



Entergy Nuclear Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213
Tel 601-368-5102

Phil Couture
Sr. Manager, Fleet Regulatory
Assurance

CNRO2021-00007

10 CFR 50.82(a)(8)(vii)

March 25, 2021

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Status of Funding for Managing Irradiated Fuel for Year Ending
December 31, 2020 – 10 CFR 50.82(a)(8)(vii) - Entergy Nuclear
Operations, Inc.

Big Rock Point
NRC Docket No. 50-155
License No. DPR-6

Indian Point Nuclear Generating Station 1
NRC Docket No. 50-003
License No. DPR-5

10 CFR 50.82(a)(8)(vii) requires that after submitting its site-specific decommissioning cost estimate pursuant to 10 CFR 50.82(a)(4)(i), a licensee must annually submit to the NRC, by March 31, a report on the status of its funding for managing irradiated fuel. On behalf of Entergy Nuclear Indian Point 2, LLC, Entergy Nuclear Palisades, LLC, and Entergy Nuclear Generation Company, LLC, Entergy Nuclear Operations, Inc. hereby submits the information required for Indian Point 1 and Big Rock Point. All or most of the spent fuel management costs are a liability of the U.S. Government as a result of its breach of the spent fuel disposal contract. However, this report takes no credit for recoveries on that liability.

This letter contains no new regulatory commitments. Should you have any questions or require additional information, please contact me at 601-368-5102.

Respectfully,



Phil Couture

PC/LJS/chm

- Enclosures:
1. Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Indian Point 1
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)
 2. Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Big Rock Point
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)

cc: NRC Region I Regional Administrator
NRC Region III Regional Administrator

NRC Project Manager, Indian Point 1
NRC Project Manager, Indian Point 2 & 3
NRC Project Manager, Big Rock Point
NRC Project Manager, Palisades
NRC Project Manager, Entergy Fleet

NRC Sr. Resident Inspector, Indian Point 2 & 3
NRC Sr. Resident Inspector, Palisades

Michigan Department of Environmental Quality
Michigan Public Service Commission
NYS Department of Public Service

Enclosure 1

CNRO2021-00007

**Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Indian Point 1
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)**

Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Indian Point 1
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)

Plant Name: **Indian Point Nuclear Generating Unit No. 1**

1. Funds accumulated to cover the cost of managing irradiated fuel as of 12/31/2020	\$344 million [Note 1]
2. Projected costs to manage fuel until DOE removal (2020\$)	\$56 million [Note 2]
3. Plan as required	See Note 3

Note 1: This amount represents the excess funds available in the Unit 1 decommissioning trust fund less an amount necessary to decommission the Independent Spent Fuel Storage Installation (ISFSI). Per Unit 1's updated decommissioning cost analysis, the present value (2020\$) of excess funds in Unit 1's decommissioning trust at the end of decommissioning in 2073, after considering license termination expenses, is \$346 million ($\$989 \text{ million} / (1.02)^{(2073-2020)}$). See Ending DTF Balance for 2073, Table 8-1, in Reference 1. The estimated cost for decommissioning Indian Point 1 and 2's share of the site ISFSI is \$10.76 million, from Entergy's Decommissioning Funding Plans (10 CFR 72.30) dated December 17, 2018 (Accession No. ML18351A478), escalated at 3% per annum to account for inflation. The licensee has allocated approximately 1/6th of the total Indian Point 1 and Indian Point 2 ISFSI decommissioning cost to Indian Point 1. Therefore, Indian Point 1's share of ISFSI decommissioning cost is calculated as 16.7% x \$10.76 million, or \$1.8 million. Thus, the present value of Unit 1 trust funds available for spent fuel management is \$346 million minus \$1.8 million, or approximately \$344.2 million. For purposes of this report only, Indian Point 1 trust funds are being considered separately from Indian Point 2 trust funds; however, both funds are covered by a single trust agreement, and will likely be handled together upon decommissioning.

Note 2: From updated Unit 1 decommissioning cost estimate, as discussed in Enclosure 8 to Reference 1. Projected costs to manage fuel until DOE removal computed using an assumed date of the completion of fuel removal from site of 2065.

Note 3: The excess currently existing in Unit 1's decommissioning trust is sufficient to cover the estimated costs of spent fuel management and ISFSI decommissioning. See Reference 1, Enclosure 8. The licensee acknowledges the need for an exemption pursuant to 10 CFR §50.12(a) to use radiological decommissioning trust funds for costs other than decommissioning activities as defined in 10 CFR 50.2.

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Enclosure 1

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**Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Indian Point 1
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)**

Reference:

1. Letter, Entergy Nuclear Operations, Inc. to USNRC, "Decommissioning Funding Status Report per 10 CFR §50.75(f)(1) and 10 CFR 50.82(a)(8)(v) -- Entergy Nuclear Operations, Inc.," CNRO2021-00004, dated March 25, 2021

Enclosure 2

CNRO2021-00007

**Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Big Rock Point
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)**

Entergy Nuclear Operations, Inc.
Status of Funding for Managing Irradiated Fuel - Big Rock Point
for Year Ending December 31, 2020 – 10 CFR 50.82(a)(8)(vii)

Plant Name: **Big Rock Point**

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|--|----------------------------------|
| 1. Funds accumulated to cover the cost of managing irradiated fuel as of 12/31/2020. | See Note 1 |
| 2. Projected costs to manage fuel until DOE removal (2020\$) | \$50.8 million ^{Note 2} |
| 3. Plan as required | See Note 1 |

Note 1: Spent fuel management costs have been paid for out of Entergy Nuclear Palisades, LLC operating funds since Big Rock Point was acquired from Consumers Energy on April 11, 2007. Entergy Nuclear Palisades, LLC plans to continue paying for spent fuel management costs from said operating funds. Therefore, no funds are specifically accumulated for the cost of managing irradiated fuel at Big Rock Point as of 12/31/2020. The costs for ISFSI decommissioning are covered by a \$5 million parent guarantee.

Note 2: Projected costs to manage fuel until DOE removal are computed using an assumed date of the completion of fuel removal from site of 2039 (19 years), and annual ISFSI management costs.