radioactive Waste site.

Costs are reported in 2012 dollars.

2.2 Contingency

This section presents a summary of information required by 10 CFR 72.30(b)(2)(ii).

Contingency has been added at an overall rate of 25%. This is consistent with the contingency evaluation criteria referenced in NUREG-1757 (Reference 3.2).

2.3 Decommissioning Cost Estimate

This section presents a summary of information required by 10 CFR 72.30(b)(2) and (b)(5).

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The estimate is limited to costs necessary to terminate the ISFSI license and meet the 10 CFR 20.1402 criteria for unrestricted use.

Tables 2 and 3 provide the significant quantities and physical dimensions used as the basis in developing the ISFSI decommissioning cost estimate.

The estimated cost to decommission the CGS ISFSI and release the facility for unrestricted use is provided in Table 4. The cost has been organized into three phases, including:

- An initial planning phase – empty storage overpacks are characterized and the specifications and work procedures for the decontamination (i.e., inner steel liner removal) developed.
- The remediation phase – residual radioactivity is removed, packaged in certified waste containers, transported to the low-level waste site, and disposed of at low-level waste site.
- The final phase – license termination surveys are performed, independent surveys are completed, and an application for license termination submitted.

In addition to the direct costs associated with a contractor providing the decommissioning services, the estimate also contains NRC billing costs, Energy Northwest's oversight staff, site security (industrial), and other site operating costs.

For estimating purposes it is conservatively assumed that all expenditures will be incurred in year 2049, five years following all spent fuel removal from CGS.

3.0 References

3.1 Energy Northwest Independent Spent Fuel Storage Installation 10 CFR 72.212 Evaluation, Revision 7.

3.2 US NRC, "Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. Nuclear Regulatory Commission's Office of Nuclear Material Safety and Safeguards, NUREG-1757, Volume 3, Revision 1, September 2003.

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Table 1

Significant Quantities and Physical Dimensions – ISFSI Pads

Item	Length (ft)	Width (ft)	Thickness (ft)	Volume (ft³)
ISFSI Pad 1	147.0	30	2.0	8,820
ISFSI Pad 2	147.0	30	2.0	8,820
ISFSI Pad 3	261.3	30	2.0	15,678
ISFSI Pad 4	261.3	30	2.0	15,678
ISFSI Pad 5	261.3	30	2.0	15,678

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Table 2

Significant Quantities and Physical Dimensions – ISFSI Overpacks

Item	Quantity	Height (ft)	Outside Diameter (ft)	Inside Diameter (ft)	Volume (ft³)
HI-STORM Lid	124	1.7	10.5	NA	18,566.4
HI-STORM Body without Pedestal	124	18.5	11.0	5.8	159,225.5
HI-STORM Pedestal	124	1.4	5.7	NA	4,495.7
HI-STORM Inside Empty Volume	124	18.5	NA	5.8	60,435.3

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Table 3

**Significant Quantities and Physical Dimensions – Other Potentially Impacted
Items**

Item	Quantity	Notes
Overpacks used for GTCC waste container storage	3	No residual radioactivity
Total Surface Area of Overpack Inner Steel Liner (1.25-inch thickness) with Residual Radioactivity (square feet)	4,089	Equivalent to the liner surface area for the 12 overpacks used to store last complete core offloads
Low-Level Radioactive Waste (cubic feet)	2,521	None
Low-Level Radioactive Waste (packaged density) (lbs/cubic foot)	83	Average weight density

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Table 4

ISFSI Decommissioning Costs and Waste Volumes

Cost Item Description	Cost Item Component (thousands, 2012 dollars)						Waste Volume (ft3)	Labor Person-Hours		
	Removal	Packaging	Transport	Disposal	Other	Total		Contractor	Licensee	NRC/ NRC Contractor
Decommissioning Contractor										
Planning (characterization, specifications, and procedures)	-	-	-	-	370	370	-	1,216	-	-
Remediation (activated liner disposal)	204	10	8	673	53	949	2,521	714	-	-
License Termination (radiological surveys)	-	-	-	-	1,311	1,311	-	11,354	-	-
Subtotal	204	10	8	673	1,734	2,629	2,521	13,284	-	-

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Table 4 (Continued)

ISFSI Decommissioning Costs and Waste Volumes

Cost Item Description	Cost Item Component (thousands, 2012 dollars)						Waste Volume	Labor Person-Hours		
Supporting Costs										
NRC and NRC Contractor Fees and Costs	-	-	-	-	183	183	-	-	-	776
Insurance	-	-	-	-	169	169	-	-	-	-
Security (industrial)	-	-	-	-	282	282	-	6,239	-	-
Energy Northwest Oversight Staff	-	-	-	-	407	407	-	-	4,733	-
Subtotal	-	-	-	-	1,041	1,041	-	6,239	4,733	776
Total (without contingency)	204	10	8	673	2,775	3,671	2,521	19,522	4,733	776
Total (with 25% contingency)	255	13	10	841	3,469	4,588				

Attachment 3
Decommissioning Funding Letter



Department of Energy

Bonneville Power Administration
Mail Drop 1399
P.O. Box 968
Richland, Washington 99352-0968

POWER BUSINESS LINE

December 6, 2012

In reply refer to: PGC/Richland

Mr. Mark Reddemann, Chief Executive Officer
Energy Northwest M/D 1023
P.O. Box 968
Richland, WA 99352-0968

Dear Mr. Reddemann:

The Bonneville Power Administration (BPA) entered into a contract in 1970 with the Energy Northwest then known as the Washington Public Power Supply System regarding Columbia Generating Station (CGS). Under this contract, BPA provides the funding for CGS's costs and in turn receives 100 percent share of its power. This contract remains in place until its termination at the end of all decommissioning activities. BPA has a commitment to pay any decommissioning costs attributable to Energy Northwest for both the CGS Nuclear Plant and its Independent Spent Fuel Storage Installation (ISFSI). The CGS costs including contributions into the trust funds for decommissioning of the plant and ISFSI are included in BPA's costs which are required by law to be recovered by BPA from its ratepayers.

If you have any questions concerning this correspondence, please contact Dana Sandlin at (509) 372-5756.

Sincerely,

A handwritten signature in black ink that reads "Andrew J. Rapacz". The signature is written in a cursive, flowing style.

Andrew J. Rapacz, Manager
Contract Generating Resources

cc:

Mr. Brad Sawatzke, Energy Northwest - PE08
Mr. Robert Dutton, Energy Northwest - PE13
Mr. Donald Gregoire, Energy Northwest -PE20