

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

March 29, 2023 NOC-AE-23003950 File No.: D57 10 CFR 50.75

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Financial Assurance for Decommissioning – 2023 Update

Pursuant to 10 CFR 50.75(f)(1), STP Nuclear Operating Company (STPNOC) submits the attached status reports regarding funds available, effective December 31, 2022, for decommissioning South Texas Project Units 1 and 2. The data is assembled by the individual co-owners of the South Texas Project:

- NRG South Texas LP
- City Public Service Board of San Antonio
- City of Austin Austin Energy.

The attached reports provide the following information for each co-owner:

- Estimated amount of decommissioning funds required
- Amount accumulated by December 31, 2022
- A schedule of the annual amounts remaining to be collected
- Assumptions for rates of escalation in decommissioning cost and for rates used in funding projections
- Contracts upon which the owners rely pursuant to 10 CFR 50.75(e)(1)(v)
- Modifications to method of providing financial fund assurance
- Material changes to trust agreements.

This letter contains no NRC commitments. If there are any questions, please contact either Stephanie Rodgers at (361) 972-4527 or me at (361) 972-4335.

Savannah Cornelius

Vice President, Financial Services and

Supply Chain

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Attachments:

- South Texas Project Financial Assurance for Decommissioning 2023 Update NRG South Texas LP
- 2. South Texas Project Financial Assurance for Decommissioning 2023 Update City Public Service Board of San Antonio
- 3. South Texas Project Financial Assurance for Decommissioning 2023 Update City of Austin Austin Energy

cc:

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 1600 E. Lamar Boulevard Arlington, TX 76011-4511

ATTACHMENT 1

SOUTH TEXAS PROJECT

FINANCIAL ASSURANCE FOR DECOMMISSIONING

2023 UPDATE

NRG SOUTH TEXAS LP

FINANCIAL ASSURANCE FOR DECOMMISSIONING NRG South Texas LP 13.2% Ownership of South Texas Project Unit 1 (Acquired from AEP)

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$53,710,814
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$82,855,422
3.	Schedule of the annual amounts remaining to be collected for items in 10 CER 50 75(b) and (c):	Amount Remaining ³ :	\$0
	collected for items in 10 CFR 50.75(b) and (c):	Number of Years to Collect:	24.65
de: de:	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate⁴:	2.540%
		Earnings Rate:	3.628%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

^{1.} The NRC formulas in section 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license.

^{2.} By Order dated October 10, 2008, in PUCT Docket No. 35772, NRG South Texas was granted approval to establish a separate spent nuclear fuel management (SNF) subaccount. By Order dated July 13, 2009, in PUCT Docket No. 36796, NRG South Texas was granted approval to establish a separate subaccount for the pre-shutdown disposal of large components. By Order dated October 7, 2013, NRG South Texas was granted approval to establish a separate subaccount for amounts recovered pursuant to a litigation settlement agreement with the United States government for certain onsite spent fuel storage and management expenses it has incurred and will incur as a result of the failure of the Department of Energy to provide for the offsite disposal of spent nuclear fuel. The amounts allocable to the subaccounts are not included in the reported amount. The reported amount includes funds accumulated based upon a site-specific study that includes license termination and other costs.

^{3.} Target amounts to be collected were established by the PUCT-approved separate non-bypassable decommissioning charges established in PUCT Tariff Control No. 41970. Actual collections will vary but the charges are intended to produce the targeted annual collection amounts established in PUCT Docket No. 41580. All current collections are being deposited in the large component disposal subaccount.

FINANCIAL ASSURANCE FOR DECOMMISSIONING

NRG South Texas LP 30.8% Ownership of South Texas Project Unit 1 (Acquired from CNP)

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$125,325,233
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$207,232,748
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	24.65
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate ⁴ :	2.540%
		Earnings Rate:	3.628%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

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^{3.} Target amounts to be collected were established by the PUCT-approved separate non-bypassable decommissioning charges established in PUCT Tariff Control No. 41941. Actual collections will vary but the charges are intended to produce the targeted annual collection amounts established in PUCT Docket No. 41580. All current collections are being deposited in the large component disposal subaccount.

FINANCIAL ASSURANCE FOR DECOMMISSIONING NRG South Texas LP 13.2% Ownership of South Texas Project Unit 2 (Acquired from AEP)

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$53,710,814
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$100,229,163
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	25.98
de de	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate ⁴ :	2.530%
		Earnings Rate:	3.628%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

The NRC formulas in section 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license.

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^{3.} Target amounts to be collected were established by the PUCT-approved separate non-bypassable decommissioning charges established in PUCT Tariff Control No. 41970. Actual collections will vary but the charges are intended to produce the targeted annual collection amounts established in PUCT Docket No. 41580. All current collections are being deposited in the large component disposal subaccount.

FINANCIAL ASSURANCE FOR DECOMMISSIONING

NRG South Texas LP 30.8% Ownership of South Texas Project Unit 2 (Acquired from CNP)

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$125,325,233
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$262,867,485
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	25.98
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate ⁴ :	2.530%
(Earnings Rate:	3.628%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

^{1.} The NRC formulas in section 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license.

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^{3.} Target amounts to be collected were established by the PUCT-approved separate non-bypassable decommissioning charges established in PUCT Tariff Control No. 41941. Actual collections will vary but the charges are intended to produce the targeted annual collection amounts established in PUCT Docket No. 41580. All current collections are being deposited in the large component disposal subaccount.

ATTACHMENT 2

SOUTH TEXAS PROJECT

FINANCIAL ASSURANCE FOR DECOMMISSIONING

2023 UPDATE

CITY PUBLIC SERVICE BOARD OF SAN ANTONIO

FINANCIAL ASSURANCE FOR DECOMMISSIONING City Public Service Board of San Antonio 12% Ownership of South Texas Project Unit 1

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$48,868,602
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$51,645,913
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	25
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate:	2.540%
		Earnings Rate:	5.14%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

^{1.} The NRC formulas in 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license. The cost of dismantling or demolishing non-radiological systems and structures is not included in NRC decommissioning cost estimates. The costs of managing and storing spent fuel on site until transfer to the Department of Energy are not included in the cost formulas.

^{2.} By Order dated November 20, 2008, in PUCT Docket No. 35786, CPS Energy was granted approval to establish separate spent fuel management and pre-shutdown activities subaccounts. The amounts allocable to these subaccounts are not included in the reported amount. The reported amount includes funds accumulated based upon a site-specific study that includes license termination and other costs.

^{3.} CPS Energy estimates that the Trust is currently fully funded, based on the 2018 decommissioning cost study and updated escalation rates. Additional contributions ended December 31, 2008. If future estimates indicate that further funding may be required, CPS Energy would be able to apply to the PUCT to seek further funding for NRC license termination costs through cost-of-service recovery authorized by Texas law.

FINANCIAL ASSURANCE FOR DECOMMISSIONING City Public Service Board of San Antonio 28% Ownership of South Texas Project Unit 1

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$114,026,739
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$138,350,762
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
	concessed for itemic in 10 of 11 out 10 of 10 out 10 of 10 out 10	Number of Years to Collect:	25
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on	Escalation Rate:	2.540%
	decommissioning funds, and rates of other factors used in funding projections:	Earnings Rate:	5.14%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

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Consistent with the approach taken for its 12% interest in the Order dated November 20, 2008, in PUCT Docket No. 35786, CPS Energy has established separate spent fuel management and pre-shutdown activity subaccounts. The amounts allocable to these subaccounts are not included in the reported amount. The reported amount includes funds accumulated based upon a site-specific study that includes license termination and other costs.

^{3.} CPS Energy estimates that the Trust is currently fully funded, based on the 2018 decommissioning cost study and updated escalation rates. Additional contributions ended January 31, 2008. If future estimates indicate that further funding may be required, CPS Energy through the City of San Antonio, its rate setting authority, would be able to set rates to collect and accumulate further funds for NRC license termination costs.

FINANCIAL ASSURANCE FOR DECOMMISSIONING City Public Service Board of San Antonio 12% Ownership of South Texas Project Unit 2

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$48,868,602
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$68,739,204
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	26
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate:	2.530%
		Earnings Rate:	5.14%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

^{1.} The NRC formulas in 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license. The cost of dismantling or demolishing non-radiological systems and structures is not included in NRC decommissioning cost estimates. The costs of managing and storing spent fuel on site until transfer to the Department of Energy are not included in the cost formulas.

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^{3.} CPS Energy estimates that the Trust is currently fully funded, based on the 2018 decommissioning cost study and updated escalation rates. Additional contributions ended December 31, 2008. If future estimates indicate that further funding may be required, CPS Energy would be able to apply to the PUCT to seek further funding for NRC license termination costs through cost-of-service recovery authorized by Texas law.

FINANCIAL ASSURANCE FOR DECOMMISSIONING City Public Service Board of San Antonio 28% Ownership of South Texas Project Unit 2

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$114,026,739
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated ² :	\$164,146,982
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining ³ :	\$0
		Number of Years to Collect:	26
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate:	2.530%
		Earnings Rate:	5.14%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

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^{3.} CPS Energy estimates that the Trust is currently fully funded, based on the 2018 decommissioning cost study and updated escalation rates. Additional contributions ended January 31, 2008. If future estimates indicate that further funding may be required, CPS Energy through the City of San Antonio, its rate setting authority, would be able to set rates to collect and accumulate further funds for NRC license termination costs.

ATTACHMENT 3

SOUTH TEXAS PROJECT

FINANCIAL ASSURANCE FOR DECOMMISSIONING

2023 UPDATE

CITY OF AUSTIN – AUSTIN ENERGY

FINANCIAL ASSURANCE FOR DECOMMISSIONING City of Austin – Austin Energy 16% Ownership of South Texas Project Unit 1

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$65,158,212
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated:	\$74,337,330
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining:	\$35,733,580
		Number of Years to Collect:	25
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate:	2.517%
		Earnings Rate:	3.25%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

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FINANCIAL ASSURANCE FOR DECOMMISSIONING City of Austin – Austin Energy 16% Ownership of South Texas Project Unit 2

1.	Minimum decommissioning fund estimate pursuant to 10 CFR 50.75(b) and (c) ¹ :	Total Required:	\$65,158,212
2.	Amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75(b) and (c):	Amount Accumulated:	\$81,400,364
3.	Schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75(b) and (c):	Amount Remaining:	\$23,743,830
		Number of Years to Collect:	26
4.	Assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections:	Escalation Rate:	2.527%
		Earnings Rate:	3.25%
5.	Contracts upon which the licensee is relying pursuant to 10 CFR 50.75(e)(1)(v):	None	
6.	Modifications to a licensee's current method of providing financial assurance occurring since the last submitted report:	None	
7.	Material changes to trust agreements:	None	

^{1.} The NRC formulas in 10 CFR 50.75(c) include only those decommissioning costs incurred by licensees to remove a facility or site safely from service and reduce residual radioactivity to levels that permit: (1) release of the property for unrestricted use and termination of the license or (2) release of the property under restricted conditions and termination of the license. The cost of dismantling or demolishing non-radiological systems and structures is not included in NRC decommissioning cost estimates. The costs of managing and storing spent fuel on site until transfer to the Department of Energy are not included in the cost formulas.