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2011 Decommissioning Cost Analysis for the Callaway Energy Center

# $\begin{tabular}{ll} \textbf{DECOMMISSIONING COST ANALYSIS} \\ & \textbf{for the} \\ \end{tabular}$

# CALLAWAY ENERGY CENTER



prepared for

Ameren Missouri

prepared by

TLG Services, Inc. Bridgewater, Connecticut

August 2011

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# TABLE OF CONTENTS

<u>SE</u>	SECTION		PAGE		
	EXI	ECUTI	VE SUMMARY	vii-xvi	
1. IN'		RODU	JCTION	1-1	
	1.1		etives of Study		
	1.2	Site I	Description	1-1	
	1.3	Regu	latory Guidance	1-2	
		1.3.1	Nuclear Waste Policy Act	1-4	
		1.3.2	Low-Level Radioactive Waste Acts	1-5	
		1.3.3	Radiological Criteria for License Termination	1-7	
2.	DE	COMM	IISSIONING ALTERNATIVES	2-1	
	2.1	DEC	ON	2-1	
		2.1.1	Period 1 - Preparations	2-2	
		2.1.2	Period 2 - Decommissioning Operations		
	2.1.3 Period 3 - Site Restoration				
	2.2	2-8			
		2.2.1	Period 1 - Preparations	2-8	
		2.2.2	Period 2 - Dormancy	2-9	
		2.2.3	Periods 3 and 4 - Delayed Decommissioning	2-10	
		2.2.4	Period 5 - Site Restoration	2-11	
3.	COS	ST EST	ГІМАТЕ	3-1	
	3.1	Basis	s of Estimate	3-1	
	3.2	3-1			
	3.3 Financial Components of the Cost Model		3-3		
		3.3.1	Contingency	3-3	
		3.3.2	Financial Risk	3-5	
	3.4	Site-S	Specific Considerations	3-6	
		3.4.1	Spent Fuel Management		
		3.4.2	Reactor Vessel and Internal Components	3-7	
		3.4.3	Primary System Components	3-8	
		3.4.4	Retired Components	3-10	
		3.4.5	Main Turbine and Condenser	3-10	
		3.4.6	Transportation Methods		
		3.4.7	Low-Level Radioactive Waste Disposal	3-11	
		3.4.8	Site Conditions Following Decommissioning	3-12	

# TABLE OF CONTENTS

(continued)

<u>SEC</u>	<u>PAGI</u>
	3.5       Assumptions       3-1         3.5.1       Estimating Basis       3-1         3.5.2       Labor Costs       3-1         3.5.3       Design Conditions       3-1         3.5.4       General       3-1         3.6       Cost Estimate Summary       3-1
4.	SCHEDULE ESTIMATE
5.	RADIOACTIVE WASTES5-
6.	RESULTS6-
7.	REFERENCES
	TABLES
3.1 3.1a 3.1b 3.1c 3.2 3.2a 3.2b 3.2c	DECON Alternative, Schedule of Spent Fuel Management Expenditures. 3-20 DECON Alternative, Schedule of Site Restoration Expenditures

# TABLE OF CONTENTS

(continued)

SEC	<u>CTION</u>	<u>PAGE</u>
	TABLES	
5.1	DECON Alternative, Decommissioning Waste Summary	
5.2	SAFSTOR Alternative, Decommissioning Waste Summary	
6.1	DECON Alternative, Decommissioning Cost Elements	
6.2	SAFSTOR Alternative, Decommissioning Cost Elements	6-5
	FIGURES	
4.1	Activity Schedule	4-3
4.2	Decommissioning Timelines	
	APPENDICES	
A.	Unit Cost Factor Development	A-1
В.	Unit Cost Factor Listing	B-1
C.	Detailed Cost Analysis, DECON	
D.	Detailed Cost Analysis, SAFSTOR	D-1

# **REVISION LOG**

No.	CRA No.	Date	Item Revised	Reason for Revision
0		08-30-11		Original Issue

# **EXECUTIVE SUMMARY**

This report presents estimates of the cost to decommission the Callaway Energy Center (Callaway) for the selected decommissioning scenarios following the scheduled cessation of plant operations. The analysis relies upon site-specific, technical information from an evaluation prepared in 2008,<sup>[1]</sup> updated to reflect current assumptions pertaining to the disposition of the nuclear unit and relevant industry experience in undertaking such projects. The current estimates are designed to provide Ameren Missouri with sufficient information to assess its financial obligations, as they pertain to the eventual decommissioning of the nuclear unit. It is not a detailed engineering study, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning.

The currently projected cost to decommission the station, assuming the DECON alternative, is estimated at \$754.5 million, as reported in 2011 dollars. An estimate for the SAFSTOR alternative is also provided.

The estimates are based on numerous fundamental assumptions that consider current regulations, low-level radioactive waste disposal options, spent fuel management requirements, site restoration practices, and project contingencies. The estimates incorporate a minimum cooling period of approximately five and one-half years for the spent fuel that resides in the storage pool when operations cease. During this period, it is assumed the spent fuel will be transferred to an Independent Spent Fuel Storage Installation (ISFSI) located on the Callaway site.

# <u>Alternatives</u> and Regulations

The ultimate objective of the decommissioning process is to reduce the inventory of contaminated and activated material so that the license can be terminated. The Nuclear Regulatory Commission (NRC or Commission) provided initial decommissioning requirements in its rule adopted on June 27, 1988. [2] In this rule, the NRC set forth financial criteria for decommissioning licensed nuclear power facilities. The regulations addressed planning needs, timing, funding methods, and environmental review requirements for decommissioning. The rule also defined three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB.

<sup>&</sup>quot;Decommissioning Cost Analysis for the Callaway Plant," Document No. A22-1599-002, Rev. 0, TLG Services, Inc., August 2008

U.S. Code of Federal Regulations, Title 10, Parts 30, 40, 50, 51, 70 and 72 "General Requirements for Decommissioning Nuclear Facilities," Nuclear Regulatory Commission, Federal Register Volume 53, Number 123 (p 24018 et seq.), June 27, 1988

<u>DECON</u> is defined as "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations."[3]

<u>SAFSTOR</u> is defined as "the alternative in which the nuclear facility is placed and maintained in a condition that allows the nuclear facility to be safely stored and subsequently decontaminated (deferred decontamination) to levels that permit release for unrestricted use."<sup>[4]</sup> Decommissioning is to be completed within 60 years, although longer time periods will be considered when necessary to protect public health and safety.

<u>ENTOMB</u> is defined as "the alternative in which radioactive contaminants are encased in a structurally long-lived material, such as concrete; the entombed structure is appropriately maintained and continued surveillance is carried out until the radioactive material decays to a level permitting unrestricted release of the property."<sup>[5]</sup> As with the SAFSTOR alternative, decommissioning is currently required to be completed within 60 years.

The 60-year restriction has limited the practicality for the ENTOMB alternative at commercial reactors that generate significant amounts of long-lived radioactive material. In 1997, the Commission directed its staff to re-evaluate this alternative and identify the technical requirements and regulatory actions that would be necessary for entombment to become a viable option. The resulting evaluation provided several recommendations; however, rulemaking has been deferred pending the completion of additional research studies, for example, on engineered barriers.

In 1996, the NRC published revisions to the general requirements for decommissioning nuclear power plants to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process.<sup>[6]</sup> The amendments allow for greater public participation

<sup>&</sup>lt;sup>3</sup> Ibid. Page FR24022, Column 3

<sup>&</sup>lt;sup>4</sup> Ibid.

<sup>&</sup>lt;sup>5</sup> <u>Ibid</u>. Page FR24023, Column 2

<sup>6</sup> U.S. Code of Federal Regulations, Title 10, Parts 2, 50, and 51, "Decommissioning of Nuclear Power Reactors," Nuclear Regulatory Commission, Federal Register Volume 61, (p 39278 et seq.), July 29, 1996

and better define the transition process from operations to decommissioning. Regulatory Guide 1.184,<sup>[7]</sup> issued in July 2000, further described the methods and procedures acceptable to the NRC staff for implementing the requirements of the 1996 revised rule relating to the initial activities and major phases of the decommissioning process. The costs and schedules presented in this analysis follow the general guidance and processes described in the amended regulations. The format and content of the estimates is also consistent with the recommendations of Regulatory Guide 1.202,<sup>[8]</sup> issued in February 2005.

# Methodology

The methodology used to develop the estimates described within this document follows the basic approach originally presented in the cost estimating guidelines<sup>[9]</sup> developed by the Atomic Industrial Forum (now Nuclear Energy Institute). This reference describes a unit factor method for determining decommissioning activity costs. The unit factors used in this analysis incorporate site-specific costs and the latest available information on worker productivity in decommissioning.

An activity duration critical path is used to determine the total decommissioning program schedule. The schedule is relied upon in calculating the carrying costs, which include program management, administration, field engineering, equipment rental, and support services, such as quality control and security.

# Contingency

Consistent with cost estimating practice, contingencies are applied to the decontamination and dismantling costs developed as "specific provision for unforeseeable elements of cost within the defined project scope, particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur." [10] The cost elements in the estimates are based on ideal conditions; therefore, the types of unforeseeable events that are almost certain to occur in decommissioning, based on industry experience, are addressed through a percentage contingency applied on a line-item basis. This contingency factor is a nearly universal element in all large-scale construction and demolition projects. It should be noted that contingency, as used in

Oecommissioning of Nuclear Power Reactors," Regulatory Guide 1.184, Nuclear Regulatory Commission, July 2000

<sup>\*</sup>Standard Format and Content of Decommissioning Cost Estimates of Decommissioning Cost Estimates for Nuclear Power Reactors," Regulatory Guide 1.202, U.S. Nuclear Regulatory Commission, February 2005

T.S. LaGuardia et al., "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986

Project and Cost Engineers' Handbook, Second Edition, American Association of Cost Engineers, Marcel Dekker, Inc., New York, New York, p. 239

this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station.

Contingency funds are expected to be fully expended throughout the program. As such, inclusion of contingency is necessary to provide assurance that sufficient funding will be available to accomplish the intended tasks.

# Low-Level Radioactive Waste Disposal

The contaminated and activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,<sup>[11]</sup> and its Amendments of 1985,<sup>[12]</sup> the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders. With the exception of Texas (which has issued a license to Waste Control Specialists for the construction of a new facility in Andrews, Texas), no new compact facilities have been successfully sited, licensed, and constructed.

The disposal facility in Barnwell, South Carolina is currently closed to generators outside the Atlantic Compact (comprising the states of Connecticut, New Jersey and South Carolina). The commercial disposal facility on the Hanford Nuclear Reservation near Richland, Washington accepts low-level radioactive waste from the Northwest (Alaska, Hawaii, Idaho, Montana, Oregon, Utah, Washington and Wyoming) and Rocky Mountain (Colorado, Nevada, and New Mexico) Compact states. This leaves Energy Solutions' disposal facility in Clive, Utah as the only available option for the disposal of the majority of the low-level radioactive waste generated in decommissioning.

For the purpose of this analysis, Ameren Missouri's Utilities Service Alliance agreement with EnergySolutions is used as the basis for estimating the disposal cost for the majority of the radioactive waste (Class A [13]). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Classes B and C), for example, generated in the dismantling of the reactor vessel. As a proxy, the disposal cost for this material is based upon the last published rate schedule for non-compact waste for the Barnwell facility.

The dismantling of the components residing closest to the reactor core generates radioactive waste considered unsuitable for shallow-land disposal (i.e., low-level

<sup>&</sup>lt;sup>11</sup> "Low-Level Radioactive Waste Policy Act of 1980," Public Law 96-573, 1980

<sup>&</sup>lt;sup>12</sup> "Low-Level Radioactive Waste Policy Amendments Act of 1985," Public Law 99-240, 1986

U.S. Code of Federal Regulations, Title 10, Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"

radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste (Greater-than-Class C or GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this study, GTCC is packaged in the same canisters used for spent fuel. The GTCC material is assumed to be stored at the ISFSI along with the spent fuel in the DECON scenario. It is shipped directly to a DOE facility as it is generated in the SAFSTOR scenario since it is assumed that the transfer of the spent fuel has been completed prior to the start of the deferred decontamination and dismantling activities.

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive materials. This waste can be analyzed on site or shipped off site to licensed facilities for further analysis, for processing and/or for conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for Callaway reflect the savings from waste recovery/volume reduction.

# High-Level Radioactive Waste Management

Congress passed the "Nuclear Waste Policy Act"<sup>[14]</sup> (NWPA) in 1982, assigning the federal government's long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the DOE. The NWPA provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities' spent fuel and high-level radioactive waste and utilities would pay the cost of the disposition services for that material. NWPA, along with the individual contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept any spent fuel or high level waste, as required by the NWPA and utility contracts. Delays continue and, as a

<sup>&</sup>quot;Nuclear Waste Policy Act of 1982 and Amendments," DOE's Office of Civilian Radioactive Management, 1982

result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE's breach of contract.

In June 2011, Ameren Missouri and the DOE reached an agreement on a settlement. The terms include payment to Ameren Missouri for spent fuel storage and related costs through 2010, and thereafter, annual payment of such costs after they are incurred.

At shutdown, the spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final reactor core. Over the following five and one-half years the assemblies are packaged into multipurpose canisters for transfer to the ISFSI. It is assumed that this period provides the necessary cooling for the final core to meet the dry storage system's requirements for decay heat.

The NRC requires that licensees establish a program to manage and provide funding for the management of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).<sup>[15]</sup> The post-shutdown costs incurred to satisfy this requirement include the isolation and continued operation of the spent fuel pool and the ISFSI during the five and one-half years following the cessation of plant operations.

Costs are also included within the decommissioning estimates for offloading the pool. Cost for the dry storage system, ISFSI construction and/or expansion, and ISFSI operations until such time that the transfer of fuel to the DOE can be completed, are expected to be fully reimbursable and therefore not addressed in this study. The eventual decommissioning of the ISFSI is also not included.

Relocation of the spent fuel from the pool to the ISFSI will allow Ameren Missouri to proceed with decommissioning (or safe-storage preparations) in the shortest time possible.

#### Site Restoration

Prompt dismantling of site structures (once the facilities are decontaminated) is clearly the most appropriate and cost-effective option. It is unreasonable to anticipate that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient than if the process is deferred. Site facilities quickly degrade without maintenance, adding additional expense and

U.S. Code of Federal Regulations, Title 10, Part 50, "Domestic Licensing of Production and Utilization Facilities," Subpart 54 (bb), "Conditions of Licenses"

creating potential hazards to the public and the demolition work force. Consequently, this study assumes that site structures are removed to a nominal depth of three feet below the local grade level wherever possible. The site is then to be graded and stabilized.

# Summary

The costs to decommission Callaway assume the removal of all contaminated and activated plant components and structural materials such that the owner may then have unrestricted use of the site with no further requirements for an operating license. Low-level radioactive waste, other than GTCC waste, is sent to a commercial processor for treatment/conditioning or to a controlled disposal facility.

Decommissioning is accomplished within the 60-year period required by current NRC regulations. Regardless of the timing of the decommissioning activities, the estimates assume the eventual removal of all the contaminated and activated plant components and structural materials, such that the facility operator may then have unrestricted use of the site with no further requirement for an operating license.

The decommissioning scenarios are described in Section 2. The assumptions are presented in Section 3, along with schedules of annual expenditures. The major cost contributors are identified in Section 6, with detailed activity costs, waste volumes, and associated manpower requirements delineated in Appendices C and D. The major cost components are also identified in the cost summary provided at the end of this section.

The cost elements in the estimates are assigned to one of three subcategories: NRC License Termination, Spent Fuel Management, and Site Restoration. The subcategory "NRC License Termination" is used to accumulate costs that are consistent with "decommissioning" as defined by the NRC in its financial assurance regulations (i.e., 10 CFR Part 50.75). The cost reported for this subcategory is generally sufficient to terminate the unit's operating license, recognizing that there may be some additional cost impact from spent fuel management.

The "Spent Fuel Management" subcategory contains costs associated with the transfer of the spent fuel to the ISFSI as well as the operation of the spent fuel pool until such time that the transfer is complete.

"Site Restoration" is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and backfilled to conform to local grade.

It should be noted that the costs assigned to these subcategories are allocations. Delegation of cost elements is for the purposes of comparison (e.g., with NRC financial guidelines) or to permit specific financial treatment (e.g., Asset Retirement Obligation determinations). In reality, there can be considerable interaction between the activities in the three subcategories. For example, an owner may decide to remove noncontaminated structures early in the project to improve access to highly contaminated facilities or plant components. In these instances, the non-contaminated removal costs could be reassigned from Site Restoration to an NRC License Termination support activity. However, in general, the allocations represent a reasonable accounting of those costs that can be expected to be incurred for the specific subcomponents of the total estimated program cost, if executed as described.

As noted within this document, the estimates were developed and costs are presented in 2011 dollars. As such, the estimates do not reflect the escalation of costs (due to inflationary and market forces) over the remaining operating life of the reactor or during the decommissioning period.

# DECON COST SUMMARY DECOMMISSIONING COST ELEMENTS

(thousands of 2011 dollars)

Cost Element	Cost
Decontamination	18,215
Removal	161,612
Packaging	24,658
Transportation	13,787
Waste Disposal	65,642
Off-site Waste Processing	25,465
Program Management [1]	272,613
Security	44,414
Corporate Allocations	40,691
Spent Fuel Pool Isolation	11,822
Spent Fuel Management - Direct Costs [2]	33,726
Insurance and Regulatory Fees	11,565
Energy	4,901
Characterization and Licensing Surveys	15,843
Property Taxes	2,595
Miscellaneous Equipment	6,948
Total [3]	754,498

Cost Element	Cost
License Termination	617,324
Spent Fuel Management	33,726
Site Restoration	103,448
Total [3]	754,498

<sup>[1]</sup> Includes engineering costs

Direct costs only. Excludes program management costs (staffing) but includes costs for spent fuel loading/ spent fuel pool O&M and Emergency Planning fees

<sup>[3]</sup> Columns may not add due to rounding

# SAFSTOR COST SUMMARY DECOMMISSIONING COST ELEMENTS

(thousands of 2011 dollars)

Cost Element	Cost
Decontamination	16,286
Removal	162,821
Packaging	18,857
Transportation	10,639
Waste Disposal	47,737
Off-site Waste Processing	27,479
Program Management [1]	364,227
Security	156,821
Corporate Allocations	55,341
Spent Fuel Pool Isolation	11,822
Spent Fuel Management [2]	33,726
Insurance and Regulatory Fees	53,557
Energy	10,144
Characterization and Licensing Surveys	17,246
Property Taxes	18,943
Miscellaneous Equipment	20,738
Total [3]	1,026,384

Cost Element	Cost
License Termination	849,173
Spent Fuel Management [4]	73,749
Site Restoration	103,462
Total [3]	1,026,384

<sup>[1]</sup> Includes engineering costs

Direct costs only. Excludes program management costs (staffing) but includes costs for spent fuel loading/spent fuel pool O&M and Emergency Planning fees

<sup>[3]</sup> Columns may not add due to rounding

<sup>[4]</sup> Includes percentage of Period 2a (dormancy) plant operating costs until spent fuel pool is emptied, in addition to the direct costs.

# 1. INTRODUCTION

This report presents estimates of the costs to decommission the Callaway Energy Center (Callaway) following a scheduled cessation of plant operations. The analysis relies upon site-specific, technical information from an earlier evaluation prepared in 2008,<sup>[1]\*</sup> updated to reflect current assumptions pertaining to the disposition of the nuclear unit and relevant industry experience in undertaking such projects. The supporting analysis was designed to provide Ameren Missouri with sufficient information to assess its financial obligations, as they pertain to the eventual decommissioning of the nuclear station. It is not a detailed engineering document, but a financial analysis prepared in advance of the detailed engineering that will be required to carry out the decommissioning.

#### 1.1 OBJECTIVES OF STUDY

The objectives of this study were to prepare comprehensive estimates of the costs to decommission Callaway, to provide a sequence or schedule for the associated activities, and to develop waste stream projections from the decontamination and dismantling activities.

An operating license was issued for Callaway in 1984 for a 40 year operating period. Ameren Missouri has informed the NRC of their intent to submit a license renewal application in the fourth quarter of 2011 (for an additional 20 years of operation). However, for the purposes of this study, the final shutdown date (license expiration) is projected to be October of 2024, based upon the current (40 year) license. This date was used as input to scheduling the decommissioning activities.

# 1.2 SITE DESCRIPTION

The nuclear unit is located in Callaway County, Missouri, approximately 80 miles west of the St. Louis metropolitan area. The nearest population center is Jefferson City, 25 miles west-southwest of the plant site. The station is an 1,171 MWe (net design electrical rating) pressurized water reactor with supporting facilities.

Westinghouse Electric Company designed the nuclear steam supply system (NSSS). The NSSS consists of a pressurized water reactor with four independent primary coolant loops, each of which contains a reactor coolant pump and a steam generator. An electrically heated pressurizer and

<sup>\*</sup> References provided in Section 7 of the document

connecting piping complete the system. The NSSS is rated at a thermal power level of 3,579 MWt (3,565 MWt reactor core plus 14 MWt for reactor coolant pumps), with a corresponding turbine-generator gross output of 1284 MWe. The system is housed within a containment structure, a pre-stressed, post-tensioned concrete structure with cylindrical wall, a hemispherical dome, and a flat foundation slab. The wall and dome form a pre-stressed post-tensioned system. The inside surface of the structure is covered with a carbon steel liner, providing a leak tight membrane.

A power conversion system converts heat produced in the reactor to electrical energy. This system converts the thermal energy of the steam into mechanical shaft power and then into electrical energy. The turbine-generator is a tandem-compound, six-flow, four element, 1800-rpm unit. The unit consists of one high pressure and three low-pressure turbine elements driving a directly coupled generator. The turbine is operated in a closed feedwater cycle that condenses the steam; the feedwater is returned to the steam generators. Heat rejected in the main condensers is removed by the circulating water system.

The circulating water system supplies cooling water to the main condenser, condensing the steam exhausted from the turbine. Cooling for the condenser circulating water system is supplied by a large natural draft cooling tower. Makeup water for the cooling tower is drawn from the Missouri River.

#### 1.3 REGULATORY GUIDANCE

The Nuclear Regulatory Commission (NRC or Commission) provided initial decommissioning requirements in its rule "General Requirements for Decommissioning Nuclear Facilities," issued in June 1988. [2] This rule set forth financial criteria for decommissioning licensed nuclear power facilities. The regulation addressed decommissioning planning needs, timing, funding methods, and environmental review requirements. The intent of the rule was to ensure that decommissioning would be accomplished in a safe and timely manner and that adequate funds would be available for this purpose. Subsequent to the rule, the NRC issued Regulatory Guide 1.159, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors," [3] which provided additional guidance to the licensees of nuclear facilities on the financial methods acceptable to the NRC staff for complying with the requirements of the rule. The regulatory guide addressed the funding requirements and provided guidance on the content and form of the financial assurance mechanisms indicated in the rule.

The rule defined three decommissioning alternatives as being acceptable to the NRC: DECON, SAFSTOR, and ENTOMB. The DECON alternative assumes

that any contaminated or activated portion of the plant's systems, structures and facilities are removed or decontaminated to levels that permit the site to be released for unrestricted use shortly after the cessation of plant operations. The rule also placed limits on the time allowed to complete the decommissioning process. For SAFSTOR, the process is restricted in overall duration to 60 years, unless it can be shown that a longer duration is necessary to protect public health and safety. The guidelines for ENTOMB are similar, providing the NRC with both sufficient leverage and flexibility to ensure that these deferred options are only used in situations where it is reasonable and consistent with the definition of decommissioning. At the conclusion of a 60-year dormancy period (or longer for ENTOMB if the NRC approves such a case), the site would still require significant remediation to meet the unrestricted release limits for license termination.

The ENTOMB alternative has not been viewed as a viable option for power reactors due to the significant time required to isolate the long-lived radionuclides for decay to permissible levels. However, with rulemaking permitting the controlled release of a site, [4] the NRC has re-evaluated this alternative. The resulting feasibility study, based upon an assessment by Pacific Northwest National Laboratory, concluded that the method did have conditional merit for some, if not most reactors. However, the staff also found that additional rulemaking would be needed before this option could be treated as a generic alternative. The NRC had considered rulemaking to alter the 60-year time for completing decommissioning and to clarify the use of engineered barriers for reactor entombments.<sup>[5]</sup>

The NRC's staff has recommended that rulemaking be deferred, based upon several factors, e.g., no licensee has committed to pursuing the entombment option, and the NRC's current priorities, at least until after the additional research studies are complete. The Commission concurred with the staff's recommendation.

In 1996, the NRC published revisions to the general requirements for decommissioning nuclear power plants. [6] When the decommissioning regulations were adopted in 1988, it was assumed that the majority of licensees would decommission at the end of the facility's operating licensed life. Since that time, several licensees permanently and prematurely ceased operations. Exemptions from certain operating requirements were required once the reactor was defueled to facilitate the decommissioning. Each case was handled individually, without clearly defined generic requirements. The NRC amended the decommissioning regulations in 1996 to clarify ambiguities and codify procedures and terminology as a means of enhancing efficiency and uniformity in the decommissioning process. The amendments allow for greater

public participation and better define the transition process from operations to decommissioning.

Under the revised regulations, licensees will submit written certification to the NRC within 30 days after the decision to cease operations. Certification will also be required once the fuel is permanently removed from the reactor vessel. Submittal of these notices will entitle the licensee to a fee reduction and eliminate the obligation to follow certain requirements needed only during operation of the reactor. Within two years of submitting notice of permanent cessation of operations, the licensee is required to submit a Post-Shutdown Decommissioning Activities Report (PSDAR) to the NRC. The PSDAR describes the planned decommissioning activities, the associated sequence and schedule, and an estimate of expected costs. Prior to completing decommissioning, the licensee is required to submit an application to the NRC to terminate the license, which will include a license termination plan (LTP).

# 1.3.1 Nuclear Waste Policy Act

Congress passed the "Nuclear Waste Policy Act" (NWPA) in 1982, assigning the federal government's long-standing responsibility for disposal of the spent nuclear fuel created by the commercial nuclear generating plants to the U.S. Department of Energy (DOE). The NWPA provided that DOE would enter into contracts with utilities in which DOE would promise to take the utilities' spent fuel and high-level radioactive waste and utilities would pay the cost of the disposition services for that material. NWPA, along with the individual contracts with the utilities, specified that the DOE was to begin accepting spent fuel by January 31, 1998.

Since the original legislation, the DOE has announced several delays in the program schedule. By January 1998, the DOE had failed to accept any spent fuel or high level waste, as required by the NWPA and utility contracts. Delays continue and, as a result, generators have initiated legal action against the DOE in an attempt to obtain compensation for DOE's breach of contract.

In June 2011, Ameren Missouri and the DOE reached an agreement. The terms include payment to Ameren Missouri for spent fuel storage and related costs through 2010, and thereafter, annual payment of such costs after they are incurred.

At shutdown, the spent fuel pool is expected to contain freshly discharged assemblies (from the most recent refueling cycles) as well as the final

reactor core. Over the following five and one-half years the assemblies are packaged into multipurpose canisters for transfer to the Independent Spent Fuel Storage Installation (ISFSI). It is assumed that this period provides the necessary cooling for the final core to meet the dry storage system's requirements for decay heat.

The NRC requires that licensees establish a program to manage and provide funding for the management of all irradiated fuel at the reactor site until title of the fuel is transferred to the Secretary of Energy, pursuant to 10 CFR Part 50.54(bb).<sup>[8]</sup> The post-shutdown costs incurred to satisfy this requirement include the isolation and continued operation of the spent fuel pool and the ISFSI during the five and one-half years following the cessation of plant operations.

Costs are also included within the decommissioning estimates for offloading the pool. Cost for the dry storage system, ISFSI construction and/or expansion, and ISFSI operations until such time that the transfer of fuel to the DOE can be completed, are expected to be fully reimbursable and therefore not addressed in this study. The eventual decommissioning of the ISFSI is also not included.

Relocation of the spent fuel from the pool to the ISFSI will allow Ameren Missouri to proceed with decommissioning (or safe-storage preparations) in the shortest time possible.

#### 1.3.2 Low-Level Radioactive Waste Acts

The contaminated and activated material generated in the decontamination and dismantling of a commercial nuclear reactor is classified as low-level (radioactive) waste, although not all of the material is suitable for "shallow-land" disposal. With the passage of the "Low-Level Radioactive Waste Policy Act" in 1980,<sup>[9]</sup> and its Amendments of 1985,<sup>[10]</sup> the states became ultimately responsible for the disposition of low-level radioactive waste generated within their own borders.

The disposal facility in Barnwell, South Carolina is currently closed to generators outside the Atlantic Compact (comprising the states of Connecticut, New Jersey and South Carolina). The commercial disposal facility on the Hanford Nuclear Reservation near Richland, Washington accepts low-level radioactive waste from the Northwest (Alaska, Hawaii, Idaho, Montana, Oregon, Utah, Washington and Wyoming) and Rocky Mountain (Colorado, Nevada, and New Mexico) Compact states. This

leaves Energy Solutions' disposal facility in Clive, Utah as the only available option for the disposal of the majority of the low-level radioactive waste generated in decommissioning.

For the purpose of this analysis, Ameren Missouri's Utilities Service Alliance agreement with EnergySolutions is used as the basis for estimating the disposal cost for the majority of the radioactive waste (Class A<sup>[11]</sup>). EnergySolutions does not have a license to dispose of the more highly radioactive waste (Class B and C), for example, generated in the dismantling of the reactor vessel. As a proxy, the disposal cost for this material is based upon the last published rate schedule for noncompact waste for the Barnwell facility.

The dismantling of the components residing closest to the reactor core generates radioactive waste considered unsuitable for shallow land disposal (i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the NRC for Class C radioactive waste (Greater-than-Class C or GTCC)). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this study, GTCC is packaged in the same canisters used for spent fuel. The GTCC material is assumed to be stored at the ISFSI along with the spent fuel in the DECON scenario. It is shipped directly to a DOE facility as it is generated in the SAFSTOR scenario since it is assumed that the transfer of the spent fuel has been completed prior to the start of the deferred decontamination and dismantling activities.

A significant portion of the waste material generated during decommissioning may only be potentially contaminated by radioactive materials. This waste can be analyzed on site or shipped off site to licensed facilities for further analysis, for processing and/or for conditioning/recovery. Reduction in the volume of low-level radioactive waste requiring disposal in a licensed low-level radioactive waste disposal facility can be accomplished through a variety of methods, including analyses and surveys or decontamination to eliminate the portion of waste that does not require disposal as radioactive waste, compaction, incineration or metal melt. The estimates for Callaway reflect the savings from waste recovery/volume reduction.

# 1.3.3 Radiological Criteria for License Termination

In 1997, the NRC published Subpart E, "Radiological Criteria for License Termination," [12] amending 10 CFR Part 20. This subpart provides radiological criteria for releasing a facility for unrestricted use. The regulation states that the site can be released for unrestricted use if radioactivity levels are such that the average member of a critical group would not receive a Total Effective Dose Equivalent (TEDE) in excess of 25 millirem per year, and provided that residual radioactivity has been reduced to levels that are As Low As Reasonably Achievable (ALARA). The decommissioning estimates assume that the Callaway site will be remediated to a residual level consistent with the NRC-prescribed level.

It should be noted that the NRC and the Environmental Protection Agency (EPA) differ on the amount of residual radioactivity considered acceptable in site remediation. The EPA has two limits that apply to radioactive materials. An EPA limit of 15 millirem per year is derived from criteria established by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund).<sup>[13]</sup> An additional and separate limit of 4 millirem per year, as defined in 40 CFR §141.16, is applied to drinking water.<sup>[14]</sup>

On October 9, 2002, the NRC signed an agreement with the EPA on the radiological decommissioning and decontamination of NRC-licensed sites. The Memorandum of Understanding (MOU)<sup>[15]</sup> provides that EPA will defer exercise of authority under CERCLA for the majority of facilities decommissioned under NRC authority. The MOU also includes provisions for NRC and EPA consultation for certain sites when, at the time of license termination, (1) groundwater contamination exceeds EPA-permitted levels; (2) NRC contemplates restricted release of the site; and/or (3) residual radioactive soil concentrations exceed levels defined in the MOU.

The MOU does not impose any new requirements on NRC licensees and should reduce the involvement of the EPA with NRC licensees who are decommissioning. Most sites are expected to meet the NRC criteria for unrestricted use, and the NRC believes that only a few sites will have groundwater or soil contamination in excess of the levels specified in the MOU that trigger consultation with the EPA. However, if there are other hazardous materials on the site, the EPA may be involved in the cleanup. As such, the possibility of dual regulation remains for certain licensees. The present study does not include any costs for this occurrence.

# 2. DECOMMISSIONING ALTERNATIVES

Detailed cost estimates were developed to decommission the Callaway nuclear unit for the approved decommissioning alternatives: DECON and SAFSTOR. Although the alternatives differ with respect to technique, process, cost, and schedule, they attain the same result: the ultimate release of the site for unrestricted use.

The following sections describe the basic activities associated with each alternative. Although detailed procedures for each activity identified are not provided, and the actual sequence of work may vary, the activity descriptions provide a basis not only for estimating but also for the expected scope of work, i.e., engineering and planning at the time of decommissioning.

The conceptual approach that the NRC has described in its regulations divides decommissioning into three phases. The initial phase commences with the effective date of permanent cessation of operations and involves the transition of both plant and licensee from reactor operations (i.e., power production) to facility de-activation and closure. During the first phase, notification is to be provided to the NRC certifying the permanent cessation of operations and the removal of fuel from the reactor vessel. The licensee is then prohibited from reactor operation.

The second phase encompasses activities during the storage period or during major decommissioning activities, or a combination of the two. The third phase pertains to the activities involved in license termination. The decommissioning estimates developed for Callaway are also divided into phases or periods; however, demarcation of the phases is based upon major milestones within the project or significant changes in the projected expenditures.

# 2.1 DECON

The DECON alternative, as defined by the NRC, is "the alternative in which the equipment, structures, and portions of a facility and site containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use shortly after cessation of operations." This study does not address the cost to dispose of the spent fuel residing at the site; such costs are funded through a surcharge on electrical generation. The study also assumes that the costs incurred with the interim on-site storage of the fuel, pending shipment by the DOE to an off-site disposal facility, are fully reimbursable.

# 2.1.1 Period 1 - Preparations

In anticipation of the cessation of plant operations, detailed preparations are undertaken to provide a smooth transition from plant operations to site decommissioning. Through implementation of a staffing transition plan, the organization required to manage the intended decommissioning activities is assembled from available plant staff and outside resources. Preparations include the planning for permanent defueling of the reactor, revision of technical specifications applicable to the operating conditions and requirements, a characterization of the facility and major components, and the development of the PSDAR.

# **Engineering and Planning**

The PSDAR, required within two years of the notice to cease operations, provides a description of the licensee's planned decommissioning activities, a timetable, and the associated financial requirements of the intended decommissioning program. Upon receipt of the PSDAR, the NRC will make the document available to the public for comment in a local hearing to be held in the vicinity of the reactor site. Ninety days following submittal and NRC receipt of the PSDAR, the licensee may begin to perform major decommissioning activities under a modified 10 CFR §50.59 procedure, i.e., without specific NRC approval. Major activities are defined as any activity that results in permanent removal of major radioactive components, permanently modifies the structure of the containment, or results in dismantling components (for shipment) containing GTCC, as defined by 10 CFR §61. Major components are further defined as comprising the reactor vessel and internals, large bore reactor coolant system piping, and other large components that are radioactive. The NRC includes the following additional criteria for use of the §50.59 process in decommissioning. The proposed activity must not:

- foreclose release of the site for possible unrestricted use,
- significantly increase decommissioning costs,
- cause any significant environmental impact, or
- violate the terms of the licensee's existing license.

Existing operational technical specifications are reviewed and modified to reflect plant conditions and the safety concerns associated with permanent cessation of operations. The environmental impact associated with the planned decommissioning activities is also considered.

Typically, a licensee will not be allowed to proceed if the consequences of a particular decommissioning activity are greater than that bounded by previously evaluated environmental assessments or impact statements. In this instance, the licensee would have to submit a license amendment for the specific activity and update the environmental report.

The decommissioning program outlined in the PSDAR will be designed to accomplish the required tasks within the ALARA guidelines (as defined in 10 CFR §20) for protection of personnel from exposure to radiation hazards. It will also address the continued protection of the health and safety of the public and the environment during the dismantling activity. Consequently, with the development of the PSDAR, activity specifications, cost-benefit and safety analyses, work packages and procedures, would be assembled to support the proposed decontamination and dismantling activities.

# Site Preparations

Following final plant shutdown, and in preparation for actual decommissioning activities, the following activities are initiated:

- Characterization of the site and surrounding environs. This includes radiation surveys of work areas, major components (including the reactor vessel and its internals), internal piping, and primary shield cores.
- Isolation of the spent fuel storage pool and fuel handling systems, such that decommissioning operations can commence on the balance of the plant. The pool will remain operational for approximately five and one-half years following the cessation of operations before the inventory resident at shutdown can be transferred to the ISFSI.
- Specification of transport and disposal requirements for activated materials and/or hazardous materials, including shielding and waste stabilization.
- Development of procedures for occupational exposure control, control and release of liquid and gaseous effluent, processing of radwaste (including dry-active waste, resins, filter media, metallic and nonmetallic components generated in decommissioning), site security and emergency programs, and industrial safety.

# 2.1.2 Period 2 - Decommissioning Operations

This period includes the physical decommissioning activities associated with the removal and disposal of contaminated and activated components and structures, including the successful termination of the 10 CFR §50 operating license. Significant decommissioning activities in this phase include:

- Construction of temporary facilities and/or modification of existing facilities to support dismantling activities. This may include a centralized processing area to facilitate equipment removal and component preparations for off-site disposal.
- Reconfiguration and modification of site structures and facilities as needed to support decommissioning operations. This may include the upgrading of roads (on- and off-site) to facilitate hauling and transport. Modifications may be required to the containment structure to facilitate access of large/heavy equipment. Modifications may also be required to the refueling area of the building to support the segmentation of the reactor vessel internals and component extraction.
- Design and fabrication of temporary and permanent shielding to support removal and transportation activities, construction of contamination control envelopes, and the procurement of specialty tooling.
- Procurement (lease or purchase) of shipping canisters, cask liners, and industrial packages for the disposition of low-level radioactive waste.
- Decontamination of components and piping systems as required to control (minimize) worker exposure.
- Removal of piping and components no longer essential to support decommissioning operations.
- Removal of control rod drive housings and the head service structure from the reactor vessel head. Segmentation of the vessel closure head.
- Removal and segmentation of the upper internals assemblies.
   Segmentation will maximize the loading of the shielded transport casks, i.e., by weight and activity. The operations are conducted under water using remotely operated tooling and contamination controls.

- Disassembly and segmentation of the remaining reactor internals, including the core shroud and lower core support assembly. Some material is expected to exceed Class C disposal requirements. As such, the segments will be packaged in modified fuel storage canisters for geologic disposal.
- Segmentation of the reactor vessel. A shielded platform is installed for segmentation as cutting operations are performed in-air using remotely operated equipment within a contamination control envelope. The water level is maintained just below the cut to minimize the working area dose rates. Segments are transferred in-air to containers that are stored under water, for example, in an isolated area of the refueling canal.
- Removal of the activated portions of the concrete biological shield and accessible contaminated concrete surfaces. If dictated by the steam generator and pressurizer removal scenarios, those portions of the associated cubicles necessary for access and component extraction are removed.
- Removal of the steam generators and pressurizer for material recovery and controlled disposal. The generators will be moved to an on-site processing center, the steam domes removed and the internal components segregated for recycling. The lower shell and tube bundle will be packaged for direct disposal. These components can serve as their own burial containers provided that all penetrations are properly sealed and the internal contaminants are stabilized, e.g., with grout. Steel shielding will be added, as necessary, to those external areas of the package to meet transportation limits and regulations. The pressurizer is disposed of intact.

At least two years prior to the anticipated date of license termination, an LTP is required. Submitted as a supplement to the Final Safety Analysis Report (FSAR) or its equivalent, the plan must include: a site characterization, description of the remaining dismantling activities, plans for site remediation, procedures for the final radiation survey, designation of the end use of the site, an updated cost estimate to complete the decommissioning, and any associated environmental concerns. The NRC will notice the receipt of the plan, make the plan available for public comment, and schedule a local hearing. LTP approval will be subject to any conditions and limitations as deemed appropriate by the Commission. The licensee may then commence with the final remediation of site facilities and services, including:

- Removal of remaining plant systems and associated components as they become nonessential to the decommissioning program or worker health and safety (e.g., waste collection and treatment systems, electrical power and ventilation systems).
- Removal of the steel liners from refueling canal, disposing of the activated and contaminated sections as radioactive waste. Removal of any activated/ contaminated concrete.
- Surveys of the decontaminated areas of the containment structure.
- Remediation and removal of the contaminated equipment and material from the fuel building and any other contaminated facility. Radiation and contamination controls will be utilized until residual levels indicate that the structures and equipment can be released for unrestricted access and conventional demolition. This activity may necessitate the dismantling and disposition of most of the systems and components (both clean and contaminated) located within these buildings. This activity facilitates surface decontamination and subsequent verification surveys required prior to obtaining release for demolition.
- Routing of material removed in the decontamination and dismantling
  to a central processing area. Material certified to be free of
  contamination is released for unrestricted disposition, e.g., as scrap,
  recycle, or general disposal. Contaminated material is characterized
  and segregated for additional off-site processing (disassembly,
  chemical cleaning, volume reduction, and waste treatment), and/or
  packaged for controlled disposal at a low-level radioactive waste
  disposal facility.

Incorporated into the LTP is the Final Survey Plan. This plan identifies the radiological surveys to be performed once the decontamination activities are completed and is developed using the guidance provided in the "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)."<sup>[16]</sup> This document incorporates the statistical approaches to survey design and data interpretation used by the EPA. It also identifies state-of-the-art, commercially available instrumentation and procedures for conducting radiological surveys. Use of this guidance ensures that the surveys are conducted in a manner that provides a high degree of confidence that applicable NRC criteria are satisfied. Once the survey is complete, the results are provided to the NRC in a format that can be verified. The NRC then reviews and evaluates the information, performs an independent confirmation of radiological site conditions, and makes a determination on final termination of the license.

The NRC will terminate the operating license if it determines that site remediation has been performed in accordance with the LTP, and that the terminal radiation survey and associated documentation demonstrate that the facility is suitable for release.

## 2.1.3 Period 3 - Site Restoration

Following completion of decommissioning operations, site restoration activities will begin. Efficient removal of the contaminated materials and verification that residual radionuclide concentrations are below the NRC limits will result in substantial damage to many of the structures. Although performed in a controlled, safe manner, blasting, coring, drilling, scarification (surface removal), and the other decontamination activities will substantially degrade power block structures including the reactor, fuel handling, and radioactive waste buildings. Under verifying circumstances. that subsurface radionuclide concentrations meet NRC site release requirements will require removal of grade slabs and lower floors, potentially weakening footings and structural supports. This removal activity will be necessary for those facilities and plant areas where historical records, when available, indicate the potential for radionuclides having been present in the soil. where system failures have been recorded, or where it is required to confirm that subsurface process and drain lines were not breached over the operating life of the station.

Prompt dismantling of site structures is clearly the most appropriate and cost-effective option. It is unreasonable to anticipate that these structures would be repaired and preserved after the radiological contamination is removed. The cost to dismantle site structures with a work force already mobilized on site is more efficient than if the process were deferred. Site facilities quickly degrade without maintenance, adding additional expense and creating potential hazards to the public as well as to future workers. Abandonment creates a breeding ground for vermin infestation as well as other biological hazards.

This cost study presumes that non-essential structures and site facilities are dismantled as a continuation of the decommissioning activity. Foundations and exterior walls are removed to a nominal depth of three feet below grade. The three-foot depth allows for the placement of gravel for drainage, as well as topsoil, so that vegetation can be established for erosion control. Site areas affected by the dismantling activities are restored and the plant area graded as required to prevent ponding and inhibit the refloating of subsurface materials.

Non-contaminated concrete rubble produced by demolition activities is processed to remove reinforcing steel and miscellaneous embedments. The processed material is then used on site to backfill foundation voids. Excess non-contaminated materials are trucked to an off-site area for disposal as construction debris.

#### 2.2 SAFSTOR

The NRC defines SAFSTOR as "the alternative in which the nuclear facility is placed and maintained in a condition that allows the nuclear facility to be safely stored and subsequently decontaminated (deferred decontamination) to levels that permit release for unrestricted use." The facility is left intact (during the dormancy period), with structures maintained in a sound condition. Systems that are not required to support the spent fuel pool or site surveillance and security are drained, de-energized, and secured. Minimal cleaning/removal of loose contamination and/or fixation and sealing of remaining contamination is performed. Access to contaminated areas is secured to provide controlled access for inspection and maintenance.

The engineering and planning requirements are similar to those for the DECON alternative, although a shorter time period is expected for these activities due to the more limited work scope. Site preparations are also similar to those for the DECON alternative. However, with the exception of the required radiation surveys and site characterizations, the mobilization and preparation of site facilities is less extensive.

# 2.2.1 Period 1 - Preparations

Preparations for long-term storage include the planning for permanent defueling of the reactor, revision of technical specifications appropriate to the operating conditions and requirements, a characterization of the facility and major components, and the development of the PSDAR.

The process of placing the plant in safe-storage includes, but is not limited to, the following activities:

• Isolation of the spent fuel storage services and fuel handling systems so that safe-storage operations may commence on the balance of the plant. This activity may be carried out by plant personnel in accordance with existing operating technical specifications. Activities are scheduled around the fuel handling systems to the greatest extent possible.

- Transfer of the spent fuel from the storage pool to the ISFSI following the minimum required cooling period.
- Draining and de-energizing of the non-contaminated systems not required to support continued site operations or maintenance.
- Disposing of contaminated filter elements and resin beds not required for processing wastes from layup activities for future operations.
- Draining of the reactor vessel, with the internals left in place and the vessel head secured.
- Draining and de-energizing non-essential, contaminated systems with decontamination as required for future maintenance and inspection.
- Preparing lighting and alarm systems whose continued use is required; de-energizing portions of fire protection, electric power, and HVAC systems whose continued use is not required.
- Cleaning of the loose surface contamination from building access pathways.
- Performing an interim radiation survey of plant, posting warning signs where appropriate.
- Erecting physical barriers and/or securing all access to radioactive or contaminated areas, except as required for inspection and maintenance.
- Installing security and surveillance monitoring equipment and relocating security fence around secured structures, as required.

### 2.2.2 Period 2 - Dormancy

The second phase identified by the NRC in its rule addresses licensed activities during a storage period and is applicable to the dormancy phases of the deferred decommissioning alternatives. Dormancy activities include a 24-hour security force, preventive and corrective maintenance on security systems, area lighting, general building maintenance, heating and ventilation of buildings, routine radiological inspections of contaminated structures, maintenance of structural integrity, and a site environmental and radiation monitoring program. Resident maintenance personnel perform equipment maintenance, inspection activities, routine services to maintain safe conditions, adequate lighting, heating, and ventilation, and periodic preventive maintenance on essential site services.

An environmental surveillance program is carried out during the dormancy period to ensure that releases of radioactive material to the environment are prevented and/or detected and controlled. Appropriate emergency procedures are established and initiated for potential releases that exceed prescribed limits. The environmental surveillance program constitutes an abbreviated version of the program in effect during normal plant operations.

Security during the dormancy period is conducted primarily to prevent unauthorized entry and to protect the public from the consequences of its own actions. The security fence, sensors, alarms, and other surveillance equipment provide security. Fire and radiation alarms are also monitored and maintained.

Consistent with the DECON scenario, the spent fuel storage pool is emptied within five and one-half years of the cessation of operations. The pool is secured for storage and decommissioned along with the power block structures in Period 4.

After an optional period of storage (such that license termination is accomplished within 60 years of final shutdown), it is required that the licensee submit an application to terminate the license, along with an LTP (described in Section 2.1.2), thereby initiating the third phase.

# 2.2.3 Periods 3 and 4 - Delayed Decommissioning

Prior to the commencement of decommissioning operations, preparations are undertaken to reactivate site services and prepare for decommissioning. Preparations include engineering and planning, a detailed site characterization, and the assembly of a decommissioning management organization. Final planning for activities and the writing of activity specifications and detailed procedures are also initiated at this time.

Much of the work in developing a termination plan is relevant to the development of the detailed engineering plans and procedures. The activities associated with this phase and the follow-on decontamination and dismantling processes are detailed in Sections 2.1.1 and 2.1.2. The primary difference between the sequences anticipated for the DECON and this deferred scenario is the absence, in the latter, of any constraint on the availability of the fuel storage facilities for decommissioning.

Variations in the length of the dormancy period are expected to have little effect upon the quantities of radioactive wastes generated from system and structure removal operations. Given the levels of radioactivity and spectrum of radionuclides expected from forty years of plant operation, no plant process system identified as being contaminated upon final shutdown will become releasable due to the decay period alone, i.e., there is no significant reduction in the waste generated from the decommissioning activities. However, due to the lower activity levels, a greater percentage of the waste volume can be designated for off-site processing and recovery.

The delay in decommissioning also yields lower working area radiation levels. As such, the estimate for this delayed scenario incorporates reduced ALARA controls for the SAFSTOR's lower occupational exposure potential.

Although the initial radiation levels due to <sup>60</sup>Co will decrease during the dormancy period, the internal components of the reactor vessel will still exhibit sufficiently high radiation dose rates to require remote sectioning under water due to the presence of long-lived radionuclides such as <sup>94</sup>Nb, <sup>59</sup>Ni, and <sup>63</sup>Ni. Therefore, the dismantling procedures described for the DECON alternative would still be employed during this scenario. Portions of the biological shield will still be radioactive due to the presence of activated trace elements with long half-lives (<sup>152</sup>Eu and <sup>154</sup>Eu). Decontamination will require controlled removal and disposal. It is assumed that radioactive corrosion products on inner surfaces of piping and components will not have decayed to levels that will permit unrestricted use or allow conventional removal. These systems and components will be surveyed as they are removed and disposed of in accordance with the existing radioactive release criteria.

## 2.2.4 Period 5 - Site Restoration

Following completion of decommissioning operations, site-restoration activities can begin. Dismantling, as a continuation of the decommissioning process, is clearly the most appropriate and cost-effective option, as described in Section 2.1.3. The basis for the dismantling cost in this scenario is consistent with that described for DECON, presuming the removal of structures and site facilities to a nominal depth of three feet below grade and the limited restoration of the site.

# 3. COST ESTIMATE

The cost estimates prepared for decommissioning Callaway consider the unique features of the site, including the NSSS, power generation systems, support services, site buildings, and ancillary facilities. The basis of the estimates, including the sources of information relied upon, the estimating methodology employed, site-specific considerations, and other pertinent assumptions, is described in this section.

#### 3.1 BASIS OF ESTIMATE

The estimates were developed using the site-specific, technical information from the 2008 analysis. This information was reviewed for the current analysis and updated as deemed appropriate. The site-specific considerations and assumptions used in the previous evaluation were also revisited. Modifications were incorporated where new information was available or experience from previously completed decommissioning programs provided viable alternatives or improved processes.

#### 3.2 METHODOLOGY

The methodology used to develop the estimates follows the basic approach originally presented in the AIF/NESP-036 study report, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," and the DOE "Decommissioning Handbook." These documents present a unit factor method for estimating decommissioning activity costs, which simplifies the estimating calculations. Unit factors for concrete removal (\$/cubic yard), steel removal (\$/ton), and cutting costs (\$/inch) are developed using local labor rates. The activity-dependent costs are estimated with the item quantities (cubic yards and tons), developed from plant drawings and inventory documents. Removal rates and material costs for the conventional disposition of components and structures rely upon information available in the industry publication, "Building Construction Cost Data," published by R.S. Means. [19]

The unit factor method provides a demonstrable basis for establishing reliable cost estimates. The detail provided in the unit factors, including activity duration, labor costs (by craft), and equipment and consumable costs, ensures that essential elements have not been omitted. Appendix A presents the detailed development of a typical unit factor. Appendix B provides the values contained within one set of factors developed for this analysis.

This analysis reflects lessons learned from TLG's involvement in the Shippingport Station Decommissioning Project, completed in 1989, as well as the decommissioning of the Cintichem reactor, hot cells, and associated facilities, completed in 1997. In addition, the planning and engineering for the Pathfinder, Shoreham, Rancho Seco, Trojan, Yankee Rowe, Big Rock Point, Maine Yankee, Humboldt Bay-3, Oyster Creek, Connecticut Yankee, and San Onofre-1 nuclear units have provided additional insight into the process, the regulatory aspects, and the technical challenges of decommissioning commercial nuclear units.

### Work Difficulty Factors

TLG has historically applied work difficulty adjustment factors (WDFs) to account for the inefficiencies in working in a power plant environment. WDFs are assigned to each unique set of unit factors, commensurate with the inefficiencies associated with working in confined, hazardous environments. The ranges used for the WDFs are as follows:

•	Access Factor	10% to 20%
•	Respiratory Protection Factor	10% to 50%
•	Radiation/ALARA Factor	10% to 37%
•	Protective Clothing Factor	10% to 30%
•	Work Break Factor	8.33%

The factors and their associated range of values were developed in conjunction with the AIF/NESP-036 study. The application of the factors is discussed in more detail in that publication.

### Scheduling Program Durations

The unit factors, adjusted by the WDFs as described above, are applied against the inventory of materials to be removed in the radiological controlled areas. The resulting man-hours, or crew-hours, are used in the development of the decommissioning program schedule, using resource loading and event sequencing considerations. The scheduling of conventional removal and dismantling activities is based upon productivity information available from the "Building Construction Cost Data" publication.

An activity duration critical path is used to determine the total decommissioning program schedule. The schedule is relied upon in calculating the carrying costs, which include program management, administration, field engineering, equipment rental, and support services such as quality control and security. This systematic approach for assembling decommissioning estimates ensures a high degree of confidence in the reliability of the resulting costs.

#### 3.3 FINANCIAL COMPONENTS OF THE COST MODEL

TLG's proprietary decommissioning cost model, DECCER, produces a number of distinct cost elements. These direct expenditures, however, do not comprise the total cost to accomplish the project goal, i.e., license termination and site restoration.

Inherent in any cost estimate that does not rely on historical data is the inability to specify the precise source of costs imposed by factors such as tool breakage, accidents, illnesses, weather delays, and labor stoppages. In the DECCER cost model, contingency fulfills this role. Contingency is added to each line item to account for costs that are difficult or impossible to develop analytically. Such costs are historically inevitable over the duration of a job of this magnitude; therefore, this cost analysis includes funds to cover these types of expenses.

#### 3.3.1 Contingency

The activity- and period-dependent costs are combined to develop the total decommissioning cost. A contingency is then applied on a line-item basis, using one or more of the contingency types listed in the AIF/NESP-036 study. "Contingencies" are defined in the American Association of Cost Engineers "Project and Cost Engineers' Handbook"[20] as "specific provision for unforeseeable elements of cost within the defined project scope; particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur." The cost elements in this analysis are based upon ideal conditions and maximum efficiency; therefore, consistent with industry practice, contingency is included. In the AIF/NESP-036 study, the types of unforeseeable events that are likely to occur in decommissioning are discussed and guidelines are provided for percentage contingency in each category. It should be noted that contingency, as used in this analysis, does not account for price escalation and inflation in the cost of decommissioning over the remaining operating life of the station.

Contingency funds are an integral part of the total cost to complete the decommissioning process. Exclusion of this component puts at risk a

successful completion of the intended tasks and, potentially, subsequent related activities. For this study, TLG examined the major activity-related problems (decontamination, segmentation, equipment handling, packaging, transport, and waste disposal) that necessitate a contingency. Individual activity contingencies ranged from 10% to 75%, depending on the degree of difficulty judged to be appropriate from TLG's actual decommissioning experience. The contingency values used in this study are as follows:

•	Decontamination	50%
•	Contaminated Component Removal	25%
•	Contaminated Component Packaging	10%
•	Contaminated Component Transport	15%
•	Low-Level Radioactive Waste Disposal	25%
•	Reactor Segmentation	75%
•	NSSS Component Removal	25%
•	Reactor Waste Packaging	25%
•	Reactor Waste Transport	25%
•	Reactor Vessel Component Disposal	50%
•	GTCC Disposal	15%
•	Non-Radioactive Component Removal	15%
•	Heavy Equipment and Tooling	15%
•	Supplies	25%
•	Engineering	15%
•	Energy	15%
•	Characterization and Termination Surveys	30%
•	Construction	15%
•	Taxes and Fees	10%
•	Insurance	10%
•	Staffing	15%

The contingency values are applied to the appropriate components of the estimates on a line item basis. A composite value is then reported at the end of each detailed estimate (as provided in Appendix C and D). For example, the composite contingency value reported for the DECON alternative in Appendix C is approximately 18.0%.

#### 3.3.2 Financial Risk

In addition to the routine uncertainties addressed by contingency, another cost element that is sometimes necessary to consider when bounding decommissioning costs relates to uncertainty, or risk. Examples can include changes in work scope, pricing, job performance, and other variations that could conceivably, but not necessarily, occur. Consideration is sometimes necessary to generate a level of confidence in the estimate, within a range of probabilities. TLG considers these types of costs under the broad term "financial risk." Included within the category of financial risk are:

- Transition activities and costs: ancillary expenses associated with eliminating 50% to 80% of the site labor force shortly after the cessation of plant operations, added cost for worker separation packages throughout the decommissioning program, national or company-mandated retraining, and retention incentives for key personnel.
- Delays in approval of the decommissioning plan due to intervention, public participation in local community meetings, legal challenges, and national and local hearings.
- Changes in the project work scope from the baseline estimate, involving the discovery of unexpected levels of contaminants, contamination in places not previously expected, contaminated soil previously undiscovered (either radioactive or hazardous material contamination), variations in plant inventory or configuration not indicated by the as-built drawings.
- Regulatory changes, for example, affecting worker health and safety, site release criteria, waste transportation, and disposal.
- Policy decisions altering national commitments (e.g., in the ability to accommodate certain waste forms for disposition), or in the timetable for such, for example, the start and rate of acceptance of spent fuel by the DOE.
- Pricing changes for basic inputs such as labor, energy, materials, and disposal. Items subject to widespread price competition (such as materials) may not show significant variation; however, others such as waste disposal could exhibit large pricing uncertainties, particularly in markets where limited access to services is available.

It has been TLG's experience that the results of a risk analysis, when compared with the base case estimate for decommissioning, indicate

that the chances of the base decommissioning estimate's being too high is a low probability, and the chances that the estimate is too low is a higher probability. This is mostly due to the pricing uncertainty for low-level radioactive waste burial, and to a lesser extent due to schedule increases from changes in plant conditions and to pricing variations in the cost of labor (both craft and staff). This cost study, however, does not add any additional costs to the estimate for financial risk, since there is insufficient historical data from which to project future liabilities. Consequently, the areas of uncertainty or risk are revisited periodically and addressed through repeated revisions or updates of the base estimates.

#### 3.4 SITE-SPECIFIC CONSIDERATIONS

There are a number of site-specific considerations that affect the method for dismantling and removal of equipment from the site and the degree of restoration required. The cost impact of the considerations identified below is included in this cost study.

## 3.4.1 Spent Fuel Management

The cost to dispose the spent fuel generated from plant operations is not reflected within the estimates to decommission Callaway. Ultimate disposition of the spent fuel is within the province of the DOE's Waste Management System, as defined by the Nuclear Waste Policy Act. As such, the disposal cost is financed by a 1 mill/kWhr surcharge paid into the DOE's waste fund during operations. However, the NRC requires licensees to establish a program to manage and provide funding for the management of all irradiated fuel at the reactor until title of the fuel is transferred to the Secretary of Energy. This funding requirement is fulfilled through inclusion of certain high-level waste cost elements within the estimates, as described below.

For estimating purposes, Ameren Missouri has assumed that all spent fuel will be relocated to an ISFSI on the Callaway site within five and one-half years after shutdown. This will allow Ameren Missouri to proceed with decommissioning (or safe-storage) operations in the shortest time possible.

It is assumed that the five and one-half years provides the necessary cooling period for the final core to meet storage requirements for decay heat. Once the pool is emptied, the spent fuel storage and handling facilities are available for decommissioning. Operation and maintenance costs for the spent fuel pool are included within the estimate.

#### Canister Loading and Transfer

A cost of \$240,000 is used for the labor to load/transport the spent fuel from the pool to the ISFSI. The capital cost for the dry storage system is not included.

### Operations and Maintenance

An annual cost of approximately \$764,000 is used for operation and maintenance of the spent fuel pool. Pool operations are expected to continue approximately five and one-half years after the cessation of operations. An annual cost of approximately \$90,000 is used for operation and maintenance of the ISFSI during decommissioning.

#### GTCC

The dismantling of the reactor internals will generate radioactive waste considered unsuitable for shallow land disposal, i.e., low-level radioactive waste with concentrations of radionuclides that exceed the limits established by the Commission for Class C radioactive waste (GTCC). The Low-Level Radioactive Waste Policy Amendments Act of 1985 assigned the federal government the responsibility for the disposal of this material. The Act also stated that the beneficiaries of the activities resulting in the generation of such radioactive waste bear all reasonable costs of disposing of such waste. However, to date, the federal government has not identified a cost for disposing of GTCC or a schedule for acceptance.

For purposes of this study, GTCC is packaged in the same canisters used to transport spent fuel. The GTCC is assumed to be disposed of as it is generated during reactor vessel segmentation operations.

#### 3.4.2 Reactor Vessel and Internal Components

The reactor pressure vessel and internal components are segmented for disposal in shielded, reusable transportation casks. Segmentation is performed in the refueling canal, where a turntable and remote cutter are installed. The vessel is segmented in place, using a mast-mounted cutter supported off the lower head and directed from a shielded work platform installed overhead in the reactor cavity. Transportation cask

specifications and transportation regulations dictate the segmentation and packaging methodology.

Intact disposal of reactor vessel shells has been successfully demonstrated at several of the sites currently being decommissioned. Access to navigable waterways has allowed these large packages to be transported to the Barnwell, South Carolina and Hanford, Washington disposal sites with minimal overland travel. Intact disposal of the reactor vessel and internal components can provide savings in cost and by eliminating the complex exposure requirements, isolation of the GTCC material, and transport/storage of the resulting waste packages. Portland General Electric (PGE) was able to dispose of the Trojan reactor as an intact package (including the internals). However, its location on the Columbia River simplified the transportation analysis since:

- the reactor package could be secured to the transport vehicle for the entire journey, i.e., the package was not lifted during transport,
- there were no man-made or natural terrain features between the plant site and the disposal location that could produce a large drop, and
- transport speeds were very low, limited by the overland transport vehicle and the river barge.

As a member of the Northwest Compact, PGE had a site available for disposal of the package - the US Ecology facility in Washington State. The characteristics of this arid site proved favorable in demonstrating compliance with land disposal regulations.

It is not known whether this option will be available when the Callaway unit ceases operation. Future viability of this option will depend upon the ultimate location of the disposal site, as well as the disposal site licensee's ability to accept highly radioactive packages and effectively isolate them from the environment. Consequently, the study assumes the reactor vessel will require segmentation, as a bounding condition.

## 3.4.3 Primary System Components

In the DECON scenario, the reactor coolant system components are assumed to be decontaminated using chemical agents prior to the start of dismantling operations. This type of decontamination can be expected to have a significant ALARA impact, since in this scenario the removal work is done within the first few years of shutdown. A decontamination factor (average reduction) of 10 is assumed for the process. In the SAFSTOR scenario, radionuclide decay is expected to provide the same benefit and, therefore, a chemical decontamination is not included.

The following discussion deals with the removal and disposition of the steam generators, but the techniques involved are also applicable to other large components, such as heat exchangers, component coolers, and the pressurizer. The steam generators' size and weight, as well as their location within the reactor building, will ultimately determine the removal strategy.

A trolley crane is set up for the removal of the generators. It can also be used to move portions of the steam generator cubicle walls and floor slabs from the reactor building to a location where they can be decontaminated and transported to the material handling area. Interferences within the work area, such as grating, piping, and other components are removed to create sufficient laydown space for processing these large components.

The generators are rigged for removal, disconnected from the surrounding piping and supports, and maneuvered into the open area where they are lowered onto a dolly. Each generator is rotated into the horizontal position for extraction from the containment and placed onto a multi-wheeled vehicle for transport to an on-site processing and storage area.

The generators are disassembled on-site with the steam dome and lightly contaminated subassemblies designated for off-site recycling. The more highly contaminated tube sheet and tube bundle are packaged for direct disposal. The interior volume is filled with low-density cellular concrete for stabilization of the internal contamination.

Reactor coolant piping is cut from the reactor vessel once the water level in the vessel (used for personnel shielding during dismantling and cutting operations in and around the vessel) is dropped below the nozzle zone. The piping is boxed and transported by shielded van. The reactor coolant pumps and motors are lifted out intact, packaged, and transported for processing and/or disposal.

## 3.4.4 Retired Components

The estimates include the cost to dispose of the retired steam generators expected to be in storage at the site upon the cessation of plant operations. The components are size-reduced to facilitate transportation.

### 3.4.5 Main Turbine and Condenser

The main turbine is dismantled using conventional maintenance procedures. The turbine rotors and shafts are removed to a laydown area. The lower turbine casings are removed from their anchors by controlled demolition. The main condensers are also disassembled and moved to a laydown area. Material is then prepared for transportation to an off-site recycling facility where it is surveyed and designated for either decontamination or volume reduction, conventional disposal, or controlled disposal. Components are packaged and readied for transport in accordance with the intended disposition.

## 3.4.6 <u>Transportation Methods</u>

Contaminated piping, components, and structural material other than the highly activated reactor vessel and internal components will qualify as LSA-I, II or III or Surface Contaminated Object, SCO-I or II, as described in Title 49.[21] The contaminated material will be packaged in Industrial Packages (IP-1, IP-2, or IP-3, as defined in subpart 173.411) for transport unless demonstrated to qualify as their own shipping containers. The reactor vessel and internal components are expected to be transported in accordance with Part 71, as Type B. It is conceivable that the reactor, due to its limited specific activity, could qualify as LSA II or III. However, the high radiation levels on the outer surface would require that additional shielding be incorporated within the packaging so as to attenuate the dose to levels acceptable for transport.

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., <sup>137</sup>Cs, <sup>90</sup>Sr, or transuranics) has been prevented from reaching levels exceeding those that permit the major reactor components to be shipped under current transportation regulations and disposal requirements.

Transport of the highly activated metal, produced in the segmentation of the reactor vessel and internal components, will be by shielded truck cask. Cask shipments may exceed 95,000 pounds, including vessel segment(s), supplementary shielding, cask tie-downs, and tractortrailer. The maximum level of activity per shipment assumed permissible was based upon the license limits of the available shielded transport casks. The segmentation scheme for the vessel and internal segments is designed to meet these limits.

The transport of large intact components (e.g., large heat exchangers and other oversized components) will be by a combination of truck, rail, and/or multi-wheeled transporter.

Transportation costs for material requiring controlled disposal are based upon the mileage to the EnergySolutions facility in Clive, Utah. Transportation costs for off-site waste processing are based upon the mileage to Oak Ridge, Tennessee. Truck transport costs are estimated using published tariffs from Tri-State Motor Transit. [22]

## 3.4.7 <u>Low-Level Radioactive Waste Disposal</u>

To the greatest extent practical, metallic material generated in the decontamination and dismantling processes is processed to reduce the total cost of controlled disposal. Material meeting the regulatory and/or site release criterion, is released as scrap, requiring no further cost consideration. Conditioning (preparing the material to meet the waste acceptance criteria of the disposal site) and recovery of the waste stream is performed off site at a licensed processing center. Any material leaving the site is subject to a survey and release charge, at a minimum.

The mass of radioactive waste generated during the various decommissioning activities at the site is shown on a line-item basis in the detailed Appendices C and D, and summarized in Section 5. The quantified waste summaries shown in these tables are consistent with 10 CFR Part 61 classifications. Commercially available steel containers are presumed to be used for the disposal of piping, small components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations. The volumes are calculated based on the exterior package dimensions for containerized material or a specific calculation for components serving as their own waste containers.

The more highly activated reactor components will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging

efficiencies are lower for the highly activated materials (greater than Type A quantity waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

Disposal fees are based upon estimated charges, with surcharges added for the highly activated components, for example, generated in the segmentation of the reactor vessel. The cost to dispose of the majority of the material generated from the decontamination and dismantling activities is based upon the current cost for disposal at EnergySolutions facility in Clive, Utah. Disposal costs for the higher activity waste (Class B and C) were based upon the last published rate schedule for noncompact waste for the Barnwell facility (as a proxy).

### 3.4.8 Site Conditions Following Decommissioning

The NRC will terminate the site license when it determines that site remediation has been performed in accordance with the license termination plan, and that the terminal radiation survey and associated documentation demonstrate that the facility is suitable for release. The NRC's involvement in the decommissioning process will end at this point. Local building codes and state environmental regulations will dictate the next step in the decommissioning process, as well as the owner's own future plans for the site.

The estimates presented herein include the dismantling of the major structures to just below ground level, backfilling and the collapsing of below grade voids, and regrading such that the site upon which the power block and supplemental structures are located is transformed into a "grassy plain."

The existing electrical switchyard and access roads will remain in support of the electrical transmission and distribution system. Site restoration does not include the remediation of the water treatment plant's settling basins, if required.

Sludge removed from the sewage treatment plant lagoon was assumed to contain low levels of contamination that would require controlled disposal. As such, 3,600 cubic feet of material from the lagoon was designated for disposition at Energy *Solutions*' facility.

The existing and replacement cooling tower discharge pipes will be left in place and flow filled with suitable material to prevent the pipes from collapsing. The intake line will also be filled. The estimates do not assume the remediation of any significant volume of contaminated soil. This assumption may be affected by continued plant operations and/or future regulatory actions, such as the development of site-specific release criteria.

#### 3.5 ASSUMPTIONS

The following are the major assumptions made in the development of the estimates for decommissioning the site.

### 3.5.1 Estimating Basis

The study follows the principles of ALARA through the use of work duration adjustment factors. These factors address the impact of activities such as radiological protection instruction, mock-up training, and the use of respiratory protection and protective clothing. The factors lengthen a task's duration, increasing costs and lengthening the overall schedule. ALARA planning is considered in the costs for engineering and planning, and in the development of activity specifications and detailed procedures. Changes to worker exposure limits may impact the decommissioning cost and project schedule.

#### 3.5.2 Labor Costs

The craft labor required to decontaminate and dismantle the nuclear unit is acquired through standard site contracting practices. The current cost of labor at the site is used as an estimating basis.

Ameren Missouri, as the operator, will continue to provide site operations support, including decommissioning program management, licensing, radiological protection, and site security. A Decommissioning Operations Contractor (DOC) will provide the supervisory staff needed to oversee the labor subcontractors, consultants, and specialty contractors needed to perform the work required for decontamination and dismantling effort. The DOC will also provide the engineering services needed to develop activity specifications, detailed procedures, detailed activation analyses, and support field activities such as structural modifications.

Personnel costs are based upon average salary information provided by Ameren Missouri. Overhead costs are included for site and corporate support, reduced commensurate with the staffing of the project. Security, while reduced from operating levels, is maintained throughout the decommissioning for access control, material control, and to safeguard the spent fuel.

#### 3.5.3 <u>Design Conditions</u>

Any fuel cladding failure that occurred during the lifetime of the plant is assumed to have released fission products at sufficiently low levels that the buildup of quantities of long-lived isotopes (e.g., <sup>137</sup>Cs, <sup>90</sup>Sr, or transuranics) has been prevented from reaching levels exceeding those that permit the major NSSS components to be shipped under current transportation regulations and disposal requirements.

The curie contents of the vessel and internals at final shutdown are derived from those listed in NUREG/CR-3474.<sup>[23]</sup> Actual estimates are derived from the curie/gram values contained therein and adjusted for the different mass of the Callaway components, projected operating life, and different periods of decay. Additional short-lived isotopes were derived from CR-0130<sup>[24]</sup> and CR-0672,<sup>[25]</sup> and benchmarked to the long-lived values from CR-3474.

The control elements are disposed of along with the spent fuel, i.e., there is no additional cost provided for their disposal.

Activation of the containment building structure is confined to the biological shield. More extensive activation (at very low levels) of the interior structures within containment has been detected at several reactors and the owners have elected to dispose of the affected material at a controlled facility rather than reuse the material as fill on site or send it to a landfill. The ultimate disposition of the material removed from the containment building will depend upon the site release criteria selected, as well as the designated end use for the site.

#### 3.5.4 General

#### Transition Activities

Existing warehouses are cleared of non-essential material and remain for use by Ameren Missouri and its subcontractors. The plant's operating staff performs the following activities at no additional cost or credit to the project during the transition period:

- Drain and collect fuel oils, lubricating oils, and transformer oils for recycle and/or sale.
- Drain and collect acids, caustics, and other chemical stores for recycle and/or sale.
- Process operating waste inventories, i.e., the estimates do not address the disposition of any legacy wastes; the disposal of operating wastes during this initial period is not considered a decommissioning expense.

## Scrap and Salvage

The existing plant equipment is considered obsolete and suitable for scrap as deadweight quantities only. Ameren Missouri will make economically reasonable efforts to salvage equipment following final plant shutdown. However, dismantling techniques assumed by TLG for equipment in this analysis are not consistent with removal techniques required for salvage (resale) of equipment. Experience has indicated that some buyers wanted equipment stripped down to very specific requirements before they would consider purchase. This required expensive rework after the equipment had been removed from its installed location. Since placing a salvage value on this machinery and equipment would be speculative, and the value would be small in comparison to the overall decommissioning expenses, this analysis does not attempt to quantify the value that an owner may realize based upon those efforts.

It is assumed, for purposes of this analysis, that any value received from the sale of scrap generated in the dismantling process would be more than offset by the on-site processing costs. The dismantling techniques assumed in the decommissioning estimates do not include the additional cost for size reduction and preparation to meet "furnace ready" conditions. For example, the recovery of copper from electrical cabling may require the removal and disposition of any contaminated insulation, an added expense. With a volatile market, the potential profit margin in scrap recovery is highly speculative, regardless of the ability to free release this material. This assumption is an implicit recognition of scrap value in the disposal of clean metallic waste at no additional cost to the project.

Furniture, tools, mobile equipment such as forklifts, trucks, bulldozers, and other property is removed at no cost or credit to the

decommissioning project. Disposition may include relocation to other facilities. Spare parts are also made available for alternative use.

### Energy

For estimating purposes, the plant is assumed to be de-energized, with the exception of those facilities associated with spent fuel storage. Replacement power costs are used to calculate the cost of energy consumed during decommissioning for tooling, lighting, ventilation, and essential services.

#### <u>Insurance</u>

Costs for continuing coverage (nuclear liability and property insurance) following cessation of plant operations and during decommissioning are included and based upon current operating premiums. Reductions in premiums, throughout the decommissioning process, are based upon the guidance and the limits for coverage defined in the NRC's proposed rulemaking "Financial Protection Requirements for Permanently Shutdown Nuclear Power Reactors." [26] The NRC's financial protection requirements are based on various reactor (and spent fuel) configurations.

### <u>Taxes</u>

Property tax payments are included for the land only and will continue through the decommissioning project.

#### Site Modifications

The perimeter fence and in-plant security barriers will be moved, as appropriate, to conform to the Site Security Plan in force during the various stages of the project.

#### 3.6 COST ESTIMATE SUMMARY

Schedules of expenditures are provided in Tables 3.1 and 3.2. The tables delineate the cost contributors by year of expenditures as well as cost contributor (e.g., labor, materials, and waste disposal).

The cost elements are also assigned to one of three subcategories: "License Termination," "Spent Fuel Management," and "Site Restoration." The subcategory "License Termination" is used to accumulate costs that are

consistent with "decommissioning" as defined by the NRC in its financial assurance regulations (i.e., 10 CFR §50.75). The cost reported for this subcategory is generally sufficient to terminate the unit's operating license, recognizing that there may be some additional cost impact from spent fuel management. These costs are identified in Tables 3.1a and 3.2a.

The "Spent Fuel Management" subcategory contains costs associated with the five and one-half years of post-shutdown pool operations and the transfer of the fuel from the pool to the ISFSI. These costs are identified in Tables 3.1b and 3.2b.

"Site Restoration" is used to capture costs associated with the dismantling and demolition of buildings and facilities demonstrated to be free from contamination. This includes structures never exposed to radioactive materials, as well as those facilities that have been decontaminated to appropriate levels. Structures are removed to a depth of three feet and backfilled to conform to local grade. These costs are identified in Tables 3.1c and 3.2c.

As discussed in Section 3.4.1, while designated for disposal at the geologic repository along with the spent fuel, GTCC waste is still classified as low-level radioactive waste and, as such, included as a "License Termination" expense.

Decommissioning costs are reported in 2011 dollars. Costs are not inflated, escalated, or discounted over the period of expenditure (or projected lifetime of the plant). The schedules are based upon the detailed activity costs reported in Appendices C and D, along with the timeline presented in Section 4.

# TABLE 3.1 DECON ALTERNATIVE SCHEDULE OF TOTAL ANNUAL EXPENDITURES

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Year	Labor	Materials	Energy	Burial	Other $^{[1]}$	Total [2]
2024	11,577	978	171	7	1,965	14,699
2025	58,992	7,323	1,003	1,575	15,120	84,013
2026	68,700	25,346	1,052	25,055	29,700	149,853
2027	67,008	26,210	767	29,080	24,429	147,494
2028	58,156	10,262	626	7,944	10,104	87,092
2029	57,997	10,234	624	7,922	10,076	86,854
2030	44,042	6,998	413	6,611	7,058	65,122
2031	32,625	8,686	143	19	3,369	44,842
2032	30,644	26,753	83	0	3,681	61,162
2033	6,698	5,848	18	0	805	13,369
		·			·	
Total	436,438	128,637	4,901	78,214	106,307	754,498

<sup>[1]</sup> Includes property taxes, insurance, fees, surveys, and GTCC disposal

<sup>[2]</sup> Columns may not add due to rounding

# TABLE 3.1a DECON ALTERNATIVE SCHEDULE OF LICENSE TERMINATION EXPENDITURES

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Year	Labor	Materials	Energy	Burial	Other	Total		
2024	11.940	340	171	7	1 450	13,217		
	11,240			-	1,458			
2025	57,149	4,265	1,003	1,575	12,653	76,646		
2026	65,441	22,302	1,052	25,055	27,550	141,399		
2027	63,309	23,019	767	29,080	22,380	138,556		
2028	53,411	6,604	626	7,944	7,841	76,426		
2029	53,265	6,586	624	7,922	7,820	76,217		
2030	42,642	5,919	413	6,611	6,390	61,975		
2031	24,040	1,157	119	19	3,281	28,616		
2032	140	0	0	0	3,366	3,506		
2033	31	0	0	0	736	766		
Total	370,666	70,191	4,776	78,214	93,476	617,324		

# TABLE 3.1b DECON ALTERNATIVE SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES

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Year	Labor	Materials	Energy	Burial	Other	Total
9094	019	000	0	0	F07	1.950
2024	213	638	0	0	507	1,358
2025	1,019	3,058	0	0	2,467	6,543
2026	999	2,997	0	0	2,128	6,124
2027	1,013	3,038	0	0	1,984	6,035
2028	993	2,979	0	0	1,990	5,962
2029	990	2,971	0	0	1,984	5,946
2030	293	879	0	0	587	1,759
2031	0	0	0	0	0	0
2032	0	0	0	0	0	0
2033	0	0	0	0	0	0
Total	5,520	16,560	0	0	11,646	33,726

# TABLE 3.1c DECON ALTERNATIVE SCHEDULE OF SITE RESTORATION EXPENDITURES

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Year	Labor	Materials Materials	Energy	Burial	Other	Total
2024	125	0	0	0	0	125
2025	824	0	0	0	0	824
2026	2,261	48	0	0	22	2,330
2027	2,686	153	0	0	65	2,904
2028	3,751	679	0	0	273	4,703
2029	3,741	677	0	0	272	4,691
2030	1,107	200	0	0	81	1,388
2031	8,585	7,529	23	0	89	16,226
2032	30,505	26,753	83	0	315	57,656
2033	6,668	5,848	18	0	69	12,602
Total	60,252	41,886	125	0	1,185	103,448

# TABLE 3.2 SAFSTOR ALTERNATIVE SCHEDULE OF TOTAL ANNUAL EXPENDITURES

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Year	Labor	Materials	Energy	Burial	Other [1]	Total [2]
2024	9,543	879	171	7	1,843	12,444
2025	48,860	7,091	832	447	9,451	66,682
2026	23,651	5,167	365	629	18,659	48,472
2027	13,317	3,369	166	13	4,330	21,196
2028	13,353	3,378	167	13	4,342	21,254
2029	13,317	3,369	166	13	4,330	21,196
2030	6,299	1,203	108	8	2,255	9,874
2031	3,350	293	83	6	1,383	5,116
2032	3,360	294	83	6	1,387	5,130
2033	3,350	293	83	6	1,383	5,116
2034	3,350	293	83	6	1,383	5,116
2035	3,350	293	83	6	1,383	5,116
2036	3,360	294	83	6	1,387	5,130
2037	3,350	293	83	6	1,383	5,116
2038	3,350	293	83	6	1,383	5,116
2039	3,350	293	83	6	1,383	5,116
2040	3,360	294	83	6	1,387	5,130
2041	3,350	293	83	6	1,383	5,116
2042	3,350	293	83	6	1,383	5,116
2043	3,350	293	83	6	1,383	5,116
2044	3,360	294	83	6	1,387	5,130
2045	3,350	293	83	6	1,383	5,116
2046	3,350	293	83	6	1,383	5,116
2047	3,350	293	83	6	1,383	5,116
2048	3,360	294	83	6	1,387	5,130
2049	3,350	293	83	6	1,383	5,116
2050	3,350	293	83	6	1,383	5,116
2051	3,350	293	83	6	1,383	5,116
2052	3,360	294	83	6	1,387	5,130
2053	3,350	293	83	6	1,383	5,116
2054	3,350	293	83	6	1,383	5,116
2055	3,350	293	83	6	1,383	5,116
2056	3,360	294	83	6	1,387	5,130

# TABLE 3.2 (continued) SAFSTOR ALTERNATIVE SCHEDULE OF TOTAL ANNUAL EXPENDITURES

Hammont	X-
Equipment	œ

Year	Labor	Materials	Energy	Burial	Other [1]	Total [2]
2057	3,350	293	83	6	1,383	5,116
2058	3,350	293	83	6	1,383	5,116
2059	3,350	293	83	6	1,383	5,116
2060	3,360	294	83	6	1,387	5,130
2061	3,350	293	83	6	1,383	5,116
2062	3,350	293	83	6	1,383	5,116
2063	3,350	293	83	6	1,383	5,116
2064	3,360	294	83	6	1,387	5,130
2065	3,350	293	83	6	1,383	5,116
2066	3,350	293	83	6	1,383	5,116
2067	3,350	293	83	6	1,383	5,116
2068	3,360	294	83	6	1,387	5,130
2069	3,350	293	83	6	1,383	5,116
2070	3,350	293	83	6	1,383	5,116
2071	3,350	293	83	6	1,383	5,116
2072	3,360	294	83	6	1,387	5,130
2073	3,350	293	83	6	1,383	5,116
2074	3,350	293	83	6	1,383	5,116
2075	3,350	293	83	6	1,383	5,116
2076	3,360	294	83	6	1,387	5,130
2077	3,350	293	83	6	1,383	5,116
2078	27,456	1,188	444	18	2,894	31,999
2079	43,085	5,077	832	34	4,135	53,163
2080	60,287	28,908	794	34,110	27,083	151,182
2081	50,850	11,050	657	12,469	10,971	85,998
2082	48,476	6,552	624	6,987	6,905	69,544
2083	48,476	6,552	624	6,987	6,905	69,544
2084	33,183	6,970	169	308	3,483	44,112
2085	30,561	26,679	83	0	3,605	60,929
2086	9,126	7,967	25	0	1,077	18,195
Total	637,419	139,174	10,144	62,323	177,324	1,026,384

<sup>[1]</sup> Includes property taxes, insurance, fees, surveys, and GTCC disposal

<sup>[2]</sup> Columns may not add due to rounding

# TABLE 3.2a SAFSTOR ALTERNATIVE SCHEDULE OF LICENSE TERMINATION EXPENDITURES

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2024	9,331	241	171	7	1,336	11,086
2025	47,813	3,949	832	447	6,984	60,026
2026	16,334	2,117	307	629	15,872	35,259
2027	3,351	419	83	13	1,407	5,273
2028	3,360	420	83	13	1,410	5,288
2029	3,351	419	83	13	1,407	5,273
2030	3,350	330	83	8	1,390	5,162
2031	3,350	293	83	6	1,383	5,116
2032	3,360	294	83	6	1,387	5,130
2033	3,350	293	83	6	1,383	5,116
2034	3,350	293	83	6	1,383	5,116
2035	3,350	293	83	6	1,383	5,116
2036	3,360	294	83	6	1,387	5,130
2037	3,350	293	83	6	1,383	5,116
2038	3,350	293	83	6	1,383	5,116
2039	3,350	293	83	6	1,383	5,116
2040	3,360	294	83	6	1,387	5,130
2041	3,350	293	83	6	1,383	5,116
2042	3,350	293	83	6	1,383	5,116
2043	3,350	293	83	6	1,383	5,116
2044	3,360	294	83	6	1,387	5,130
2045	3,350	293	83	6	1,383	5,116
2046	3,350	293	83	6	1,383	5,116
2047	3,350	293	83	6	1,383	5,116
2048	3,360	294	83	6	1,387	5,130
2049	3,350	293	83	6	1,383	5,116
2050	3,350	293	83	6	1,383	5,116
2051	3,350	293	83	6	1,383	5,116
2052	3,360	294	83	6	1,387	5,130
2053	3,350	293	83	6	1,383	5,116
2054	3,350	293	83	6	1,383	5,116
2055	3,350	293	83	6	1,383	5,116
2056	3,360	294	83	6	1,387	5,130

# TABLE 3.2a (continued) SAFSTOR ALTERNATIVE SCHEDULE OF LICENSE TERMINATION EXPENDITURES

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2057	3,350	293	83	6	1,383	5,116
2058	3,350	293	83	6	1,383	5,116
2059	3,350	293	83	6	1,383	5,116
2060	3,360	294	83	6	1,387	5,130
2061	3,350	293	83	6	1,383	5,116
2062	3,350	293	83	6	1,383	5,116
2063	3,350	293	83	6	1,383	5,116
2064	3,360	294	83	6	1,387	5,130
2065	3,350	293	83	6	1,383	5,116
2066	3,350	293	83	6	1,383	5,116
2067	3,350	293	83	6	1,383	5,116
2068	3,360	294	83	6	1,387	5,130
2069	3,350	293	83	6	1,383	5,116
2070	3,350	293	83	6	1,383	5,116
2071	3,350	293	83	6	1,383	5,116
2072	3,360	294	83	6	1,387	5,130
2073	3,350	293	83	6	1,383	5,116
2074	3,350	293	83	6	1,383	5,116
2075	3,350	293	83	6	1,383	5,116
2076	3,360	294	83	6	1,387	5,130
2077	3,350	293	83	6	1,383	5,116
2078	26,844	1,188	444	18	2,894	31,387
2079	42,237	5,077	832	34	4,135	52,315
2080	57,000	28,826	794	34,110	27,053	147,782
2081	47,617	10,568	657	12,469	10,778	82,089
2082	45,269	5,971	624	6,987	6,671	65,522
2083	45,269	5,971	624	6,987	6,671	65,522
2084	26,800	1,464	152	308	3,408	32,132
2085	139	0	0	0	3,291	3,430
2086	42	0	0	0	983	1,024
Total	535,683	80,735	9,686	62,323	160,746	849,173

# TABLE 3.2b SAFSTOR ALTERNATIVE SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2024	213	638	0	0	507	1,358
2025	1,047	3,142	0	0	2,467	6,656
2026	7,317	3,050	58	0	2,787	13,212
2027	9,966	2,950	83	0	2,924	15,923
2028	9,993	2,958	83	0	2,932	15,966
2029	9,966	2,950	83	0	2,924	15,923
2030	2,949	873	25	0	865	4,711
2031-86	0	0	0	0	0	0
	·	·	·		·	
Total	41,451	16,560	333	0	15,405	73,749

70

94

314

0

0

0

11,917

57,498

17,171

# TABLE 3.2c SAFSTOR ALTERNATIVE SCHEDULE OF SITE RESTORATION EXPENDITURES

(thousands, 2011 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2024-77	0	0	0	0	0	0
2078	539	0	0	0	0	539
2079	873	0	0	0	0	873
2080	3,144	77	0	0	28	3,250
2081	3,304	466	0	0	186	3,956
2082	3,293	596	0	0	240	4,129
2083	3,293	596	0	0	240	4,129

Total	60.285	41.879	125	0	1.173	103,462

5,497

26,679

7,967

17

83

25

2084

2085

2086

6,332

9,085

30,421

#### 4. SCHEDULE ESTIMATE

The schedules for the decommissioning scenarios considered in this study follow the sequences presented in the AIF/NESP-036 study, with minor changes to reflect recent experience and site-specific constraints. In addition, the scheduling has been revised to reflect the spent fuel management plan described in Section 3.4.1.

A schedule or sequence of activities for the DECON alternative is presented in Figure 4.1. The scheduling sequence assumes that fuel is removed from the spent fuel pool within five and one-half years. The key activities listed in the schedule do not reflect a one-to-one correspondence with those activities in the cost tables, but reflect dividing some activities for clarity and combining others for convenience. The schedule was prepared using the "Microsoft Project Professional 2010" computer software.<sup>[27]</sup>

#### 4.1 SCHEDULE ESTIMATE ASSUMPTIONS

The schedule reflects the results of a precedence network developed for the site decommissioning activities, i.e., a PERT (Program Evaluation and Review Technique) Software Package. The work activity durations used in the precedence network reflect the actual man-hour estimates from the cost table, adjusted by stretching certain activities over their slack range and shifting the start and end dates of others. The following assumptions were made in the development of the decommissioning schedule:

- The fuel building is isolated until such time that all spent fuel has been transferred from the spent fuel pool to the DOE. Decontamination and dismantling of the storage pool is initiated once the transfer of spent fuel is complete (DECON option).
- All work (except vessel and internals removal) is performed during an 8-hour workday, 5 days per week, with no overtime. There are eleven paid holidays per year.
- Reactor and internals removal activities are performed by using separate crews for different activities working on different shifts, with a corresponding backshift charge for the second shift.
- Multiple crews work parallel activities to the maximum extent possible, consistent with optimum efficiency, adequate access for cutting, removal and laydown space, and with the stringent safety measures necessary during demolition of heavy components and structures.

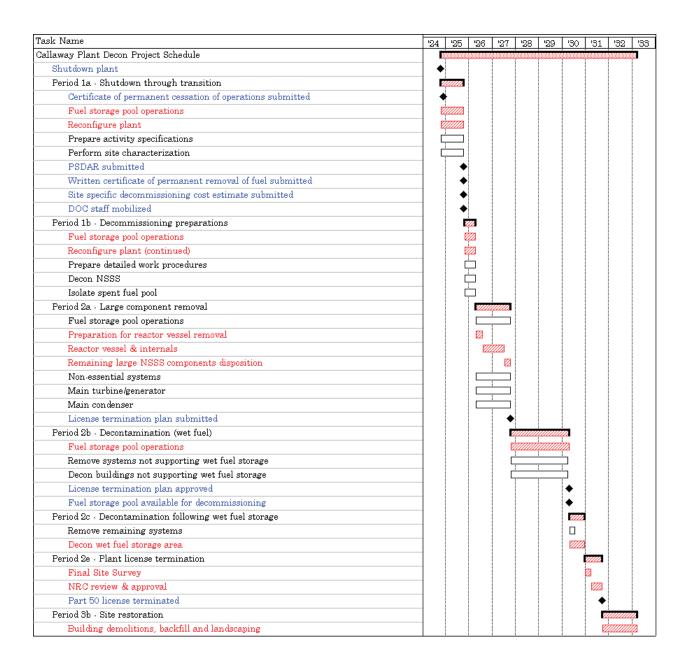
• For plant systems removal, the systems with the longest removal durations in areas on the critical path are considered to determine the duration of the activity.

#### 4.2 PROJECT SCHEDULE

The period-dependent costs presented in the detailed cost tables are based upon the durations developed in the schedules for decommissioning. Durations are established between several milestones in each project period; these durations are used to establish a critical path for the entire project. In turn, the critical path duration for each period is used as the basis for determining the perioddependent costs. A second critical path is shown for the spent fuel storage period, which determines the release of the Fuel Building for final decontamination.

Project timelines are provided in Figures 4.2 and 4.3 with milestone dates based on a 2024 shutdown date. The fuel pool is emptied approximately five and one-half years after shutdown. Deferred decommissioning in the SAFSTOR scenarios is assumed to commence so that the operating license is terminated within a 60-year period from the cessation of plant operations.

## FIGURE 4.1 ACTIVITY SCHEDULE

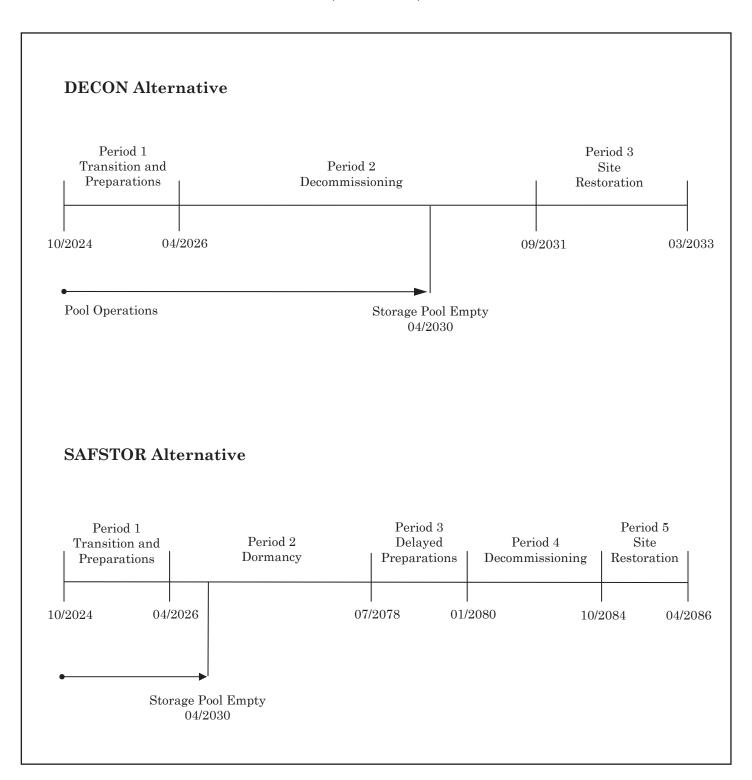


Legend: 1. Red text and/or shaded scheduling bars indicate critical path activities

- 2. Shaded scheduling bars associated with major decommissioning periods, e.g., Period 1a, indicate overall duration of that period
- 3. Blue text and/or diamond symbols indicate major milestones

# FIGURE 4.2 DECOMMISSIONING TIMELINES

(not to scale)



#### 5. RADIOACTIVE WASTES

The objectives of the decommissioning process are the removal of all radioactive material from the site that would restrict its future use and the termination of the NRC license. This currently requires the remediation of all radioactive material at the site in excess of applicable legal limits. Under the Atomic Energy Act, [28] the NRC is responsible for protecting the public from sources of ionizing radiation. Title 10 of the Code of Federal Regulations delineates the production, utilization, and disposal of radioactive materials and processes. In particular, Part 71 defines radioactive material as it pertains to transportation and Part 61 specifies its disposition.

Most of the materials being transported for controlled burial are categorized as Low Specific Activity (LSA) or Surface Contaminated Object (SCO) materials containing Type A quantities, as defined in 49 CFR Parts 173-178. Shipping containers are required to be Industrial Packages (IP-1, IP-2 or IP-3, as defined in 10 CFR §173.411). For this study, commercially available steel containers are presumed to be used for the disposal of piping, small components, and concrete. Larger components can serve as their own containers, with proper closure of all openings, access ways, and penetrations.

The volumes of radioactive waste generated during the various decommissioning activities at the site are shown on a line-item basis in Appendices C and D, and summarized in Tables 5.1 and 5.2. The quantified waste volume summaries shown in these tables are consistent with Part 61 classifications. The volumes are calculated based on the exterior dimensions for containerized material and on the displaced volume of components serving as their own waste containers.

The reactor vessel and internals are categorized as large quantity shipments and, accordingly, will be shipped in reusable, shielded truck casks with disposable liners. In calculating disposal costs, the burial fees are applied against the liner volume, as well as the special handling requirements of the payload. Packaging efficiencies are lower for the highly activated materials (greater than Type A quantity waste), where high concentrations of gamma-emitting radionuclides limit the capacity of the shipping canisters.

No process system containing/handling radioactive substances at shutdown is presumed to meet material release criteria by decay alone (i.e., systems radioactive at shutdown will still be radioactive over the time period during which the decommissioning is accomplished, due to the presence of long-lived radionuclides).

While the dose rates decrease with time, radionuclides such as <sup>137</sup>Cs will still control the disposition requirements.

The waste material produced in the decontamination and dismantling of the nuclear units is primarily generated during Period 2 of DECON and Period 4 of SAFSTOR. Material that is considered potentially contaminated when removed from the radiological controlled area is sent to processing facilities in Tennessee for conditioning and disposal. Heavily contaminated components and activated materials are routed for controlled disposal. The disposal volumes reported in the tables reflect the savings resulting from reprocessing and recycling.

For purposes of constructing the estimates, the cost for disposal at the Energy *Solutions* facility was used as a proxy for future disposal facilities. Separate rates were used for containerized waste and large components, including the steam generators and reactor coolant pump motors. Demolition debris including miscellaneous steel, scaffolding, and concrete was disposed of at a bulk rate. The decommissioning waste stream also included resins and dry active waste.

Since Energy Solutions is not currently able to receive the more highly radioactive components generated in the decontamination and dismantling of the reactor, disposal costs for the Class B and C material were based upon the last published rate schedule for non-compact waste for the Barnwell facility (as a proxy). Additional surcharges were included for activity, dose rate, and/or handling added as appropriate for the particular package.

A small quantity of material generated during the decommissioning will not be considered suitable for near-surface disposal, and is assumed to be disposed of in a geologic repository, in a manner similar to that envisioned for spent fuel disposal. Such material, known as Greater-Than-Class-C or GTCC material, is estimated to require six spent fuel storage canisters (or the equivalent) to dispose of the most radioactive portions of the reactor vessel internals. The volume and weight reported in Tables 5.1 and 5.2 represent the packaged weight and volume of the spent fuel storage canisters.

# TABLE 5.1 DECON ALTERNATIVE DECOMMISSIONING WASTE SUMMARY

Waste	Cost Basis	Class [1]	Waste Volume (cubic feet)	Mass (pounds)
Low-Level Radioactive Waste (near-surface	EnergySolutions	A	146,443	12,358,063
disposal)	Barnwell	В	1,690	191,293
	Barnwell	C	459	48,448
Greater than Class C (geologic repository)	Spent Fuel Equivalent	GTCC	2,142	422,146
Processed/Conditioned (off-site recycling center)	Recycling Vendors	A	281,077	10,863,740
Totals [2]			431,812	23,883,690

 $<sup>^{[1]}</sup>$  Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

<sup>[2]</sup> Columns may not add due to rounding.

# TABLE 5.2 SAFSTOR ALTERNATIVE DECOMMISSIONING WASTE SUMMARY

Waste	Cost Basis	Class [1]	Waste Volume (cubic feet)	Mass (pounds)
Waste	Cost Basis	Class	(cubic feet)	(pourus)
Low-Level Radioactive	EnergySolutions	A	123,652	9,946,932
Waste (near-surface				
disposal)	Barnwell	В	376	49,054
	Barnwell	C	470	47,758
Greater than Class C	Spent Fuel			
(geologic repository)	Equivalent	GTCC	2,142	422,146
Processed/Conditioned	Recycling			
(off-site recycling center)	Vendors	A	301,556	11,730,720
Totals [2]			428,196	22,196,610

 $<sup>^{[1]}</sup>$  Waste is classified according to the requirements as delineated in Title 10 CFR, Part 61.55

<sup>[2]</sup> Columns may not add due to rounding.

#### 6. RESULTS

The analysis to estimate the costs to decommission Callaway relied upon the sitespecific, technical information developed for a previous analysis prepared in 2008. While not an engineering study, the estimates provide the plant owner with sufficient information to assess its financial obligations, as they pertain to the eventual decommissioning of the nuclear station.

The estimates described in this report are based on numerous fundamental assumptions, including regulatory requirements, project contingencies, low-level radioactive waste disposal practices, high-level radioactive waste management options, and site restoration requirements. The decommissioning scenarios assume continued operation of the station's spent fuel pool for a minimum of five and on-half years following the cessation of operations for continued cooling of the assemblies. Once sufficiently cooled, the assemblies will be moved to the ISFSI for interim storage and to await transfer to a DOE facility (e.g., geologic repository).

The cost projected to promptly decommission (DECON) Callaway is estimated to be \$754.5 million. The majority of this cost (approximately 81.8%) is associated with the physical decontamination and dismantling of the nuclear unit so that the operating license can be terminated. Another 4.5% is associated with the management, interim storage, and eventual transfer of the spent fuel. The remaining 13.7% is for the demolition of the designated structures and limited restoration of the site.

The cost projected for deferred decommissioning (SAFSTOR) is estimated to be \$1,026.4 million. The majority of this cost (approximately 82.7%) is associated with placing the unit in storage, ongoing caretaking of the unit during dormancy, and the eventual physical decontamination and dismantling of the nuclear unit so that the operating license can be terminated. Another 7.2% is associated with the management, interim storage, and eventual transfer of the spent fuel. The remaining 10.1% is for the demolition of the designated structures and limited restoration of the site.

The primary cost contributors, identified in Tables 6.1 and 6.2, are either labor-related or associated with the management and disposition of the radioactive waste. Program management is the largest single contributor to the overall cost. The magnitude of the expense is a function of both the size of the organization required to manage the decommissioning, as well as the duration of the program. It is assumed, for purposes of this analysis, that Ameren Missouri will oversee the decommissioning program, using a DOC to manage the decommissioning labor force and the associated subcontractors. The size and composition of the management

organization varies with the decommissioning phase and associated site activities. However, once the operating license is terminated, the staff is substantially reduced for the conventional demolition and restoration of the site (for the DECON alternative).

As described in this report, the spent fuel pool will remain operational for a minimum of five and one-half years following the cessation of operations. The pool will be isolated and an independent spent fuel island created. This will allow decommissioning operations to proceed in and around the pool area. Over the five and one-half year period, the spent fuel will be packaged into multi-purpose canisters and transferred to the ISFSI. The ISFSI will continue to operate until such time that the transfer of spent fuel to a DOE facility is complete.

The cost for waste disposal includes only those costs associated with the controlled disposition of the low-level radioactive waste generated from decontamination and dismantling activities, including plant equipment and components, structural material, filters, resins and dry-active waste. As described in Section 5, disposition of the low-level radioactive material required controlled disposal is at the Energy Solutions' facility. Highly activated components, requiring additional isolation from the environment (GTCC), are packaged for geologic disposal. The cost of geologic disposal is based upon a cost equivalent for spent fuel.

A significant portion of the metallic waste is designated for additional processing and treatment at an off-site facility. Processing reduces the volume of material requiring controlled disposal through such techniques and processes as survey and sorting, decontamination, and volume reduction. The material that cannot be unconditionally released is packaged for controlled disposal at one of the currently operating facilities. The cost identified in the summary tables for processing is all-inclusive, incorporating the ultimate disposition of the material.

Removal costs reflect the labor-intensive nature of the decommissioning process, as well as the management controls required to ensure a safe and successful program. Decontamination and packaging costs also have a large labor component that is based upon prevailing union wages. Non-radiological demolition is a natural extension of the decommissioning process. The methods employed in decontamination and dismantling are generally destructive and indiscriminate in inflicting collateral damage. With a work force mobilized to support decommissioning operations, non-radiological demolition can be an integrated activity and a logical expansion of the work being performed in the process of terminating the operating license. Prompt demolition reduces future liabilities and can be more cost effective than deferral, due to the deterioration of the facilities (and therefore the working conditions) with time.

The reported cost for transport includes the tariffs and surcharges associated with moving large components and/or overweight shielded casks overland, as well as the general expense, e.g., labor and fuel, of transporting material to the destinations identified in this report. For purposes of this analysis, material is primarily moved overland by truck.

Decontamination is used to reduce the plant's radiation fields and minimize worker exposure. Slightly contaminated material or material located within a contaminated area is sent to an off-site processing center, i.e., this analysis does not assume that contaminated plant components and equipment can be decontaminated for uncontrolled release in-situ. Centralized processing centers have proven to be a more economical means of handling the large volumes of material produced in the dismantling of a nuclear unit.

License termination survey costs are associated with the labor intensive and complex activity of verifying that contamination has been removed from the site to the levels specified by the regulating agency. This process involves a systematic survey of all remaining plant surface areas and surrounding environs, sampling, isotopic analysis, and documentation of the findings. The status of any plant components and materials not removed in the decommissioning process will also require confirmation and will add to the expense of surveying the facilities alone.

The remaining costs include allocations for heavy equipment and temporary services, as well as for other expenses such as regulatory fees and the premiums for nuclear insurance. While site operating costs are greatly reduced following the final cessation of plant operations, certain administrative functions do need to be maintained either at a basic functional or regulatory level.

## TABLE 6.1 DECON ALTERNATIVE DECOMMISSIONING COST ELEMENTS

(thousands of 2011 dollars)

Cost Element	Total	Percentage
Decontamination	18,215	2.4
Removal	161,612	21.4
Packaging	24,658	3.3
Transportation	13,787	1.8
Waste Disposal	65,642	8.7
Off-site Waste Processing	25,465	3.4
Program Management [1]	272,613	36.1
Security	44,414	5.9
Corporate Allocations	40,691	5.4
Spent Fuel Pool Isolation	11,822	1.6
Spent Fuel Management [2]	33,726	4.5
Insurance and Regulatory Fees	11,565	1.5
Energy	4,901	0.6
Characterization and Licensing Surveys	15,843	2.1
Property Taxes	2,595	0.3
Miscellaneous Equipment	6,948	0.9
Total [3]	754,498	100

Cost Element	Total	Percentage
License Termination	617,324	81.8
Spent Fuel Management	33,726	4.5
Site Restoration	103,448	13.7
Total [3]	754,498	100.0

<sup>[1]</sup> Includes engineering costs

Direct costs only. Excludes program management costs (staffing) but includes costs for spent fuel loading/spent fuel pool O&M and Emergency Planning fees

<sup>[3]</sup> Columns may not add due to rounding

### TABLE 6.2 SAFSTOR ALTERNATIVE DECOMMISSIONING COST ELEMENTS

(thousands of 2011 dollars)

Cost Element	Total	Percentage
Decontamination	16,286	1.6
Removal	162,821	15.9
Packaging	18,857	1.8
Transportation	10,639	1.0
Waste Disposal	47,737	4.7
Off-site Waste Processing	27,479	2.7
Program Management [1]	364,227	35.5
Security	156,821	15.3
Corporate Allocations	55,341	5.4
Spent Fuel Pool Isolation	11,822	1.2
Spent Fuel Management [2]	33,726	3.3
Insurance and Regulatory Fees	53,557	5.2
Energy	10,144	1.0
Characterization and Licensing Surveys	17,246	1.7
Property Taxes	18,943	1.8
Miscellaneous Equipment	20,738	2.0
Total [3]	1,026,384	100.0

Cost Element	Total	Percentage
License Termination	849,173	82.73
Spent Fuel Management [4]	73,749	7.19
Site Restoration	103,462	10.08
Total [3]	1,026,384	100.0

<sup>[1]</sup> Includes engineering costs

Direct costs only. Excludes program management costs (staffing) but includes costs for spent fuel loading/spent fuel pool O&M and Emergency Planning fees

<sup>[3]</sup> Columns may not add due to rounding

<sup>[4]</sup> Includes percentage of Period 2a (dormancy) plant operating costs until spent fuel pool is emptied, in addition to the direct costs.

#### 7. REFERENCES

- 1. "Decommissioning Cost Analysis for the Callaway Plant," Document No. A22-1599-002, Rev. 0, TLG Services, Inc., August 2008
- 2. U.S. Code of Federal Regulations, Title 10, Parts 30, 40, 50, 51, 70 and 72, "General Requirements for Decommissioning Nuclear Facilities," Nuclear Regulatory Commission, Federal Register Volume 53, Number 123 (p 24018 et seq.), June 27, 1988
- 3. U.S. Nuclear Regulatory Commission, Regulatory Guide 1.159, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors," October 2003
- 4. U.S. Code of Federal Regulations, Title 10, Part 20, Subpart E, "Radiological Criteria for License Termination"
- 5. U.S. Code of Federal Regulations, Title 10, Parts 20 and 50, "Entombment Options for Power Reactors," Advanced Notice of Proposed Rulemaking, Federal Register Volume 66, Number 200, October 16, 2001
- 6. U.S. Code of Federal Regulations, Title 10, Parts 2, 50 and 51, "Decommissioning of Nuclear Power Reactors," Nuclear Regulatory Commission, Federal Register Volume 61 (p 39278 et seq.), July 29, 1996.
- 7. "Nuclear Waste Policy Act of 1982 and Amendments," U.S. Department of Energy's Office of Civilian Radioactive Management, 1982
- 8. U.S. Code of Federal Regulations, Title 10, Part 50, "Domestic Licensing of Production and Utilization Facilities," Subpart 54 (bb), "Conditions of Licenses"
- 9. "Low Level Radioactive Waste Policy Act," Public Law 96-573, 1980
- 10. "Low-Level Radioactive Waste Policy Amendments Act of 1985," Public Law 99-240, 1986
- 11. Waste is classified in accordance with U.S. Code of Federal Regulations, Title 10, Part 61.55
- 12. U.S. Code of Federal Regulations, Title 10, Part 20, Subpart E, "Radiological Criteria for License Termination," Federal Register, Volume 62, Number 139 (p 39058 et seq.), July 21, 1997

#### 7. REFERENCES

(continued)

- 13. "Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination," EPA Memorandum OSWER No. 9200.4-18, August 22, 1997.
- 14. U.S. Code of Federal Regulations, Title 40, Part 141.16, "Maximum contaminant levels for beta particle and photon radioactivity from man-made radionuclides in community water systems"
- 15. "Memorandum of Understanding Between the Environmental Protection Agency and the Nuclear Regulatory Commission: Consultation and Finality on Decommissioning and Decontamination of Contaminated Sites," OSWER 9295.8-06a, October 9, 2002
- 16. "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)," NUREG/CR-1575, Rev. 1, EPA 402-R-97-016, Rev. 1, August 2000
- 17. T.S. LaGuardia et al., "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986
- 18. W.J. Manion and T.S. LaGuardia, "Decommissioning Handbook," U.S. Department of Energy, DOE/EV/10128-1, November 1980
- 19. "Building Construction Cost Data 2011," Robert Snow Means Company, Inc., Kingston, Massachusetts
- 20. Project and Cost Engineers' Handbook, Second Edition, p. 239, American Association of Cost Engineers, Marcel Dekker, Inc., New York, New York, 1984
- 21. U.S. Department of Transportation, Title 49 of the Code of Federal Regulations, "Transportation," Parts 173 through 178
- 22. Tri-State Motor Transit Company, published tariffs, Interstate Commerce Commission (ICC), Docket No. MC-427719 Rules Tariff, March 2004, Radioactive Materials Tariff, February 2011
- 23. J.C. Evans et al., "Long-Lived Activation Products in Reactor Materials" NUREG/CR-3474, Pacific Northwest Laboratory for the Nuclear Regulatory Commission, August 1984

#### 7. REFERENCES

(continued)

- 24. R.I. Smith, G.J. Konzek, W.E. Kennedy, Jr., "Technology, Safety and Costs of Decommissioning a Reference Pressurized Water Reactor Power Station," NUREG/CR-0130 and addenda, Pacific Northwest Laboratory for the Nuclear Regulatory Commission, June 1978
- 25. H.D. Oak, et al., "Technology, Safety and Costs of Decommissioning a Reference Boiling Water Reactor Power Station," NUREG/CR-0672 and addenda, Pacific Northwest Laboratory for the Nuclear Regulatory Commission, June 1980
- 26. "Financial Protection Requirements for Permanently Shutdown Nuclear Power Reactors," 10 CFR Parts 50 and 140, Federal Register Notice, Vol. 62, No. 210, October 30, 1997
- 27. "Microsoft Project Professional 2011," Microsoft Corporation, Redmond, WA.
- 28. "Atomic Energy Act of 1954," (68 Stat. 919)

## APPENDIX A UNIT COST FACTOR DEVELOPMENT

### APPENDIX A UNIT COST FACTOR DEVELOPMENT

Example: Unit Factor for Removal of Contaminated Heat Exchanger < 3,000 lbs.

#### 1. SCOPE

Heat exchangers weighing < 3,000 lbs. will be removed in one piece using a crane or small hoist. They will be disconnected from the inlet and outlet piping. The heat exchanger will be sent to the waste processing area.

#### 2. CALCULATIONS

Act ID	Activity Description	Activity Duration (minutes)	Critical Duration (minutes)*
a b c d e f g h	Remove insulation Mount pipe cutters Install contamination controls Disconnect inlet and outlet lines Cap openings Rig for removal Unbolt from mounts Remove contamination controls	60 60 20 60 20 30 30	(b) 60 (b) 60 (d) 30 30
i	Remove, wrap, send to waste processing area  Totals (Activity/Critical)	<u>60</u> 355	60 255
+ Re + Ra	tion adjustment(s): spiratory protection adjustment (50% of critical dura diation/ALARA adjustment (37% of critical duration sted work duration	*	128 <u>95</u> 478
	otective clothing adjustment (30% of adjusted durati uctive work duration	on)	143 621
+ Wo	ork break adjustment (8.33 % of productive duration)	)	<u>52</u>
Total	work duration (minutes)		673

#### \*\*\* Total duration = 11.217 hr \*\*\*

<sup>\*</sup> alpha designators indicate activities that can be performed in parallel

### APPENDIX A (continued)

### 3. LABOR REQUIRED

Crew	Number	Duration (hours)	Rate (\$/hr)	Cost
Laborers	3.00	11.217	\$40.00	\$1,346.04
Craftsmen	2.00	11.217	\$55.71	\$1,249.80
Foreman	1.00	11.217	\$60.00	\$673.02
General Foreman	0.25	11.217	\$61.00	\$171.06
Fire Watch	0.05	11.217	\$40.00	\$22.43
Health Physics Technician	1.00	11.217	\$44.00	\$493.55
Total Labor Cost				\$3,955.90
4. EQUIPMENT & CON	SUMABLES	COSTS		
Equipment Costs				none
<ul> <li>Consumables/Materials Costs</li> <li>Universal Polypropylene Sorbent 50 @ \$0.56/sq ft [1]</li> <li>Tarpaulin, oil resistant, fire retardant 50 @ \$0.41/sq ft [2]</li> <li>Gas torch consumables 1 @ \$10.71 x 1 /hr [3]</li> </ul>			\$28.00 \$20.50 \$10.71	
Subtotal cost of equipment an				\$59.21
Overhead & profit on equipment and materials @ 15.30 %			\$8.43	
Total costs, equipment & material			\$67.64	
TOTAL COST:				
Removal of contaminated	heat excha	nger <3000 pc	ounds:	\$4,023.54
Total labor cost:				\$3,955.90
Total equipment/material cost	s:			\$67.64
Total craft labor man-hours required per unit:			81.88	

#### 5. NOTES AND REFERENCES

- Work difficulty factors were developed in conjunction with the Atomic Industrial Forum's (now NEI) program to standardize nuclear decommissioning cost estimates and are delineated in Volume 1, Chapter 5 of the "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," AIF/NESP-036, May 1986.
- References for equipment & consumables costs:
  - 1. <u>www.mcmaster.com</u> online catalog, McMaster Carr Spill Control (7193T88)
  - 2. R.S. Means (2011) Division 01 56, Section 13.60-0600, page 20
  - 3. R.S. Means (2011) Division 01 54 33, Section 40-6360, page 664
- Material and consumable costs were adjusted using the regional indices for Columbia, Missouri.

Unit Cost Factor	Cost/Unit(\$)
Removal of clean instrument and sampling tubing, \$/linear foot	0.45
Removal of clean pipe 0.25 to 2 inches diameter, \$/linear foot	4.75
Removal of clean pipe >2 to 4 inches diameter, \$/linear foot	6.84
Removal of clean pipe >4 to 8 inches diameter, \$/linear foot	13.53
Removal of clean pipe >8 to 14 inches diameter, \$/linear foot	25.94
Removal of clean pipe >14 to 20 inches diameter, \$/linear foot	33.68
Removal of clean pipe >20 to 36 inches diameter, \$/linear foot	49.57
Removal of clean pipe >36 inches diameter, \$/linear foot	58.91
Removal of clean valve >2 to 4 inches	89.78
Removal of clean valve >4 to 8 inches	135.30
Removal of clean valve >8 to 14 inches	259.42
Removal of clean valve >14 to 20 inches	336.83
Removal of clean valve >20 to 36 inches	495.70
Removal of clean valve >36 inches	589.14
Removal of clean pipe hanger for small bore piping	29.39
Removal of clean pipe hanger for large bore piping	105.22
Removal of clean pump, <300 pound	227.25
Removal of clean pump, 300-1000 pound	635.91
Removal of clean pump, 1000-10,000 pound	2,512.51
Removal of clean pump, >10,000 pound	4,855.69
Removal of clean pump motor, 300-1000 pound	267.30
Removal of clean pump motor, 1000-10,000 pound	1,046.19
Removal of clean pump motor, >10,000 pound	2,353.92
Removal of clean heat exchanger <3000 pound	1,349.70
Removal of clean heat exchanger >3000 pound	3,392.76
Removal of clean feedwater heater/deaerator	9,560.36
Removal of clean moisture separator/reheater	19,650.32
Removal of clean tank, <300 gallons	292.44
Removal of clean tank, 300-3000 gallon	923.97
Removal of clean tank, >3000 gallons, \$/square foot surface area	7.79

Unit Cost Factor	Cost/Unit(\$)
Removal of clean electrical equipment, <300 pound	124.28
Removal of clean electrical equipment, 300-1000 pound	435.19
Removal of clean electrical equipment, 1000-10,000 pound	870.37
Removal of clean electrical equipment, >10,000 pound	2,080.03
Removal of clean electrical transformer < 30 tons	1,444.55
Removal of clean electrical transformer > 30 tons	4,160.05
Removal of clean standby diesel generator, <100 kW	1,475.49
Removal of clean standby diesel generator, 100 kW to 1 MW	3,293.38
Removal of clean standby diesel generator, >1 MW	6,817.96
Removal of clean electrical cable tray, \$/linear foot	11.60
Removal of clean electrical conduit, \$/linear foot	5.07
Removal of clean mechanical equipment, <300 pound	124.28
Removal of clean mechanical equipment, 300-1000 pound	435.19
Removal of clean mechanical equipment, 1000-10,000 pound	870.37
Removal of clean mechanical equipment, >10,000 pound	2,080.03
Removal of clean HVAC equipment, <300 pound	150.28
Removal of clean HVAC equipment, 300-1000 pound	522.91
Removal of clean HVAC equipment, 1000-10,000 pound	1,042.15
Removal of clean HVAC equipment, >10,000 pound	2,080.03
Removal of clean HVAC ductwork, \$/pound	0.48
Removal of contaminated instrument and sampling tubing, \$/linear foot	1.39
Removal of contaminated pipe 0.25 to 2 inches diameter, \$/linear foot	20.32
Removal of contaminated pipe >2 to 4 inches diameter, \$/linear foot	34.39
Removal of contaminated pipe >4 to 8 inches diameter, \$/linear foot	54.67
Removal of contaminated pipe >8 to 14 inches diameter, \$/linear foot	106.28
Removal of contaminated pipe >14 to 20 inches diameter, \$/linear foot	127.23
Removal of contaminated pipe >20 to 36 inches diameter, \$/linear foot	175.31
Removal of contaminated pipe >36 inches diameter, \$/linear foot	206.84
Removal of contaminated valve >2 to 4 inches	410.69
Removal of contaminated valve >4 to 8 inches	492.85

Unit Cost Factor	Cost/Unit(\$)
Removal of contaminated valve >8 to 14 inches	1,007.40
Removal of contaminated valve >14 to 20 inches	1,277.34
Removal of contaminated valve >20 to 36 inches	1,697.70
Removal of contaminated valve >36 inches	2,013.05
Removal of contaminated pipe hanger for small bore piping	132.03
Removal of contaminated pipe hanger for large bore piping	439.82
Removal of contaminated pump, <300 pound	879.29
Removal of contaminated pump, 300-1000 pound	2,048.94
Removal of contaminated pump, 1000-10,000 pound	6,654.59
Removal of contaminated pump, >10,000 pound	16,203.50
Removal of contaminated pump motor, 300-1000 pound	884.33
Removal of contaminated pump motor, 1000-10,000 pound	2,722.12
Removal of contaminated pump motor, >10,000 pound	6,111.62
Removal of contaminated heat exchanger <3000 pound	4,023.54
Removal of contaminated heat exchanger >3000 pound	11,690.42
Removal of contaminated tank, <300 gallons	1,465.84
Removal of contaminated tank, >300 gallons, \$/square foot	28.52
Removal of contaminated electrical equipment, <300 pound	678.28
Removal of contaminated electrical equipment, 300-1000 pound	1,666.80
Removal of contaminated electrical equipment, 1000-10,000 pound	3,211.02
Removal of contaminated electrical equipment, >10,000 pound	6,344.12
Removal of contaminated electrical cable tray, \$/linear foot	32.70
Removal of contaminated electrical conduit, \$/linear foot	16.33
Removal of contaminated mechanical equipment, <300 pound	754.34
Removal of contaminated mechanical equipment, 300-1000 pound	1,839.92
Removal of contaminated mechanical equipment, 1000-10,000 pound	3,538.68
Removal of contaminated mechanical equipment, >10,000 pound	6,344.12
Removal of contaminated HVAC equipment, <300 pound	754.34
Removal of contaminated HVAC equipment, 300-1000 pound	1,839.92
Removal of contaminated HVAC equipment, 1000-10,000 pound	3,538.68

Unit Cost Factor Co	ost/Unit(\$)
Removal of contaminated HVAC equipment, >10,000 pound	6,344.12
Removal of contaminated HVAC ductwork, \$/pound	1.98
Removal/plasma arc cut of contaminated thin metal components, \$/linear in	a. 3.65
Additional decontamination of surface by washing, \$/square foot	7.55
Additional decontamination of surfaces by hydrolasing, \$/square foot	33.34
Decontamination rig hook up and flush, \$/ 250 foot length	6,342.48
Chemical flush of components/systems, \$/gallon	17.41
Removal of clean standard reinforced concrete, \$/cubic yard	134.03
Removal of grade slab concrete, \$/cubic yard	175.15
Removal of clean concrete floors, \$/cubic yard	345.59
Removal of sections of clean concrete floors, \$/cubic yard	1,032.77
Removal of clean heavily rein concrete w/#9 rebar, \$/cubic yard	228.56
Removal of contaminated heavily rein concrete w/#9 rebar, \$/cubic yard	2,006.85
Removal of clean heavily rein concrete w/#18 rebar, \$/cubic yard	288.92
Removal of contaminated heavily rein concrete w/#18 rebar, \$/cubic yard	2,653.13
Removal heavily rein concrete w/#18 rebar & steel embedments, \$/cubic yar	d 441.58
Removal of below-grade suspended floors, \$/cubic yard	345.59
Removal of clean monolithic concrete structures, \$/cubic yard	855.56
Removal of contaminated monolithic concrete structures, \$/cubic yard	1,995.44
Removal of clean foundation concrete, \$/cubic yard	671.85
Removal of contaminated foundation concrete, \$/cubic yard	1,859.02
Explosive demolition of bulk concrete, \$/cubic yard	29.60
Removal of clean hollow masonry block wall, \$/cubic yard	90.64
Removal of contaminated hollow masonry block wall, \$/cubic yard	297.33
Removal of clean solid masonry block wall, \$/cubic yard	90.64
Removal of contaminated solid masonry block wall, \$/cubic yard	297.33
Backfill of below-grade voids, \$/cubic yard	31.19
Removal of subterranean tunnels/voids, \$/linear foot	107.71
Placement of concrete for below-grade voids, \$/cubic yard	126.91
Excavation of clean material, \$/cubic yard	3.19

Unit Cost Factor	Cost/Unit(\$)
Excavation of contaminated material, \$/cubic yard	39.88
Removal of clean concrete rubble (tipping fee included), \$/cubic yard	22.91
Removal of contaminated concrete rubble, \$/cubic yard	24.11
Removal of building by volume, \$/cubic foot	0.29
Removal of clean building metal siding, \$/square foot	1.08
Removal of contaminated building metal siding, \$/square foot	3.71
Removal of standard asphalt roofing, \$/square foot	2.11
Removal of transite panels, \$/square foot	2.04
Scarifying contaminated concrete surfaces (drill & spall), \$/square foot	12.08
Scabbling contaminated concrete floors, \$/square foot	7.27
Scabbling contaminated concrete walls, \$/square foot	19.08
Scabbling contaminated ceilings, \$/square foot	65.35
Scabbling structural steel, \$/square foot	5.97
Removal of clean overhead crane/monorail < 10 ton capacity	614.39
Removal of contaminated overhead crane/monorail < 10 ton capacity	1,701.23
Removal of clean overhead crane/monorail >10-50 ton capacity	1,474.56
Removal of contaminated overhead crane/monorail >10-50 ton capacity	4,082.25
Removal of polar crane > 50 ton capacity	6,188.09
Removal of gantry crane > 50 ton capacity	26,000.33
Removal of structural steel, \$/pound	0.20
Removal of clean steel floor grating, \$/square foot	4.43
Removal of contaminated steel floor grating, \$/square foot	12.63
Removal of clean free standing steel liner, \$/square foot	11.68
Removal of contaminated free standing steel liner, \$/square foot	33.34
Removal of clean concrete-anchored steel liner, \$/square foot	5.84
Removal of contaminated concrete-anchored steel liner, \$/square foot	38.83
Placement of scaffolding in clean areas, \$/square foot	16.80
Placement of scaffolding in contaminated areas, \$/square foot	26.01
Landscaping with topsoil, \$/acre	28,266.82
Cost of CPC B-88 LSA box & preparation for use	2,113.50

Unit Cost Factor	Cost/Unit(\$)
Cost of CPC B-25 LSA box & preparation for use	1,933.79
Cost of CPC B-12V 12 gauge LSA box & preparation for use	1,569.88
Cost of CPC B-144 LSA box & preparation for use	10,784.62
Cost of LSA drum & preparation for use	194.44
Cost of cask liner for CNSI 8 120A cask (resins)	7,742.32
Cost of cask liner for CNSI 8 120A cask (filters)	8,101.54
Decontamination of surfaces with vacuuming, \$/square foot	0.75

# APPENDIX C DETAILED COST ANALYSIS DECON

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Activity Description	Decon F Cost	Removal Pa Cost	Packaging Tr Costs	Transport Pr	Off-Site Processing I Costs	LLRW Disposal C Costs (	Other Costs Con	Total Contingency	Total Li Costs	NRC S Lic. Term. M Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A C	Burial Volumes Class B Class Cu. Feet Cu. Fe	c c	GTCC Pro-	Burial/ Processed C Wt., Lbs. Ma	Ut Craft Cc Manhours M	Utility and Contractor Manhours
PERIOD 1a -Shutdown through Transition																				
Period la Direct Decemmissioning Activities  [1a1] Propure prephilminary decommissioning cost  [1a2] Notification of Oesastion of Operations  [1a3] Remove find & source material  Notification of Dominance Infanticular  Notification of Dominance Infanticular  Notification of Dominance Infanticular  Notification of Dominance Infanticular  Period 14							152	53	174 a n/a	174										1,300
							233	35	a 268 617	268 617										2,000
							117	18 18 23 23	134 174 174	134 174										1,000
al. 12. Define mapie work sequence  1a.1.13 Perform SIR and EA  1a.1.14 Perform SIR expecific Cost Study  1a.1.15 Prepared submit License Termination Plan  1a.1.16 Receive NRC approval of formination plan							875 362 584 478	131 54 88 72	1,007 416 671 550 a	1,007 416 671 550										7,500 3,100 5,000 4,096
Activity Specifications																				
la.1.7.1 Plant & temporary facilities la.1.7.2 Plant & systems la.1.7.2 A most systems la.1.7.3 MSSB Decontaminion Flush la.1.7.4 Reactor vessel la.1.7.5 Reactor vessel la.1.7.6 Stem generators la.1.7.7 Stem generators la.1.7.7 Main Turbine la.1.7.9 Main Turbine la.1.7.1.1.7 Dant structures & buildings la.1.7.1.1.7 Denn structures & buildings la.1.7.1.1.7 Plant structures & buildings la.1.7.1.7 Plant structures & site choseout							574 486 58 829 759 759 58 364 187 47 47 47 47 47 47 47 47 47 47 47 47 47	86 73 9 114 114 114 7 7 7 7 7 16 81 16	660 559 67 953 872 67 419 215 54 54 419 617 617	594 503 67 953 872 67 419 107		66 56 107 107 54 54 509 60 60								4, 920 4, 167 500 7, 100 6, 500 3, 120 1, 600 4, 600 3, 120 3, 120 4, 600 3, 120 3, 120 3, 120 3, 120 3, 120 4, 600 3, 120 4, 600 3, 120 4, 600 4, 600 4, 600 4, 600 5, 600 6, 7, 600 7, 7, 7, 800 7, 7, 800 7, 800 8, 7, 800 8, 80
In 118 Propared desaurability acqueree In 118 Propared desaurability acqueree In 119 Propared desaurability acqueree In 120 Desaurability acqueree clean very system In 121 Regimp/Cont. Civil Envloyed coingides. In 1.2 Propare considering a containers In 1.2 Subtotal Period in Advivity Costs							280 2,800 163 2,200 144 13,608	420 420 25 330 22 2,041	322 3,220 188 2,530 165 15,650	322 3,220 188 2,530 165 15,043										2,400 1,400 1,230 73,753
Period Ia Collateral Costs Ia.3.1 Spent Fuel Capital and Transfer Ia.3 Subtotal Period Ia Collateral Costs							3,600	540 540	4,140		4,140									
Period In Period-Dependent Costs  In A.2. Insurance In A.2. Hoperty base In A.3. Health physics supplies In A.4. Heavy equipment rental In A.4. Disposal of DAW generated In A.4. NRC Peas long Reses In A.4. NRC Peas Insuring Peas In A.10. Spent Fuel Pool O&M In A.11. Skewicz Schaff Cost In A.13. Seeurity Schaff Cost In A.13. Seeurity Schaff Cost In A.14. Urithy Shaff Cost In A.14. Subtract al Period Dependent Costs		486				,	1,589 280 	159 28 65 65 9 108 77 135 114 138 13 138 43 114 6,465	1,747 308 567 502 53 832 846 1,486 382 878 103 878 103 878 1386 1386 878 878 878 878 878 878 878 878 878 8	1,747 308 567 562 532 832 846	1,486 878 103 2,467							12,190		
1a.0 TOTAL PERIOD 1a COST		068	13	63		88	61,555	9,046	71,535	64,322	6,607	607		610				12,190	20	654,624

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

					(the	usands of	(thousands of 2011 dollars)											
Activity Activity Description	Decon Removal Cost Cost	l Packaging Costs	g Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total I Costs	NRC Sp Lic. Term. Mar Costs	Spent Fuel S Management Resto Costs Cc	Site Pro Restoration Vo Costs Cu	Processed Volume Class A Cu. Feet Cu. Feet	Burial s A Class B reet Cu. Feet	al Volumes 3 Class C st Cu. Feet	GTCC t Cu. Feet	Burial/ Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 1b - Decommissioning Preparations																		
Period 1b Direct Decommissioning Activities																		
						į	*		į									
						117	18	635 134	572 134		. 64							1,000
						292	44	336	336		13.6							2,500
						117	18	134	134		001							1,000
						117	18	134	134									1,000
						424	10	487	487									3,630
1b.1.1.9 Facility closeout			,	•		140	21	161	81	,	81	,						1,200
1b.1.1.10 Missile shields 1b.1.1.1 Biological shield						140	8 [3	161	60									1,200
1b.1.1.12 Steam generators		•				537	81	617	617									4,600
1b.1.11.3 Reinforced concrete						117	18	134	67		67							1,000
1b.1.1.14 Main Turbine 1b.1.1.15 Main Condensers						182	N 61	209			508							1,560
1b.1.1.16 Auxiliary building					٠	319	48	366	330		37							2,730
1b.1.1.17 Reactor building 1b.1.1 Total						3,880	48 582	366 4,462	330 3,623		839							2,730 33,243
63	. 009						300	006	006								1,067	
1b.1 Subtotal Period 1b Activity Costs	. 009		•			3,880	882	5,362	4,522		623						1,067	33,243
Period 1b Additional Costs 1b.2.1 Spent fuel pois loshton 1b.2.2 Sive Characterization 1b.2.2 Subroan Period ib Additional Costs 1b.2.2 Subroan Period ib Additional Costs						10,280 2,551 12,830	1,542 765 2,307	11,822 3,316 15,137	11,822 3,316 15,137								19,100 19,100	7,852
4	į						į	000	9									
		'			:	1,080	162	1,242	1,242								:	
1b.3.3 Process decommissioning water waste 1b.3.4 Process decommissioning chemical flush waste	2 2	. 4	18 70		2,921		772	3,987	3,987							16,989	147	
1b.3.5 Small tool allowance 1b.3.6 Pipe cutting equipment	. 1,100						165	2 1,265	1,265									
	1,500					. 000	225	1,725	1,725									
10.3.5 Spent ruet capitat and transfer 1b.3 Subtotal Period 1b Collateral Costs	2,419 1,102		67 313		3,020	2,760	1,767	11,447	9,515	1,932						100,906	203	
Period 1b Period-Dependent Costs 1b.4.1 Decon supplies	27						t-	34	34						,		,	
						801	80	881	881									
1b.4.3 Property taxes 1b.4.4 Health physics supplies	. 257					141	14	321	321									
					. 5		333	253	253								. 5	
					7 .	730	109	839	839				000			, TB1,	77 ,	
						388	33	426	426									
1b.4.10 Spent Fuel Pool O&M						385	21 CS	442		442								
						45	7 7 7	52		52								
1b.4.13 Security Staff Cost						3,474	521	3,996	3,996									79,383
1b.4.14 DOC Staff Cost						5,750	863	6,613	6,613									64,137
	27 476		. 8		17	29,872	4,327	34,728	33,485	1,243			360			7,197	. 12	358,011
1b.0 TOTAL PERIOD 1b COST	3,045 1,578		75 314		3,037	49,342	9,283	66,675	62,660	3,175	839		643 71			108,103	20,381	399, 106
PERIOD 1 TOTALS	3,045 2,468		88 317		3,065	110,897	18,329	138,210	126,982	9,782	1,446		1,253 77			120,293	20,401	1,053,731

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Activity Description	Decon Rer Cost C	Removal Pack Cost Co	Packaging Transport Costs Costs	P. P.	Off-Site LI ocessing Dis Costs C	LLRW Disposal Otl	Other To Costs Conti	Total T	N Total Lie. Costs Co	NRC Sper Lic. Term. Mana Costs C	Spent Fuel Management Re Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A Cu. Feet C	Burial Volu: Class B Cl Cu. Feet Cu	olumes Class C G7 Cu. Feet Cu.	GTCC Pro	Burial/ Processed Wt., Lbs. Ma	Craft C Manhours N	Utility and Contractor Manhours
PERIOD 2a - Large Component Removal Period 2a Direct Decommissioning Activities																				
Nuclear Steam Supply System Remoral 2a, 1.1.1 Remore Todouth Phining and 2a, 1.1.2 Pressurior Relief Tank 2a, 1.1.3 Remover Codout Pumps & Motors 2a, 1.1.4 Pressurior Relief Tank 2a, 1.1.6 Remoral Generator 2a, 1.1.6 Remoral Generator 2a, 1.1.8 Remoral Vessell Internals 2a, 1.1.8 Remover Vessell Internals 2a, 1.1.9 Vessell & Internals 2a, 1.1.10 Remover Vessell Removal 2a, 1.1.10 Totals	176 30 90 44 44 149 116 116 8 8 8	188 25 26 94 94 4,985 83 3,239 6,218 14,888	25 77 79 509 3,067 2,252 2,252 2,37 9,530 2,113 17,879	27 8 8 1188 145 145 2,540 2,497 1,371 1,371 838 7,661	2,549	363 94 889 982 6,994 223 8,225 1,094 2,095 3,627	267 267 533	232 47 327 327 384 4,027 2,462 1,612 1,613 6,530 26,152	1,012 211 211,666 2,089 23,635 15,678 921 12,348 12,355 11,355 11,355 11,355 11,355	1,012 211 1,666 2,089 23,635 15,678 15,678 921 32,188 11,335 11,335 11,344			40,262 40,262 40,262 	1,227 328 3,386 3,386 23,739 22,546 3,881 1,377 - 8,735 68,436	903	459	2,142 142 142 9 33	140,300 36,395 816,140 267,393 3,570,150 3,349,305 86,025 326,029 954,999 9,968,791	6,838 1,068 4,188 23,247 23,233 10,800 4,285 29,600 	
Removal of Major Equipment 2a.1.2 Main TurbineGenerator 2a.1.3 Main Condensers		501	420 220	82	795 700	568 531		441 622	2,810 3,552	2,810 3,552			4,921 7,701	2,740				626,627 551,564	9,888 27,762	
Concenting Coets from Clean Building Demoition 20.1.4.1 Monther 20.1.4.2 Monther 20.1.4.3 Monther Shop 20.1.4.5 Monther Shop 20.1.4.5 Peol Building 20.1.4.7 Totals		902 457 1 95 220 1,675						135 69 0 14 33 251	1,037 525 1 1 109 253 1,926	1,037 525 1 109 253 1,926									10,575 5,551 16 1,108 2,395 19,645	
20, 15.1 100 And Birds Statems Speakin RCA 20, 15.2 100 And Birds Statems Speakin RCA 20, 15.2 100 And Birds Statems Speakin RCA 20, 15.3 4.8 Mish Stoum RCA 20, 15.4 4.8 Mish Stoum RCA 20, 15.6 AC Mish Stoum RCA 20, 15.6 AC Mish Turbine 20, 15.7 AC Mish Turbine 20, 15.7 AC Mish Turbine 20, 15.8 AC Mish Turbine 21, 15.8		705 1115 5 127 5 1	En	8 c	6286 389 387 773 773 773 773 773 773 773 774 775 775 775 775 775 775 775 775 775	47 47 47 47 47 47 47 47 47 47 47 47 47 4		277 277 278 278 278 278 278 278 278 278	11,644 2078 2078 2078 2078 2078 2078 2078 2078	1,1644 208 315 315 316 317 318 318 318 318 318 318 318 318 318 318		310 300 301 302 303 303 303 303 303 303 303	7,7829 474 474 2,156 8892 4,109 6,512 1,316 1,316 1,389 1,389 1,389	211 211 147 438 4438 487 219 487 78 78 71,154				87,227 87,227 87,227 88,384 48,384 48,384 144,376 89,727 89,722 89,721 82,910 83,148 83,307 83,307	13,471 2,280 2,280 6,144 6,114 6,114 1,207 1,207 1,207 1,207 1,207 1,207 1,207 1,207 1,208 1,207 1,207 1,208 1,207 1,208 1,207 1,208 1,207 1,208 1,207 1,208 1,207 1,208 1,207 1,208	

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Activity Description				_	M-Site LL						pent Fuel		LOccoon		>		ı	rrial/		tility and
	Decon Rer Cost C	Removal Pack Cost C	Packaging Tran Costs Co	Transport Proc Costs Co	ocessing Dis Costs Co	Disposal Otl Costs Co	Other T Costs Cont	Total 1 Contingency (	Total Lic Costs	Lic. Term. Ma Costs	Management F Costs	Restoration Costs	Volume Cu. Feet	Class A Cu. Feet C	Class B C Cu. Feet C	Class C G. Cu. Feet Cu.	GTCC Pro Cu. Feet Wt	Processed Wt., Lbs. M	Craft C Manhours N	Contractor Manhours
Disposal of Plant Systems (continued) 2a.1.5.39 HF. Secondary Liquid Waste 0.115.00 HF. Secondary Liquid Waste	697	1,008	70	61	507	528		825	3,696	3,696		, e	6,186	2,619				454,900	31,872	
2a.1.0.40 9A - Auxiliary On w. Hansser 2a.1.5.41 RS - Bulk Chemical Storage 2a.1.5.41 R. Chib Wasto		20.2	. 0 .	. 55	529			107	760	760			6,449					261,890	1,825	
2a.1.5.43 Ltd. Oily Washe		244		. œ	185			8 5	230	530		0 . 0	2,256					91,628	4,296	
2a.1.5 Totals	1,077	8,657	242	291	4,264	1,495		3,437	19,464	15,471		3,993	51,976	7,167			oí 	2,687,951	192,002	
2a.1.6 Scaffolding in support of decommissioning		1,600	28	9	112	18		425	2,189	2,189			1,233	82				62,415	36,741	
2a.1 Subtotal Period 2a Activity Costs	2,139	28,730	18,790	8,113	10,969	38,239	533	30,328 1	137,841	133,848		3,993	146,354	80,837	903	459	2,142 13,	13,897,350	398,120	10,357
Period 2a Collateral Costs 2a.33 Process decommissioning water waste 2a.33 Process decommissioning water waste 2a.33 Smill tool though et chemical flush waste 2a.34 Sport Ped Capital and Pransfer 2a.34 Sport Ped Capital and moless of OSF rons exceed metallic waste 2a.35 Subrotal Period 2a Callerral Costs	198 	348 348	82 25 	313 127		254 254 	5,520 62 5,582	265 85 52 828 6 1,237	1,300 492 401 6,348 68 8,609	1,300 492 361 68 2,221	6,348	40		1,270 410 				76,188 43,711 	248 77 	
Perriod 2a Perriod-Department Costs 2a.4.1 Income supplies 2a.4.3 Insurance 2a.4.4 Health physics supplies 2a.4.4 Health physics supplies 2a.4.6 Department remail 2a.4.6 Department remail 2a.4.6 Department of DAW generated 2a.4.1 Remarks of DAW generated 2a.4.1 Expense of DAW generated 2a.4.1 Liquid Radwater Processing Equipment/Services 2a.4.1 Liquid Radwater Processing Equipment/Services 2a.4.1 Corporate Allections 2a.4.1 Department of DAW Services 2a.4.1 Shotton Perriod Services 2a.4.1 Shotton Perriod Services	\$	2,389				757	916 437	21 92 92 44 600 445 445 112 112 112 113 113 113 113 113 113 113	104 1,008 481 2,999 3,408 3,408 1,235 1,232 1,567 1,371 1,37	1004 1,008 433 2,408 3,408 1,232 1,2	11,567	. ' <sub>8</sub> ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '		5.911				118,222		206, 014 247, 543 460, 886 914, 443
2a.0 TOTAL PERIOD 2a COST	2,420	34,441	19,024	8,575	10,969	39,211 87	87,017		245,714	232,186	9,446	4,081	146,354	88,428	903	459	2,142 14,	14,135,470	398,637	924,800
PERIOD 2b - Site Decontamination																				
Period 2b Direct Decommissioning Activities																				
Disposal of Plant Systems 20.1.1.2 200 Reactor Bids You-System Specific 20.1.1.2 200 Reactor Bids You-System Specific RCA 20.1.1.2 200 Reactor Bids Won-System Specific 20.1.1.3 700 Cornell Bids Non-System Specific Ch 20.1.1.4 300 Cornell Bids Non-System Specific Ch 20.1.1.5 700 Radwase Bids Non-System Specific Ch 20.1.1.5 70 Radwase Bids Non-System Specific Ch 20.1.1.8 An U-Demmeralized WF System Specific 20.1.1.1 8 An U-Demmeralized WF System Specific 20.1.1.1 8 An U-Confeasing System Specific 20.1.1.1 Bids Committed System Cornell 20.1.1.1 Bids Committed System Cornell 20.1.1.1 Bids Committed System Presument 20.1.1.1 Bids Committed System Presument 20.1.1.1 Bids Committed System Presument 20.1.1.1 Bids Committed Committed 20.1.1.1 Bids Committed Committed 20.1.1.1 Bids Committed Committed 20.1.1.1 Bids Committed Committed 20.1.1.1 Bids Committed 20.1.1 Bids Committ		98 588 588 11.18	8 F 8	20 1 1 2 3 4 3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	22 391 175 176 1041 58 26 149 403 178 178 178 178 178 178 178 178 178 178	81 82 82 877 140		208 208 208 207 465 465 76 114 114 114 118 22 22 28 29 29 37 37 37 37 37 37 37 37 37 37 38 38 38 38 38 38 38 38 38 38 38 38 38	187 1,2005 1,440 1,440 1,758 4,272 4,272 4,21 1,016 4,055 4,055 1,68 1,68 1,68 1,68 1,68 1,68 1,68 1,78 1,78 1,78 1,78 1,78 1,78 1,78 1,7	187 1,205 440 440 441 621 621 63 788 788 788 788 788 788 788 788 788 78			289 4,788 1.189 1.2684 705 1.1812 4,5812 1.1928 1.1928 1.1928 1.1928 1.248	139 172 1,437 720				22,768 86,849 86,849 60,301 12,759 12,750 12,297 182,297 484,206 50,693	1,768 9,413 29,413 29,076 21,919 3,289 3,289 1,740 1,740 1,740 1,740 2,517 6,014 5,014 5,114 8,1	

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Column	Activity Description	Decon Removal Cost Cost	moval Packaging Cost Costs	ng Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other	Total Contingency	Total Lic Costs	NRC Sp Lic. Term. Mar Costs	Spent Fuel Management R Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A Cu. Feet C	Burial Volu Class B C Cu. Feet Cr	olumes Class C G Cu. Feet Cu	GTCC Pro	Burial/ Processed Wt., Lbs. Ma	U Craft Co Manhours M	Utility and Contractor Manhours
The control of the co	Disposal of Plant Systems (continued)				g a								000						١.	
No. 10.00   1.	tral Chilled Water		8 8	٠,	70 ,			2 27	ĕ 96	, to .		96	. 000					20,924	1,765	
Column   C	ral Chilled Water RCA		27	0	15			6	25	52		. 1	187					7,591	482	
The control of the	ntial Serv Wtr Pumphouse HVAC		119					00 8	5 55			22	. 000					. 00	427	
Companies   Comp	raste Building HVAC		1185			16		8 28	496	496			2,425	. 22				104,709	3,454	
Manufactories	ol Building HVAC		175					26	201			201		. !					3,959	
options         options         1         <	tary Building HVAC		457			80 ,		190	1,132	1,132		. 8	5,064	171				220,163	8,489	
	inment Cooling		510			106		252	1,526	1,526		3.	7,367	482				340,176	9,596	
Market Control   13   13   13   13   13   13   13   1	inment Intgratd Leak Rate Test		40	1 2				17	108	108			580					23,570	750	
Continue	inment Atmospheric Control		50	61		1-		21	143	143			1,086	31				46,696	392	
1	nment Purge HVAC		366	9 51		28		63	384	200 4.00 4.00			1,948	128				89,958 155,375	7,257	
T. Y. T. S.	d Badwaste	761	888			452		798	3.472	3.472			5.560	2.280				400.250	30.882	
1	Radwaste		381			245		189	1,044	1,044			2,114	1,156				180,557	7,433	
1	ntamination		105	22		28		47	271	27.1			983	132				50,841	2,049	
1	gency Fuel Oil		62					6	72			72							1,260	
1,	ressed Air		193					29	222			222							4,187	
A A CALLEL CALLE CALLEL CALLEL CALLEL CALLEL CALLEL CALLEL CALLEL CALLEL CALLEL	pressed Air RCA		132	1				43	246	246			801					32,538	2,339	
1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	thing Air		24	•				4	58			28							516	
A STATE A COLOR A COLO	thing Air RCA		20					9	32	32			7.1					2,874	402	
A A A A A A A A A A A A A A A A A A A	Protection		382					57	439			439							8,376	
March   Marc	Protection RCA		414	7				161	928	958		. ;	4,411					179,151	7,064	
A Charlement of the control of the c	lestic Water		177					7.7	204	. 1		204							3,837	
No. 10.   No.	testic Water RCA		27	0 0	02.5	, 6		10	80 5	00 E			247					10,039	459	
No. 100   No.	Handling & Storage Ketor vssi		5T 1	20	1 04	56		81°	127	12.7		, 8	199	118				36,924	374	
Continue	ice gas (CO2 N2 H2 & O2)		900					0 8	000	, ,		00	. 0					. 00	1,226	
1.   1.   1.   1.   1.   1.   1.   1.	nee Gas (CUZ NZ HZ & UZ) RCA		260	4				98 8	990	998		. 0	2,433					98,813	4,481	
Classical Continuous	dby Diesel Engine		330					00	980			380							6,749	
Continuity   Con	ary Drains		45					- ;	522			22	, 0					. 00 12	972	
Part	cary Drams KCA		109	21	104			44	264	264			1,273					51,684	1,811	
Contaminated         157         45         47         415         45         415         45         415         45         415         45         415         45         455 </td <td>Drains</td> <td></td> <td>09</td> <td></td> <td>. !</td> <td></td> <td></td> <td>o ;</td> <td>89</td> <td>. ;</td> <td></td> <td>89</td> <td>. !</td> <td></td> <td></td> <td></td> <td></td> <td>. :</td> <td>1,276</td> <td></td>	Drains		09		. !			o ;	89	. ;		89	. !					. :	1,276	
Particle	Drains RCA		147		175			64	397	397			2,139					86,858	2,694	
Continuis   Cont	neal & Detergent Waste		123			200		80	253	353			504	159				33,900	3,488	
& Anniyeis         188         7         6         18         28         28         28         28         18         28         28         28         28         28         28         28         18         28         28         28         28         18         28         28         28         18         28         18         28         28         18         28         18         28         28         18         28         18         28         28         18         28         18         28         28         18         28	& Equipment Drains		1,520			945		684	3,637	3,637			3,739	4,320				516,638	29,273	
Fig. 1   St.	ess Sampling & Analysis		138	L-	54	40		54	298	298			661	180				42,123	2,771	
Continuity Bilds   1510   15	ar Sampling		80	5	32	30		34	187	187			423	138				28,947	1,618	
Characteristic   Line	es Stores Site Security Bldg		181					27	208			208							3,815	
Continuitive designation         1,564         1,5162         515         6,57         8,649         2,736         3,728         30,882         5,111         9,179         16,315         3,728         3,178         30,882         5,111         9,179         1,531         1,541         1,541         1,541         1,541         1,541         1,611         9,179         7,819         7,818         7,819         7,	System Specific		30					4	34			34							603	
4. Contaminationing Fig. 1. See 1. Se						3,449		6,352	35,723	30,582		5,141	98,179	16,315				5,318,678	321,572	
Technimiated 655 375 1102 33 170 462 1.097 1.1279 5.427 5.427 5.427 5.427 6.42	g in support of decommissioning		2.000			22		531	2.736	2.736			1.541	102				78.019	45.926	
1.554   1.102   1.354   1.102   1.357   1.45   1.45   1.257																				
Corridor-Contaminated         665         375         14         78         196         207         17         2024         2024         2068         880         7         7844	otte bullaings		1.102			1.097		1.279	5.427	5.427			5 995	10 039				972.803	44.361	
Corridor-Contaminated         15         6         0         2         1         4         1         38         39         1754         181         7584 <td></td> <td></td> <td>375</td> <td></td> <td></td> <td>207</td> <td></td> <td>517</td> <td>2,024</td> <td>2,024</td> <td></td> <td></td> <td>2,058</td> <td>3,820</td> <td></td> <td></td> <td></td> <td>412,073</td> <td>19,424</td> <td></td>			375			207		517	2,024	2,024			2,058	3,820				412,073	19,424	
Honding   Hond	cation Corridor - Contaminated	15	9			4		11	39	39			17	83				7,854	392	
iditing the proper land the pr	ne Shop	18	14			20		14	54	54				103				8,892	597	
Personnel Tunnel         36         12         0         1         0         1         0         3         7         30	age Building	45	16			11		30	109	109			19	213				19,136	1,162	
State   1,128   1,22	e and Personnel Tunnel	9	12			3		7	30	30				28				5,022	334	
Storinge   40   19   1   4   5   12   19   10   110		354	181	7		109		267	1,028	1,028			844	2,021				208,610	9,997	
Propietometry bidgs   2,535   1,755   55   52   52   53   52   53   54   53   54   54   54   54   54	Drum Storage	40	19	1	100	12		68	110	110			99	226				22,242	1,092	
2b Activity Costs 4,231 18,887 606 8,682 4,919 . 9,156 47,688 42,497 . 5,141 108,720 32,981 . 7,505,329 449  cert Lagon LLW sbastes Pand Removal sbastes Pan	erator Keplacement Bidgs		1,725			1,448		2.273	9,179	9,179			666'8	16,563				1.656.632	4,358	
Deficiency Costs 4,231 18.887 606 9.06 8.822 4,319 . 9,156 47.688 42.497 . 5,141 108.720 32,381 . 7,053,329 443, 443, 443, 443, 443, 443, 443, 443										. !										
1.5   1.5	eriod 2b Activity Costs					4,919		9,156	47,638	42,497		5,141	108,720	32,981				7,003,329	449,217	
ent Lagron LLAW	Costs																			
Authorized Parial Removal 4,888 . 199 . 27 468 989 7,543 6,296	reatment Lagoon LLW					207	. !	178	1,247	1,247				3,600				345,600	388	
Experimental consists and a second consists of the consists of	ower Asbestos Fanel Kemoval					- 206	469	821	6,296	1.947		6,296		3 600				3.45.600	101,822	
168 . 72 274 . 387 . 229 1,130 1,130 1,110 66.617	CINCLE OF THE COSCS	•					OOF		01011			o care		00010				0.10,000	COMPANY	
168 . 72 274 . 387 . 289 1,130 1,110 66617 168	Costs																			
0.001 0.001	ecommissioning water waste	168				387		229	1,130	1,130				1,110				66,617	216	
	scommissioning enemical nusn waste	ο.	499			970		273	1,606 494	1,606				1,338				142,540	067	
	i ano warke		425					*5	1101	1.01.										

Callaway Energy Center Decommissioning Cost Analysis

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Description	Decon Rer Cost C	Removal Packaging Cost Costs	ging Transport	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs C	Total Contingency	Total Li Costs	NRC S <sub>I</sub> Lic. Term. Ma Costs	Spent Fuel Management R. Costs	Site P Restoration Costs	Processed Volume C Cu. Feet Cu	Class A Class B Cu. Feet Cu. Feet	rrial Volumes is B Class C feet Cu. Feet	C GTCC et Cu. Feet	Burial / Processed Wt., Lbs.	Craft C Manhours	Utility and Contractor Manhours
Period 2b Collateral Costs (continued) 2b.34 Decommissioning Equipment Disposition 2b.35 Spent Puel Capital and Prince of Spin Puel Capital and Prince of Sp.35 On-site survey and release of 297.3 tons clean metallic waste 2b.35 Subretal Period 2b Collateral Costs		429	138 34  292 721	545 545	877 1,303	8,400 303 8,703	123 1,260 30 1,985	928 9,660 334 14,150	928 334 4,490	099'6		000'9	397			303,726	88 , , 10	
Period 2b Period-Dependent Costs 29.4.1 Decon applies 29.4.2 Insurance 29.4.3 Property tunes 29.4.4 Health physics supplies 29.4.4 Health physics supplies 29.4.5 Depond of OAW generated	1,190	3.435 4.590			305	1,431 682	297 143 68 859 689 689	1,487 1,574 751 4,294 5,279 564	1,487 1,574 751 4,294 5,279 564				6,547					
NIRC Press.  INIRC Press.  INIRC Press.  INIRC Press.  Initial Bradenard Precessing Equipment/Services  Initial Bradenard Precessing Equipment/Services  Initial Bradenard Precessing Equipment/Services  Initial Bradenard Albertalons  Compound Albertalons  Our Spart Cost  Unitial Smit Cost  Unitial Smit Cost  Shart Cos		8,025			305	1, 324 1, 749 2, 225 1, 861 473 10, 351 14, 479 32, 819 46, 864 114, 475	199 175 222 279 71 1,035 2,172 4,923 7,030 18,288	1,522 1,924 2,447 2,140 543 11,387 16,651 37,742 53,893 142,448	1,522 1,924 543 11,387 16,651 37,742 53,893 137,611	2,447 2,140 251 251 			6,547			130,948		321,671 371,257 689,114 1,382,043
2b.0 TOTAL PERIOD 2b COST PERIOD 2d - Decontamination Following Wet Fuel Storage	5,591	32,245	1,115 2,542	9,478	6,735	123,647	30,429	211,780	185,845	14,498	11,437	114,720	45,973			8,042,761	552,194	1,382,043
Period 2d Direct Decommissioning Activities 2d.1.1 Remove spent fuel racks	838	83	310 87		1,154		772	3,244	3,244				5,241			445,519	1,925	
Disposal of Plant Systems 24.1.2.1 to 60 Pacel BRIS Ann-Spacific Systems RCA 24.1.2.2 to 60 Pacel BRIS Ann-Spacific Systems Rock 24.1.2.2 to 60 Pacel BRIS Ann-Systems Specific 24.1.2.4 to CA-Pacel BRIS Ann-Systems Specific 24.1.2.4 GG- Pacel Bristing Food Bristing Food Bristing 24.1.2.5 GG- Food Bristing Food Bristing 24.1.2.5 GG- Food Bristing Food Bristing 24.1.2.7 Foods		317 49 412 23 252 1,175	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	263 14 14 213 4 4 306 902	20 180 7 7 26 23 232		121 20 186 8 118 47 49	716 107 1,035 44 724 277 2,903	716 107 1,035 44 724 2,903			3,200 170 2,602 50 3,729 1,239 10,991	90 818 31 116			129,974 14,594 175,143 4,665 161,302 50,329 536,007	5,859 953 8,042 448 4,671 2,115 22,089	
Decontamination of Site Buildings 2d.1.3.1 Fuel Building 2d.1.3 Totals	785 785	851 851	9 58	222	67		099	2,621	2,621 2,621			2,705	1,041			199,583 199,583	31,559 31,559	
Scaffolding in support of decommissioning	,	400	-1	28	4		106	547	547			308	20		•	15,604	9,185	,
2d.1 Subtotal Period 2d Activity Cests Period 2d Additional Cests 22l.2 I. Leners-Termination Survey Program Management 23l.2 Substant Poved 9d Additional Creas	1,623	2,509	365 171	1,151	1,458	1,366	2,038	9,315 1,776 1,776	9,315 1,776 1,776			14,004	7,359			1,196,713	64,759	. 12,480
Period 2d Callateral Costs 24.3.1 Process decommissioning water waste 24.3.8 Small tool allowance 24.3.4 Decommissioning Relignment Disposition 24.3.8 Subtoral Period 2d Collateral Costs	8 , , 8	. 89 . 89	39 148  138 34 177 183	545	209 87 297		124 10 123 256	610 78 928 1,616	610 78 928 1,616				601 - 397 998			36,055 303,726 339,781	117	
Period 2d Period-Dependent Costs 2d.4.1 Decen supplies 2d.4.2 Insurance 2d.4.3 Property unace 2d.4.4 Health physics supplies 2d.4.5 Heavy equipment rental 2d.4.6 Disposal of DAW generated 2d.4.7 Plant wortey budget 2d.4.7 NRC Fees	172	547 1,253				391 186	43 19 188 188 29 48	215 430 205 683 1,441 179 222 525	215 480 205 683 1,441 179 222 525				2.081			41,624		

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Index Activity Description Period 2d Period-Dependent Costs (continued)	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs		Total Contingency			Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A Cu. Feet	Burial Voh Class B C Cu. Feet C	olumes Class C G Cu. Feet Cu	GTCC Pro	Burial / Processed Wt., Lbs. M	Craft Manhours	Utility and Contractor Manhours
2d.4.9 Liquid Radwaste Processing Equipment/Services 2d.4.10 Corporate Allocations 2d.4.11 Security Staff Cost 2d.4.12 DIOC Staff Cost							258 1,890 1,171 6.144	39 189 176 922	297 2,079 1,347 7,066	297 2,079 1,347										
	172	1,800	. 42	, ∞		. 6	9,174	1,376	10,551 25,240	10,551 25,240				2,081				41,624		. 89
2d.0 TOTAL PERIOD 2d COST	1,885	4,377	587	362	1,697	1,851	21,250	5,937	37,946	37,946			20,004	10,438				1,578,117	65	65,032
Period 2f Direct Decommissioning Activities 2f.1.1 ORISE confirmatory survey							154	46	200	200										,
2f.1.2 Terminate license 2f.1 Subtotal Period 2f Activity Costs							154	46	а 200	200										
Period 2f Additional Costs 2f.2.1 License Termination Survey 2f.2 Subtotal Period 2f Additional Costs							7,808	2,342	10,150	10,150									149,339 149,339	339
Period 2f Collateral Costs 2f.3.1 DOC staff relocation expenses 2f.3 Subtotal Period 2f Collateral Costs							1,080	162 162	1,242	1,242										
Period 2f Period-Dependent Cests 2f. 1. Insurance 2f. 2. The Universe St. 2f. 3. Health piers supplies 2f. 4. The Disposal of DWW generated 2f. 4. Disposal of DWW generated 2f. 4. The Comparies Allowing Security Suff Cest 2f. 4. Security Suff Cest 2f. 4. Disposal of DWW generated 2f. 4. Subtocal Period Suff Cost 2f. 4. Subtocal Period 2f Period Dependent Costs						16	212	21 165 16 16 184 199 776 861 861 2,246	233 826 30 126 640 1,529 5,946 6,600 17,515	233 826 826 30 126 640 1,584 1,584 1,586 6,600 17,515				353				7,050		==
2f.0 TOTAL PERIOD 2f COST		661	œ	1		16	23,624	4,796	29,106	29,106				353				7,050	149,350	350
PERIOD 2 TOTALS	9,897	71,723	20,733	11,480	22,144	47,813	255,537	85,219	524,547	485,084	23,944	15,518	281,077	145,191	903	459	2,142 23	23,763,400	1,165,214	214
PERIOD 3b - Site Restoration  Poriod 3b Direct Decembersioning Activities																				
Demonstrator of Remaining Site Buildings Bh.11.1 Remembring Site Buildings Bh.12. Aurillary Bh.13. Aurillary Bh.13. Aurillary Bh.14. Aurillary Bh.14. Grundling & Sterow Water Pumphouse Bh.14. Grundling & Sterow Water Pumphouse Bh.11. Grundling & Sterow Pasemat Bh.11. Townsuriesting Carriers - Contaminated Bh.11. Demonstrating Chernetter Bh.11. Demonstrating Flower Basemat Bh.11. The Water Pumphouse Bh.11. Mark Water Pumphouse Bh.11. Mark Bellmouse Site Pumdation Bh.11. The Machine Shop Bh.11. The Machine Shop Bh.11. Red Machine Site Pumdation Bh.11. Red Machine Site Pumdation Bh.11. Red Machine Site Pumdation Bh.11. Red Machine Bh. Building Bh.11. Steurity Additions		6,121 88 1,561 314 1,561 834 848 894 898 298 298 298 298 298 1,831 1,83						617 617 617 618 618 618 618 618 618 618 618 618 618	5,889 4728 4728 1,795 361 1,629 1,629 1,629 1,629 2,72 2,710 424 2,710 424 2,710 424 2,710 424 2,710 428 2,710 4 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2			2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2							2 9 4 1 1 2 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	60,047 49,968 619 619 4,345 11,215 674 13,938 3,938 3,938 4,224 4,224 4,224 4,224 27,921 6,482 3,190 11,081 3,840 2,482 3,384 3,190 11,081 3,840 3,840 3,340 3,40 3,

Table C
Callaway Energy Center
DECON Decommissioning Cost Estimate
(thousands of 2011 dollars)

	ı					LLRW			ı	ı		Site	Processed		Burial Volumes	П	П	Burial/	ı	Utility and
Activity Index Activity Description	Decon Rei Cost (	Removal Pac Cost C	Packaging Tr Costs	Transport P Costs	Processing Costs	Disposal Costs	Other Costs (	Total Contingency	Total I Costs	Lic. Term. R Costs	Management   Costs	Restoration Costs	Volume Cu. Feet	Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet C	GTCC 1 Cu. Feet	Processed Wt., Lbs.	Craft ( Manhours	Contractor
Demolition of Remaining Site Buildings (continued)																				
3b.1.1.22 Service		502						75	577			577							6,045	
3b.1.1.23 Sludge Pump Station & Lagoon		22						4	53			59							313	
3b.1.1.24 Steam Generator Replacement Bldgs		1,187						178	1,365			1,365							15,693	
3b.1.1.25 Turbine Building		3,648						547	4,195			4,195							55,694	
3b.1.1.26 Turbine Pedestal		1,053						158	1,211			1,211							10,928	
3b.1.1.27 U.H.S. Cooling Tower		638						96	734			73.4							6.681	
3b 1.1.28 Water Treatment Plant		-						0	-			-							6	
ob 1190 Evel Dullding		2000						200	0 0 40			0 0 40							00 200	
object men bunding		2,000						000	040,40			040,40							000,440	
30.1.1 Lotals		31,001						4,608	30,708			30,708							382,179	
Site Closeout Activities		0000						900	0.710			0							17.000	
		9,320						1,398	10,718			10,718							17,928	
		124						6T	142			142							260	
							182	27	508	508										1,560
3b.1 Subtotal Period 3b Activity Costs		40,494					182	6,101	46,778	508		46,568							400,700	1,560
g																				
		1,226					6	185	1,419			1,419							5,830	
		4,219						633	4,852			4,852							15,960	
		3,779						267	4,346			4,346							9,588	
-		3,846						577	4,423			4,423							20,462	
3b.2 Subtotal Period 3b Additional Costs		13,070					6	1,962	15,040			15,040							51,840	
e								00	C III			i i								
		410						79	472			472								
3b.3 Subtotal Period 3b Collateral Costs		410						62	472			472								
Period 3b Period-Dependent Costs																				
3b.4.1 Insurance																	,			
3b.4.2 Property taxes							421	42	463			463								
		4.058						609	4.667			4.667								
							109	16	125			125					,			
3b.4.5 Corporate Allocations							4,590	459	5.049	5.049										
							2.002	300	2,302			2.302								37.646
							10,006	1.501	11,507			11,507								106,663
							4 643	697	5.340			5 340								61 174
-		4.058					21,771	3.624	29.453	5.049		24.404								205.483
		3,000						10000	001.00	200										200, 100
3b.0 TOTAL PERIOD 3b COST		58,032					21,961	11,749	91,742	5,258		86,484							452,540	207,043
PERIOD 3 TOTALS		58.032					21.961	11.749	91.742	5.258		86.484							452.540	207.043
TOTAL COST TO DECOMMISSION	12,942 1	132,224	20,821	11,797	22,144	50,878	388,396	115,297	754,498	617,324	33,726	103,448	281,077	146,444	1,690	459	2,142	23,883,690	1,638,154	3,963,950

TOTAL COST TO DECOMMISSION WITH 18,04% CONTINGENCY:	\$754,498	\$754,498 thousands of 2011 dollars	ollars
TOTAL NRC LICENSE TERMINATION COST IS 81.82% OR:	\$617,324	\$617,324 thousands of 2011 dollars	ollars
SPENT FUEL MANAGEMENT COST IS 4.47% OR:	\$33,726	\$33,726 thousands of 2011 dollars	ollars
NON-NUCLEAR DEMOLITION COST IS 13.71% OR:	\$103,448	\$103,448 thousands of 2011 dollars	ollars
TOTAL LOW-LEVEL RADIOACTIVE WASTE VOLUME BURIED (EXCLUDING GTCC):	148,593	148,593 cubic feet	
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	2,142	2,142 cubic feet	
TOTAL SCRAP METAL REMOVED:	71,335 tons	tons	
TOTAL CRAFT LABOR REQUIREMENTS:	1,638,154	1,638,154 man-hours	

End Notes: not extract the sectivity not charged as decommissioning expense, an exidence that this activity performed by decommissioning staff. 0 · indicates that this value is less than 0.5 but is non-zero, a cell containing " " indicates a zero value

# APPENDIX D DETAILED COST ANALYSIS SAFSTOR

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

					71:0 800	ANG L.				Selv	G	-760						, I - I - I		7.00
Activity Activity Description	Decon	Removal Cost	Packaging Costs	Transport Costs	Processing Costs	Disposal Costs	Other Costs (	Total Contingency	Total I Costs	ji .	Management Costs	Restoration Costs	Volume Cu. Feet	Class A Cu. Feet	Class B (	et C	GTCC P	ed .	Craft C Manhours	Contractor Manhours
PERIOD 1a - Shutdown through Transition																				
Period 1a Direct Decommissioning Activities																				
							347	104	451 174 a n/a	451 174										1,300
1a.1.6 Deadwate plant systems & process was te 1a.1.7 Prepare and submit PSDAR 1a.1.8 Review plant dwgs & specs. 1a.19 Derferen derioldy and survey							233 152	35	268 174	268 174										2,000
							117 117 175 117 362 584	18 26 18 18 54 88	134 134 201 134 416 671	134 134 201 134 416 671										1,000 1,000 1,500 1,000 3,100 5,000
Activity Specifications 10.11 for Propur plant and facilities for SAFSTOR 10.11 for 2 Plant systems 10.11 for 2 Plant systems 10.11 for 3 Plant structures and buildings 11.11 for 4 Water management 10.11 for Facility and site dormancy 10.11 for Facility and site dormancy 11.11 for Total Total							574 486 364 233 233 1,892	86 73 55 35 35 284	660 559 419 268 2,175	660 559 419 268 268 2,175										4,920 4,167 3,120 2,000 2,000 16,207
Detailed Work Procedures 1a.177. Plant systems 1a.172. Feality closecut & dormancy 1a.17. Total							138 140 278	21 21 42	159 161 320	159 161 320										1,183 1,200 2,383
1a.1.18 Procure vacuum dying system 1a.1.19 Druin/devergize non-cent, systems 1a.1.20 Drain/devergize non-mained systems 1a.1.21 Drain/devergize contamined systems 1a.1.22 Decon/secure contaminated systems 1a.1.2 Decon/secure contaminated systems 1a.1 Suboral Period Ia Activity Costs							12 4,536	732	13 a a 5,268	13 5,268										35,890
Period Ia Collateral Costs 1a.3.1 Spent Feel Capital and Transfer 1a.3 Subtotal Period Ia Collateral Costs							3,600	540 540	4,140		4,140 4,140									
d la 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		454 436 436		ા લ			1,589 280 280 724 724 769 1,351 2,89 2,970 6,892 28,971 6,892	159 28 28 65 66 6 77 77 135 43 135 135 136 421 421 421 421 421 421 421 421 421 421	1,747 3,08 567 562 53 832 846 1,486 332 878 878 878 878 878 878 878 878 878 87	1,747 308 567 502 502 533 832 846 	1,486 878 878 103			610				12,130		155.471
1a.0 TOTAL PERIOD 1a COST		890	13	61		28	51,943	7,683	60,559	53,953	6,607			610				12,190	20	616,761

Callaway Energy Center Decommissioning Cost Analysis

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Activity Description	Decon R Cost	Removal P Cost	Packaging 7 Costs	Transport Costs	Off-Site Processing Costs	LLKW Disposal Costs	Other Costs Co	Total Contingency	Total L Costs	NKC Lic. Term. N Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A Cu. Feet C	Class B C	Class C G Cu. Feet Cu	GTCC Pro	Burial / Processed Wt., Lbs. Ma	Craft Co Manhours M	Utility and Contractor Manhours
PERIOD 1b - SAFSTOR Limited DECON Activities																				
Period 1b Direct Decommissioning Activities																				
Decortamination of Site Buildings 1b.1.13 Reactor 1b.1.14 Reactor 1b.1.15 Camminated 1b.1.15 Communication Corridor - Contaminated 1b.1.14 Ford Building 1b.1.14 How Building 1b.1.17 How Members Shop 1b.1.15 Reforepress Fullding 1b.1.17 Reforepress Fullding 1b.1.18 Reforepress Fullding 1b.1.18 Reforepress Fullding 1b.1.18 Reforepress Fullding 1b.1.19 Reforement Transporters 1b.1.11 Reforement Transporters 1b.1.11 Totals	1,235 128 124 774 177 43 83 303 303 34 305 36 303							618 313 7 387 9 22 22 22 151 151 171	1,853 940 21 21 1,161 26 65 7 7 454 51 454	1,853 940 21 21 1,161 26 65 7 7 454 51 61 454									24,102 12,527 276 14,371 344 865 91 5,964 671	
1b.1 Subtotal Period 1b Activity Costs	3,051							1,525	4,576	4,576									59,211	
Period 1b Collateral Costs 1b.3.1 Deon equipment 1b.3.2 Process decommissioning water waste 1b.3.4 Small tool allowance 1b.3.5 Sener Fuel Capital and Transfer 1b.3.5 Shorts I and Transfer 1b.3.5 Shorts I and Transfer	872 171	02 . 02	, 2, , 2	267		377		131 227 8 144 509	1,003 1,113 58 1,104 3,278	1,003 1,113 58				1,082				64,942	2111	
Period 1b Period-Dependent Costs 1b.4.2 Insurance 1b.4.3 Insurance 1b.4.3 Property was pipeles 1b.4.4 Hould physics supplies 1b.4.5 Have quipment rental 1b.4.6 Bayes of Color	1,108		16					277 40 7 7 116 116 117 27 19 34 34 29 34 108 20 108 21 108 21 108 21 108 21 108 21 108 21 108 21 108 21 21 21 21 21 21 21 21 21 21 21 21 21	1,385 440 78 455 455 126 63 210 221 221 221 221 221 221 221 221 221	1,385 440 78 455 455 126 63 210 210 213 	3775 2221 26			731				14,626 		89.691 106,720 146,411
1b.0 TOTAL PERIOD 1b COST	5,203	524	98	270		411	12,260	4,021	22,774	21,049	1,726			1,814				79,568	59,446	146,411
PERIOD 1 c - Preparations for SAFSTOR Dormancy Period 1c Direct Decommissioning Activities																				
1c.1.1 Prepara support equipment for storage 1c.1.2 Install containment pressure equal, lines 1c.1.3 Internia survey prior to dormancy 1c.1.4 Secure building accesses 1c.1.5 Prepara & submit interim report		39						66 6 220 10	503 45 953 a 78	503 45 953 78									3,000 700 15,678	283
1c.1 Subtotal Period 1c Activity Costs		476					801	301	1,579	1,579									19,378	583
Period Ic Additional Costs 1e2.1 Spent Fuel Isolation 1c2 Subtotal Period 1c Additional Costs							10,280	1,542	11,822 11,822	11,822										
Period Collateral Collateral Collateral Collateral Let 3.1 1-23.1 Processe decommissioning water wrate 1-23.3 Small tool allowance 1-24.4 Snort Faul Capital and Transfer 1-2.4 Snort Faul Capital and Transfer 1-2.5 Snort Faul Capital and Transfer 1-2.5 Snort Faul Capital and Transfer 1-2.5 Short Faul Farried 1-2 Callateral Costs	187	4	76	292		413		248 1 144 393	1,216 4 1,104 2,324	1,216 4 1,220	1,104 1,104			1,183				71,001	231	
Period Ic Period. Dependent Costs 1c.4.1 Insurance 1c.4.2 Property taxes							400	40	440 78	440 78										

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

Utility and Contractor Manhours							39,691	106,720	146.995	910 168					444.257 329,543 773,800	773,800			1,509,686 880,650
Craft C Manhours	ı	'	۰.					, 10	19.614	79 080						30			160
Burial/ Processed Wt., Lbs.	ı	!	3,073					3,073	74 073	165.839					18,406	18,406			98,237
GTCC Cu. Feet	ı																		
Volumes Class C Cu. Feet																			
Burial V Class B Cu. Feet																			
Class A Cu. Feet		;	tor .					154	1.83.7	3.760	5				920	920			4.912
Processed Volume Cu. Feet																			
Site Restoration Costs																			
Spent Fuel Management R Costs								622		10.058			15,732 15,732		312 	63,691			
NRC Lic. Term. Costs		246 126	210	213		1.584	1,998	8,143	27.671	109.673		335 675 1,009			2,270 1,231 910 79 333 970 	21,092		4,039 8,137 12,176	27,384 14,852 5,007 423 4,017 10,598 13,365 97,597 61,433
Total L Costs	ı	246 126	210	213	221	1.584	1,998	8,143	29.397	119 781		a a 335 675 1,009	15,732 15,732		2,582 1,231 910 79 666 970 4,014 3,510 4,554 23,731 25,383 68,042	84,784		a a 4,039 8,137 12,176	27,384 14,852 5,007 423 4,017 10,598 13,365 97,597 61,433
Total Contingency		49 16	272	19	29	144	261	1,062	3 931	15.634		44 135 179	2,052 2,052		235 112 182 13 87 88 88 385 458 54 54 54 83 3311 8,414	10,644		527 1,627 2,154	2,489 1,350 1,001 71 72 524 963 1,215 12,730 8,013
Other Costs	ı		182	194	192	1 440	1,737	7,081	23 701	87 904		291 540 831	13,680		2,347 1,119 579 881 3,650 3,650 3,658 4,140 20,636 22,072 58,835	73,346		3,512 6,510 10,022	24,894 13,502 3,493 9,635 12,150 84,867 53,420
LLRW Disposal Costs		'							490	250						43			2229
Off-Site Processing Costs																			
Transport Costs		'	٠.						293	7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0 7.0						80			
Packaging T Costs			· ,					, 00	8	178						20			
Removal Pa Cost		197						307	286	006 6						728			
Decon R Cost									187	A 300									
Activity Description		Period 1e Period-Dependent Costs (continued) 1c.4.3 Health physics supplies 1c.4.4 Heavy equipment rental	Disposat of DAW generated Plant energy budget	NRC Fees Recomment Planning Race	Spent Fuel Pool O&M	ISFSI Operating Costs Cornors to Allocations	Security Staff Cost	Utility Staff Cost Subtotal Period 1c Period-Dependent Costs	TOTAL PERIOD 1c COST	PERIOD 1 TOTALS	PERIOD 2a - SAFSTOR Dormancy with Wet Spent Fuel Storage	Quarterly Inspection  Quarterly Inspection  Quarterly Inspection  Quarterly Inspection  Quarterly Inspection  Anal.13 Senia rannal environmental survey  Engan reports  Maniconnec confrontement  Maniconnec confrontement  Maniconnec conpiles  Maniconnec conpiles	Period 2a Collinteral Costs 2a.5.1 Sport Fuel Capital and Transfer 2a.3 Subtotal Period 2a Collateral Costs	David David Davidat Code	Period. Dependent Costs Insurance Proporty taxes Property taxes Health physics supplies Disposal of DNA generated Plant enemy budget Emergency Planting Fees Sport Leaf Fee 10 (&M ISSE Operating Costs Science Sport Cost Disting Staff Cost Science Staff Cost Disting Staff Cost Science Staff Cost Disting Staff Cost Staff Cost Disting Staff Cost Staff Cost Disting Staff Cost Dispondent Costs	TOTAL PERIOD 2a COST	PERIOD 2c - SAFSTOR Dormancy without Spent Fuel Storage	Previol 2c Direct Documenistoring Activities 62.12 Quarterly Institution of Quarterly Institution 62.13 Perpain report of Prepair reports 62.14 Minimumous roof replacement 62.15 Minimumous roop supplies 62.15 Silving Freed 2c Activity Costs 62.15 Silving Freed 2c Activity Costs	Perriod 2e Period-Dopendant Costs 22.4.1 Insustance 22.4.2 Property taxos 22.4.3 Health bylosis supplies 22.4.4 The falls bylosis supplies 22.4.5 Pinta energy budget 22.4.6 NIRC Peac. 22.4.6 Norporta Milocations 22.4.8 Security Saff Cost 22.4.9 Utility Saff Cost
Activity Index		Period 1c I 1c.4.3 1c.4.4		10.4.7					0 2 1	PERIOD	PERIOD	Period 2a 1 2a.1.1 2a.1.2 2a.1.3 2a.1.4 2a.1.5	Period 2a ( 2a.3.1 2a.3	é	Period 2a 1 2a.4.1 2a.4.2 2a.4.3 2a.4.5 2a.4.5 2a.4.7 2a.4.9 2a.4.10 2a.4.11 2a.4.11	2a.0	PERIOD	Period 2c I 2c 1.1 2c 1.2 2c 1.3 2c 1.4 2c 1.5	Period 2c F 2c4.1 2c4.3 2c4.3 2c4.4 2c4.4 2c4.5 2c4.6 2c4.6

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

Utility and Contractor Manhours	2,390,336	2,390,336	3,164,136		1,300	1,000 1,300 7,500 3,100 5,000 4,096		7.370 4.167 7.100 6.500 6.500 1.600 400 400 400 3.120 4.690 900 5.777	2,400 1,400 1,230 72,703	32,857 130,377 163,234	235,937	į	4.733 2,500 1,350 1,000 1,000
Craft Manhours	160	160	190							, , , , , , , , , , , , , , , , , , ,	œ		
Burial/ Processed Wt., Lbs.	98,237	98,237	116,643							5,186	5,186		
GTCC Cu. Feet													
Burial Volumes lass B Class C													
్ చ	2										. 6		
cd Class A t Cu. Feet	4,912	4,912	5,832							259	. 259		
Processed n Volume Cu. Feet								99 56 10 10 10 10 10 10 10 10 10 10 10 10 10	639		639	i	
Site Restoration Costs											9		7.8
Spent Fuel Management Costs			63,691										
NRC Lic. Term. Dests	234,677	246,853	267,946		174	134 174 1,007 416 671 550		890 503 872 872 67 419 107 	322 3,220 188 2,530 165 14,869	286 155 250 253 22 420 151 1,683 1,883 1,0,121 15,175	30,045	i i	972 386 45 134 134
Total Costs	234,677	246,853	331,637		174 617	a 134 174 1,007 416 671 550		988 559 953 872 67 419 215 54 419 617 617 617 617 617	322 3,220 188 2,530 165 15,509	286 1155 250 253 22 420 1151 1,688 1,836 10,121 15,175	30,684	a c	635 336 181 134 134
Total Contingency	28,357	30,511	41,155		23	18 23 131 54 88 88		129 73 124 114 114 9 9 5 5 7 7 7 7 7 7 7 7 16 16 16 16 16 16 16 16 16 16 16 16 16	42 420 25 330 22 2,023	26 14 50 33 4 4 55 15 23 23 1,320 1,320 1,508	3,931	Š	83 44 24 18 18
Other Costs	201,962	211,983	285,329		152	117 152 875 362 584 478		860 486 829 759 58 864 187 47 47 47 864 537 537 644 84,643	280 2,800 163 2,200 144 13,486	260 141 	26,315	Î	292 292 158 117 117
LLRW Disposal Costs	229	229	272								12		
Off-Site Processing Costs	٠												
Transport Costs	18	18	22								1		
Packaging Costs	105	105	125								9		
Removal Cost	4,006	4,006	4,734							200 220	420		
Decon Cost													
y Activity Description	Subtotal Period 2c Period-Dependent Costs	TOTAL PERIOD 2c COST	PERIOD 2 TOTALS	PERIOD 3a - Reactivate Site Following SAFSTOR Dormancy	Period 3a Direct Decommissioning Activities 3a.1.1 Prepare preliminary decommissioning cost 3a.1.2 Revew plant dwgs & specs.	Fortiern detailed rate surveys End product description Detailed by product inventory Define major work sequence Pericons Silks and EA Pericons Silks and E	Activity Specifications	39.1.11.1 Re-activate plant & temporary facilities 39.1.11.2 Plant systems 39.1.11.3 Reactor internals 39.1.11.5 Hondown vessel 39.1.11.5 Hondown vessel 39.1.11.5 Stem generators 30.1.11.1 Name forward 30.1.11.1 Man forward 30.1.11.1 Man forward 30.1.11.1 When temperators 30.1.11 When temperators 30.1.11 When forward withings	Dimoning & Site Proparations 3a.1.2 Popura disamathing sequence 3a.1.14 Point propare disamathing sequence 3a.1.14 Disamathing & temp, severe 3a.1.15 Rigging reader clean-up system 3a.1.16 Rigging Cont. Certal Europselvoling (ec. 3a.1.16 Procure caskellines & continers 3a.1. Subtonal Perend Sin Activity Costs	Period 3a Period-Dopendent Coats 3a.4.2 Property traces 3a.4.2 Property traces 3a.4.4 Heavy equipment rental 3a.4.4 Heavy equipment rental 3a.4.6 Pieze 10 DAW generated 3a.4.6 Pieze 20 DAW generated 3a.4.6 Pieze 3a.4.7 NINC Peez 3a.4.8 Corporate Allocations 3a.4.8 General's Saff Coat 3a.4.1 Utility Staff Coat 3a.4.1 Utility Staff Coat 3a.4.1 Utility Staff Coat	TOTAL PERIOD 3a COST	G [9 ≥	Plant systems Roadror internals Roadror internals Romaining buildings CRD cooling assembly CRD housings & I'Cl tubes
Activity Index	2c.4 S	2c.0 T	PERIOD 2	PERIOD 3	Period 3a D 3a.1.1 F 3a.1.2 F		Activity Sp.	3a.111.1 F 3a.111.2 F 3a.111.4 F 3a.111.6 F 3a.111.7 F 3a.111.7 B 3a.111.10 D 3a.111.10 B	Planning & 3a.1.12 F 3a.1.13 F 3a.1.14 I 3a.1.15 F 3a.1.16 F 3a.1.16 F 3a.1.16 F 3a.1.16	Period 3a P 3a 4.1 I 3a 4.2 I 1 3a 4.2 I 1 3a 4.4 I 1 3a 4.5 I 1 3a 4.7 I 1 3a 4.8 I 3a 4.7 I 1 3a 4.8 I 3a 5. I 3a	3a.0 T	PERIOD 3 Period 3b I Detailed W	35.1.1.1 35.1.1.2 F 35.1.1.3 F 35.1.1.4 C

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

	Activity Index Activity Description	Decon	Removal ] Cost	Packaging Costs	Transport Costs	Off-Site Processing 1 Costs	LLRW Disposal Costs	Other Costs Co	Total Contingency	Total Li Costs	NRC S Lic. Term. Ma Costs	Spent Fuel Management I Costs	Site F Restoration Costs	Processed Volume Cu. Feet C	Class A Cla	Burial Volumes Class B Class C Cu. Feet Cu. Feet	es ss C GTCC Feet Cu. Feet	Burial/ C Processed set Wt., Lbs.	ded Craft s. Manhours	Utility and Contractor rs Manhours	or rs
From the conditions of the con	nuced)							117 424 140 53 140 537 117 117 182 319 319 3,763	18 64 21 21 81 81 27 27 27 48 48 48 565	134 487 487 161 60 161 134 209 209 209 366 366 4,328	134 487 81 60 60 161 617 67									ಗೆಜೆಗೆ ಗೆಕ್ಗೆಗೆಡಿಡಿಜ್ಞ	6830 2200 2200 600 600 600 730 730 243
The continue of the continue	ivity Costs ditional Costs							3,763 2,551 2,551	565 765 765	4,328 3,316 3,316	3,489 3,316 3,316		833						. 19,		243 852 852
the continue of the continue o	expenses nt and Costs	877. · · 872.	1,100 1,100					1,080 1,080	131 162 165 458	1,003 1,242 1,265 3,510	1,003 1,242 1,265 3,510										
Transition   Tra	Period 3b Period Dependent Costs 8b.4.2 Insurance 8b.4.2 Insurance 8b.4.4 Health physics supplies 8b.4.4 Health physics supplies 8b.4.4 Health physics supplies 8b.4.5 Heavy conjument rental 8b.4.6 Disposal of DAW generated 8b.4.8 NRC Fees pudget 8b.4.1 DoC Seaff Cost 8b.4.10 Security Saff Cost 8b.4.11 DOC Seaff Cost 8b.4.12 Utility Saff Cost 8b.4.12 Utility Saff Cost 8b.4.2 Utility Saff Cost 8b.4.2 Utility Saff Cost 8b.4.3 Exhoral Period 3b Period Dependent Costs	8	437 437 438 673					587 289 	13 28 28 28 109 65 8 8 8 27 27 261 475 1,565 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,619 2,79 2,79 2,79 2,79 2,79 2,79 2,79 2,7	645 645 308 308 546 502 502 299 2,871 2,871 12,000 20,077 41,837	67 645 308 308 546 502 502 502 209 2,871 3,640 12,000 20,077 41,837							ਜ਼ੀ ਜ਼ੀ 			
Femoral Sego Sand Sand Sand Sand Sand Sand Sand Sand	COST	926	1,973	12	61		27	42,924	7,126	52,990	52,151		839		582			. 11,		,	702
chricities and the contribute of the contribute	nt Removal	926	2,393	18	00		38	69,239	11,056	83,675	82,196		1,479		841			. 16,			623
Mathematical Books   Mathema	ng Activities																				
## Demolition	Nuclear Steam Supply System Removal 44.1.12 Preseaver Related Trank 44.1.12 Preseaver Related Trank 44.1.14 Preseaver Coolant Plange 44.1.14 Preseaver 44.1.14 Preseaver 44.1.15 Removed Coolant Purps & Motors 44.1.16 Refined Steam Generators Units 44.1.18 Removed Visused Interruals Grace Removal 44.1.18 Preseave & Interruals Grace Copposed 44.1.18 Removed Visused Interruals 44.1.17 Removed Visused Interruals 44.1.17 Removed Visused 44.1.17 Removed Visused 44.1.17 Removed Visused	36 6 0 0 9 7 7 7 7 7 7 6 0 31 50 22 9	171 23 83 56 4,985 5,685 13,747	25 7 48 413 2,179 2,179 2,179 7,310 1,350 1,350	14 175 140 2,497 2,497 2,497 33 671 671 671 673 673 673 673 673 673 673	130 37 2,549 2,549 56	182 47 889 982 5,918 5,918 139 3,778 10,743 1,975 30,571		130 27 284 284 3,739 2,454 107 5,952 1,611 5,672 20,304	689 1500 1,500 1,926 21,944 15,598 681 20,641 12,355 15,135 90,619	689 151 1,500 1,926 21,944 15,598 681 20,641 12,355 15,135 90,619			580 164 	614 164 3,386 3,739 22,546 22,546 2,947 2,947 2,947 9,531 6,7,785						80 80 250 250 250 965
902	Removal of Major Equipment 4a.1.2 Main Turbins/Generator 4a.1.3 Main Condensers		442	284	37	837			270 448	1,871	1,871 2,653			5,180 8,106				. 414		.21 302	
	Cascading Casts from Clean Building Demolition Ada.1.41. Reactor Ada.1.42. Avazimy fan.1.43. Puel Building		902 457 220						135 69 33	1,037 525 253	1,037 525 253								. 10,	775 551 995	

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

Andinita		d leaves		110000	Ι,	LLRW				NRC Spe	Spent Fuel	Site	Processed	1	Burial Volumes		Burial/			Utility and
Activity Description	Cost		Costs		Costs		Costs Con	Contingency	Costs C					Cu. Feet Cu	Cu. Feet Cu.	Feet Cu. Feet		sed Crait bs. Manhours		hours
Cascading Costs from Clean Building Demolition (continued) 4a.1.44 Hot Machine Shop 4a.1.45 Rudwaste 4a.14 Tetals		1 95 1.675						0 14 251	1 109 1.926	1 109 1.926									16 1,108 19.645	
CONTRACT CON																				
Disposal of Plant Systems 4 a.1.5.1 100 Aux.Bldg Non-System Specific RCA 4 a.1.5.2 100 Auxiliary Bldg Non-System Specific		705	11 2	38	626	, 10		275	1,644	1,644			7,629	, 87			98	309,812 1 35,461	2,030	
4a.1.5.3 AB - Main Steam 4a.1.5.4 AB - Main Steam RCA		270	. 00		177			48	310	315		310	2.156						5,833	
		265						40	305			305							5,641	
4a.1.5.7 AE - Feedwater		293 202						8 44	337 232			337 232							3,144 4,271	
		249						37	286			286							5,352	
4a.1.5.9 AK - Condensate Demineralizer 4a.1.5.10 AL - Auxiliary Feedwater		6 92						14	105			105							1,944	
		55			. :			. 00 ;	26	. !		26	. !						468	
4a.1.5.12 BM - Steam Generator Blowdown 4a.1.5.13 BM - Steam Generator Blowdown - RCA		380	61 4	4 5	95			148	252 885 885 885	252 885			1,157				4 9	46,993 166 857	2, 137 7, 066	
		307	6	21	513			158	1,009	1,009		. '	6,255				. 25		6,161	
4a.1.5.15 CA - Steam Seal 4a.1.5.16 CB - Main Turkino Lurko Oil		60 21						m a	24			24 69							455	
		10							3 ==			11 2							198	
		14						01 0	16			16							287	
4a.1.5.19 CE - Stator Cooling water 4a.1.5.20 CF - Lube Oil Storage Xfer & Prfication		21 68						9 19	44			44							812	
		31						ю	36			36							657	
4a.1.5.22 CH - Mam Turbine Control Oil 4a.1.5.23 DA - Girculating Water		349						52.9	401			70							1,219	
		29						6	89			89							1,260	
00		225			. 000			oc 5	092			09	10 10 0						1,084	
4a.1.5.2b DD - Cooling Wit Chem Control KCA 4a.1.5.27 EJ - Residual Heat Removal		362	26	3 8	368	192		201	1,179	1,179			4,481	876			. 25	144,376 256,270	7,137	
		309	e0 a	oc ;	182			106	607	607			2,214				œ s		5,913	
4a.1.5.29 EN - Containment Spray 4a.1.5.30 EP - Accumulator Safety Injection		161	10 00	10	163			92	400	400			3,026						4,134 3,112	
		24						4	27			27							521	
4a.1.5.32 FB - Auxiliary Steam 4a.1.5.33 FB - Auxiliary Steam RCA		88 28			. 67			32	112	187		112	816					33.148	2,106	
		63						6	7.3			7.3							1,320	
4a.1.5.35 FE-Auxiliary Steam Chemical Addition 4a.1.5.36 GE-Turbine Building HVAC		2 081						1 27	907			907							105	
		7.1	1	00	99			28	168	168			801						1,395	
4a.1.5.38 HE - Boron Recycle		467	20	55	284	131		197	1,121	1,121			3,460	614			. 19	191,035	3,962	
		35	١.					10	37	i		37							069	
4a.1.5.41 KS - Bulk Chemical Storage 4a.1.5.42 T.E - Oily Waste		18.1	01 ,	27 ,	529			107	208	760		- 808	6,449					261,890	1,825 3,865	
		244	00	œ	185			06	230	530			2,256				6 .	91,628	1,296	
4a.1.5.44 Turbine Bldg Non-System Specific 4a.1.5 Totals		751 8,362	153	249	4,890	290		2,677	863 16,921	12,928		3,993	59,608	2,748			. 2,64	2,648,658 16	15,405 166,857	
4a.1.6 Scaffolding in support of decommissioning		1,467	28	9	112	18		392	2,023	2,023			1,233	82			.9	62,415 3	33,634	
4a.1 Subtotal Period 4a Activity Costs	229	26,957	14,382	6,636	11,897	31,179	391	24,342	116,013	112,020		3,993	156,147	70,614	376	470 2	2,142 13,20	13,208,740 33	337,509	8,009
Period 4a Collateral Costs																				
4a.3.3 Small tool allowance	ю,	. 582	10	19		27		12	8328	68		. 88		77				4,593	15	
4a.3.4 On-site survey and release of 60.87 tons clean metallic waste 4a.3 Subrotal Period 4a Collateral Costs	, 10	285	, 10	. 19		27	62	6	68 464	68 431		. 88		77				4,593	. 12	
Period 4a Period-Dependent Costs																				
4a.4.1 Decon supplies 4a.4.2 Insurance	. 63						. 691	16 69	78 760	78 760										
4a.4.3 Property taxes		1 945					330	33	363	326		98 ,								
		2,236		!				335	2,571	2,571								100		
4a.4.0 Disposator DAW generated			100	3		217		70	401	401				4,608			Ď.	9,167	102	

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

1.	Activity Description	Decon R. Cost	Removal Pac Cost C	Packaging Tre	O Transport Pro Costs	Off-Site L Processing Dis Costs C	LLRW Disposal Ot Costs Cc	Other T Costs Cont	Total Contingency	Total Lic Costs	NRC S <sub>F</sub> Lic. Term. Ma Costs	Spent Fuel Management F Costs	Site F Restoration Costs	Processed Volume Cu. Feet	Class A Cl	Burial Volumes Class B Class C Cu. Feet Cu. Feet	es ss C GTCC Feet Cu. Feet	Burial/ C Processed eet Wt., Lbs.	al/ ssed Craft bs. Manhours		Utility and Contractor Manhours
1.	ts (continued) ressing Equipment/Sarvices riod-Dependent Casts							810 845 457 457 3,728 4,731 0,691 1,103	122 85 68 882 559 559 3,104 8,035	932 930 525 9,702 4,288 16,941 23,794 63,716	932 930 525 9,702 4,288 16,941 23,794 63,680				4,658						76,786 169,543 307,143 553,471
Column   C	COST	296	31,423	14,487	6,672	11,897		51,556	32,439	180,193	176,131		4,062	156,147	75,349	376				7,676	561,481
1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1, 1,	nination aning Activities acks	760	88	310	25		1,154		733	3,127	3,127				5,241			. 44	5,519	1,925	
	Abon System Specific RCA wine System Specific RCA wine System Specific wine System System Specific wine System System wine System System wine System System System wine System w		8 8 8 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		uar ' = = = = = = = = = = = = = = = = = =	411 175 175 175 175 175 175 175 175 175 1			8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	1,205 1,205 1,205 1,205 1,205 1,058 1,068 1,068 1,088	1,205 1,205 1,205 1,205 1,205 1,205 1,205 1,1,708 1,1,		1,589 1,168	2,002 2,139 3,200 1,239 1,532 2,039 1,192 1,192 1,192 1,192 1,192 1,197 1,114 2,038 2,038 2,038 2,038 3,048 5,038 1,143 2,185	985			9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1,000 1,	

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

and ctor urs					12,480		186,367 397,406 699,909 1,282,671
Utility and Contractor Manhours	F6391631946400£84		01-04-00-00-00-00-00-00-00-00-00-00-00-00-	6		21 % 0	
Craft Manhours	3,837 459 459 1,226 6,748 972 972 1,276 1,	50,451	38,232 15,247 306 27,454 441 419 919 196 7,811 850 3,885 95,320	451,619	388 101,822 102,209	. 88 	221 221 
Burial/ Processed Wt., Lbs.	10,039 35,813 98,813 	93,623	913,505 250,301 4,296 15,402 4,446 9,974 2,532 122,462 12,564 1,478,101	7,786,067	345,600	12,779 303,726 316,505	135,596
GTCC Cu. Feet							
c t							
Burial Volumes Class B Class Cu. Feet Cu. Fe							
Class A		122	9,355 1,954 42 42 562 51 107 1,027 11,027 114	26,527	3,600	213 610	6,780 
Processed Volume Cu. Feet		1,849	5,995 2,058 1,705 1,705 19 844 66 11,704	139,409			
Site P Restoration Y Costs (	204 65 65 65 68 68 68 68 141			5,141	6,296 6,296		
Spent Fuel Management Costs							
NRC Lic. Term. Costs	58 109 109 268 258 3274 253 253 157 167	3,034	4,934 1,546 2,28 2,28 36 82 1,77 7,76 82 1,09	45,269	1,776 1,247 3,023	187 510 928 334 1,959	1,557 1,836 875 4,476 6,157 6,157 1,267 10,359 10,359 10,359 10,34,485 1,4,485 1,6,084 1,86,384
Total Costs	204 65 65 65 65 68 68 68 68 68 68 68 20 20 20 20 20 20 20 20 20 20 20 20 20	3,034	4,934 1,546 2,288 3,68 82 1,7 7,7 82 1,7 1,0 10,109	50,410	1,776 1,247 6,296 9,319	187 510 928 334 1,959	1,557 1,836 875 4,476 6,157 6,157 684 1,775 2,244 1,267 10,339 10,339 10,339 10,339 10,339 11,340 13,485 136,084
Total Contingency	72 C C C C C C C C C C C C C C C C C C C	288	1,156 408 88 578 10 24 4 4 210 23 106 23 23 23 23 23 25 28	9,404	410 178 821 1,409	34 67 123 30 254	311 167 808 808 808 903 903 204 204 165 963 1,580 7,107 17,576
Other Costs					1,366 469 1,834	803	1,669 796 796 796 796 1,102 9,630 9,063 9,437 107,341
LLRW Disposal Costs		27	1,061 110 2 42 42 3 3 6 6 6 6 7 7 7 7 1,288	4,173	207	74 87 162	316
Off-Site Processing Costs		168	492 169 169 222 2 2 69 69 69	11,453		545 545 545	11,998
Transport Costs		6	157 43 18 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	903	781 109 890	55 . 85 . 58	255
Packaging T		42	18 8 8 8 6 8 6 7 7 8 7	773	77 27	14 . 138 	146
Removal I	177 277 277 280 380 45 46 112 112 112 113 113 1147 1147 1181 1181 181 181 183	2,200	911 221 3 721 6 8 8 8 102 102 102	19,899	5 4,898 4,903	444	3,581 5,581 5,354 
Decon			1,125 586 13 700 16 40 5 312 312 312 313 3146	3,806		13 13	1,246
Activity Description	Disposal of Plant Systems (continued)  10.1.252 KD - Domestie Water KCA  10.1.253 KD - Domestie Water KCA  10.1.254 KD - Domestie Water KCA  10.1.256 KE - Ford Handling & Sorange Retor vest  10.1.256 KH - Service Gas (CO2 N. 197 & CO2)  10.1.256 KH - Service Gas (CO2 N. 197 & CO2)  10.1.256 KH - Service Gas (CO2 N. 29 Hz & CO2)  10.1.256 LA - Santiury Denia Regime  10.1.256 LA - Santiury Denia RCA  10.1.256 LD - Cornical & Denegart Water  10.1	Scaffolding in support of decommissioning	Decontamination of Site Buildings 40.1.4.1 Reactor 40.1.4.2 Auxiliary 40.1.4.3 Communication Corridor - Contaminated 40.1.4.4 Feel Building 40.1.4.4 Feel Building 40.1.4.5 Redioactive Building 40.1.4.5 Redioactive and Personnel Turnel 40.1.4.8 Redioactive and Personnel Turnel 40.1.4.8 Redioactive and Personnel Turnel 40.1.4.8 Redioactive Registerement Bidgs 40.1.4.1 Stoam Generator Replacement Bidgs 40.1.4 Totals	Subtotal Period 4b Activity Costs	ewied 4b Additional Costs Leisen Premiution Survey Program Management 16.2.1 Stantary Treatment Lapon LIAN 16.2.2 Stantary Treatment Lapon LIAN 16.2.3 Coing Two-rat-Absortes Paral Etamoral 16.2.2 Statusary Terration of the Additional Costs	Collatoral Costs Process decounsissioning water waste Small tool allowance Decounsissioning Equipment Disposition On-site sarvey and release of 297,3 tons clean metallic waste Subroan Period is Collatoral Costs	Period 4b Period-Dependent Costs 16.4.1 Decen supplies 16.4.2 Insurance 16.4.3 Property transcription 16.4.4 Health physics supplies 16.4.5 Health physics supplies 16.4.6 Disposal of DAW generated 16.4.7 Disposal of DAW generated 16.4.3 Liquid Induses Processing Equipment/Services 16.4.1 Liquid Induses Processing Equipment/Services 16.4.1 Decentry Suff Cost 16.4.1 DrOC Suff Cost 16.4.1 DrOC Suff Cost 16.4.1 DrOC Suff Cost 16.4.1 DrOC Suff Cost 16.4.3 Subtonal Period 4b Period Dependent Costs 16.4.1 PREMIOD 4b COST

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

Activity Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs (	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Class A C	Burial Volumes Class B Class C Cu. Feet Cu. Feet	es ss C GTCC Feet Cu. Feet	Burial/ C Processed set Wt., Lbs.		Craft Con Manhours Ma	Utility and Contractor Manhours
PERIOD 4f-License Termination																				
4£1							154	46	200	200										
41.1.2 Terminate heense 4f.1 Subtotal Period 4f Activity Costs							154	46	a 200	200										
Period 4f Additional Costs 4f.2.1 License Termination Survey 4f.2 Subtotal Period 4f Additional Costs							7,808	2,342	10,150	10,150 10,150									149,339 149,339	6,240 6,240
Period 4f Collateral Costs 4f.3.1 DOC staff rebocation expenses 4f.3 Subtotal Period 4f Collateral Costs							1,080	162 162	1,242	1,242										
Period 4f Period-Dependent Costs 44.1 Insurance 44.2 Property taxes 45.3 Health physics supplies 45.4 Disposal ONAW generated 44.4 Panta energy backet						9 .	212	21 21 165 5		233 826 30 126								7,050	= .	
						19	582 1,440 1,006 5,171 5,739 14,259	58 144 151 776 861 2,197	640 1,584 1,157 5,946 6,600 17,143	640 1,584 1,157 5,946 6,600 17,143				323				7,050	=	18,926 57,566 74,914 151,406
4f0 TOTAL PERIOD 4f COST		661	80	1		16	23,300	4,748	28,734	28,734				353				7,050	149,350	157,646
PERIOD 4 TOTALS	5,361	66,263	15,640	8,578	23,895	36,297	184,834	65,830	406,698	391,199		15,499	301,556	113,219	376	470 2,	2,142 21,89	21,897,310 1,0	1,041,205	2,014,278
PERIOD 5b - Site Restoration Period 5b Direct Decommissioning Activities																				
Demolition of Remaining Site Buildings  6 b.11.2 Availary  6 b.11.3 Availary  6 b.11.3 Availary  6 b.11.4 Braye Pacific  6 b.11.4 Circulating & Service Ware Pumptonse  6 b.11.6 Communication Corndor. Clean  6 b.11.7 Communication Corndor. Clean  6 b.11.7 Communication Corndor. Clean  6 b.11.9 Diesel Generation  6 b.11.1 Frew Mere Basemut  6 b.11.1 Frew Mere Pumptonse  6 b.11.1 Frew Mere Pumptonse  6 b.11.1 Handeline Shop  6 b.11.1 Stean Communication  6 b.11.2 Turbin Building  6 b.11.2 Under Steanment Plant  6 b.11.2 Under Steanment Plant  6 b.11.1 Tutal		4,111 4,111 1,638 1,131 1,314 1,324 1,324 2,037 2,037 2,037 1,187						768 617 617 73 47 119 119 119 119 119 119 119 119 119 11	6.889 4,728 1,746 1,746 1,746 1,746 1,162 1,028 1,028 1,038			6.889 4,7728 1,746 1,746 1,1028 1,1028 1,028 1,038 1,23 2,340 2,340 2,44 2,41 3,41,96 1,286 4,41,96 1,286 4,41,96 1,286						~ 	60.047 619 619 619 619 619 619 619 619	

Table D
Callaway Energy Center
SAFSTOR Decommissioning Cost Estimate
(thousands of 2011 dollars)

					Off-Site	LLRW				NRC	Spent Fuel	Site	Processed		Burial Volumes	mes		Burial/		Utility and
Activity Index Activity Description	Decon Cost	Removal Cost	Removal Packaging Cost Costs	Transport Costs	Processing Costs	Disposal Costs	Other	Total Contingency	Total Costs	Lic. Term. Costs	Management Costs	Restoration Costs	Volume Cu. Feet	Class A Cu. Feet	Class B C Cu. Feet C	Class C Cu. Feet C	GTCC F	Processed Wt., Lbs.	Craft (Manhours	Contractor Manhours
Site Closeout Activities		066.0						906	915.01			915-01							17 000	
		124						19	142			142							592	
5b.1.4 Final report to NRC							182	27	209	209										1.560
		40,494					182	6,101	46,778	209		46,568							400,700	1,560
Danied Rh Additional Costs																				
5b.2.1 Concrete Crushing		1.226					6	185	1.419			1.419			,	,	,		5.830	
		4,219						633	4,852			4,852							15,960	
5b.2.3 Cooling Tower Discharge & Intake Pipe Flow Fill		3,779						567	4,346			4,346							9,588	
5b.2.4 Cooling Tower Demolition		3,846						577	4,423			4,423							20,462	
5b.2 Subtotal Period 5b Additional Costs		13,070		,			6	1,962	15,040			15,040			,				51,840	
29																				
_		410						62	472			472								
5b.3 Subtotal Period 5b Collateral Costs		410						62	472			472								
Period 5b Period-Dependent Costs																				
5b.4.2 Property taxes							421	42	463			463								
		4,058						609	4,667			4,667				,				
							109	16	125			125								
							4,500	420	4,950	4,950						,				
							2,002	300	2,302			2,302								37,646
							10,006	1,501	11,507			11,507				,				106,663
00							4,643	697	5,340			5,340								61,174
5b.4 Subtotal Period 5b Period-Dependent Costs		4,058					21,681	3,615	29,354	4,950		24,404								205,483
5b.0 TOTAL PERIOD 5b COST	٠	58,032					21,871	11,740	91,643	5,159		86,484							452,540	207,043
PERIOD 5 TOTALS		58,032					21,871	11,740	91,643	5,159		86,484							452,540	207,043
TOTAL COST TO DECOMMISSION	11,676	133,622	15,962	9,168	23,895	37,468	649,178	145,416	1,026,384	849,173	73,749	103,462	301,556	123,652	376	470	2,142	22,196,610	1,592,143	7,012,263

TOTAL COST TO DECOMMISSION WITH 16.51% CONTINGENCY:	\$1,026,384 thousands of 2011 dollars
TOTAL NRC LICENSE TERMINATION COST IS 82.73% OR:	\$849,173 thousands of 2011 dollars
SPENT FUEL MANAGEMENT COST IS 7.19% OR:	\$73,749 thousands of 2011 dollars
NON-NUCLEAR DEMOLITION COST IS 10.08% OR:	\$103,462 thousands of 2011 dollars
TOTAL LOW-LEVEL RADIOACTIVE WASTE VOLUME BURIED (EXCLUDING GTCC):	124,497 cubic feet
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED	2,142 cubic feet
TOTAL SCRAP METAL REMOVED:	71,407 tons
TOTAL CRAFT LABOR REQUIREMENTS:	1,592,143 man-hours

End Notes: not influence that this activity not charged as decommissioning expense, an a radicates that this activity performed by decommissioning staff.

O influence that this value is less than 0.5 but is non-zero.

a call containing \*\* a factors a zero value.