

**REQUEST FOR ADDITIONAL INFORMATION**  
**REGARDING NEBRASKA PUBLIC POWER DISTRICT'S**  
**DECOMMISSIONING FUNDING PLAN UPDATE FOR**  
**COOPER NUCLEAR STATION INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS**  
**DOCKET NO. 72-66**

**Regulatory Requirement**

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 10 CFR 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

**Background**

By letter dated December 17, 2015, Nebraska Public Power District (NPPD) submitted, for U.S. Nuclear Regulatory Commission (NRC) staff review and approval, a decommissioning funding plan update (DFP Update) for the independent spent fuel storage installation (ISFSI) at Cooper Nuclear Station (Cooper) (Agencywide Documents Access and Management System Accession No. ML16014A382). The NRC staff reviewed NPPD's DFP update and believes NPPD's submittal was not sufficient to meet the intent of the requirement in 72.30(c). The DFP update does not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

**RAI 1**

Provide a revised DFP that includes information on the occurrence, and the effect on decommissioning costs, of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.