

# SIEMENS

U.S. Nuclear Regulatory Commission  
Division of Fuel Cycle Safety Branch and  
Safeguards, NMSS  
Washington, D.C. 20555-0001

Name: Wedekind  
Department: ZFB 11  
Telephone: (089) 234-3186  
Telefax: (089) 234-4779

Attn: Robert C. Pierson, Chief

Date: 20.12.96

Re: Decommissioning Financial Responsibility  
License No. SNM-1227

Dear Mr. Pierson,

I am the Chief Financial Officer of Siemens Aktiengesellschaft, a corporation of the Federal Republic of Germany. This letter is in support of Siemens Aktiengesellschaft's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 70.

Siemens Aktiengesellschaft guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 70, the decommissioning of the following facility owned and operated by Siemens Power Corporation, a subsidiary of Siemens Aktiengesellschaft. The current cost estimate, so guaranteed, is shown for the facility:

<u>Name of Facility</u>	<u>Location of Facility</u>	<u>Current Cost Estimate</u>
Siemens Power Corporation License No. SNM-1227	2101 Horn Rapids Road Richland, WA 99352	\$27,000,000

Siemens Aktiengesellschaft is not required to file a Form 10K with the U.S. Securities and Exchange Commission.

The fiscal year of Siemens Aktiengesellschaft ends on September 30. The figures for the following items marked with a double asterisk are derived from Siemens Aktiengesellschaft's independently audited, consolidated financial statements for the year ended September 30, 1996.

## Zentralabteilung Finanzen

Leitung:  
Dr. Karl-Hermann Baumann

Briefadresse:  
Siemens AG  
ZFB 11  
80312 München

Hausadresse:  
Wittelsbacherplatz 2  
80333 München

Telefon: (0 89) 2 34 - 0  
Telex: 52 100 sie d

9701270244 970114  
PDR ADDCK 0700:257  
C PLD


Siemens Aktiengesellschaft - Vorsitzender des Aufsichtsrats: Hermann Franz - Vorstand: Heinrich v. Pierer, Vorsitzender - Mitglieder: Karl-Hermann Baumann, Adolf Hüttel, Volker Jung, Walter Küneth, Horst Langer, Werner Maly, Wolfram O. Martensen, Peter Prihalla, Jürgen Radomski, Claus Weyrich, Günter Wilhelm. Sitz der Gesellschaft: Berlin und München - Registergericht: Berlin-Charlottenburg, HRB 12300, München, HRB 5684

Financial Test: Alternative II

- |      |   |                                |                   |
|------|---|--------------------------------|-------------------|
| 1.   | Decommissioning cost estimate for facility,<br>License No. SNM-1227.  |                                | \$27,000,000      |
| 2.*  | Current bond rating of most recent issuance of this<br>firm and name of rating service.                                     | Standard & Poor's:<br>Moody's: | AAA<br>Aaa        |
| 3.*  | Date of issuance of bond  |                                | 06/24/1992        |
| 4.*  | Date of maturity of bond  |                                | 06/24/2002        |
| 5.** | Tangible net worth plus accrued decommissioning costs   |                                | \$ 15,617,000,000 |
| 6.** | Total assets in United States (required only if less than<br>90 percent of firm's assets are located in the United States.) |                                | \$ 7,672,935,000  |
|      |   | <u>Yes</u>                     | <u>No</u>         |
| 7.   | Is line 5 at least \$10 million?  | <u>X</u>                       | —                 |
| 8.   | Is line 5 at least 6 times line 1?  | <u>X</u>                       | —                 |
| 9.** | Are at least 90 percent of firm's assets located<br>in the United States? If not, complete line 10.                         | —                              | <u>X</u>          |
| 10.  | Is line 6 at least 6 times line 1?  | <u>X</u>                       | —                 |

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

By



(Signature)

Dr. K.-H. Baumann  
Chief Financial Officer

**Zentralabteilung Finanzen**

Leitung  
Dr. Karl-Hermann Baumann

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\* The Standard & Poor's AAA rating was obtained by Siemens Aktiengesellschaft and is not assigned to a specific debt issue. The Moody's Aaa rating was obtained for the guaranteed debt of a wholly-owned subsidiary of Siemens Aktiengesellschaft, Siemens Capital Corporation.

\*\* Denotes figure derived from the Siemens Aktiengesellschaft consolidated financial statements for the year ended September 30, 1996.

## Zentralabteilung Finanzen

Leitung:  
Dr. Karl-Hermann Baumann

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Siemens Aktiengesellschaft - Vorsitzender des Aufsichtsrats: Hermann Franz - Vorstand: Heinrich v. Pierer, Vorsitzender - Mitglieder: Karl-Hermann Baumann, Adolf Hüttl, Volker Jung, Walter Künert, Horst Langer, Werner May, Wolfram O. Martinsen, Peter Pribilla, Jürgen Radomski, Claus Weyrich, Günter Wilhelm  
Sitz der Gesellschaft: Berlin und München - Registergericht: Berlin-Charlottenburg, HRB 12300; München, HRB 6554

# KPMG Deutsche Treuhand-Gesellschaft

Aktiengesellschaft Wirtschaftsprüfungsgesellschaft  
Zweigniederlassung München

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Postfach 81 05 29  
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Telefon (0 89) 92 82-00  
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Siemens Aktiengesellschaft  
Zentralabteilung Finanzen  
Attn.: Dr. Seeborg  
Wittelsbacherplatz 2

80333 München

20 December 1996 - ms/ds

Dear Dr. Seeborg,

At your request, we have performed the procedures enumerated below with respect to the Siemens Aktiengesellschaft "Schedule Reconciling Amounts Contained in Chief Financial Officer's Letter With Amounts Included in the Consolidated Financial Statements for the Year Ended September 30, 1996" set forth in the accompanying Exhibit I.

Siemens Aktiengesellschaft prepared the information contained in Exhibit I to demonstrate its financial responsibility under the U.S. Nuclear Regulatory Commission's financial assurance regulations 10 CFR Part 70, and to assist its wholly-owned subsidiary and licensee Siemens Power Corporation (License No. SNM-1227) in complying with such regulations.

Our procedures, with respect to the information contained in Exhibit I, were as follows:

1. We agreed the amounts entitled "Stockholder's equity" and "Intangible assets, net" to amounts reported on the Siemens Aktiengesellschaft consolidated balance sheet as of September 30, 1996 which is included in the Siemens Aktiengesellschaft consolidated financial statements for the year ended September 30, 1996. We have previously examined the Siemens Aktiengesellschaft consolidated financial statements for the year ended September 30, 1996 in accordance with German generally accepted auditing standards and have issued our report thereon dated December 4, 1996.

Aufsichtsvorstand  
WP Dr. Ing.  
Christian Schöckel

Vorstand  
WP Prof. Dr. Dr. h. c.  
Hans Havemann  
Vorsitzender  
WP StB Dipl.-Kfm.  
Walter Alben  
WP StB Dipl.-Kfm.  
Joel Berger  
WP StB Dipl.-Kfm.  
Gerald R. Jekert

WP StB Dipl.-Volker  
Uwe Brandt  
WP RA StB  
Dr. Wolfgang Ebers  
WP StB Dipl.-Kfm.  
Gerd Gehr  
WP StB Dipl.-Kfm.  
Wilfried Hausmann  
WP Dr. Martin Hode  
RA StB  
Dr. Hans-Wolfgang Lüllmann  
WP Dipl.-Kfm.  
Ulrich Meier  
WP StB Dipl.-Kfm.  
Rüdiger Perleke

WP StB  
Dr. Hans Schellen  
WP StB Dipl.-Kfm.  
Walter Schöckel  
Dr. Ing. Karl Adolf Scholz  
WP RA StB  
Dr. Armin Seibert  
WP StB  
Prof. Dr. Klaus Stobberg  
WP StB  
Dr. Peter Weiser  
WP RA StB  
Prof. Dr. Harald Voelkmann  
WP StB Dipl.-Kfm.  
Wolfgang Zeile

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10117  
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Bankverbindung  
Deutsche Bank AG  
München, T. 111 21  
B. 2 190 296 10  
USA 49 08 136 7515

2. We agreed the amount entitled "Accrued decommissioning costs" to an amount included in a Siemens Aktiengesellschaft prepared schedule. This schedule analyses the components of the amount reported as "other accruals" on the Siemens Aktiengesellschaft consolidated balance sheet as of September 30, 1996 which is included in the Siemens Aktiengesellschaft consolidated financial statements for the year ended September 30, 1996.
3. We determined the arithmetical accuracy of the amounts entitled "Tangible net worth" and "Tangible net worth plus accrued decommissioning costs".
4. We agreed the amount in the column captions "Per Chief Financial Officer's Letter" to the amount reported as "Tangible net worth plus accrued decommissioning costs" in the 20 December 1996 letter from Dr. Karl-Hermann Baumann, Chief Financial Officer of Siemens Aktiengesellschaft, to the U.S. Nuclear Regulatory Commission.
5. We agreed the amount titled "Total assets in United States" to the amount reported on the Siemens Corporation consolidated balance sheet as of September 30, 1996, which is included in the Siemens Corporation Consolidated Financial Statements for September 30, 1996.

Because the above procedures are not sufficient to constitute an examination made in accordance with German generally accepted auditing standards, we do not express an opinion on any of the amounts, accounting records or the letter referred to above. In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the information contained in Exhibit I should be adjusted. Had we performed additional procedures, matters might have come to our attention that would have been reported to you.

This report relates only to the Siemens Aktiengesellschaft "Schedule Reconciling Amounts Contained in Chief Financial Officer's Letter With Amounts Included in the Consolidated Financial Statements for the Year Ended September 30, 1996" set forth in the accompanying Exhibit I and does not extend to any other documents.



Exhibit I

SIEMENS AKTIENGESELLSCHAFT

SCHEDULE RECONCILING AMOUNTS CONTAINED IN CHIEF  
FINANCIAL OFFICER'S LETTER WITH AMOUNTS INCLUDED IN  
THE CONSOLIDATED FINANCIAL STATEMENTS FOR THE YEAR  
ENDED

SEPTEMBER 30, 1996

	\$ in millions	
	Per Consolidated Financial <u>Statements</u>	Reconciling <u>Item</u>
		Per Chief Financial Officer's <u>Letter</u>
Stockholder's equity	16,504	
Less Intangible assets, net	<u>905</u>	
Tangible net worth	15,599	
Add Accrued decommissioning cost (Mixed Waste 12, Balance of Plant 6)		18
Tangible net worth plus accrued decommissioning costs		15,617
Total assets in United States		7,673

It is understood that this report is to be provided by the management of Siemens Aktiengesellschaft to the U.S. Nuclear Regulatory Commission to comply with the financial assurance regulations referred to in the first paragraph of this report. This report should not be referred to or distributed for any other purpose without our prior consent.

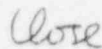
Very truly yours,

KPMG Deutsche Treuhand-Gesellschaft  
Aktiengesellschaft  
Wirtschaftsprüfungsgesellschaft



Dr. Marianne Schramm

ppa.



Martin Close

Attachment - Exhibit I

ATTACHMENT 1  
VERIFICATION OF EOF EQUIPMENT AND SUPPLIES

EOF STRAIGHT LINE DOSE ASSESSMENT COMPUTER OPERATIONAL CHECK

1. Power up computer, monitor and printer designated for using the Straightline dose code.
2. Screen entitled "Big Rock Point Dose Assessment Main Menu" will appear. Type "5" for "Execute Dose Model" and press Enter.
3. Dose calculation screen will appear. Type in the following parameters:
  - a. Stability Class: type "D" then press tab.
  - b. Wind Speed: type "1.0" then press tab.
  - c. Wind Speed From: type "1" then press tab.
  - d. Wind Direction: type "0" then press tab.
  - e. Noble Gas, Ci/sec: type "1" then press tab.
  - f. Iodine, Ci/sec: type "1"

Leave all other parameters as they appear. Press "Enter" to begin calculation.

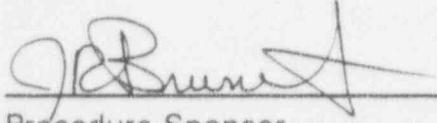
When calculation is complete, press the "F2" key.

4. When the main menu appears, type "6," "Print Notification Form," and press Enter. Notification Form will be printed.
5. When the main menu appears, type "7," "Access Meteorological Monitoring Systems," and press Enter.
6. When the "Meteorological Data Menu" appears, type "1," "Print Big Rock Met Tower Data," and press Enter. Met data will be printed.
7. When the main menu appears, type "7," "Access Meteorological Monitoring Systems," and press Enter.
8. Type "2," "Print WSI Hourly Forecast Data," and press Enter. Met data will be printed.
9. When main menu appears, press the "F2" key to exit program.
10. Power off computer, monitor and printer.



PALISADES NUCLEAR PLANT  
SITE EMERGENCY PLAN

TITLE: ORGANIZATIONAL CONTROL OF EMERGENCIES

 1/20/97  
\_\_\_\_\_  
Procedure Sponsor Date

EPKarpe 11/22/96  
\_\_\_\_\_  
Technical Reviewer Date

KLPenrod 12/2/96  
\_\_\_\_\_  
User Reviewer Date

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