

RS-17-045

10 CFR 50.75(f) 10 CFR 72.30(b)

March 30, 2017

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

> Braidwood Station, Units 1 and 2 Renewed Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

> Byron Station, Units 1 and 2 Renewed Facility Operating License Nos. NPF-37 and NPF-66 NRC Docket Nos. STN 50-454, STN 50-455, and 72-68

Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Renewed Facility Operating License Nos. DPR-53 and DPR-69 <u>NRC Docket Nos. STN 50-317 and STN 50-318</u>

Clinton Power Station, Unit 1 Facility Operating License No. NPF-62 NRC Docket No. 50-461 and 72-1046

Dresden Nuclear Power Station, Units 1, 2 and 3 Facility Operating License No. DPR-2 Renewed Facility Operating License Nos. DPR-19 and DPR-25 <u>NRC Docket Nos. 50-10, 50-237, 50-249, and 72-37</u>

LaSalle County Station, Units 1 and 2 Renewed Facility Operating License Nos. NPF-11 and NPF-18 <u>NRC Docket Nos. 50-373, 50-374, and 72-70</u>

Limerick Generating Station, Units 1 and 2 Renewed Facility Operating License Nos. NPF-39 and NPF-85 <u>NRC Docket Nos. 50-352, 50-353, and 72-65</u>

Nine Mile Point Nuclear Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-63 and DPR-69 NRC Docket Nos. 50-220, 50-410, and 72-1036

> Oyster Creek Nuclear Generating Station Renewed Facility Operating License No. DPR-16 NRC Docket No. 50-219 and 72-15

Peach Bottom Atomic Power Station, Units 1, 2, and 3 Facility Operating License No. DPR-12 Renewed Facility Operating License Nos. DPR-44 and DPR-56 NRC Docket Nos. 50-171, 50-277, 50-278, and 72-29

Quad Cities Nuclear Power Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-29 and DPR-30 NRC Docket Nos. 50-254, 50-265, and 72-53

R.E. Ginna Nuclear Power Plant Renewed Facility Operating License No. DPR-18 <u>NRC Docket Nos. 50-244 and 72-67</u>

Salem Generating Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-70 and DPR-75 <u>NRC Docket Nos. 50-272, 50-311, and 72-48</u>

Three Mile Island Nuclear Station, Unit 1 Renewed Facility Operating License No. DPR-50 NRC Docket No. 50-289

Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Independent Spent Fuel Storage Installation Materials License No. SNM-2505 NRC Docket No. 72-08

- Subject: Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations
- References: 1. Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem," dated December 17, 2012
  - Letter from David M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Clinton Power Station," dated September 6, 2016
  - Letter from Michael P. Gallagher (Exelon Generation Company, LLC) to U.S. NRC, "Withdrawal of Certification of Permanent Cessation of Power Operations for Clinton Power Station and Previously Submitted Licensing Actions in Support of Decommissioning," dated December 14, 2016

In accordance with 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (f), Exelon Generation Company, LLC (EGC) is submitting a report on the status of decommissioning funding for the reactors owned by EGC. Additionally, in accordance with 10 CFR 72.30, "Financial assurance and recordkeeping for decommissioning," EGC is submitting a report on the status of decommissioning funding for the independent spent fuel storage installations (ISFSIs) owned by EGC. Updated decommissioning cost estimates for ISFSI decommissioning are provided in the attached report. With respect to the other information required by 10 CFR 72.30(b) and (c); there has been no change from the information provided in Reference 1.

The ISFSI decommissioning funding plan for Clinton Power Station (CPS) was provided in Reference 2. EGC acknowledged in Reference 2 that there was a decommissioning funding shortfall for the Clinton ISFSI and EGC would ensure adequate funding was provided for decommissioning of the ISFSI in the biennial decommissioning funding submittal. A decommissioning funding shortfall no longer exists and adequate funding assurance is provided to decommission both the site and the ISFSI. This change was primarily driven by EGC's reversal of its decision to shutdown CPS prior to the end of its licensed operating life as detailed in Reference 3 and the issuance of NUREG-1307 Revision 16, "Report on Waste Burial Charges." Attachment 30 contains changes to the CPS ISFSI decommissioning funding plan that was provided in Reference 2.

In accordance with 10 CFR 50.75(b)(4), 50.75(c), and 50.75(f), the estimated cost of decommissioning for financial assurance is based on either the NRC formula cost amount calculated in accordance with 10 CFR 50.75(c) or site-specific decommissioning cost estimates. If used in this report, the site-specific decommissioning cost estimates are based on a period of safe storage that is specifically described in the estimates. Site-specific cash flows from the site-specific cost estimates are included, as applicable. Unless otherwise noted, the specific cash flow analysis for the site-specific decommissioning cost estimates conservatively assumes all expenses in a year are incurred at the beginning of year (i.e., beginning of year convention) during the decommissioning period. The cash flow analysis for Peach Bottom Atomic Power Station (PBAPS), Unit 1 assumes that half of the current year contributions are included in the current year convention). EGC uses a mid-year convention in this instance because the contributions are made monthly at a constant rate throughout the year.

Nine Mile Point Nuclear Station, Unit 2 is co-owned by Nine Mile Point Nuclear Station, LLC (82%), an indirect EGC subsidiary, and Long Island Power Authority (LIPA) (18%). The information provided in this letter for Nine Mile Point Nuclear Station, Unit 2 includes summary statements provided and verified by LIPA.

For shutdown units, the reporting requirements of 10 CFR 50.82(a)(8)(v) and (vii) are also included in this report.

EGC has not made a final determination of the decommissioning option for any of its nuclear units. EGC uses the formula cost amount or the site-specific decommissioning cost estimates to demonstrate adequacy of funding to meet regulatory requirements. To the extent the site-specific cost estimates assume a decommissioning option; EGC may select a different decommissioning option in the future for any of its nuclear units, recognizing that the chosen option must meet NRC requirements for decommissioning funding.

Due to increased costs, as reflected in the updated site-specific decommissioning cost estimate, PBAPS Unit 1 does not currently meet the minimum funding assurance criteria under 10 CFR 50.75 and 10 CFR 50.82 as of December 31, 2016, based solely on the trust fund balance. Financial assurance for decommissioning this reactor is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii). The source of revenue for the external sinking fund is a "nonbypassable charge" approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. The amount collected will be adjusted in accordance with the applicable tariff in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC to cover any funding shortfall that exists at that time. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The next adjustment will be effective January 1, 2018. The PaPUC has been notified that the amount collected may need to be adjusted in the next filing. EGC's ability to adjust the amount collected for PBAPS Unit 1 is consistent with the guidance in Regulatory Guide 1.159. "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2 which provides that, "Adjustments to the annual amount of funds being set aside may be made to coincide with rate cases considered by a licensee's public utility commission (PUC)."

There were no disbursements through December 31, 2016 from the decommissioning trust funds since the last report, other than those for allowed administrative costs and other incidental expenses of the fund in connection with the operation of the fund in accordance with 10 CFR 50.75(h)(1)(iv).

There are no regulatory commitments contained within this letter.

If you have any questions concerning this letter, please contact me at (630) 657-2823.

Respectfully,

Patrick R. Simpson U Manager – Licensing Exelon Generation Company, LLC

cc: Regional Administrator – NRC Region I Regional Administrator - NRC Region III NRC Senior Resident Inspector - Braidwood Station NRC Senior Resident Inspector - Byron Station NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant NRC Senior Resident Inspector - Clinton Power Station NRC Senior Resident Inspector - Dresden Nuclear Power Station NRC Senior Resident Inspector – LaSalle County Station NRC Senior Resident Inspector – Limerick Generating Station NRC Senior Resident Inspector - Nine Mile Point Nuclear Station NRC Senior Resident Inspector – Oyster Creek Nuclear Generating Station NRC Senior Resident Inspector – Peach Bottom Atomic Power Station NRC Senior Resident Inspector - Quad Cities Nuclear Power Station NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant NRC Senior Resident Inspector - Salem Generating Station NRC Senior Resident Inspector - Three Mile Island Nuclear Station

#### Attachments:

- 1. Labor, Energy, and Burial Factors Used in Calculations (All Facilities)
- 2. Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1
- 3. Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2
- 4. Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1
- 5. Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2
- 6. Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1
- 7. Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2
- 8. Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1
- 9. Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1
- 10. Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2
- 11. Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3
- 12. Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1
- 13. Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2
- 14. Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1
- 15. Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2
- 16. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1

- 17. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 EGC Portion
- 18. Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 LIPA Portion
- 19. Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station
- 20. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1
- 21. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2
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- 23. Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1
- 24. Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2
- 25. Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant
- 26. Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1
- 27. Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2
- 28. Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1
- 29. ISFSI Decommissioning Funding Estimates
- 30. Changes to the Proposed ISFSI Decommissioning Funding Plans for Clinton Power Station

Attachment 1

Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

#### ATTACHMENT 1 Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The labor, energy, and burial indexes used are consistent with those described in NUREG-1307, Revision 16, issued March 2017.

The current labor cost indexes used are obtained from the Employment Cost Index, published by the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Specifically, EGC used the Employment Cost Index for total compensation for private industry workers by region. The labor adjustment factors were calculated according to Section 3.2 of NUREG-1307, Revision 16, using fourth quarter 2016 data. Table 1 shows the data used for this calculation.

Region	Applicable Sites	Series ID	4Q2016 Index Number	Base L <sub>x</sub>	Labor Adjustment Factor (L <sub>x</sub> )
Northeast	Limerick Nine Mile Point Oyster Creek Peach Bottom R.E. Ginna Salem TMI	CIU201000000210I	128.7	2.16	2.780
South	Calvert Cliffs	CIU201000000220I	126.2	1.98	2.499
Midwest	Braidwood Byron Clinton Dresden LaSalle Quad Cities	CIU201000000230I	125.7	2.08	2.615

## Table 1: Labor Adjustment Factors

The current energy cost indexes used are obtained from Producer Price Indexes (PPI) – Commodities, published by the U.S. Department of Labor, BLS. Specifically, EGC used the PPI for industrial electric power (WPU0543) and light fuel oils (WPU0573). The energy adjustment factors were calculated according to Section 3.3 of NUREG-1307, Revision 16, using December 2016 data. Table 2 shows the data used for this calculation.

WPU0543 – January 1986 (base value)	114.2
WPU0573 – January 1986 (base value)	82.0
WPU0543 – December 2016 (preliminary value)	215.0
WPU0573 – December 2016 (preliminary value)	152.0
Industrial electric power adjustment factor - Px	1.883
Light fuel oil adjustment factor - F <sub>x</sub>	1.854
Energy Adjustment Factor (PWR) – E <sub>x</sub> (PWR)	1.870
Energy Adjustment Factor (BWR) – E <sub>x</sub> (BWR)	1.869

## ATTACHMENT 1 (Continued) Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The waste burial adjustment factors used are taken from Table 2-1 of NUREG-1307, Revision 16, based on 2016 data. The adjustment factors EGC used assume a combination of compact-affiliated and non-compact facilities for sites affiliated with a compact. This is consistent with current waste disposal practices at EGC and consistent with typical waste disposal practices during decommissioning. For sites not affiliated with a compact, the values for generators located in unaffiliated states were used. Table 3 summarizes the data used for the calculation of the waste adjustment factors.

# **Table 3: Waste Adjustment Factors**

LLW Burial Site	Reactor Type	Applicable Site	Combination of Compact- Affiliated and Non-Compact Disposal Facilities Waste Adjustment Factor (B <sub>x</sub> )	Generators Located in the Unaffiliated States and those Located in Compact-Affiliated States having no Disposal Facility Waste Adjustment Factor (B <sub>x</sub> )
South Carolina site Atlantic Compact	BWR	Oyster Creek	12.111	N/A
South Carolina site Atlantic Compact	PWR	Salem	10.971	N/A
Generic LLW Disposal Site	BWR	Clinton Dresden LaSalle Limerick Nine Mile Point Peach Bottom Quad Cities	N/A	13.132
Generic LLW Disposal Site	PWR	Braidwood Byron Calvert Cliffs R.E. Ginna TMI	N/A	12.471

The calculation methodology used for all adjustment factors is consistent with NUREG-1307, Revision 16.

Attachment 2

Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1

#### ATTACHMENT 2 Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$ 492,056
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,870 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$ 322,022 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S.	

NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.

(a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated February 4, 2016 ("Report on Status of Decommissioning Funding for Braidwood Station, Units 1 and 2 and Byron Station, Unit 2"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the February 4, 2016 letter.

#### ATTACHMENT 2 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 1 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on October 17, 2046.

Attachment 3

Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2

#### ATTACHMENT 3 Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$492,056
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,879 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$348,139 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.	

(a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated February 4, 2016 ("Report on Status of Decommissioning Funding for Braidwood Station, Units 1 and 2 and Byron Station, Unit 2"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the February 4, 2016 letter.

## ATTACHMENT 3 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Braidwood Station, Unit 2 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on December 18, 2047.

Attachment 4

Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1

#### ATTACHMENT 4 Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$492,056
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,739 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$353,618 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust	

- subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

## ATTACHMENT 4 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 1 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2044.

Attachment 5

Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2

#### ATTACHMENT 5 Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$492,056
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$4,747(a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$340,758 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trus	

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated February 4, 2016 ("Report on Status of Decommissioning Funding for Braidwood Station, Units 1 and 2 and Byron Station, Unit 2"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation. No other changes have been made to the decommissioning funding plan in the February 4, 2016 letter.

#### ATTACHMENT 5 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Byron Station, Unit 2 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on November 6, 2046.

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Attachment 6

Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1

#### ATTACHMENT 6 Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 1 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$456,881
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,053 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$358,696 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR	

9 There are no material changes to the trust fund agreements.

50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on July 31, 2034.

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Attachment 7

Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2

#### ATTACHMENT 7 Annual Radiological Decommissioning Funding Assurance Report for Calvert Cliffs Nuclear Power Plant, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$456,881
•		ψ+30,001
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,062 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$459,606 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prep method, coupled with an external trust fund, in accordance with 1	

- method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on August 13, 2036.

PUBLIC

Attachment 8

Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1

#### ATTACHMENT 8 Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$652,255
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,500 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$513,387 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
Q	Financial accurance for decommissioning is provided by the pre-	

8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from David M. Gullott (EGC) to U.S. NRC, dated September 6, 2016 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Clinton Power Station"). The costs have been escalated to December 31, 2016 using a unit specific escalation rate. Attachment 30 provides changes that have been made to the decommissioning funding plan from the September 6, 2016 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on September 29, 2026.

PUBLIC

Attachment 9

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

## ATTACHMENT 9 Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)		
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$405,539 (a)		
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A(b)		
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$372,178 (c)		
5	Schedule of the annual amounts remaining to be collected.	\$0		
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	2% (d)		
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).			
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) .			
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""'Non-Qualified Nuclear Decommissioning Trust" Entities into their Parent Company," dated December 22, 2016.			
10	2016 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$3,278 (e)		
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$120,735 (f)		
	Reimbursed from the decommissioning trust fund	\$86,848 (g)		
	Not yet reimbursed from the decommissioning trust fund	\$33,888 (h)		
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2016.	\$13,699		
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B).	\$15,050(a)		

(a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Dresden Unit 1 has been shutdown since October 31, 1978 and some decommissioning activities have already occurred on this unit. However, the amount to decommission Dresden Unit 1 was calculated pursuant to 10 CFR 50.75(c) to be \$554.7 million (as of December 31, 2016). Dresden Unit 1 was a BWR reactor that operated at a maximum power level of 700 MWt (< 1200 MWt as specified in 10 CFR 50.75(c)). This amount assumes Dresden Unit 1 was a BWR reactor type rated at a power capacity of 1200 MWt as required by the formula in 10 CFR 50.75(c). The calculation of this value assumes the labor, energy, and burial factors described in Attachment 1 and does not account for decommissioning activities that have occurred for Dresden Unit 1.</li>

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1640-004, Revision 0, "Decommissioning Cost Analysis for the Dresden Nuclear Power Station Unit 1," August 2012). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Dresden Nuclear Power Station, Unit 1, Post-Shutdown Decommissioning Activities Report (PSDAR), as most recently updated in a letter from K.R. Jury (EGC) to U.S. NRC on January 5, 2007. The costs have been escalated from the 2012 dollars reflected in the 2012 decommissioning cost estimate to estimated costs as of December 31, 2016.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE estimate for the 2012 thru 2016 annual radiological cost because EGC considers the SSCE estimated cost for 2012 thru 2016 decommissioning activities to be historical expenditures at the time the 2017 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Dresden Nuclear Power Station, Unit 1, will take place beginning in 2029, coinciding with the decommissioning of Dresden Nuclear Power Station, Unit 2.

(b) ISFSI decommissioning cost is included in the Dresden Nuclear Power Station, Unit 2 and Unit 3 site-specific cost estimates.

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2016 is consistent with the projected 2016 expense total of \$3,094 (December 31, 2015 thousands of dollars) from the site-specific cost estimate.

The amount spent on decommissioning in 2016 represents the 2016 charges to the Dresden Unit 1 project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) Not all historical data was available, and therefore, the cumulative amounts spent on decommissioning are estimates based on the best information obtainable at this time.
- (g) Not all historical data was available, and therefore, the amount reimbursed is an estimate based on the best information obtainable at this time.
- (h) The amount not yet reimbursed is an estimate based on the best information obtainable at this time.

	Radiological Decommissioning	BOY Trust Fund	BOY Trust Fund Value	Trust Fund	EOY Trust Fund
Year	Cost	Value	Less Cost	Earnings	Value
2017	\$3,131	\$372,178	\$369,048	\$7,381	\$376,429
2018	\$3,131	\$376,429	\$373,298	\$7,466	\$380,764
2019	\$3,131	\$380,764	\$377,633	\$7,553	\$385,186
2020	\$3,139	\$385,186	\$382,046	\$7,641	\$389,687
2021	\$3,131	\$389,687	\$386,557	\$7,731	\$394,288
2022	\$3,131	\$394,288	\$391,157	\$7,823	\$398,980
2023	\$3,131	\$398,980	\$395,849	\$7,917	\$403,766
2024	\$3,139	\$403,766	\$400,627	\$8,013	\$408,640
2025	\$3,131	\$408,640	\$405,509	\$8,110	\$413,619
2026	\$3,131	\$413,619	\$410,488	\$8,210	\$418,698
2027	\$3,131	\$418,698	\$415,567	\$8,311	\$423,879
2028	\$3,139	\$423,879	\$420,739	\$8,415	\$429,154
2029	\$39,359	\$429,154	\$389,795	\$7,796	\$397,591
2030	\$83,706	\$397,591	\$313,885	\$6,278	\$320,162
2031	\$90,985	\$320,162	\$229,177	\$4,584	\$233,761
2032	\$66,229	\$233,761	\$167,531	\$3,351	\$170,882
2033	\$49,809	\$170,882	\$121,073	\$2,421	\$123,494
2034	\$2,314	\$123,494	\$121,180	\$2,424	\$123,604
2035	\$2,314	\$123,604	\$121,290	\$2,426	\$123,715
2036	\$2,320	\$123,715	\$121,395	\$2,428	\$123,823
2037	\$18,829	\$123,823	\$104,994	\$2,100	\$107,094
2038	\$6,864	\$107,094	\$100,230	\$2,005	\$102,234
2039	\$95	\$102,234	\$102,139	\$2,043	\$104,182
2040	\$54	\$104,182	\$104,128	\$2,083	\$106,210
_2041	\$0	\$106,210	\$106,210	\$2,124	\$108,335
2042	\$5,064	\$108,335	\$103,270	\$2,065	\$105,336

Total\* \$405,539

\*Column may not add due to rounding

	Irradiated Fuel	BOY Irradiated Fuel Trust Fund	BOY Irradiated Fuel Trust Fund	Irradiated Fuel Trust Fund	EOY Irradiated Fuel Trust Fund
Year	Cost	Value	Less Cost	Earnings	Value
2017	\$0	\$13,699	\$13,699	\$274	\$13,973
2018	\$0	\$13,973	\$13,973	\$279	\$14,252
2019	\$0	\$14,252	\$14,252	\$285	\$14,537
2020	\$0	\$14,537	\$14,537	\$291	\$14,828
2021	\$0	\$14,828	\$14,828	\$297	\$15,124
2022	\$0	\$15,124	\$15,124	\$302	\$15,427
2023	\$0	\$15,427	\$15,427	\$309	\$15,735
2024	\$0	\$15,735	\$15,735	\$315	\$16,050
2025	\$0	\$16,050	\$16,050	\$321	\$16,371
2026	\$0	\$16,371	\$16,371	\$327	\$16,699
2027	\$0	\$16,699	\$16,699	\$334	\$17,033
2028	\$0	\$17,033	\$17,033	\$341	\$17,373
2029	\$842	\$17,373	\$16,531	\$331	\$16,862
2030	\$600	\$16,862	\$16,261	\$325	\$16,586
2031	\$516	\$16,586	\$16,071	\$321	\$16,392
_2032	\$517	\$16,392	\$15,875	\$318	\$16,193
2033	\$516	\$16,193	\$15,677	\$314	\$15,991
2034	\$516	\$15,991	\$15,475	\$310	\$15,785
2035	\$516	\$15,785	\$15,269	\$305	\$15,574
2036	\$517	\$15,574	\$15,057	\$301	\$15,358
2037	\$2 <i>,</i> 075	\$15,358	\$13,284	\$266	\$13,549
2038	\$705	\$13,549	\$12,844	\$257	\$13,101
2039	\$755	\$13,101	\$12,346	\$247	\$12,593
2040	\$1,501	\$12,593	\$11,092	\$222	\$11,314
2041	\$2,451	\$11,314	\$8,863	\$177	\$9,040
2042	\$2,448	\$9,040	\$6,592	\$132	\$6,724
2043	\$576	\$6,724	\$6,148	\$123	\$6,271

Total\* \$15,050

\*Column may not add due to rounding

Attachment 10

Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2

#### ATTACHMENT 10 Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$631,059	
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A	
3	Site-specific cost amount per 10 CFR 72.30(b)	\$2,355 (a)	
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$651,199 (b)	
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0	
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)	
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).		
8	Financial assurance for decommissioning is provided by the prenavment		

- 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on December 22, 2029.

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Attachment 11

Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3
## ATTACHMENT 11 Annual Radiological Decommissioning Funding Assurance Report for Dresden Nuclear Power Station, Unit 3 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$631,059
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$2,356 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$665,882 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	<ul> <li>Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections</li> </ul>	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)	(1)(v).
8	Financial assurance for decommissioning is provided by the prep method, coupled with an external trust fund, in accordance with 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structu	

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) This is the site-specific cost estimate for ISFSI radiological decommissioning that was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated December 17, 2012 ("Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Braidwood, Byron, Dresden, LaSalle, Limerick, Oyster Creek, Peach Bottom, Quad Cities, and Salem"). The costs have been escalated from 2012 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on January 12, 2031.

Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1

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## ATTACHMENT 12 Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1 (December 31, 2016 dollars, thousands)

	1	Formula cost amount per 10 CFR 50.75(c)	\$652,255
	2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
	3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,423 (a)
	4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$476,685 (b)
	5	Schedule of the annual amounts remaining to be collected.	\$0
	6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
	7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1	)(v).
	8	Financial assurance for decommissioning is provided by the preparethod, coupled with an external trust fund, in accordance with 10 $50.75(e)(1)(i)$ and 10 CFR 72.30(e)(1).	
	9	Effective February 28, 2017, EGC changed the corporate structure subsidiary companies through which the non-qualified decommiss fund is managed and controlled. No change was made to the non agreement or to its master terms and conditions. This change was letter from Patrick R. Simpson (Exelon Generation Company, LLC NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated 22, 2016.	ioning trust -qualified trust s detailed in ) to U.S.
)	The	site-specific decommissioning funding plan was previously provide	d in a letter

(a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

## ATTACHMENT 12 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 1 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on April 17, 2042.

PUBLIC

Attachment 13

Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2

## ATTACHMENT 13 Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$652,255
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,429 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$477,242 (b)
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the preparethod, coupled with an external trust fund, in accordance with 1 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	Effective February 28, 2017, EGC changed the corporate structur subsidiary companies through which the non-qualified decommiss fund is managed and controlled. No change was made to the nor agreement or to its master terms and conditions. This change was letter from Patrick R. Simpson (Exelon Generation Company, LLC NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," date 22, 2016.	sioning trust n-qualified trust is detailed in \$) to U.S.
) Th	e site-specific decommissioning funding plan was previously provide	ed in a letter

(a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated from mid-year 2014 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

## ATTACHMENT 13 (Continued) Annual Radiological Decommissioning Funding Assurance Report for LaSalle County Station, Unit 2 (December 31, 2016 dollars, thousands)

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on December 16, 2043.

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Attachment 14

Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1

## ATTACHMENT 14 Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$666,765
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$3,675 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$408,501 (b)
5	Schedule of the annual amounts remaining to be collected.	\$8,232 (c)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the exter fund method, coupled with an external trust fund, in accordance v 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).	rnal sinking vith 10 CFR

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

## ATTACHMENT 14 (continued) Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 1 (December 31, 2016 dollars, thousands)

- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013 and allows for the collection of annual payments from ratepayers of \$8,232K through 2023. It is possible that when the impact of license renewal (approved in 2014) is factored into the PaPUC's next cost adjustment calculation (effective January 1, 2018), the collections will be adjusted downward, and potentially could go to \$0, beginning in 2018 through 2043.
- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 26, 2044.

PUBLIC

Attachment 15

Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2

### ATTACHMENT 15 Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2 (December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$666,765
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$3,672 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$430,247 (b)
5	Schedule of the annual amounts remaining to be collected.	\$13,105 (c)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
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8 Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated from mid-year 2013 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

## ATTACHMENT 15 (continued) Annual Radiological Decommissioning Funding Assurance Report for Limerick Generating Station, Unit 2 (December 31, 2016 dollars, thousands)

- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$13,105K through 2028. It is possible that when the impact of license renewal (approved in 2014) is factored into the PaPUC's next cost adjustment calculation (effective January 1, 2018), the collections will be adjusted downward, and potentially could go to \$0, beginning in 2018 through 2048.
- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on June 22, 2049.

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1

2

### ATTACHMENT 16 Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 1 (December 31, 2016 dollars, thousands)

1 Formula cost amount per 10 CFR 50.75(c) \$595,890 2 Site-specific cost amount per 10 CFR 50.75(b)(4) N/A 3 \$6,344 (a) Site-specific cost amount per 10 CFR 72.30(b) 4 The amount of decommissioning trust funds accumulated as of December 31, 2016 \$581,113 (b) 5 Schedule of the annual amounts remaining to be collected. \$0 6 Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections 2% (c) 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).

8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on August 22, 2029.

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 EGC Portion

### ATTACHMENT 17 Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2, EGC Portion

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$546,747 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,195 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$361,768 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the prep	

Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- 9 There are no material changes to the trust fund agreements.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Nine Mile Point Nuclear Station, Unit 2 of 82%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2046.

Annual Radiological Decommissioning Funding Assurance Report for Nine Mile Point Nuclear Station, Unit 2 LIPA Portion

#### ATTACHMENT 18 Annual Radiological Decommissioning Funding Assurance Report for

# Nine Mile Point Nuclear Station, Unit 2, LIPA Portion

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$120,018 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$1,140 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$115,425 (c)
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the prep	

Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- 9 There are no material changes to the trust fund agreements.
- (a) Value is based on the Long Island Power Authority (LIPA) ownership share of Nine Mile Point Nuclear Station, Unit 2 of 18%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. This amount was provided by the Nine Mile Point Nuclear Station, Unit 2 coowner LIPA. LIPA has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016. EGC has not independently verified or assessed the trust fund amount.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on October 31, 2046.

PUBLIC

Attachment 19

Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station

## **ATTACHMENT 19** Annual Radiological Decommissioning Funding Assurance Report for **Oyster Creek Nuclear Generating Station**

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$572,184	
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	\$1,083,421 (a)	
3	Site-specific cost amount per 10 CFR 72.30(b)	\$5,688 (b)	
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$888,501 (c)	
5	Schedule of the annual amounts remaining to be collected.	<b>\$</b> 0	
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)	
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment		

- method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""'Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) This is based on the SAFSTOR scenario from the site-specific cost estimate, and is greater than the formula cost amount under 10 CFR 50.75(c), as required by 10 CFR 50.75(b)(1). The site-specific estimate has been previously provided in a letter from James Barstow (EGC) to U.S. NRC, dated March 30, 2016 (TLG Report E16-1726-001, Revision 0, "Decommissioning Cost Analysis for the Oyster Creek Nuclear Generating Station," March 2016). The costs have been escalated from the December 31, 2015 dollars in the decommissioning cost estimate to December 31, 2016.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The costs have been escalated from December 31, 2015 dollars in the cost estimate to December 31, 2016 using a unit specific escalation rate consistent with that used for the plant cost estimate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

### ATTACHMENT 19 (continued) Annual Radiological Decommissioning Funding Assurance Report for Oyster Creek Nuclear Generating Station (December 31, 2016 dollars, thousands)

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 31, 2019. This date is based on the State of New Jersey Administrative Consent Order, dated December 9, 2010.

ATTACHMENT 19 (continued)
Annual Radiological Decommissioning Funding Assurance Report for
Oyster Creek Nuclear Generating Station
(December 31, 2016 dollars, thousands)

	Site	ISFSI Dediclorical	BOY	BOY		EOY
	Radiological	Radiological Decommissioning	Trust	Trust Fund	Trust	Trust
Year	Decommissioning Cost	Cost	Fund	Value	Fund	Fund
2017*	\$3,189	\$0		Less Cost	Earnings	Value
			\$888,501	\$885,313	\$17,706	\$903,019
2018*	\$3,189	\$0 ¢0	\$903,019	\$899,830	\$17,997	\$917,827
2019*	\$3,189	\$0	\$917,827	\$914,638	\$18,293	\$932,931
2020	\$81,970	\$0	\$932,931	\$850,961	\$17,019	\$867,980
2021	\$71,757	\$0 \$0	\$867,980	\$796,223	\$15,924	\$812,148
2022	\$7,603	\$0	\$812,148	\$804,545	\$16,091	\$820,636
2023	\$7,603	\$0 \$0	\$820,636	\$813,033	\$16,261	\$829,294
2024	\$7,624	\$0 \$0	\$829,294	\$821,670	\$16,433	\$838,103
2025	\$7,401	\$0	\$838,103	\$830,702	\$16,614	\$847,316
2026	\$7,202	\$0	\$847,316	\$840,114	\$16,802	\$856,916
2027	\$7,202	\$0	\$856,916	\$849,714	\$16,994	\$866,708
2028	\$7,222	\$0	\$866,708	\$859,486	\$17,190	\$876,675
2029	\$7,202	\$0	\$876,675	\$869,473	\$17,389	\$886,862
2030	\$7,202	\$0	\$886,862	\$879,660	\$17,593	\$897,253
2031	\$7,202	\$0	\$897,253	\$890,051	\$17,801	\$907,852
2032	\$7,222	\$0	\$907,852	\$900,629	\$18,013	\$918,642
2033	\$7,202	\$0	\$918,642	\$911,439	\$18,229	\$929,668
2034	\$7,202	\$0	\$929,668	\$922,466	\$18,449	\$940,915
2035	\$7,202	\$0	\$940,915	\$933,713	\$18,674	\$952,387
2036	\$7,189	\$0	\$952,387	\$945,198	\$18,904	\$964,102
2037	\$7,169	\$0	\$964,102	\$956,932	\$19,139	\$976,071
2038	\$7,169	\$0	\$976,071	\$968,901	\$19,378	\$988,279
2039	\$7,169	\$0	\$988,279	\$981,110	\$19,622	\$1,000,732
2040	\$7,189	\$0	\$1,000,732	\$993,543	\$19,871	\$1,013,414
2041	\$7,169	\$0	\$1,013,414	\$1,006,245	\$20,125	\$1,026,369
2042	\$7,169	\$0	\$1,026,369	\$1,019,200	\$20,384	\$1,039,584
2043	\$7,169	\$0	\$1,039,584	\$1,032,414	\$20,648	\$1,053,063
2044	\$7,189	\$0	\$1,053,063	\$1,045,874	\$20,917	\$1,066,791
2045	\$7,169	\$0	\$1,066,791	\$1,059,622	\$21,192	\$1,080,814
2046	\$7,169	\$0	\$1,080,814	\$1,073,645	\$21,473	\$1,095,118
2047	\$7,169	\$0	\$1,095,118	\$1,087,948	\$21,759	\$1,109,707
2048	\$7,189	\$0	\$1,109,707	\$1,102,518	\$22,050	\$1,124,568
2049	\$7,169	\$0	\$1,124,568	\$1,117,399	\$22,348	\$1,139,747
2050	\$7,169	\$0	\$1,139,747	\$1,132,577	\$22,652	\$1,155,229
2051	\$7,169	\$0	\$1,155,229	\$1,148,060	\$22,961	\$1,171,021
2052	\$7,189	\$0	\$1,171,021	\$1,163,832	\$23,277	\$1,187,108
2053	\$7,169	\$0	\$1,187,108	\$1,179,939	\$23,599	\$1,203,538
2054	\$7,169	\$0	\$1,203,538	\$1,196,368	\$23,927	\$1,220,295
2055	\$7,169	\$0	\$1,220,295	\$1,213,126	\$24,263	\$1,237,389
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ATTACHMENT 19 (continued)			
Annual Radiological Decommissioning Funding Assurance Report for			
Oyster Creek Nuclear Generating Station			
(December 31, 2016 dollars, thousands)			

$\begin{array}{c c c c c c c c c c c c c c c c c c c $	Year	Site Radiological Decommissioning Cost	ISFSI Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$			\$0				
$\begin{array}{c c c c c c c c c c c c c c c c c c c $			•				
2059\$7,169\$0\$1,290,726\$1,283,556\$25,671\$1,309,2272060\$7,189\$0\$1,309,227\$1,302,038\$26,041\$1,328,0792061\$7,169\$0\$1,328,079\$1,320,909\$26,418\$1,347,3282062\$7,169\$0\$1,347,328\$1,340,158\$26,803\$1,366,9612063\$7,169\$0\$1,366,961\$1,359,792\$27,196\$1,386,9882064\$7,189\$0\$1,386,988\$1,379,799\$27,596\$1,407,3952065\$7,169\$0\$1,407,395\$1,400,225\$28,005\$1,428,2302066\$7,169\$0\$1,449,481\$1,442,312\$28,846\$1,471,1582068\$7,189\$0\$1,493,248\$1,463,969\$29,279\$1,493,2482069\$7,169\$0\$1,515,801\$1,508,631\$30,173\$1,538,8042070\$7,169\$0\$1,538,804\$1,531,634\$30,633\$1,562,2672071\$7,169\$0\$1,586,179\$1,579,010\$31,580\$1,610,5902073\$7,169\$0\$1,635,489\$1,508,631\$30,333\$1,622,4762074\$7,169\$0\$1,635,489\$1,590,663\$31,813\$1,622,4762075\$44,826\$0\$1,635,489\$1,590,663\$31,813\$1,622,4762076\$105,840\$0\$1,622,476\$1,516,637\$30,333\$1,546,9692077\$175,595\$904\$1,622,476\$1,516,637\$30,333 </td <td></td> <td>•</td> <td>•</td> <td></td> <td></td> <td></td> <td></td>		•	•				
$\begin{array}{c c c c c c c c c c c c c c c c c c c $							
2061\$7,169\$0\$1,328,079\$1,320,909\$26,418\$1,347,328 $2062$ \$7,169\$0\$1,347,328\$1,340,158\$26,803\$1,366,961 $2063$ \$7,169\$0\$1,366,961\$1,359,792\$27,196\$1,386,988 $2064$ \$7,189\$0\$1,386,988\$1,379,799\$27,596\$1,407,395 $2065$ \$7,169\$0\$1,407,395\$1,400,225\$28,005\$1,428,230 $2066$ \$7,169\$0\$1,428,230\$1,421,060\$28,421\$1,449,481 $2067$ \$7,169\$0\$1,449,481\$1,442,312\$28,846\$1,471,158 $2068$ \$7,189\$0\$1,471,158\$1,463,969\$29,279\$1,493,248 $2069$ \$7,169\$0\$1,515,801\$1,508,631\$30,173\$1,538,804 $2070$ \$7,169\$0\$1,515,801\$1,508,631\$30,633\$1,562,267 $2070$ \$7,169\$0\$1,538,804\$1,531,634\$30,633\$1,562,267 $2072$ \$7,189\$0\$1,586,179\$1,579,010\$31,580\$1,610,590 $2074$ \$7,169\$0\$1,610,590\$1,603,421\$32,068\$1,635,489 $2075$ \$44,826\$0\$1,635,489\$1,590,663\$31,813\$1,622,476 $2076$ \$105,840\$0\$1,622,476\$1,516,637\$30,333\$1,546,969 $2077$ \$175,595\$904\$1,546,969\$1,370,470\$27,409\$1,397,879 $2078$ \$142,749\$3,837\$1,397,							
2062 $$7,169$ $$0$ $$1,347,328$ $$1,340,158$ $$26,803$ $$1,366,961$ $2063$ $$7,169$ $$0$ $$1,366,961$ $$1,359,792$ $$27,196$ $$1,386,988$ $2064$ $$7,189$ $$0$ $$1,386,988$ $$1,379,799$ $$27,596$ $$1,407,395$ $2065$ $$7,169$ $$0$ $$1,407,395$ $$1,400,225$ $$28,005$ $$1,428,230$ $2066$ $$7,169$ $$0$ $$1,428,230$ $$1,421,060$ $$28,421$ $$1,449,481$ $2067$ $$7,169$ $$0$ $$1,449,481$ $$1,442,312$ $$$28,846$ $$1,471,158$ $2068$ $$7,189$ $$0$ $$1,471,158$ $$1,463,969$ $$$29,279$ $$$1,493,248$ $2069$ $$7,169$ $$0$ $$1,493,248$ $$1,486,079$ $$$29,722$ $$1,515,801$ $2070$ $$7,169$ $$0$ $$1,515,801$ $$1,508,631$ $$30,173$ $$1,538,804$ $2071$ $$7,169$ $$0$ $$1,562,267$ $$1,555,078$ $$31,102$ $$1,586,179$ $2073$ $$7,169$ $$0$ $$1,586,179$ $$1,579,010$ $$31,580$ $$1,610,590$ $2074$ $$7,169$ $$0$ $$1,610,590$ $$1,603,421$ $$32,068$ $$1,635,489$ $2075$ $$44,826$ $$0$ $$1,622,476$ $$1,516,637$ $$30,333$ $$1,546,969$ $2077$ $$175,595$ $$904$ $$1,546,969$ $$1,370,470$ $$27,409$ $$1,397,879$ $2078$ $$142,749$ $$3,837$ $$1,397,879$ $$1,251,293$ $$25,026$ $$1,276,319$ </td <td>2061</td> <td>\$7,169</td> <td>\$0</td> <td></td> <td></td> <td>\$26,418</td> <td></td>	2061	\$7,169	\$0			\$26,418	
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$\begin{array}{c c c c c c c c c c c c c c c c c c c $	2065	\$7,169	\$0	\$1,407,395	\$1,400,225	\$28,005	\$1,428,230
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2075\$44,826\$0\$1,635,489\$1,590,663\$31,813\$1,622,4762076\$105,840\$0\$1,622,476\$1,516,637\$30,333\$1,546,9692077\$175,595\$904\$1,546,969\$1,370,470\$27,409\$1,397,8792078\$142,749\$3,837\$1,397,879\$1,251,293\$25,026\$1,276,3192079\$68,778\$946\$1,276,319\$1,206,595\$24,132\$1,230,7272080**\$156\$0\$1,230,727\$1,230,572\$24,611\$1,255,183	2073	\$7,169	\$0	\$1,586,179	\$1,579,010	\$31,580	\$1,610,590
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2077\$175,595\$904\$1,546,969\$1,370,470\$27,409\$1,397,8792078\$142,749\$3,837\$1,397,879\$1,251,293\$25,026\$1,276,3192079\$68,778\$946\$1,276,319\$1,206,595\$24,132\$1,230,7272080**\$156\$0\$1,230,727\$1,230,572\$24,611\$1,255,183	2075	\$44,826	\$0	\$1,635,489	\$1,590,663	\$31,813	\$1,622,476
2078\$142,749\$3,837\$1,397,879\$1,251,293\$25,026\$1,276,3192079\$68,778\$946\$1,276,319\$1,206,595\$24,132\$1,230,7272080**\$156\$0\$1,230,727\$1,230,572\$24,611\$1,255,183	2076	\$105,840	\$0	\$1,622,476	\$1,516,637	\$30,333	\$1,546,969
2079         \$68,778         \$946         \$1,276,319         \$1,206,595         \$24,132         \$1,230,727           2080**         \$156         \$0         \$1,230,727         \$1,230,572         \$24,611         \$1,255,183	2077	\$175,595	\$904	\$1,546,969	\$1,370,470	\$27,409	\$1,397,879
2080** \$156 \$0 \$1,230,727 \$1,230,572 \$24,611 \$1,255,183	2078	\$142,749	\$3,837	\$1,397,879	\$1,251,293	\$25,026	\$1,276,319
	2079	\$68,778	\$946	\$1,276,319	\$1,206,595	\$24,132	\$1,230,727
2081** \$85 \$0 \$1 255 183 \$1 255 098 \$25 102 \$1 280 199	2080**	\$156	\$0	\$1,230,727	\$1,230,572	\$24,611	\$1,255,183
	2081**	\$85	\$0	\$1,255,183	\$1,255,098	\$25,102	\$1,280,199

Total\*\*\* \$1,083,421 \$5,688

\* Costs in 2017, 2018, and 2019 prior to permanent shutdown at the end of 2019 are for decommissioning planning and do <u>not</u> include any physical decommissioning work.

\*\*Costs in 2080 and 2081 are administrative expenses associated with submitting a final report to the NRC following license termination and do <u>not</u> include any physical decommissioning work.

\*\*\*Columns may not add due to rounding.

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

## ATTACHMENT 20 Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)		
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$248,539 (a)		
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (h)		
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$100,982 (b)		
5	Schedule of the annual amounts remaining to be collected.	\$2,118 (c)		
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	3% (d)		
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).			
8	Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii).			
9	Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.			
10	2016 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$839 (e)		
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$4,108 (f)		
	Reimbursed from the decommissioning trust fund	\$0		
	Not yet reimbursed from the decommissioning trust fund	\$4,108 (g)		

	Not yet reimbursed from the decommissioning trust fund	\$4,108 (g)
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2016.	N/A (h)

13 Projected cost of managing irradiated fuel based on sitespecific estimate per 10 CFR 50.82(a)(8)(vii)(B).

## ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1 (December 31, 2016 dollars, thousands)

(a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Peach Bottom Unit 1 has been shutdown since October 31, 1974 and some decommissioning activities have already occurred on this unit. Furthermore, Peach Bottom Unit 1 was a High Temperature Gas Cooled Reactor (HTGR), which does not translate to a BWR or PWR as specified in the formula for calculating the formula cost amount, and hence a formula cost amount per 10 CFR 50.75(c) cannot be calculated for Peach Bottom Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1640-015, Revision 0, "Decommissioning Cost Analysis for the Peach Bottom Atomic Power Station Unit 1," August 2015). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Peach Bottom Unit 1 Decommissioning Plan. The costs have been escalated from the mid-year 2015 dollars reflected in the SSCE to estimated costs as of December 31, 2016.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE for the annual radiological decommissioning costs in 2015 and 2016. EGC considers the SSCE estimated costs for 2015 and 2016 decommissioning activities to be historical expenditures at the time the 2017 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Peach Bottom Atomic Power Station, Unit 1, will take place beginning in 2033, coinciding with the decommissioning of Peach Bottom Atomic Power Station, Unit 2.

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$2,118K through 2032.

### ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1 (December 31, 2016 dollars, thousands)

(d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.

(e) The amount spent on decommissioning in 2016 is consistent with the amount budgeted at the station. Even though the amount exceeds the projected 2016 expense total of \$201 (December 31, 2015 thousands of dollars) from the sitespecific cost estimate, it is immaterial to the overall funding assurance analysis. The \$638 (thousands of dollars) difference between actual and projected is the result of activities related to asbestos abatement and to repair stucco panels.

The amount spent on decommissioning in 2016 represents the 2016 charges to the Peach Bottom Unit 1 project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) The cumulative amount spent on decommissioning is an estimate based on the best information obtainable at this time.
- (g) The amount not yet reimbursed is an estimate based on the best information obtainable at this time.
- (h) Peach Bottom Atomic Power Station, Unit 1 was shut down in October of 1974, with defueling of the core completed by the following June. Starting in 1975, the spent fuel was shipped by truck to Idaho. The final of 44 shipments was completed in February of 1977. Consequently, no irradiated fuel for Peach Bottom Unit 1 remains on-site, and therefore 10 CFR 50.82(a)(8)(vii) and 10 CFR 72.30(b) do not apply.

## ATTACHMENT 20 (Continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1 (December 31, 2016 dollars, thousands)

Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost**	First Half Contributions	Trust Fund Earnings	Second Half Contributions	EOY Trust Fund Value
2017	\$204	\$100,982	\$100,778	\$1,059	\$3,055	\$1,059	\$105,951
2018	\$204	\$105,951	\$105,746	\$1,05 <del>9</del>	\$3,204	\$1,059	\$111,068
2019	\$204	\$111,068	\$110,864	\$1,059	\$3,358	\$1,059	\$116,339
2020	\$205	\$116,339	\$116,135	\$1,059	\$3,516	\$1,059	\$121,768
2021	\$204	\$121,768	\$121,564	\$1,059	\$3,679	\$1,059	\$127,360
2022	\$204	\$127,360	\$127,156	\$1,059	\$3,846	\$1,059	\$133,120
2023	\$204	\$133,120	\$132,916	\$1,059	\$4,019	\$1,059	\$139,053
2024	\$205	\$139,053	\$138,848	\$1,059	\$4,197	\$1,059	\$145,163
2025	\$204	\$145,163	\$144,958	\$1,059	\$4,381	\$1,059	\$151,457
2026	\$204	\$151,457	\$151,252	\$1,059	\$4,569	\$1,059	\$157,939
2027	\$204	\$157,939	\$157,735	\$1,059	\$4,764	\$1,059	\$164,616
2028	\$205	\$164,616	\$164,411	\$1,059	\$4,964	\$1,059	\$171,493
2029	\$204	\$171,493	\$171,289	\$1,059	\$5,170	\$1,059	\$178,577
2030	\$204	\$178,577	\$178,373	\$1,059	\$5,383	\$1,059	\$185,873
2031	\$204	\$185,873	\$185,669	\$1,059	\$5,602	\$1,059	\$193,389
2032	\$205	\$193,389	\$193,184	\$1,059	\$5,827	\$1,059	\$201,129
2033	\$36,594	\$201,129	\$164,535	\$0	\$4,936	\$0	\$169,471
2034	\$55,121	\$169,471	\$114,351	\$0	\$3,431	\$0	\$117,781
2035	\$63,615	\$117,781	\$54,166	\$0	\$1,625	\$0	\$55,791
2036	\$46,456	\$55,791	\$9,336	\$0	\$280	\$0	\$9,616
2037	\$41,221	\$9,616	\$ (31,606)	\$0	\$0	\$0	\$ (31,606)
2038	\$2,261	\$ (31,606)	\$ (33,866)	\$0	\$0	\$0	\$ (33,866)

## Total\* \$248,539

\* Columns may not add due to rounding

\*\* Annual contributions added to individual years - Earnings of half of contributions are included in current year to estimate payment of contributions throughout the year PUBLIC

Attachment 21

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2

### ATTACHMENT 21 Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2 (December 31, 2016 dollars, thousands)

1 Formula cost amount per 10 CFR 50.75(c) \$333,382 (a) 2 Site-specific cost amount per 10 CFR 50.75(b)(4) N/A 3 Site-specific cost amount per 10 CFR 72.30(b) \$2,340 (a)(b) 4 The amount of decommissioning trust funds accumulated as of December 31, 2016 \$253,637 (c) 5 Schedule of the annual amounts remaining to be collected. \$0 (d) 6 Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections 3% (e) 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).

- 8 Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Peach Bottom Atomic Power Station, Unit 2 of 50%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

## ATTACHMENT 21 (continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 2 (December 31, 2016 dollars, thousands)

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2032.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on August 8, 2033.

Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3

#### ATTACHMENT 22 Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3 (Decomber 21, 2016 dollare, thousando)

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$333,382 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$2,340 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$275,030 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1	)(v).
8	Financial assurance for decommissioning is provided by the exter	nal sinking

- fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
  9 Effective February 28, 2017, EGC changed the corporate structure of its
- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Peach Bottom Atomic Power Station, Unit 3 of 50%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

### ATTACHMENT 22 (continued) Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 3 (December 31, 2016 dollars, thousands)

(d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2033.

- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on July 2, 2034.

Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1
### ATTACHMENT 23 Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1 (December 31, 2016 dollars, thousands)

1 Formula cost amount per 10 CFR 50.75(c) \$473,294 (a) 2 Site-specific cost amount per 10 CFR 50.75(b)(4) N/A 3 Site-specific cost amount per 10 CFR 72.30(b) \$5,601 (a)(b) 4 The amount of decommissioning trust funds accumulated as of December 31, 2016 \$412,683 (c) 5 Schedule of the annual amounts remaining to be collected. \$0 6 Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections 2% (d) 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v). 8 Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Quad Cities Nuclear Power Station, Unit 1 of 75%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

### ATTACHMENT 23 (continued) Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 1 (December 31, 2016 dollars, thousands)

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 14, 2032.

Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2

### ATTACHMENT 24 Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2 (December 31, 2016 dollars, thousands)

1 Formula cost amount per 10 CFR 50.75(c) \$473,294 (a) 2 Site-specific cost amount per 10 CFR 50.75(b)(4) N/A 3 Site-specific cost amount per 10 CFR 72.30(b) \$5,602 (a)(b) 4 The amount of decommissioning trust funds accumulated as of December 31, 2016 \$462,635 (c) 5 Schedule of the annual amounts remaining to be collected. \$0 6 Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections 2% (d) 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v). Financial assurance for decommissioning is provided by the prepayment 8 method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1). 9 Effective February 28, 2017, EGC changed the corporate structure of its

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Quad Cities Nuclear Power Station, Unit 2 of 75%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.

### ATTACHMENT 24 (continued) Annual Radiological Decommissioning Funding Assurance Report for Quad Cities Nuclear Power Station, Unit 2 (December 31, 2016 dollars, thousands)

- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on December 14, 2032.

Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant

### ATTACHMENT 25 Annual Radiological Decommissioning Funding Assurance Report for R.E. Ginna Nuclear Power Plant

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$434,408
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$6,241 (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$423,414 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the prep method, coupled with an external trust fund, in accordance with 1	•

- method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).
- 9 There are no material changes to the trust fund agreements.
- (a) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on September 18, 2029.

Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1

### ATTACHMENT 26 Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1 (December 31, 2016 dollars, thousands)

1 Formula cost amount per 10 CFR 50.75(c) \$199,616 (a) 2 Site-specific cost amount per 10 CFR 50.75(b)(4) N/A 3 Site-specific cost amount per 10 CFR 72.30(b) \$1,557 (a)(b) 4 The amount of decommissioning trust funds accumulated as of December 31, 2016 \$234,941 (c) 5 Schedule of the annual amounts remaining to be collected. \$0 (d) 6 Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections 3% (e)

- 7 There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- 8 Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).
- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) Value is based on the Exelon Generation Company, LLC (EGC) ownership share of Salem Generating Station, Unit 1 of 42.59%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

### ATTACHMENT 26 (continued) Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 1 (December 31, 2016 dollars, thousands)

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2035.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on August 13, 2036.

PUBLIC

Attachment 27

Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2

### ATTACHMENT 27 Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2 (December 31, 2016 dollars, thousands)

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$199,616 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	\$1,556 (a)(b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$195,313 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0 (d)
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	3% (e)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1	)(v).
8	Financial assurance for decommissioning is provided by the exter fund method, coupled with an external trust fund, in accordance w	

50.75(e)(1)(ii) and 10 CFR 72.30(e)(3).

- 9 Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.
- (a) All values are based on the Exelon Generation Company, LLC (EGC) ownership share of Salem Generating Station, Unit 2 of 42.59%.
- (b) The site-specific decommissioning funding plan was previously provided in a letter from Patrick R. Simpson (EGC) to U.S. NRC, dated March 31, 2015 ("Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations"). The site-specific cost estimate for ISFSI radiological decommissioning contained in this letter has been updated. The detailed sitespecific cost estimate for ISFSI radiological decommissioning is provided in Attachment 29. The costs have been escalated and provided in December 31, 2016 dollars using a site specific escalation rate. No other changes have been made to the decommissioning funding plan in the March 31, 2015 letter.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.

### ATTACHMENT 27 (continued) Annual Radiological Decommissioning Funding Assurance Report for Salem Generating Station, Unit 2 (December 31, 2016 dollars, thousands)

- (d) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2013, and allows for the collection of annual payments from ratepayers of \$0 through 2039.
- (e) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company, "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (f) For purposes of this report, permanent termination of operations (shutdown) is expected on April 18, 2040.

Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1

### ATTACHMENT 28 Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1

(December 31, 2016 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$467,860
2	Site-specific cost amount per 10 CFR 50.75(b)(4)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (a)
4	The amount of decommissioning trust funds accumulated as of December 31, 2016	\$625,913 (b)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (c)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(	1)(v).
8	Financial assurance for decommissioning is provided by the prep	ayment

method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i).
Effective February 28, 2017, EGC changed the corporate structure of its subsidiary companies through which the non-qualified decommissioning trust fund is managed and controlled. No change was made to the non-qualified trust agreement or to its master terms and conditions. This change was detailed in letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S.

NRC, "Notice of Merger of Subsidiary ""Non-Qualified Nuclear Decommissioning Trust' Entities into their Parent Company," dated December 22, 2016.

- (a) Three Mile Island does not have an ISFSI. Therefore, 10CFR72 does not apply to Three Mile Island.
- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. EGC has no past-due tax payments related to decommissioning trust fund activities as of December 31, 2016. Periodic payments of estimated income taxes are made during the year on a quarterly basis. The trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2016.
- (c) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (d) For purposes of this report, permanent termination of operations (shutdown) is expected on April 19, 2034.

ISFSI Decommissioning Funding Estimates

### ATTACHMENT 29 ISFSI Decommissioning Funding Estimates

### Calvert Cliffs Nuclear Power Plant (December 31, 2016 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
<b>Decommissioning Contractor</b>									
Planning (characterization, specs and procedures)					\$393	\$393			1,336
Decontamination (activated liner and concrete removal)	\$464	\$5	\$1,055	\$1,907	\$768	\$4,199	26,166	4,105	
License Termination (radiological surveys)				0	\$2,032	\$2,032		16,274	
Subtotal	\$464	\$5	\$1,055	\$1,907	\$3,192	\$6,623	26,166	20,379	1,336
Supporting Costs									
NRC and NRC Contractor Fees and Costs		8			\$400	\$400			776
Property taxes					\$340	\$340			
Security Staff Cost					\$377	\$377			4937
Oversight Staff					\$352	\$352			3740
Subtotal					\$1,469	\$1,469			9453
Total (w/o contingency)	\$464	\$5	\$1,055	\$1,907	\$4 <b>,</b> 661	\$8,092	26,166	20,379	10,789
Total (w/25% contingency)						\$10,115			

Costs for ISFSI decommissioning are split according to the unit's site specific cost escalation factor. The cost split is the following: Calvert Cliffs Unit 1: \$5,053 Calvert Cliffs Unit 2: \$5,062

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### Nine Mile Point Nuclear Station (December 31, 2016 dollars, thousands)

ATTACHMENT 29 (Continued) ISFSI Decommissioning Funding Estimates

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$422	\$422			1,384
Decontamination (activated HSM disposition)	\$537	\$6	\$1,518	\$2,860	\$821	\$5,743	40,659	4,613	
License Termination (radiological surveys)					\$2,345	\$2,345		18,710	
Subtotal	\$537	<b>\$</b> 6	\$1,518	\$2,860	\$3,587	\$8,509	40,659	23,323	1,384
						- -			
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$400	\$400			776
Insurance					\$151	\$151			
Property taxes					\$339	\$339			
Security Staff Cost					\$398	\$398			4,937
Oversight Staff					\$347	\$347			3,740
Subtotal					\$1,634	\$1,634			9,453
Total (w/o contingency)	\$537	\$6	\$1,518	\$2,860	\$5,221	\$10,143	40,659	23,323	10,837
Total (w/25% contingency)						\$12,679			

Costs for ISFSI decommissioning are split according to the unit's site specific cost escalation factor. The cost split is the following: Nine Mile Point Unit 1: \$6,344 Nine Mile Point Unit 2: \$6,335

Unit costs are then pro-rated based on ownership share.

Peach Bottom Atomic Power Station (December 31, 2016 dollars, thousands)

Decommissioning Contractor Planning (characterization, specs and procedures)	Costs	Packaging Costs	Transport Costs	Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Contractor Manhours
Planning (characterization, specs and procedures) Decontanting (caritoria									
Decontamination (activated					\$372	\$372			1,192
	\$257	\$139	666\$	\$2,424		\$3,819	35,613	2,692	
License Termination (radiological surveys)					\$1,794	\$1,794		14,799	
Subtotal	\$257	\$139	666\$	\$2,424	\$2,167	\$5,986	35,613	17,491	1,192
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$432	\$432			776
Insurance					\$63	\$63			
Property taxes					\$340	\$340			
Site O&M					\$115	\$115			
Security Staff Cost					\$226	\$226			1,729
Oversight Staff					\$327	\$327			1,901
Subtotal					\$1,50 <b>3</b>	\$1,503			4,406
Total (w/o contingency) \$	\$257	\$139	666\$	\$2,424	\$3,670	\$7,489	35,613	17,491	5,598
Total (w/25% contingency)						\$9,361			

Costs for ISFSI decommissioning are split according to the unit's site specific cost escalation factor. The cost split is the following: Peach Bottom Unit 2: \$4,680 Peach Bottom Unit 2: \$4,681

Unit costs are then pro-rated based on ownership share.

Quad Cities Nuclear Power Station (December 31, 2016 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$485	\$485			1,336
Decontamination (overpack disposition)	\$627	\$370	\$1,398	\$4,955	\$48	\$7,399	117,230	8,994	
License Termination (radiological surveys)					\$2,096	\$2,096		16,811	
Subtotal	\$627	\$370	\$1,398	\$4,955	\$2,629	\$9,980	117,230	25,805	1,336
Supporting Costs						j			
NRC and NRC Contractor Fees and Costs					\$42 <b>1</b>	\$421			776
Insurance					\$157	\$157			
Property taxes					\$333	\$333			
Heavy Equipment	\$337					\$337			
Energy					\$49	\$49			
Security Staff Cost					\$305	\$305			4,978
Oversight Staff					\$369	\$369			3,771
Subtotal	\$337				\$1,633	\$1,970			9,525
Total (w/o contingency)	\$96 <b>5</b>	\$370	<b>\$1,398</b>	\$4,955	\$4,262	\$11,950	117,230	25,805	10,861
Total (w/25% contingency)						\$14,937			

Costs for ISFSI decommissioning are split according to the unit's site specific cost escalation factor. The cost split is the following: Quad Cities Unit 1: \$7,468 Quad Cities Unit 2: \$7,469

Unit costs are then pro-rated based on ownership share.

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### **R.E. Ginna Nuclear Power Plant** (December 31, 2016 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$216	\$216			1,072
Decontamination (activated liner and concrete removal)	\$359	\$2	\$466	\$761	\$687	\$2,274	8,731	3,087	
License Termination (radiological surveys)					\$977	776\$		7,496	
Subtotal	\$359	<b>\$</b> 2	\$466	\$761	\$1,880	\$3,467	8,731	10,583	1,072
									:
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$402	\$402			776
Insurance					\$152	\$152	i		
Property taxes					\$345	\$345			
Security Staff Cost					\$271	\$271			4,971
Oversight Staff					\$356	\$356			3,771
Subtotal					\$1,526	\$1,526			9,518
Total (w/o contingency)	\$359	\$2	\$466	\$761	\$3,406	\$4,993	8,731	10,583	10,590
Total (w/25% contingency)						\$6,241			

## Salem Generating Station (December 31, 2016 dollars, thousands)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (ft3)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)					\$430	\$430			1,240
Decontamination (overpack disposition)	\$259	\$104	\$233	\$1,813		\$2,409	29,111	2,570	
License Termination (radiological surveys)					\$2,121	\$2,121		16,105	
Subtotal	\$259	\$104	\$233	\$1,813	\$2,550	656'Þ\$	111'62	18,675	1,240
Supporting Costs									
NRC and NRC Contractor Fees and Costs					\$402	\$402			776
insurance					\$100	\$100			
Property taxes					\$16	\$16			
Security Staff Cost					\$160	\$160			2,910
Oversight Staff					\$210	\$210			2,277
Subtotal	\$0				\$88\$	\$888			5,963
Total (w/o contingency)	\$259	\$10 <b>4</b>	\$233	\$1,813	\$3,438	\$5,847	29,111	18,675	7,203
Total (w/25% contingency)						\$7,309			
Coote for ICECI decor	t t t t t t t t t t t t t t t t t t t			11		-			

Costs for ISFSI decommissioning are split according to the unit's site specific cost escalation factor. The cost split is the following: Salem Unit 1: \$3,656 Salem Unit 2: \$3,653

Unit costs are then pro-rated based on ownership share.

Changes to the Proposed ISFSI Decommissioning Funding Plans for Clinton Power Station

### Attachment 30 Changes to the Proposed ISFSI Decommissioning Funding Plans for Clinton Power Station

In letter from David M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Clinton Power Station," dated September 6, 2016, EGC submitted proposed ISFSI decommissioning funding plans for Clinton Power Station (CPS). At the time, EGC did not have sufficient funding to decommission the ISFSI and was monitoring funding assurance and new developments for CPS to assess the status of funding assurance and to take such actions as may be necessary to resolve any continuing funding shortfalls. EGC acknowledged in the above reference letter that adequate funding would be provided for decommissioning of the ISFSI in the biennial decommissioning funding submittal.

Since the issuance of the above referenced letter, adequate decommissioning funding assurance for the ISFSI has been provided. The change in funding status was primarily driven by two factors. EGC has reversed the decision to close CPS as detailed in letter from Michael P. Gallagher (Exelon Generation Company, LLC) to U.S. NRC, "Withdrawal of Certification of Permanent Cessation of Power Operations for Clinton Power Station and Previously Submitted Licensing Actions in Support of Decommissioning," dated December 14, 2016. EGC has changed its shutdown date assumption used in the calculation of the decommissioning trust fund earnings credit through shutdown from June 1, 2017 to September 29, 2026. This has resulted in significantly more earnings prior to shutdown. The second factor was the issuance of NUREG-1307 Rev. 16, "Report on Waste Burial Charges." The waste burial adjustment factors used in the calculation of the NRC Minimum Formula Amount for CPS decreased in Rev. 16 of NUREG-1307 when compared to Rev. 15. This has resulted in a decrease in the overall Formula Cost Amount per 10 CFR 50.75(c).

The following sections of Attachment 1 of the decommissioning funding plan in letter from David M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Clinton Power Station," dated September 6, 2016 are revised as follows:

### 2.1 Reasonable Assurance of Funds Availability

EGC's trust fund for CPS exceeds the costs required for radiological decommissioning as of information available on December 31, 2016 as outlined in Attachment 8. These excess assets will be used to decommission the on-site ISFSI. Attachment 8 shows the trust fund assets for CPS, the costs estimated for radiological decommissioning under 10 CFR 50.75(c), and the costs estimated for ISFSI decommissioning under 10 CFR 72.30(b) as of December 31, 2016.

### 2.4 Method of Assurance

Decommissioning funding assurance is provided by the methods allowed by 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1). In order to meet the requirements of 10 CFR 72.30(b)(4), EGC periodically updates the CPS DCE, including ISFSI decommissioning costs, and adjusts the funding levels, as necessary, in accordance with 10 CFR 50.75.

### Attachment 30 (continued) Changes to the Proposed ISFSI Decommissioning Funding Plans for Clinton Power Station

### 2.6 Certification of Financial Assurance

In accordance with 10 CFR 72.30(b), financial assurance, for decommissioning, has been provided in an amount that meets or exceeds the requirements of 10 CFR50.75(b). As demonstrated in Attachment 8, this provides the requisite financial assurance for the ISFSI decommissioning cost.

All other sections and Attachments in letter from David M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "Proposed Independent Spent Fuel Storage Installation (ISFSI) Decommissioning Funding Plans for Clinton Power Station," dated September 6, 2016 remain unchanged.