



THE BANK OF NEW YORK MELLON

February 14, 2020

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-001

Subject: 30-Day Notice of Payment from the City of Tallahassee Trust Fund Non-Qualified
Nuclear Decommissioning Trust Fund for Crystal River Unit 3
Docket No. 50-302
License No. DPR-72

Dear Sir:

The Bank of New York Mellon Trust Company, N.A., as successor in interest to NCNB National Bank of Florida, Inc. (the “**Trustee**”), is the trustee of the City of Tallahassee’s (the “**City**”) non-qualified nuclear decommissioning trust fund (the “**Decommissioning Trust Fund**”) for Crystal River Unit 3 (CR-3).

Pursuant to that certain Decommissioning Trust Agreement, dated February 3rd, 1992 (the “**Agreement**”), between the Trustee and the City, as heretofore amended and supplemented, governing the Decommissioning Trust Fund, no disbursements or payments from the Decommissioning Trust Fund shall be made by the Trustee until the Trustee (i) has received written direction from the City pursuant to the Agreement; (ii) has given the NRC thirty (30) days’ notice of payment and (iii) does not receive prior written notice of objection from the Director, Office of Nuclear Reactor Regulation, NRC.

The purpose of this letter is to provide notice to the NRC that the City has directed the Trustee to disburse the entire Decommissioning Trust Fund, in cash, to Duke Energy Florida, LLC’s, non-qualified nuclear decommissioning trust for CR-3 pursuant to the written direction. In addition to the written direction, Trustee has relied upon the statements set forth in the certification attached hereto.

If the Trustee does not receive prior written notice of objection, Trustee will make the disbursement to Duke Energy Florida, LLC in accordance with the written direction on March 26, 2020.

Capitalized terms not otherwise specifically defined herein shall have the same meaning as in the Agreement.

Sincerely,



Barbara Denton
Vice President

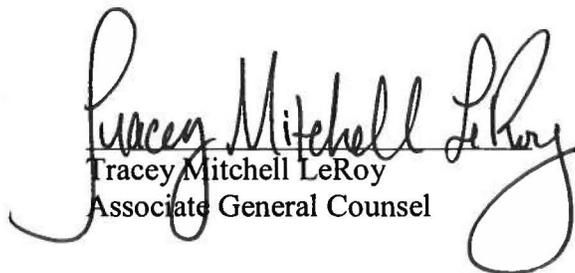
xc: NMSS Project Manager
Director, Office of Nuclear Reactor Regulation
Regional Administrator, Region I
State Contact

Certification of Tracey M. LeRoy
on behalf of Duke Energy Florida, LLC

February 13, 2020

The following statements are true and accurate to the best of my knowledge as of the date set forth above:

1. NRC issued Order dated September 8, 1999 Approving the Transfer of License for Crystal River Unit 3 (“**CR-3**”) to the Extent Held by the City of Tallahassee (the “**City**”) to Florida Power Corporation and Approving Conforming Amendment (ADAMS Accession No. ML020670117) (the “**Order**”);
2. Notwithstanding the transfer of the City’s 1.3333% ownership interest in CR-3 to Florida Power Corporation (now known as Duke Energy Florida, LLC (“**DEF**”)) on October 1, 1999, the City retained the City’s non-qualified nuclear decommissioning trust fund (the “**Decommissioning Trust Fund**”) for CR-3;
3. As indicated in the safety evaluation enclosed with the Order, DEF expected that retention of the Nuclear Decommissioning Trust Fund by the City would allow earnings to accrue at a greater rate due to the City’s tax exempt status and would avoid potential adverse tax consequences if the Nuclear Decommissioning Trust Fund were transferred to DEF’s nuclear decommissioning trust fund;
4. The funds to be transferred from the Decommissioning Trust Fund to DEF’s non-qualified nuclear decommissioning trust will be used to pay for expenses related to decommissioning CR-3 as defined by the NRC in its regulations and issuances and as provided in the CR-3 license and any amendments thereto (collectively, the “**Decommissioning Expenses**”); and
5. Because the rate of return of DEF’s qualified nuclear decommissioning trust fund is greater than that of the Decommissioning Trust Fund, DEF will use the transferred funds as the first source of payment for Decommissioning Expenses.
6. As of December 31, 2019, the balance of the Decommissioning Trust Fund was \$7,300,493.32.


Tracey Mitchell LeRoy
Associate General Counsel