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LIC-13-0024
March 6, 2013

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

Reference: Docket No. 50-285

SUBJECT: Omaha Public Power District (OPPD) Nuclear Decommissioning Funding Plan for the Fort Calhoun Station Independent Spent Fuel Storage Installation (ISFSI)

In accordance with 10 CFR 72.30, "Financial assurance and recordkeeping for decommissioning," OPPD hereby submits the Nuclear Decommissioning Funding Plan (DFP) for the Fort Calhoun Station (FCS) ISFSI.

The Final Rule requiring submittal of the DFP was effective on December 17, 2012. The failure to submit the DFP by the effective date is documented in the FCS Corrective Action Program and the reporting requirement is tracked in the FCS Commitment Tracking System.

No regulatory commitments are contained in this submittal.

If you should have any questions regarding this submittal, please contact Mr. Bill R. Hansher at (402) 533-6894.

Sincerely,

Louis P. Cortopassi
Site Vice President and CNO

LPC/mle

Enclosure: Omaha Public Power District Nuclear Decommissioning Funding Plan for the Fort Calhoun Station Independent Spent Fuel Storage Installation (ISFSI)

E. E. Collins, Jr., NRC Regional Administrator, Region IV
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N 145524

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Enclosure

**Omaha Public Power District Nuclear Decommissioning Funding Plan for the Fort
Calhoun Station Independent Spent Fuel Storage Installation (ISFSI)**

Omaha Public Power District Nuclear Decommissioning Funding Plan for the Fort Calhoun Station Independent Spent Fuel Storage Installation (ISFSI)

The U.S. Nuclear Regulatory Commission (NRC) published the Decommissioning Planning final rule in the Federal Register on June 17, 2011 (76 FR 35512) which adds reporting requirements for a Decommissioning Fund Plan (DFP) for holders and applicants of both general and specific licenses under 10 CFR part 72. This rule was effective December 17, 2012. Omaha Public Power District (OPPD) provides the following information required by 10 CFR 72.30(b) to be included in the DFP:

Requirement 1:

- (1) Information on how reasonable assurance will be provided that funds will be available to decommission the ISFSI or MRS.

Information for Requirement 1:

Pursuant to 10 CFR 72.30(e)(5), since OPPD is a power reactor licensee under 10 CFR 50, OPPD utilizes the method of 10 CFR 50.75(b) and (e) to provide financial assurance for decommissioning the Fort Calhoun Station (external sinking fund).

Requirement 2:

- (2) A detailed cost estimate for decommissioning, in an amount reflecting:
- (i) The cost of an independent contractor to perform all decommissioning activities;
 - (ii) An adequate contingency factor; and
 - (iii) The cost of meeting the § 20.1402 of this chapter criteria for unrestricted use, provided that, if the applicant or licensee can demonstrate its ability to meet the provisions of § 20.1403 of the chapter, the cost estimate may be based on meeting the § 20.1403 criteria.

Information for Requirement 2:

OPPD maintains a decommissioning cost estimate (DCE) for the Fort Calhoun Station, which is updated annually. Embedded in the DCE maintained by OPPD, are the costs associated with decommissioning the ISFSI located at the site. The information below, extracted from the TLG Services, Inc. decommissioning estimate for Fort Calhoun Station, details the costs of ISFSI decommissioning in 2012 dollars.

TLG Services, Inc. - Decommissioning Cost Estimate for the Fort Calhoun Station

(thousands of 2012 dollars)

Activity Index	Activity	Decon Cost	Removal Cost	Packaging Cost	Transport Cost	Off-Site Processing Cost	LLRW Disposal Cost	Other Costs	Total Contingency	Total Costs
3e.2.1	ISFSI License Termination							\$4,675		\$4,675
3e.4.4	NRC ISFSI Fees							85	8	93
3e.4.5	ISFSI Operating Costs							1,970		1,970
									Total	\$6,738

Requirement 3:

- (3) Identification of and justification for using the key assumptions contained in the DCE.

Information for Requirement 3:

The ISFSI decommissioning costs were extracted from the TLG Services, Inc. Decommissioning Cost Estimate update for the Fort Calhoun Station, prepared July 31, 2008 and escalated to 2012 dollars using a 3% escalation rate. The 3% escalation rate is the average of the annual escalation rates of the decommissioning cost estimate since the last TLG Services update.

Requirement 4:

- (4) A description of the method of assuring funds for decommissioning from paragraph (e) of this section, including means for adjusting cost estimates and associated funding levels periodically over the life of the facility.

Information for Requirement 4:

As indicated in the information for Requirement 1, OPPD utilizes the method of 10 CFR 50.75(b) and (e) to provide financial assurance for decommissioning the Fort Calhoun Station. OPPD adjusts the amount of financial assurance required by 10 CFR 50.75(b) annually in accordance with paragraph (2) of that section, and further adjustment is required by 10 CFR 50.75(f) every two years and annually at five years prior to the end of the plant's licensed life.

As of December 31, 2012, the trust fund assets were \$349.7 million. Pursuant to 10 CFR 50.75(c), the December 2012 estimated NRC minimum decommissioning amount to decommission Fort Calhoun Station Unit No. 1 is \$437.8 million and the 72.30 ISFSI decommissioning cost is \$6.7 million.

Requirement 5:

- (5) The volume of onsite subsurface material containing residual radioactivity that will require remediation to meet the criteria for license termination.

Information for Requirement 5:

There is no known subsurface material containing residual radioactivity in the proximity of the ISFSI that will require remediation to meet the criteria for license termination.

Requirement 6:

- (6) A certification that financial assurance for decommissioning has been provided in the amount of the cost estimate for decommissioning.

Information for Requirement 6:

In accordance with 10 CFR 72.30(b), financial assurance, for decommissioning, has been provided in an amount that meets or exceeds the requirements of 10 CFR 50.75(b). As demonstrated in Requirement 4, this provides the requisite financial assurance for the ISFSI decommissioning cost.

Dated: 2-15-13



J. W. Thurber
Division Manager - Finance