

**REQUEST FOR ADDITIONAL INFORMATION
PENNSYLVANIA STATE UNIVERSITY
ANNUAL CERTIFICATION OF FINANCIAL ASSURANCE
(TECHNICAL ASSIGNMENT CONTROL NUMBER L33304,
DOCKET NUMBERS 70-113 AND 50-005)**

1. Comparison of Financial Data

The annual certification submitted by a letter dated December 20, 2013, lacks a comparison of the data used by the licensee in the financial test with the amounts in the independently audited year-end financial statements, an evaluation of the licensee's off-balance sheet transactions, and bond rating verification by the licensee's independent certified public accountant. Thus, provide the following documentation:

- comparison of the data used in the financial test with the independently audited year-end financial statements;
- evaluation by its independent certified public accountant of the off-balance sheet transactions; and
- bond rating verification.

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 30, Appendix E.II.(C)(1) states, in part, that the licensee's independent certified public accountant must compare the data used by the licensee in the financial test, which is derived from the independently audited, year-end financial statements for the latest fiscal year, with the amounts in such financial statement. The accountant must evaluate the licensee's off-balance sheet transactions and provide an opinion on whether those transactions could materially adversely affect the licensee's ability to pay for decommissioning costs. The accountant must verify that a bond rating, if used to demonstrate passage of the financial test, meets the requirements of Section II of this Appendix.

2. Express Waivers of Notice

The self-guarantee agreement does not include the express waivers of notice in paragraphs 17 and 21 of the recommended self-guarantee agreement model language. Though not a regulatory requirement, U.S. Nuclear Regulatory Commission staff request that the self-guarantee agreement be revised to include the express waivers of notice language recommended in Appendix A.9.12 of Reference 2.

References

1. Letter from J. Doncsecz, Pennsylvania State University, "Audited Financial Statements - Year Ending June 30, 2013, Self-Guarantee Agreement and Standby Trust Agreement", December 20, 2013. Agencywide Documents Access and Management System (ADAMS) Accession Number ML14015A387.
2. U.S. Nuclear Regulatory Commission, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness, Final Report", NUREG-1757, Vol. 3, Rev. 1, February 2012. ADAMS Accession Number ML12048A683.

Enclosure