

## **NRR-PMDAPEm Resource**

---

**From:** Feintuch, Karl  
**Sent:** Thursday, July 11, 2013 12:05 PM  
**To:** Feintuch, Karl  
**Subject:** ME1438 Record of discussions with Dominion Energy Kewaunee (DEK) Re: applicability of Parent Company Guarantee vs. Parent Support Agreement  
**Attachments:** MF1438 - Record of discussion of regulations for parent financial guarantees.docx

Attached is a summary of discussions to date. These discussions are not interpretations as defined in 10 CFR 50.3, and the licensee is so advised that they can seek formal interpretations. Discussions are informative regarding the nature of requirements and any unique circumstances in their specific application.

**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 756

**Mail Envelope Properties** (26E42474DB238C408C94990815A02F09DED476E0BF)

**Subject:** ME1438 Record of discussions with Dominion Energy Kewaunee (DEK) Re: applicability of Parent Company Guarantee vs. Parent Support Agreement  
**Sent Date:** 7/11/2013 12:04:47 PM  
**Received Date:** 7/11/2013 12:04:50 PM  
**From:** Feintuch, Karl

**Created By:** Karl.Feintuch@nrc.gov

**Recipients:**  
"Feintuch, Karl" <Karl.Feintuch@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	320	7/11/2013 12:04:50 PM
MF1438 - Record of discussion of regulations for parent financial guarantees.docx		
18275		

**Options**  
**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

## Phone Call July 9, 2013

Phone call from Karl Feintuch, NRC, to Craig Sly, DEK – the licensee

### Agenda:

Discuss progress toward supplying additional information that addresses need for Parent Company Guarantee. Sly estimates that submittal of additional information would occur within July.

## Phone call June 14, 2013

### Bridge line

866-740-1260, Access Code 2732784#

### Attendees

Participants for NRC: Karl Feintuch, Michael Dusaniwskyj, Jocelyn Lian

Participants for Dominion: Rick Anderson – Finance, Fred Gerloff – Finance, Dave Sommers – Licensing, Stu Yuen - Decommissioning Director, Craig Sly - Licensing

**Dominion contact:** Craig Sly, 804-273-2784, Nuclear Licensing and Operations Support, Dominion Resources Services, Inc.

### Agenda:

Continue discussion of suitability of Kewaunee's "parent company guarantee" for a decommissioning facility over "Parent Support Agreement" Re: ML083540651 dated 12/19/2008, for an operating plant. Describe how regulations are used to assess if a licensee has provided reasonable assurance that they are financially qualified.

## Phone call May 14, 2013

### Bridge line

866-740-1260, Access Code 2732784#

### Attendees

Participants for NRC: Karl Feintuch, Michael Dusaniwskyj, Jocelyn Lian

Participants for Dominion: Rick Anderson – Finance, Fred Gerloff – Finance, Dan Meekhoff – Decommissioning Team Lead, Stu Yuen - Decommissioning Director, Craig Sly - Licensing

**Dominion contact:** Craig Sly, 804-273-2784, Nuclear Licensing and Operations Support, Dominion Resources Services, Inc.

**Agenda:**

Clarify need for Kewaunee “parent company guarantee” or “Parent Support Agreement” Re: ML083540651 dated 12/19/2008

Clarify references to “Financial Tests”