

**UCAN DATA REQUEST
UCAN- SDG&E DR-01
SDG&E DCE APPLICATION – A.14-12-007
SDG&E RESPONSE
DATE RECEIVED: MAY 18, 2015
DATE RESPONDED: JUNE 1, 2015**

Question 1

Please provide a copy of all data responses provided to other parties.

SDG&E Response:

SDG&E has not received any other data responses in this proceeding except requests to receive all responses to other parties' requests. SDG&E will post all non-confidential data request responses to its website.

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Question 2:

Page 4 of Mr. Levin’s testimony states that Mr. Levin has been involved in 11 major decommissioning projects. For each of these projects, please provide the following information and associated documentation:

- a. **A description of the nature and dates of Mr. Levin’s involvement;**
- b. **The decommissioning cost estimated at the start of the decommissioning project, broken down by major decommissioning activity (“milestone”);**
- c. **Any subsequent decommissioning cost estimates;**
- d. **The actual cost of decommissioning to-date;**
- e. **A list of the decommissioning milestones completed to-date; and**
- f. **The proceeding number(s) of the state regulatory proceeding(s) in which the decommissioning cost estimate was reviewed and cost recovery for decommissioning was authorized.**

SDG&E Response:

Response 2a:

Mr. Levin has participated in 11 major decommissioning projects to date:

1. Shippingport Atomic Power Station
2. Pathfinder Atomic Plant
3. Cintichem, Inc.
4. Big Rock Point Nuclear Plant
5. Vermont Yankee Nuclear Power Station
6. Rancho Seco Nuclear Generating Station
7. Dresden Nuclear Power Station, Unit 1
8. Zion Nuclear Power Station, Units 1 & 2
9. Trojan Nuclear Plant
10. Crystal River 3 Nuclear Generating Plant
11. San Onofre Nuclear Generating Station, Units 1, 2 & 3

SDG&E has provided a short resume for Mr. Levin as Attachment 1 to support this response, referencing whom he was employed by, the dates of his employment, and his major roles and responsibilities. SDG&E also provides the table in Attachment 2 to this response, referencing whom Mr. Levin was employed by, and the services he provided, for each of the 11 decommissioning projects identified above.

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Response to Question 2 (Continued)

Response 2b:

The decommissioning cost estimated at the start of each project identified in Response 2a above may be found on the Nuclear Regulatory Commission's (NRC) ADAMS web site, where publicly available. Per NRC regulations at 10 CFR 50.82(a)(4)(i), prior to or within two years after permanent cessation of operations, licensees are required to submit a post-shutdown decommissioning activities report (PSDAR). The PSDAR contains among other information, a site-specific decommissioning cost estimate (DCE) at the start of the decommissioning project. (Note: Site-specific DCEs are sometimes submitted as a separate document when the PSDAR is filed with NRC.)

NRC's ADAMS web site may be found at <http://www.nrc.gov/reading-rm/adams.html>. With the exception of SONGS, VY and CR3 (current clients of Mr. Levin), Mr. Levin does not maintain these start-of-project DCEs for the decommissioning projects identified in Response 2a.

Response 2c:

Mr. Levin does not maintain these subsequent DCEs for the decommissioning projects identified in Response 2a.

Any subsequent DCEs for each project identified above may be found on the NRC's ADAMS web site, where publicly available. Licensees may have submitted updated DCEs separately, as part of an updated PSDAR, and/or as part of a submitted License Termination Plan. Since SONGS, VY and CR3 announced their retirements, they have not produced subsequent DCEs.

Response 2d:

Mr. Levin does not maintain actual costs of decommissioning for the decommissioning projects identified in Response 2a.

The actual cost of decommissioning through December 31, 2014 for each project identified in Response 2a, may be found on the NRC's ADAMS web site, where publicly available.

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Response to Question 2 (Continued)

Response 2e:

Mr. Levin does not maintain this type of information for the decommissioning projects identified in Response 2a.

“Milestones” completed at each NRC licensee decommissioning project identified above, may be found on the NRC’s ADAMS web site, where publicly available.

Response 2f:

Mr. Levin does not maintain this type of information for the decommissioning projects identified in Response 2a.

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Question 3

Page 4 of Mr. Levin’s testimony states that Mr. Levin has developed and reviewed decommissioning cost estimates for 40 commercial nuclear units. For each of these decommissioning projects, please provide the following information and associated documentation:

- a. **The name of the power plant;**
- b. **The decommissioning cost estimated at the start of the decommissioning project, broken down by milestone;**
- c. **Any subsequent decommissioning cost estimates;**
- d. **The actual cost of decommissioning to-date;**
- e. **A list of the decommissioning milestones completed to-date; and**
- f. **The proceeding number(s) of the state regulatory proceeding(s) in which the decommissioning cost estimate was reviewed and cost recovery for decommissioning was authorized.**

SDG&E Response:

Response 3a:

Mr. Levin clarifies that he has participated in the development *and/or* review of decommissioning cost estimates for more than 40 commercial nuclear units:

1. Dresden Nuclear Power Station, Unit 1
2. Dresden Nuclear Power Station, Unit 2
3. Dresden Nuclear Power Station, Unit 3
4. Quad Cities Nuclear Power Station, Unit 1
5. Quad Cities Nuclear Power Station, Unit 2
6. Zion Nuclear Power Station, Unit 1
7. Zion Nuclear Power Station, Unit 2
8. Byron Station, Unit 1
9. Byron Station, Unit 2
10. Braidwood Station, Unit 1
11. Braidwood Station, Unit 2
12. LaSalle County Station, Unit 1
13. LaSalle County Station, Unit 2
14. Clinton Power Station, Unit 1
15. Limerick Generating Station, Unit 1
16. Limerick Generating Station, Unit 2
17. Peach Bottom Atomic Power Station, Unit 1
18. Peach Bottom Atomic Power Station, Unit 2
19. Peach Bottom Atomic Power Station, Unit 3

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Response to Question 3a (Continued)

20. Oyster Creek Nuclear Generating Station
21. Salem Nuclear Generating Station, Unit 1
22. Salem Nuclear Generating Station, Unit 2
23. Three Mile Island Nuclear Station, Unit 1
24. Rancho Seco Nuclear Generating Station
25. Big Rock Point Nuclear Plant
26. Yankee Rowe Nuclear Power Station
27. Vermont Yankee Nuclear Power Station
28. San Onofre Nuclear Generating Station, Unit 1
29. San Onofre Nuclear Generating Station, Unit 2
30. San Onofre Nuclear Generating Station, Unit 3
31. Trojan Nuclear Plant
32. Maine Yankee Atomic Power Station
33. Crystal River 3 Nuclear Generating Plant
34. Haddam Neck Plant
35. Seabrook Station, Unit 1
36. Cintichem, Inc.
37. Pathfinder Atomic Plant
38. Shippingport Atomic Power Station
39. Hope Creek Generating Station
40. Humboldt Bay Power Plant, Unit 3
41. Shoreham Nuclear Power Plant
42. Saxton Nuclear Experimental Corporation

Mr. Levin notes that the majority of these DCEs have been performed for nuclear units prior to cessation of operations. Commercial nuclear plant operators update decommissioning costs on a routine basis during plant operations to determine decommissioning funding requirements.

Mr. Levin also provides the table in Attachment 3 to this response, referencing whom he was employed by, and the cost estimating services he provided and/or participated in, for each nuclear unit identified above.

Response 3b:

Please see Response 2b.

Response 3c:

Please see Response 2c.

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Response to Question 3 (Continued)

Response 3d:

Please see Response 2d.

Response 3e:

Please see Response 2e.

Response 3f:

Please see Response 2f.

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Question 4

Page 4 of Mr. Levin’s testimony states that Mr. Levin has had the opportunity to develop and review decommissioning cost estimates for 40 commercial nuclear units.

- a. **Please clarify whether Mr. Levin has developed *and* reviewed the cost estimates for all 40 units, or whether in some cases he has reviewed cost estimates developed by others.**
- b. **Please provide a list of the commercial nuclear units for which Mr. Levin has developed decommissioning cost estimates.**

SDG&E Response:

Response 4a:

Mr. Levin has participated in the development of decommissioning cost estimates, in some instances, and participated in the review of decommissioning cost estimates developed by others, in other instances. Please see Attachment 3 for Mr. Levin’s role in the development and/or review of decommissioning cost estimates.

Response 4b:

Please see Attachment 3 for Mr. Levin’s role in the development and/or review of decommissioning cost estimates.

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Question 5

Page 4 of Mr. Levin’s testimony states, “the DCE generally conforms to the guidance for preparing decommissioning cost estimates provided by the NRC.” Please identify all ways in which the DCE does not conform to the NRC guidelines and explain the reasons for and the implications of each deviation.

SDG&E Response:

NRC guidance for preparing decommissioning cost estimates is found in Regulatory Guide 1.202.¹ The NRC

“...issues regulatory guides to describe and make available to the public methods that the NRC staff considers acceptable for use in implementing specific parts of the agency’s regulations, techniques that the staff uses in evaluating specific problems or postulated accidents, and data that the staff need in reviewing applications for permits and licenses. Regulatory guides are not substitutes for regulations, and compliance with them is not required.”²

Reg. Guide 1.202 Section 3 describes site-specific cost estimate content and format acceptable to NRC, for estimates required by the PSDAR. Based upon the DCE’s description of the methodology that was used to present the summary form results found in the DCE report, and the contents of the DCE report, Mr. Levin states that he finds that the DCE meets or exceeds all guidance found in Reg. Guide 1.202.

1. Regulatory Guide 1.202, “Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors,” U.S. Nuclear Regulatory Commission, February 2005.
2. Ibid, pg. 1.