# ATTACHMENT F

TESTIMONY OF MR. TODD SMITH AND ASSOCIATED EXHIBITS

# EXHIBIT No. YA-300

DIRECT TESTIMONY OF MR. TODD SMITH

YANKEE ATOMIC ELECTRIC COMPANY

### UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Yankee Atomic Electric Company

Docket No. ER\_\_\_\_\_

## DIRECT TESTIMONY OF TODD SMITH

)

## 1 I. INTRODUCTION

- 2 Q. Please state your name and business address.
- 3 A. My name is Todd Smith. My business address is TSSD Services, Inc., 79 Aviator
- 4 Place, Oakland, Maine 04963.
- 5
- 6 Q. By whom are you employed and in what capacity?
- 7 A. I am the President of TSSD Services, Inc. ("TSSD"), a professional consulting firm
- 8 that provides management and technical staff resources to the nuclear industry. Its
- 9 services pertain to all stages of the nuclear plant lifecycle, including decommissioning.
- 10 I am also the Director of Operations for Yankee Atomic Electric Company ("Yankee"
- 11 or the "Company"), as well as its sister companies, Connecticut Yankee Atomic
- 12 Power Company ("Connecticut Yankee") and Maine Yankee Atomic Power Company
- 13 ("Maine Yankee"). As Director of Operations, I am responsible for day-to-day
- 14 operations at each Yankee facility, including budget adherence.
- 15
- 16 Q. Please summarize your educational and professional background.
- 17 A. I graduated from Thomas College, earning a Bachelor of Science degree in
- 18 Accounting (1992) and, later, a Masters of Business Administration degree (1999).

1		I worked in the heavy construction industry for six years, including as a project cost
2		engineer for Cianbro Corporation, one of the largest construction and construction
3		services companies on the East Coast. As President of TSSD, I have extensive
4		experience in the nuclear decommissioning field. My career has included eighteen
5		years of work with the heavy construction industry, involving the tasks of construction
6		management, corporate management and project controls. For twelve years, I have
7		served as Executive Director of Business Operations, Business Manager, Project
8		Controls Manager, or Decommissioning Waste Manager at Yankee, Connecticut
9		Yankee and/or Maine Yankee.
10		
11	Q.	Have you previously testified before a regulatory commission?
12	A.	Yes. I presented testimony before this Commission on behalf of the Company in
13		Docket Nos. ER11-109-000 and ER06-249-000. I also presented testimony on behalf
14		of Maine Yankee in Docket Nos. ER08-1356-000 and ER04-55-000, and on behalf of
15		Connecticut Yankee in Docket Nos. ER11-101-000 and ER04-981-000.
16		
17	II.	PURPOSE OF TESTIMONY
18	Q.	What is the purpose of your testimony?
19	А.	Yankee is submitting an application to the Commission to reduce its wholesale rates to
20		reflect the combined effect of: (1) Yankee's receipt of a damage award in litigation
21		with the DOE, and the need to address the possible recovery of additional damages in
22		the future phases of litigation; and (2) a projected increase in decommissioning costs

1		due primarily to the extension of the period during which Yankee must store spent
2		nuclear fuel and high-level waste, as well as other revised cost estimates.
3		In my testimony I will present Yankee's new estimate of the costs of various
4		activities and items required to operate and subsequently dismantle and decontaminate
5		("D&D") the Company's independent spent fuel storage installation ("ISFSI"). I refer
6		to these costs collectively as "decommissioning costs" and to my analysis as the "2013
7		Estimate." Another Yankee witness, Ms. Carla Pizzella, Yankee's Vice President,
8		Chief Financial Officer and Treasurer, uses the new decommissioning cost estimate to
9		analyze the adequacy of funding for Yankee's Nuclear Decommissioning Trust
10		("NDT"). Finally, I note that the decommissioning estimate is subject to certain
11		assumptions, and variations in these assumptions could cause large changes in the
12		final costs that the Company may incur. The two other Yankee witnesses, Mr. Wayne
13		Norton and Ms. Pizzella, discuss these assumptions and the potential for changes to
14		the assumptions further in their testimony.
15		
16	Q.	Can you summarize your testimony?
17	A.	The 2013 Estimate is divided into two components: ISFSI operations and ISFSI
18		D&D. It projects a total cost of \$225.4 million for storing spent nuclear fuel and high-
19		level waste and ISFSI D&D for the 2013 to 2033 period as shown in Exhibit No. YA-
20		301. This total compares favorably to Yankee's previous estimate of the same costs,
21		which was performed in 2010 (the "2010 Estimate"), when the equivalent portions of
22		the two estimates are compared. The 2010 Estimate projected a total cost (including
23		escalation) of \$122 million for the period 2010-2022, as shown in Exhibit No. YA-

1		302. As I will explain, the 2013 Estimate covers a longer period, based on the
2		projected extension of the period during which Yankee will have to operate the ISFSI.
3		However, the two estimates can be compared for the period that they both cover,
4		namely 2010-2022. The combination of actual costs in 2010-2012 with the 2013
5		Estimate's forecast for 2013-2022 totals \$116 million, which is a decrease of \$6
6		million. Thus, on a comparable basis (i.e., comparing the portions of the two
7		estimates covering the same period $-2010$ to 2022), the 2013 Estimate is very close to
8		the 2010 Estimate; differing by less than 5 percent.
9		The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's
10		projection of \$122 million for a number of reasons. The primary reason for the
11		difference is that, based on DOE's delays in removing the spent fuel and high-level
12		waste, Yankee's operations are projected to extend an additional eleven years to 2033.
13		Extending Yankee's operations to 2033 increases the 2013 Estimate (including
14		escalation) to \$225.4 million, which is an increase of \$103.4 million. Other reasons
15		for the difference include the capital costs associated with new security requirements
16		expected to result from regulation changes being considered by the NRC, and the
17		incorporation of the new "site specific" ISFSI D&D cost estimate prepared by an
18		independent third-party, as required by recently adopted NRC regulation.
19		
20	II.	BACKGROUND
21	Q.	Can you provide some background regarding Yankee's decommissioning efforts?
22	A.	Yes. As explained more fully in Mr. Norton's testimony, on February 26, 1992,

23 Yankee's Board of Directors voted to permanently cease power operations at the Plant

1		and commence the process of decommissioning. D&D activities were undertaken
2		beginning in 1993, and were completed in 2007. Construction of the ISFSI was
3		completed in 1998. Transfer of spent fuel and Greater-Than-Class C ("GTCC") waste
4		to the storage canisters was completed in 2003. On August 10, 2007, the Nuclear
5		Regulatory Commission ("NRC") issued Yankee a fuel storage-only operating license
6		for the Plant. Yankee has safely and securely stored the spent fuel and GTCC waste
7		from the Plant in the ISFSI since that time.
8		Most of the legal and regulatory issues associated with the Plant's
9		decommissioning have been resolved by past proceedings and settlement agreements.
10		Thus, for example, under a 2006 settlement agreement, the recovery of the costs of the
11		decommissioning activities completed in 2007, including the D&D of the Plant, were
12		finalized. The 2006 settlement agreement also established how any net proceeds from
13		litigation against DOE for its delay in removing nuclear materials from the Plant site
14		shall be applied to Yankee costs. With the Plant D&D completed in 2007, Yankee's
15		principal remaining activities include the current operation of the ISFSI and the future
16		decommissioning of the ISFSI. And, its primary rate component is its
17		decommissioning charge to fund the NDT to cover the costs of these activities.
18		
19	Q.	When were Yankee's current decommissioning charges established?
20	A.	The Company's current decommissioning charges were established by a 2006
21		settlement, which also established a schedule of charges through 2014. In 2010,
22		Yankee submitted a filing to the Commission that included an updated

1		decommissioning estimate, which is the 2010 Estimate I mentioned earlier. However,
2		in that filing Yankee did not propose any change in its charges to fund the NDT.
3		The current decommissioning charges include charges of \$11.75 million
4		annually for the remainder of 2013 and 2014, for the purpose of funding ongoing spent
5		fuel/GTCC waste storage costs and the costs of remaining D&D activities, including
6		corporate dissolution, that will be required after DOE removes the spent fuel and
7		GTCC waste from the site.
8		
9	III.	2013 DECOMMISSIONING ESTIMATE
10	Q.	What are the key assumptions underlying the 2013 Estimate?
11	A.	The most important assumption underlying the 2013 Estimate is the projection that the
12		DOE will not remove Yankee's spent fuel and GTCC waste and the site will not be
13		fully decommissioned and remediated before 2033. As explained by Mr. Norton, the
14		2033 end-date was chosen based on the assumption that DOE would complete the
15		removal of spent fuel and GTCC waste from the Yankee site in 2031.
16		Another key assumption used in the 2013 Estimate is that DOE will bear the
17		cost of removing the GTCC waste, in addition to the spent nuclear fuel. The Company
18		believes that this is a DOE obligation under the Standard Contract. However, DOE
19		has contested this matter in litigation. In 2008, the Federal Circuit Court of Appeals
20		found that the proper valuation of GTCC waste disposal is an issue that must be
21		resolved in future proceedings, and that the Government need not "bear the cost of
22		GTCC waste disposal alone." Yankee Atomic Electric Co. v. U.S., 536 F.3d 1268,
23		1279 (2008). In 2010, the U.S. Court of Federal Claims similarly stated that "any

1		additional costs of GTCC disposal are reserved for future proceedings." Yankee
2		Atomic Electric Co. v. U.S., 94 Fed.Cl. 678, 721 n.47 (2010). Notwithstanding these
3		rulings, Yankee believes that it will ultimately prevail on this issue, and thus has
4		assumed in the 2013 Estimate that DOE will bear the cost of GTCC waste removal.
5		Obviously, if Yankee is required to pay a share of the costs of removal and disposal of
6		the GTCC waste, then its costs of decommissioning will increase.
7		Further, with the exception of new NRC ISFSI security requirements expected
8		to result from a pending rulemaking proceeding (discussed below), the 2013 Estimate
9		is based on current laws, regulations, and other mandates applicable to the Company's
10		decommissioning activities, including nuclear operations, nuclear waste handling,
11		nuclear security, and environmental remediation. Although there have been no major
12		changes in regulatory requirements since the 2010 Estimate, we cannot be assured that
13		this will remain the case over the entire storage period. Such mandates may change
14		over time, and the longer the time period over which storage and decommissioning
15		extend, the greater the chance that such changes may take place.
16		Ms. Pizzella and Mr. Norton provide further detail regarding the assumptions
17		underlying the 2013 Estimate, and discuss a number of uncertainties that may force
18		the Company to adjust these assumptions in the future. It is important to understand
19		that my testimony is based on these assumptions, and is therefore subject to the
20		uncertainties Ms. Pizzella and Mr. Norton identify.
21		
22	Q.	Describe the approach you took to prepare the 2013 Estimate.
23	A.	To prepare the 2013 Estimate, I reviewed the projections of the scope of work and

1	labor and material unit costs that formed the basis for the projections in the 2010
2	Estimate of costs for the fuel storage period, including D&D of the ISFSI in order to
3	determine whether these projections remain valid for purposes of the 2013 Estimate. I
4	performed the analysis in this manner because, with the completion of the physical
5	decommissioning of the Plant, Yankee has entered a steady state of operation that
6	consists of managing the spent fuel and GTCC waste storage on site. Because the
7	Plant is no longer operating, the volume of spent fuel and GTCC waste are constant.
8	Thus, absent any major changes in regulatory requirements, this steady state of
9	operation requires a relatively predictable scope of activities.
10	Likewise, the unit costs of performing these activities are relatively stable on a
11	constant dollar basis in the absence of any significant change in market conditions.
12	The same is true of ISFSI D&D: the constant dollar cost of decontaminating and
13	dismantling the ISFSI should not change if there has not been a change in the
14	regulatory requirements affecting the scope of that work, or a change in market
15	conditions affecting the costs. For example, if there has been no change in insurance
16	market conditions, the premium costs for Yankee to obtain insurance to cover the
17	same scope of work involved in decommissioning should not change. Thus, if there
18	has been no major change in regulatory requirements or market conditions affecting
19	ISFSI operations or D&D, the cost projections in the 2010 Estimate should remain
20	valid, once adjusted for escalation and the extended fuel storage term. In my
21	testimony, I accordingly focus on the portions of the scope of work where I have
22	identified changes in the scope of work or the cost of accomplishing the scope of
23	work.

1	Q.	How is the 2013 Estimate expressed?
2	A.	The 2013 Estimate of the scope and unit cost for completing decommissioning is
3		expressed in constant 2013 dollars; in other words, it assesses the price of goods and
4		services based on the value of a dollar in 2013.
5		
6	Q.	What is the constant dollar estimate used for?
7	А.	The constant dollar estimate is used as an input in Yankee's decommissioning funding
8		model, which also takes into account escalation over the projected period until final
9		decommissioning is completed as well as other factors; this produces the final estimate
10		that becomes the basis of Yankee's funding requirements and decommissioning
11		collections. Ms. Pizzella's testimony describes the development of the funding model.
12		
13	Q.	After your review of the 2010 projections of the scope of work and labor and material
14		unit costs, what did you conclude?
15	A.	Based on my review and analysis, I concluded that the scope of work and unescalated
16		unit costs projected in the 2010 Estimate for ISFSI operations and D&D remain
17		reasonable, with the exceptions that I will discuss. There are only a few significant
18		differences between the two estimates in terms of the scope of work. With the Plant
19		site decommissioning completed, the scope of both estimates is primarily limited to
20		the remaining fuel storage activities – i.e., ISFSI operations and D&D. While there
21		have been no major changes in the regulatory requirements affecting ISFSI operations
22		or ISFSI D&D, Yankee has determined, based on experience since the 2010 Estimate
23		was prepared, that it requires additional management resources to address regulatory

1		requirements. In addition, as I will discuss, the 2013 Estimate takes into account the
2		prospect that security costs will increase to comply with new requirements coming out
3		of a rulemaking currently pending before the NRC. As I will also discuss later in my
4		testimony, there have been a number of areas where I have identified changes in the
5		costs of accomplishing the scope of work reflected in the 2013 Estimate.
6		To be clear, I am not claiming that the nominal costs (i.e., the costs actually
7		charged in a particular year, expressed in the value of dollars existing in that year) of
8		labor and materials will stay the same over the next decade: these nominal costs will
9		undoubtedly increase with inflation. However, the real, constant-dollar costs of these
10		labor and materials projected in the 2010 Estimate remain a reasonable projection of
11		these costs today, when expressed in 2013 dollars to account for escalation since the
12		2010 Estimate was prepared, and taking into account the extended term of spent fuel
13		storage and the other factors I will discuss.
14		
15	Q.	How did you convert the costs in the 2010 Estimate and the 2013 Estimate to escalated
16		dollars?
17	A.	For the 2010 Estimate, I adjusted each of the cost projections, in 2010 constant dollars
18		by escalating them annually at an assumed rate of 2.5% per year to the year of
19		expenditure. For the 2013 Estimate, I used the actual costs for the period 2010 through
20		2012 and then similarly adjusted the cost projections in 2013 constant dollars for the
21		period 2013 through 2023 by 2.5% annually to the year of expenditure.
22		

1	Q.	How does the 2013 Estimate compare with the 2010 Estimate?
2	A.	The 2010 Estimate projected a total cost (including escalation) of \$122 million over
3		the 2010-2022 period. The combination of actual costs in 2010-2012 with the 2013
4		Estimate's forecast for 2013-2022 totals \$116 million, which is a decrease of \$6
5		million. Thus, on a comparable basis (i.e., comparing the portions of the two
6		estimates covering the same period $-2010$ to 2022), the 2013 Estimate is very close to
7		the 2010 Estimate; differing by less than 5 percent. Extending Yankee's operations to
8		2033 increases the 2013 Estimate (including escalation) to \$225.4 million, which is an
9		increase of \$103.4 million.
10		
11	Q.	What accounts for the difference between the total amount of the 2013 Estimate and
12		the 2010 Estimate?
12 13	A.	the 2010 Estimate? The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection
	A.	
13	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection
13 14	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that,
13 14 15	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that, based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's
13 14 15 16	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that, based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's operations are projected to extend an additional 11 years to 2033. Other reasons for
13 14 15 16 17	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that, based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's operations are projected to extend an additional 11 years to 2033. Other reasons for the difference include the capital costs associated with new security requirements
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> </ol>	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that, based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's operations are projected to extend an additional 11 years to 2033. Other reasons for the difference include the capital costs associated with new security requirements expected to result from regulation changes being considered by the NRC, and the
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> </ol>	A.	The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection of \$122 million for a number of reasons. The primary reason for the difference is that, based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's operations are projected to extend an additional 11 years to 2033. Other reasons for the difference include the capital costs associated with new security requirements expected to result from regulation changes being considered by the NRC, and the incorporation of the new "site specific" ISFSI D&D cost estimate prepared by an

1		I discuss each specific cost category below. First, I address the various
2		activities and cost categories associated with Yankee's operation of the ISFSI.
3		Second, I address activities and cost categories associated with the dismantlement and
4		decontamination of the Company's ISFSI.
5		
6	IV.	NEW ESTIMATE OF ISFSI OPERATION COSTS
7	Q.	Describe the type of expenses that Yankee expects to incur for ISFSI operations over
8		the next 20 years.
9	A.	ISFSI operations will continue until DOE removes the spent fuel and GTCC waste,
10		allowing for the decommissioning of the ISFSI. Yankee expects that the ISFSI
11		operating costs will continue to cover a number of categories, including costs for
12		insurance, labor, security, materials and supplies, miscellaneous expenses, outside
13		services, property taxes, regulatory fees, rentals and leases and utilities.
14		
15	Q.	Explain how Yankee projected insurance costs.
16	A.	The insurance cost estimate is based on an updated estimate of costs provided by
17		Yankee's insurance consultant, Marsh USA Inc., derived from the current contractual
18		terms. The total estimated cost of insurance for the period 2013-2033 is \$12,846,183.
19		The levels of insurance that Yankee procures for prudent business operations and
20		regulations have not materially changed since the 2010 Estimate. However, due to
21		more favorable insurance rates, there has been a significant reduction in projected
22		insurance costs. Namely, in the 2010 Estimate insurance costs were projected to be
23		\$14,792,743 for the period 2010-2022. As a result of the more favorable rates and

1		incorporating actual costs for 2010-2012, such costs are now projected to be only
2		\$6,999,238 for that same period. Based on my review, the new estimate of insurance
3		costs is reasonable.
4		
5	Q.	Please explain the labor estimate.
6	A.	The labor estimate consists of salaries and benefits to staff working in the areas of the
7		long term operations of the ISFSI (excluding contractor security staff, which is
8		discussed separately below). In preparing the estimate, Yankee reviewed the positions
9		held by current staff, and determined whether it plans to fill each position in the future
10		with Company employees or with contracted workers. The Company then forecasted
11		future staffing needs based on activities scheduled to occur during each year, and
12		determined the cost of each position based on existing labor rates. That review of
13		staffing needs revealed a need to add additional resources to manage Yankee's
14		compliance with regulatory requirements, especially those enforced by the NRC.
15		Experience has shown that the shift from power production to spent fuel storage
16		operations has not reduced the regulatory requirements with which Yankee must
17		comply to the extent projected in the 2010 Estimate. The 2013 Estimate includes
18		additional positions that the Company determined it needed to fill to maintain the
19		regulatory authorizations it needs to continue to operate the ISFSI and eventually to
20		decommission it. Namely, Yankee added three program managers and a licensing
21		engineer. All work part-time for Yankee and its sister companies, and each of the
22		program managers has specific areas of expertise (e.g., security and corrective action).
23		Yankee also added a Canister Relicensing Project Manager to manage the planning,

1		engineering and licensing activities to support the license renewal for Yankee and its					
2		sister companies, and to support industry efforts to implement Consolidated Interim					
3		Storage.					
4		The costs of each non-contractor position reflect the costs of employee					
5		benefits. Yankee's employee benefits include medical, dental and life insurance, as					
6		well as compensation costs such as payroll taxes. Medical and dental insurance costs					
7		are based on contracted costs for each type of insurance, with anticipated medical					
8		trends. Other benefits have been calculated based on the percentage of payroll that					
9		such benefits have historically represented.					
10		Based on this review, the 2013 Estimate for Labor - Non-Manual is					
11		\$42,784,821 for the period 2013-2033. This category of costs has increased from the					
12		2010 Estimate as a result of increased labor costs of operating and managing the					
13		ISFSI. In the 2010 Estimate, labor costs were projected to be \$14,711,378 for the					
14		period 2010-2022. As a result of the increase in labor costs and incorporating actual					
15		costs for 2010-2012, such costs are now projected to be \$20,887,076 for that same					
16		period.					
17							
18	Q.	Describe the estimate for the security costs, including new NRC regulations expected					
19		to increase security costs.					
20	A.	The security category includes the costs associated with "Labor – Security," which					
21		includes guarding the ISFSI through Yankee's current vendor, G4S. In preparing the					
22		2013 Estimate, Yankee calculated an estimate for a portion of the costs in this					
23		category based on review of the contract, rates under the contract, and the work that					

1	remains to be performed under the contract. Based on this review, Yankee estimates
2	the costs for this category to be \$74,172,018 for the period 2013-2033. Also, because
3	there have been no material changes to rates or scope of work, the 2013 Estimate is
4	comparable to the 2010 Estimate with respect to Labor – Security costs. In the 2010
5	Estimate, these costs were projected to be \$33,431,820 for the period 2010-2022. In
6	the 2013 Estimate, the costs are now projected to be \$32,927,759 for that same period.
7	In addition to the Labor – Security costs, the 2013 Estimate projects an
8	increase in the costs of maintaining security at Yankee's ISFSI in compliance with
9	regulations that the NRC's is considering in a pending rulemaking proceeding. The
10	NRC has initiated a rulemaking to revise the existing security requirements in its
11	regulations that apply during the storage of spent nuclear fuel and high-level waste at
12	ISFSIs. These new regulations are expected to impose new security requirements on
13	Yankee's ISFSI operations. The NRC's specific objectives for this rulemaking are to:
14	(i) update the ISFSI security regulations to improve the consistency and clarity to
15	reflect current NRC thinking on security requirements, and to incorporate lessons
16	learned from recent security inspections and evaluations conducted; (ii) to make
17	generically applicable requirements similar to those imposed on ISFSI licensees by the
18	post-9/11 security orders; and (iii) to update ISFSI security regulations using a risk-
19	informed and performance based structure. See Draft Technical Basis for a
20	Rulemaking to Revise the Security Requirements for Facilities Storing Spent Nuclear
21	Fuel and High-Level Radioactive Waste, Revision 1, NRC-2009-0558 (Dec. 16, 2009).
22	In the 2013 Estimate, Yankee has included the projected costs of these new
23	regulations in the "Outside Services - ISFSI OP" category, and estimates these costs to

1		be \$20,474,026 for the period 2013-2033. In the 2010 Estimate, these costs were
2		projected to be \$8,248,052 for the period 2010-2022. In the 2013 Estimate, as a result
3		of the new security requirements and including actuals for 2010-2012, the costs are
4		now projected to be \$12,497,906 for that same period.
5		
6	Q.	Describe the estimate for the materials and supplies category.
7	A.	The materials and supplies category is drawn from the projected costs for consumables
8		to be used during the remainder of operations onsite. Such costs include, among other
9		things, fuel for machinery, office supplies, and computer supplies. Costs are based on
10		a projection of future costs on an item-by-item basis. In the 2013 Estimate, these costs
11		are projected to be \$1,948,622 for the period 2013-2033. They have remained
12		relatively static from the 2010 Estimate. In the 2010 Estimate, these costs were
13		projected to be \$1,232,328 for the period 2010-2022. In the 2013 Estimate, the costs
14		are now projected to be \$1,179,544 for that same period.
15		
16	Q.	Explain the miscellaneous expenses identified in the 2013 Estimate.
17	A.	This category consists of costs of travel, meals, operation and maintenance of vehicles
18		and equipment, and rentals and leases. The Company based its 2013 Estimate of these
19		costs on actual costs prescribed by its contracts over the period until 2033, or on input
20		from the provider of the service or responsible Company manager. The 2013 Estimate
21		for these costs is \$2,156,833 for the period 2013-2033. The estimate of these costs has
22		decreased since the 2010 Estimate. In the 2010 Estimate, these costs were projected to
23		be \$2,160,945 for the period 2010-2022. In the 2013 Estimate, the costs are now

1		projected to be \$1,078,208 for that same period. The primary reason for this decrease
2		is due to a revised estimate for non-manual travel expenses. Yankee was conservative
3		in its 2010 non-manual travel expenses estimate. The current estimate reflects
4		Yankee's experience with these expenses
5		
6	Q.	Explain how Yankee projected the costs of outside legal services.
7	A.	The forecast for the cost of legal services was provided by Company's counsel, with
8		input from our outside litigation attorneys. It accounts for anticipated legal matters
9		such as the DOE litigation and upcoming rate cases. The 2013 Estimate of these costs
10		is \$11,729,783. Compared to the 2010 Estimate, there is a significant reduction in the
11		estimate for these costs because of improved efficiencies associated with the DOE
12		litigation process. Namely, in the 2010 Estimate, these costs were projected to be
13		\$9,400,011 for the period 2010-2022. In the 2013 Estimate, as a result of the
14		streamlined DOE litigation processes and taking into account actual costs for 2010-
15		2012, the costs are now projected to be \$7,412,722 for that same period. Of course,
16		delays in current litigation, or unforeseen litigation arising in the future could change
17		this portion of the estimate.
18		
19	Q.	Explain how Yankee projected the costs of outside services for administrative and
20		general for the 2013 Estimate.
21	A.	Yankee estimated the administrative and general ("A&G") costs required to support
22		operation of the Company during the fuel storage period by projecting its current
23		costs, and attempting to identify any changes that would increase the level of these

1		costs (when adjusted for inflation). Yankee based its 2013 Estimate of these costs on					
2		actual costs prescribed by its contracts over the period until 2033, or on input from the					
3		provider of the service or responsible Company manager. Yankee also compared its					
4		estimate of A&G costs with the A&G costs incurred by Maine Yankee and					
5		Connecticut Yankee in connection with a similar type and scope of work. The 2013					
6		Estimate of these costs is \$15,733,421. The new estimate is not significantly higher					
7		than the 2010 Estimate. In the 2010 Estimate, these costs were projected to be					
8		\$8,898,249 for the period 2010-2022. In the 2013 Estimate, the costs are now					
9		projected to be \$9,663,638 for that same period.					
10							
11	Q.	Explain how Yankee projected the cost of property taxes.					
12	A.	The Company pays property taxes to the Town of Rowe, Massachusetts, which is the					
13		location of the ISFSI. Yankee is subject to the town's general property tax assessment					
14		and tax rates. The Town has only one other significant taxpaying entity, thus the					
15		Company's ISFSI represents a significant portion of the total assessed property values.					
16		The Company assumed in the 2013 Estimate that property taxes will continue for the					
17		remainder of the ISFSI's lifetime, and estimates these costs to total \$6,805,473 for the					
18		period 2013-2033. Obviously, such things as major changes in property valuations or					
19		tax rates could cause this estimate to change. The property tax estimate in the 2010					
20		Estimate was lower than the current estimate. In the 2010 Estimate, these costs were					
21		projected to be \$2,159,042 for the period 2010-2022. In the 2013 Estimate, the costs					
22		are now projected to be \$3,430,416 for that same period. This increase reflects the					

1		fact that the property re-valuations conducted by the Town of Rowe resulted in
2		increased annual tax assessments for the Company.
3		
4	Q.	Explain how Yankee estimated its costs for regulatory fees.
5	A.	Regulatory Fees consist of the amounts paid to the federal and state agencies that
6		oversee Yankee's activities, including the Environmental Protection Agency, the
7		FERC, the NRC, the Massachusetts Department of Environmental Protection, the
8		Massachusetts Department of Public Health, and the Massachusetts Department of
9		Public Utilities. The 2013 Estimate projects \$11,290,815 in regulatory fees for the
10		period 2013-2033. These costs have remained relatively static. In the 2010 Estimate,
11		these costs were projected to be \$5,307,349 for the period 2010-2022. That
12		projection has decreased in the 2013 Estimate to \$4,254,845 for that same period.
13		
14	Q.	Describe the costs that appear in the rentals and leases category in the 2013 Estimate.
15	A.	This category consists of the costs Yankee incurs to obtain items such as office space,
16		furniture, and equipment. Under the 2013 Estimate, Yankee projects that its costs for
17		rentals and leases will be insignificant, based on current contracts and projected needs.
18		Consequently, Yankee does not track these costs separately. Instead, they are included
19		in the miscellaneous expenses category for purposes of the 2013 Estimate. The 2010
20		Estimate projected \$367,197 in rentals and leases costs for the period 2010-2022.
•		

21

1 Q. Please explain how Yankee projected utility costs.

2	A.	Similar to rentals and leases, utility costs are based on current contracts and projected				
3		needs for water, electricity and telephone service. The Company estimates these costs				
4		to total \$1,886,443 for the period 2013-2033. The estimate for utility costs in the 2010				
5		Estimate was significantly higher than the current estimate. In the 2010 Estimate,				
6		these costs were projected to be \$2,673,175 for the period 2010-2022. In the 2013				
7		Estimate, the costs are now projected to be only \$964,644 for that same period. This				
8		reduction is due primarily to a reduced estimate of Yankee's purchased power costs.				
9						
10	Q.	Does the 2013 Estimate include a contingency allowance? If so, please describe the				
11		contingency allowance.				
12	A.	Yes. The 2013 Estimate includes a contingency allowance. The line item cost				
13		estimates described elsewhere in this testimony consider work performed under				
14		normal conditions, with no complications such as inclement weather or equipment				
15		problems, among others. A contingency calculation is necessary to allow for the				
16		likely occurrence of such disruptions. Contingency factors in the 2013 Estimate were				
17		derived from Yankee's experience and assessments of future risk, and applied to total				
18		costs. Similar to the 2010 Estimate, Yankee used a 5% contingency for ISFSI				
19		operations and a 10% contingency for the final three years of the estimate which				
20		includes ISFSI D&D. The 2013 Estimate includes a contingency allowance of				
21		\$13,138,348 for the period 2013-2033. The new contingency allowance reflects a				
22		negligible increase from the 2010 Estimate. The contingency allowance in the 2010				

1		Estimate was \$6,352,180 for the period 2010-2022, and in the 2013 Estimate it is
2		\$6,563,953 for that period.
3		It is important to remember, however, that contingency factors such as the one
4		included in the 2013 Estimates can only account for minor difficulties, delays and
5		disruptions. That is, they reflect the certainty that any project involving a facility's
6		operation and dismantlement over a lengthy time period will encounter circumstances
7		that cause costs to deviate from projected levels, even though those specific
8		circumstances cannot be predicted or identified in advance. Contingency allowances
9		cannot address the larger uncertainties discussed by Ms. Pizzella or Mr. Norton, such
10		as general inflation, extended delays by the DOE, or industry-wide regulatory
11		changes.
12		
13	V.	NEW ESTIMATE OF THE ISFSI D&D COSTS
14	Q.	What are the tasks associated with ISFSI D&D?
15	A.	After DOE removes the spent fuel and GTCC waste, it will be necessary for Yankee to
16		dismantle and decontaminate the ISFSI. D&D tasks include engineering, site
17		preparations, ISFSI remediation, removal of major equipment, demolition of
18		remaining portions of the waste containment structure, disposal of low level waste,
19		decontamination and environmental restoration of the site, conducting a final radiation
20		survey, preparation of a final dismantling program report for the NRC, and general
21		corporate, regulatory and administrative costs.

Q. How were the costs of these D&D activities projected for purposes of the 2013
 2 Estimate?

3	A.	The NRC now requires each licensee operating an ISFSI to commission a third-party			
4		to prepare an estimate of the cost of completing the ISFSI D&D. Yankee			
5		commissioned such an estimate, which was completed by Knight Cost Engineering			
6		Services, LLC ("KCES") in December of 2012. The D&D estimate is provided as			
7		Exhibit No. YA-303. The D&D estimate was prepared in accordance with the			
8		guidelines provided in Regulatory Guide 1.202 and NUREG-1713. In addition, it			
9		takes into account the guidelines identified in NUREG-1757. These are NRC			
10		regulations and guidelines addressing the requirements for the preparation of ISFSI			
11		D&D cost estimates.			

12 Two types of costs were determined in the D&D estimate: (i) activity costs; 13 and (ii) level of effort costs. All costs were current to July, 2012. The activity costs 14 were developed utilizing a unit cost factor approach. Site material quantities for 15 concrete, steel and equipment where developed from site specific drawings. 16 Productivity factors were applied to these quantities to determine activity durations. 17 Labor crews were developed and applied to the material quantities to determine labor 18 costs and person-hours. The activity durations were used to develop a project 19 schedule. The level of effort costs, such as equipment rental and General Contractor 20 ("GC") staff, were developed based on the project schedule duration. A rental 21 equipment file was developed for the construction effort. The GC staff was assumed 22 to be on-site for the duration of the project.

23

1	Q.	What assumptions were used in the preparation of the D&D estimate?				
2	А.	KCES used a number of assumptions in preparing the D&D estimate. These				
3		assumptions, which were based on the most current decommissioning methodologies				
4		and site-specific considerations, include the following. Component quantities were				
5		developed from actual plant listings. Concrete volumes were developed from plant				
6		drawings. The oversight staff was assumed to be the similar size and configuration as				
7		it is today, with staff positions and costs at July, 2012 salary and benefit levels.				
8		Subcontractor base labor rates and fringe benefits were taken from the 2012 R. S.				
9		Means Heavy Construction Cost Data and adjusted to Massachusetts based on the City				
10		Cost Indexes for Pittsfield, MA. Activity labor costs did not include any allowance				
11		for delays between activities, nor was there any cost allowance for craft labor retained				
12		on-site while waiting for work to become available. All skilled laborers will be				
13		supplied locally and hired by the GC. Transportation costs were based on actual				
14		mileage from Yankee to the Studsvik processing facility in Memphis, Tennessee. The				
15		ISFSI concrete pad, Vertical Concrete Cask ("VCC") exterior concrete and VCC liner				
16		steel were assumed to be Class A waste to be disposed of at the Studsvik processing				
17		facility in Tennessee. A disposal rate of \$0.13 per pound was used, based on				
18		information provided by Studsvik. A number of buildings will be disposed of as clean				
19		waste in a local landfill at a disposal rate of \$91.80 per ton, based on information				
20		provided in the 2012 R. S. Means Building Construction Cost Data. All Multi				
21		Purpose Canisters ("MPCs") containing both spent fuel and GTCC waste will have				
22		been removed from site prior to the start of D&D activities. Property taxes were				
23		included at the cost of \$200,000 per year, and fees were included at the current cost of				

1		\$325,000 per year. Insurance and legal costs were included at the current cost of
2		\$631,000 per year and \$200,000 per year, respectively. The D&D activities will be
3		performed under the current regulations. The removal of the pad and concrete
4		overpacks will be performed in Tyvek coveralls. No subsurface material is assumed
5		to require remediation regarding radionuclides.
6		
7	Q.	What was the total cost of the D&D estimate?
8	A.	KCES determined that the total D&D cost including contingency is \$9.8 million,
9		which includes \$8.5 million for radiological removal and \$1.3 million for non-
10		radiological removal.
11		
12	Q.	How did you use this third-party ISFSI D&D estimate in connection with the
13		preparation of the overall 2013 Estimate?
14	A.	I used the KCES estimate of the GC costs, which are the costs of the hands-on D&D
15		activities. These costs total \$8,987,978, and represent approximately two-thirds of the
16		total KCES D&D estimate. The remaining costs, which are not related to the GC
17		costs, basically comprise A&G and other corporate costs. These costs are represented
18		differently in the overall estimate of decommissioning costs. Consequently, I prepared
19		my own projections of those costs, and relied on the KCES estimate as a check on and
20		support for my projections. With respect to these costs, my projections and the KCES
21		estimate are essentially identical.

22

1 <b>\</b>	/ <b>I</b> .	ESCAI	LATIC	ON R.	ATE
------------	--------------	-------	-------	-------	-----

2	Q.	You explained earlier that the NDT funding analysis takes into account escalation in
3		decommissioning costs after 2013. Do you have a recommendation regarding a
4		reasonable escalation rate?
5	А.	Yes. I recommend that the NDT funding analysis use an escalation rate of 2.5% per
6		year. This is the same escalation rate that was applied to the 2010 Estimate to develop
7		the 2010 funding schedule.
8		
9	Q.	What is your basis for this recommendation?
10	A.	My recommendation to use 2.5% as the annual escalation rate in the Yankee funding
11		analysis is based on several factors. First, a significant portion of the Company's costs
12		of ISFSI operations are incurred under long-term contracts (i.e., contracts with a
13		duration of 3 to 5 years) under which the pricing reflects 2.5% annual escalation.
14		Unlike projections of general inflation rates, which can be open to debate, these
15		contracts leave no doubt that a significant portion of Yankee's costs will escalate at a
16		2.5% annual rate. This fact makes it reasonable and appropriate to use a 2.5% annual
17		inflation assumption in Yankee's decommissioning funding model. Further, the 2.5%
18		escalation rate falls below the long-term CPI average of 3.4% since 1980, as shown in
19		Exhibit No. YA-302.
20		
21	Q.	Thank you. I have no further questions at this time.

#### UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Yankee Atomic Electric Company ) Docket No. ER13- -000

## DECLARATION OF TODD SMITH

I depose and state under penalty of perjury that the foregoing exhibits were prepared or assembled by me or under my direction, and that I have read the foregoing questions and answers labeled as my testimony: that if asked the same questions my answers in response would be as shown; and that the facts contained in my answers are true to the best of my knowledge, information, and belief.

Todd Smith

# EXHIBIT No. YA-301

2013 DECOMMISSIONING COST ESTIMATE

## YANKEE ATOMIC ELECTRIC COMPANY 2013 DECOMMISSIONING ESTIMATE

(Escalated 2013 Dollars)

Cost Categories	Costs 2013 - 2033
Contingency	\$13,138,348
Insurance	\$12,846,183
Labor - Non-Manual	\$42,784,821
Labor - Security	\$74,172,018
Materials & Supplies	\$1,948,622
Miscellaneous	\$2,156,833
Outside Services - A&G	\$15,733,421
Outside Services - Fuel Loading	\$1,487,382
Outside Services - ISFSI OP's	\$20,474,026
Outside Services - Legal	\$11,729,783
Outside Services - NON-RAD D&D of ISFSI	\$1,220,487
Outside Services - RAD D&D of ISFSI	\$7,767,491
Property Taxes	\$6,805,473
Regulatory Fees	\$11,290,815
Utilities	\$1,886,443
Grand Total	\$225,442,145

## 2013-2033 Summary (UNESCALATED)

	Data										
FERC Summary	Sum of 2013	Sum of 2014	Sum of 2015	Sum of 2016	Sum of 2017	Sum of 2018	Sum of 2019	Sum of 2020	Sum of 2021	Sum of 2022	Sum of 2023
Contingency	\$357,690	\$343,148	\$465,028	\$500,680	\$514,704	\$364,704	389,704	\$377,204	\$364,704	\$364,704	\$364,704
Insurance	\$431,000	\$537,667	\$431,000	\$431,000	\$431,000	\$431,000	431,000	\$431,000	\$431,000	\$431,000	\$431,000
Labor - Non-Manual	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750
Labor - Security	\$2,380,000	\$2,380,000	\$2,618,000	\$2,879,800	\$3,167,780	\$3,167,780	3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780
Materials & Supplies	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	75,000	\$75,000	\$75,000	\$75,000	\$75,000
Miscellaneous	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	80,950	\$80,950	\$80,950	\$80,950	\$80,950
Outside Services - A&G	\$528,100	\$720,600	\$776,850	\$1,478,100	\$1,470,600	\$470,600	470,600	\$470,600	\$470,600	\$470,600	\$470,600
Outside Services - Fuel Loading	\$0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$C	) \$0	\$0
Outside Services - ISFSI OP's	\$438,000	\$548,000	\$2,548,000	\$2,548,000	\$2,548,000	\$548,000	548,000	\$548,000	\$548,000	\$548,000	\$548,000
Outside Services - Legal	\$900,000	\$200,000	\$450,000	\$200,000	\$200,000	\$200,000	700,000	\$450,000	\$200,000	\$200,000	\$200,000
Outside Services - NON-RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$C	) \$0	\$0
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$C	) \$0	\$0
Property Taxes	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	260,000	\$260,000	\$260,000	\$260,000	\$260,000
Regulatory Fees	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	390,000	\$390,000	\$390,000	\$390,000	\$390,000
Utilities	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	70,000	\$70,000	\$70,000	\$70,000	\$70,000
Grand Total	\$7,511,490	\$7,206,115	\$9,765,578	\$10,514,280	\$10,808,784	\$7,658,784	8,183,784	\$7,921,284	\$7,658,784	\$7,658,784	\$7,658,784

## 2013-2033 Summary (UNESCALATED)

											Sum of Totals
FERC Summary	Sum of 2024	Sum of 2025	Sum of 2026	Sum of 2027	Sum of 2028	Sum of 2029	Sum of 2030	Sum of 2031	Sum of 2032	Sum of 2033	2013 - 2033
Contingency	\$364,704	\$402,204	\$364,704	\$364,704	\$364,704	\$364,704	\$806,158	\$826,408	\$1,055,378	\$514,798	\$9,835,440
Insurance	\$431,000	\$431,000	\$431,000	\$431,000	\$431,000	\$431,000	\$431,000	\$431,000	\$431,000	\$1,054,000	\$9,780,667
Labor - Non-Manual	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,600,750	\$1,620,750	\$1,715,750	\$1,024,750	\$33,174,750
Labor - Security	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$3,167,780	\$500,000	\$0	\$58,274,500
Materials & Supplies	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$75,000	\$20,000	\$1,520,000
Miscellaneous	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	\$80,950	\$96,950	\$38,700	\$1,673,700
Outside Services - A&G	\$470,600	\$470,600	\$470,600	\$470,600	\$470,600	\$470,600	\$478,100	\$470,600	\$426,850	\$577,530	\$12,574,530
Outside Services - Fuel Loading	\$0	\$0	\$0	\$0	\$0	\$0	\$260,000	\$700,000	\$0	\$0	\$960,000
Outside Services - ISFSI OP's	\$548,000	\$548,000	\$548,000	\$548,000	\$548,000	\$548,000	\$548,000	\$548,000	\$548,000	\$75,000	\$16,925,000
Outside Services - Legal	\$200,000	\$950,000	\$200,000	\$200,000	\$200,000	\$200,000	\$700,000	\$450,000	\$200,000	\$1,600,000	\$8,800,000
Outside Services - NON-RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$763,449	\$0	\$763,449
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4,858,781	\$0	\$4,858,781
Property Taxes	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$260,000	\$100,000	\$5,300,000
Regulatory Fees	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	\$390,000	\$608,000	\$598,000	\$8,616,000
Utilities	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$70,000	\$60,000	\$1,460,000
Grand Total	\$7,658,784	\$8,446,284	\$7,658,784	\$7,658,784	\$7,658,784	\$7,658,784	\$8,867,738	\$9,090,488	\$11,609,158	\$5,662,778	\$174,516,816

## Summary 2013 - 2033 (ESCALATED)

	Data										
FERC Summary	Sum of 2013	Sum of 2014	Sum of 2015	Sum of 2016	Sum of 2017	Sum of 2018	Sum of 2019	Sum of 2020	Sum of 2021	Sum of 2022	Sum of 2023
Contingency	\$357,690	\$351,727	\$488,570	\$539,178	\$568,137	\$412,629	\$451,937	\$448,377	\$444,356	\$455,465	\$466,852
Insurance	\$431,000	\$551,109	\$452,819	\$464,140	\$475,743	\$487,637	\$499,828	\$512,324	\$525,132	\$538,260	\$551,716
Labor - Non-Manual	\$1,600,750	\$1,640,769	\$1,681,788	\$1,723,833	\$1,766,928	\$1,811,102	\$1,856,379	\$1,902,789	\$1,950,358	\$\$1,999,117	\$2,049,095
Labor - Security	\$2,380,000	\$2,439,500	\$2,750,536	\$3,101,230	\$3,496,636	\$3,584,052	\$3,673,654	\$3,765,495	\$3,859,632	\$3,956,123	\$4,055,026
Materials & Supplies	\$75,000	\$76,875	\$78,797	\$80,767	\$82,786	\$84,856	\$86,977	\$89,151	\$91,380	\$93,665	\$\$96,006
Miscellaneous	\$80,950	\$82,974	\$85,048	\$87,174	\$89,354	\$91,587	\$93,877	\$96,224	\$98,630	\$101,095	\$103,623
Outside Services - A&G	\$528,100	\$738,615	\$816,178	\$1,591,752	\$1,623,267	\$532,441	\$545,752	\$559,396	\$573,380	\$587,715	\$602,408
Outside Services - Fuel Loading	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Outside Services - ISFSI OP's	\$438,000	\$561,700	\$2,676,993	\$2,743,917	\$2,812,515	\$620,012	\$635,512	\$651,400	\$667,685	\$684,377	\$701,486
Outside Services - Legal	\$900,000	\$205,000	\$472,781	\$215,378	\$220,763	\$226,282	\$811,785	\$534,909	\$243,681	\$249,773	\$\$256,017
Outside Services - NON-RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	<b>\$0</b>
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	<b>\$0</b>
Property Taxes	\$260,000	\$266,500	\$273,163	\$279,992	\$286,991	\$294,166	\$301,520	\$309,058	\$316,785	\$\$324,704	\$332,822
Regulatory Fees	\$390,000	\$399,750	\$409,744	\$419,987	\$430,487	\$441,249	\$452,280	\$463,587	\$475,177	\$487,057	\$499,233
Utilities	\$70,000	\$71,750	\$73,544	\$75,382	\$77,267	\$79,199	\$81,179	\$83,208	\$85,288	\$\$87,420	\$89,606
Workmans Compensation											
Grand Total	\$7,511,490	\$7,386,268	\$10,259,960	\$11,322,730	\$11,930,875	\$8,665,211	\$9,490,680	\$9,415,917	\$9,331,485	\$9,564,772	\$9,803,891

## Summary 2013 - 2033 (ESCALATED)

											Sum of Totals
FERC Summary	Sum of 2024	Sum of 2025	Sum of 2026	Sum of 2027	Sum of 2028	Sum of 2029	Sum of 2030	Sum of 2031	Sum of 2032	Sum of 2033	2013 - 2033
Contingency	\$478,523	\$540,920	\$502,748	\$515,317	\$528,200	\$541,405	\$1,226,665	\$1,288,914	\$1,687,180	\$843,556	\$13,138,348
Insurance	\$565,509	\$579,647	\$594,138	\$608,992	\$624,217	\$639,822	\$655,817	\$672,213	\$689,018	\$1,727,102	\$12,846,183
Labor - Non-Manual	\$2,100,323	\$2,152,831	\$2,206,652	\$2,261,818	\$2,318,363	\$2,376,322	\$2,435,730	\$2,527,817	\$2,742,884	\$1,679,172	\$42,784,821
Labor - Security	\$4,156,402	\$4,260,312	\$4,366,820	\$4,475,990	\$4,587,890	\$4,702,587	\$4,820,152	\$4,940,656	\$799,325	\$0	\$74,172,018
Materials & Supplies	\$98,406	\$100,867	\$103,388	\$105,973	\$108,622	\$111,338	\$114,121	\$116,974	\$119,899	\$32,772	\$1,948,622
Miscellaneous	\$106,213	\$108,869	\$111,590	\$114,380	\$117,240	\$120,171	\$123,175	\$126,254	\$154,989	\$63,414	\$2,156,833
Outside Services - A&G	\$617,468	\$632,905	\$648,727	\$664,945	\$681,569	\$698,608	\$727,486	\$733,975	\$682,384	\$946,350	\$15,733,421
Outside Services - Fuel Loading	\$0	\$0	\$0	\$0	\$0	\$0	\$395,621	\$1,091,761	\$0	\$0	\$1,487,382
Outside Services - ISFSI OP's	\$719,023	\$736,999	\$755,424	\$774,310	\$793,667	\$813,509	\$833,847	\$854,693	\$876,060	\$122,896	\$20,474,026
Outside Services - Legal	\$262,417	\$1,277,644	\$275,702	\$282,595	\$289,660	\$296,901	\$1,065,133	\$701,846	\$319,730	\$2,621,786	\$11,729,783
Outside Services - NON-RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,220,487	\$0	\$1,220,487
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$7,767,491	\$0	\$7,767,491
Property Taxes	\$341,143	\$349,671	\$358,413	\$367,373	\$376,558	\$385,971	\$395,621	\$405,511	\$415,649	\$163,862	\$6,805,473
Regulatory Fees	\$511,714	\$524,507	\$537,619	\$551,060	\$564,836	\$578,957	\$593,431	\$608,267	\$971,979	\$979,893	\$11,290,815
Utilities	\$91,846	\$94,142	\$96,496	\$98,908	\$101,381	\$103,915	\$106,513	\$109,176	\$111,906	\$98,317	\$1,886,443
Workmans Compensation											\$0
Grand Total	\$10,048,988	\$11,359,313	\$10,557,718	\$10,821,661	\$11,092,203	\$11,369,508	\$13,493,312	\$14,178,059	\$18,558,982	\$9,279,121	\$225,442,145

# EXHIBIT No. YA-302

COMPARISON OF 2010 AND 2013 ESTIMATE

# 2013 Estimates Yankee Atomic Comparison to 2010 Estimate

Exhibit No. YA-302

		<b>A</b>			
		2010 Estimate		2013 Estimate	
	2010			10-2012 Actuals 2013-22	Comments
Categories for FERC Summary		0-22 Escalated (2.5%)		Estimate Escalated	Comments
Contingency	\$	6,352,180	\$	6,563,953	
Insurance	\$	14,792,743	\$	6,999,238	More Favorable Insurance Rates
Labor - Non-Manual	\$	14,711,378	\$	20,887,076	Revised Labor Costs to Manage ISFSI's
Labor - Security	\$	33,431,820	\$	32,927,759	
Materials & Supplies	\$	1,232,328	\$	1,179,544	
Miscellaneous	\$	2,160,945	\$	1,078,208	
Outside Services - A&G	\$	8,898,249	\$	9,663,638	
Outside Services - Decom	\$	11,830,660	\$	7,983,741	ISFSI DECOM estimate updated in 2012
Outside Services - ISFSI OP's	\$	8,248,052	\$	12,497,906	2013-2023 estimate includes capital expenditures associated with pending new security regulations
Outside Services - Legal	\$	9,400,011	\$	7,412,722	Streamlined DOE Litigation
Property Taxes	\$	2,159,042	\$	3,430,416	č
Regulatory Fee's	\$	5,307,349	\$	4,254,845	
Rentals & Leases	\$	367,197	\$	-	
Utilities	\$	2,673,175	\$	964,644	Revised Estimate for Purchased Power
Grand Total	\$	121,565,127	\$	115,843,689	
Footnotes:					
1 2010-2012 Actuals are \$6.3 Millio	on und	ler 2010 Estimate Bu	døe	t for the same time period	4

1. 2010-2012 Actuals are \$6.3 Million under 2010 Estimate Budget for the same time period

## EXHIBIT No. YA-303

DECOMMISSIONING STUDY OF THE YANKEE ROWE INDEPENDENT SPENT FUEL STORAGE INSTALLATION

KNIGHT COST ENGINEERING SERVICES, LLC DECEMBER, 2012

# Decommissioning Study of the Yankee Rowe Independent Spent Fuel Storage Installation

Prepared for Yankee Atomic Power Company

Knight Cost Engineering Services, LLC December, 2012

#### **TABLE OF CONTENTS**

1.0	INTRODUCTION	3
2.0	SUMMARY	4
3.0	DECOMMISSIONING COST ESTIMATING METHODOLOGIES	7
4.0	ASSUMPTIONS	8
5.0	SCHEDULES	10
6.0	PROJECT MANAGEMENT	12
	6.1 UTILITY STAFF	12
	6.2 DECOMMISSIONING GENERAL CONTRACTOR	12
	6.3 SECURITY	13
7.0	REFERENCES	14
AP	PENDIX A	15

#### **1.0 INTRODUCTION**

The purpose of this study is to identify the costs associated with the decommissioning of the Yankee Rowe (YR) Independent Spent Fuel Storage Installation (ISFSI). This estimate includes only the structures, systems and land within the NRC licensed area. The YR ISFSI is located in the South East portion of the former reactor site. The NAC-MPC fuel storage and transport canister system chosen by YR is licensed by the NRC for both storage and transportation.

There are 16 dry storage casks on the 50 by 180-foot, three-foot-thick concrete pad at the YR ISFSI. Fifteen of the casks contain the 533 spent fuel assemblies and one cask stores sections of the reactor vessel internals that are classified as Greater Than Class C (GTCC) waste. Each vertical concrete cask has a three and a half-inch steel liner surrounded by 21 inches of reinforced concrete. The entire dry storage process -- procuring materials, fabricating the fuel containers, constructing the storage facility and transferring spent fuel was completed in June 2003.

#### 2.0 SUMMARY

Decommissioning is the safe removal of a facility or site from service and the reduction of radioactivity to a level that permits either the release of the property for unrestricted use and NRC license termination; or a restricted release of the property and NRC license termination. This estimate includes all costs incurred to release the property for unrestricted use.

On June 17, 2011, the NRC published a final rule amending its regulations to improve decommissioning planning. The rule will become effective on December 17, 2012 and requires compliance by March 31, 2013. This rule will require licensees to report additional details in their decommissioning cost estimate. To assist in the implementation of the new rule, the NRC issued NUREG-1757, "Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping and Timeliness."

NUREG-1757 does not apply to licensees under 10CFR Part 50 nor does it eliminate the need to follow Regulatory Guide 1.202 or NUREG-1713. It does provide additional information to support the development of the cost estimate. This cost estimate was prepared in accordance with the guidelines provided in RG 1.202 and NUREG-1713. In addition, it does take into account the guidelines identified in NUREG-1757.

NUREG-1757 specifies that a contingency of 25% is to be included in the estimate. This estimate takes exception to this contingency level for two reasons. First, the estimate is conservative in that the entire storage pad, concrete overpacks and overpack liners are assumed to be disposed of as potentially contaminated. Second, the YR site has recently been successfully decommissioned. Many of the key personnel involved in that project remain at the YR ISFSI. The lessons learned from that project will be incorporated in the YR ISFSI decommissioning. For this reason it is felt that a 10% contingency is adequate to cover unknown and unplanned occurrences.

The total cost including contingency is **\$9.8 million**, **\$8.5** million for radiological removal and **\$1.3** million for non-radiological removal. Table 2-1 provides a summary of costs. Cost details are provided in Appendix A

#### TABLE 2-1 SUMMARY OF COSTS

	Tota	<u>al Cost</u>	Radiological <u>Removal \$</u>	Non- radiological <u>Removal \$</u>
Grand Total Building	\$9.	,848,120	\$8,510,833	\$1,337,287
Tax on General Contractor		\$0	\$0	\$0
General Contractor with contingency	\$6	,033,612	\$5,214,301	\$819,311

Exhibit No. YA-303

Page 5 of 20

<b>Knight Cos</b>	t Engineering Services, LLC	2
-------------------	-----------------------------	---

KCES 2012-900, Rev. 0

Site Costs with	a contingency	\$3,814,508	\$3,296,532	\$517,976
General Contra	actor	\$5,485,102	\$4,740,274	\$744,828
Site Costs		\$3,467,735	\$2,996,847	\$470,888
YR ISFSI		\$8,952,837	\$7,737,121	\$1,215,716
PERIOD DEF	PENDENT COSTS	\$5,814,531	\$5,024,970	\$789,562
1.1	YR Site Costs	\$3,467,735	\$2,996,847	\$470,888
1.1.1	Project Management	\$1,222,720		
1.1.2	Security Staff	\$889,014		
1.1.3	Fees	\$325,000	\$280,868	\$44,132
1.1.4	Insurance	\$631,000	\$545,316	\$85,684
1.1.5	Legal	\$200,000	\$172,842	\$27,158
1.1.6	Property Taxes	\$200,000	\$172,842	\$27,158
1.2	General Contractor	\$2,346,796	\$2,028,122	\$318,674
1.2.1	Decommissioning General Contractor	\$1,209,290	,,	
1.2.2	Waste Packaging Crew	\$512,621		
1.2.3	Equipment & Materials	\$624,885		
ACTIVITIES		\$3,138,305	\$2,712,151	\$426,154
1.3	Project Engineering	\$21,108	\$18,242	\$2,866
1.3.1	Procedure Development and Review - Offsite	\$10,554		
	Preparation of QA and Safety Documents -			
1.3.2	Offsite (in parallel with 1.2.1)	\$10,554		
	Site Mobilization and General Employee			
1.4	Training (GET)	\$106,669	\$92,184	\$14,485
1.4.1	Site Mobilization	\$27,198		
1.4.2	General Employee Training	\$71,738		
1.4.3	Site Specific Training	\$7,733		
1.5	Site Preparation - Performed by Staff	\$14,404	\$12,448	\$1,956
1.5.1	Initial Site Survey			
1.5.2	Setup work areas			
1.5.3	Decontamination Readiness Review			
1.6	Disconnect all utilities to work areas.	\$7,202	\$6,224	\$978
1.6.1	Electrical	\$3,601		
1.6.2	Ventilation	\$1,800		
1.6.3	Piping	\$1,800		
1.7	Removal inside security fence	\$2,596,684	\$2,535,505	\$61,179
1.7.1	Remove Guard Posts	\$3,305		\$3,305
1.7.2	Instrument Enclosure	\$8,375	\$0	\$8,375
1.7.3	Remove VCCs	\$1,208,823	\$1,208,823	\$0
1.7.3.1	Exterior Concrete	\$612,010	\$0	\$0
1.7.3.2	Steel liner	\$596,812		
	Remove Concrete Pad	\$1,326,683	\$1,326,683	
1.7.4		+ - ,		
1.7.4 1.7.5	Remove Fence and Towers	\$39,399		\$39,399
1.7.4 1.7.5 1.7.6	Remove Fence and Towers Remove Light Towers	\$39,399 \$10,100		\$39,399 \$10,100

Exhibit No. YA-303 Page 6 of 20

Knight Cost Engineering Services, LLC

KCES 2012-900, Rev. 0

1.8.1	Remove Nuisance Fence	\$70,485		\$70,485
1.8.2	Retaining Wall	\$46,334		\$46,334
	Conduit and wire - Instrument Enclosure to	17 / 1 / 1 <b>/</b> 1 / 1 / 1 / 1		
1.8.3	Utility Pole	\$23,208		\$23,208
1.8.4	Remove road inside licensed area	\$190,915		\$190,915
1.8.5	Remove vehicle barriers	\$3,373		\$3,373
1.8.10	Miscellaneous			
	Final Site Survey Structure gone - By DGC			
1.9	Staff	\$25,000	\$21,605	\$3,395
1.9.1	Prepare Final Status Survey Plan			
1.9.2	Soil Sampling			
1.9.3	Direct Survey			
1.9.4	Sampling Analysis			
1.9.5	Prepare Final Status Survey Report			
1.1	<b>Orise Site Release Confirmation</b>			
1.11	Outside areas	\$2,904		\$2,904
1.11.1	Backfill, grade and seed	\$2,904		\$2,904
1.12	<b>Demolition Crew Demobilization</b>	\$19,465	\$16,822	\$2,643
1.13	Final Project Report - Offsite	\$10,554	\$9,121	\$1,433

#### 3.0 DECOMMISSIONING COST ESTIMATING APPROACH

Two types of costs were determined in this estimate: activity costs and level of effort costs. The activity costs were developed utilizing a unit cost factor approach. Site material quantities for concrete, steel and equipment where developed from site specific drawings. Productivity factors were applied to these quantities to determine activity durations. Labor crews were developed and applied to the material quantities to determine labor costs and person-hours. The activity durations were used to develop a project schedule.

The level of effort costs such as equipment rental and the General Contractor (GC) staff were developed based on the project schedule duration. A rental equipment file was developed for the construction effort. The GC staff is assumed to be on-site for the duration of the project. The Oversight staff cost is another level of effort cost that is included in the cost estimate.

Bulk removal of the storage pad and concrete storage casks is assumed to be performed using an excavator with a hydraulic hammer attachment. The steel liner will be segmented utilizing torch cutters. All of this waste will be trucked off-site for processing. This leads to a large disposal volume; however, at a lower rate for bulk processing than for direct burial. In addition, there will be far less characterization and iterative decontamination. Clean structures will be demolished using mechanical means and disposed of at a local landfill.

In addition to the removal labor there is a dedicated waste packaging crew included in this estimate. This crew will consolidate, package and prepare containers for transportation. The waste packaging is estimated to remain on site for the duration of the project. This crew consists of 2 laborers; 1 Health Physics Technician; 1 Equipment Operator and 1 Foreman.

#### 4.0 ASSUMPTIONS

Following is a list of assumptions developed by KCES in completing this study. These assumptions are based on the most current decommissioning methodologies and site-specific considerations.

- 1. Component quantities were developed from actual plant listings.
- 2. Concrete volumes were developed from plant drawings.
- 3. The oversight staff is assumed to be the similar size and configuration as it is currently.
- 4. The oversight staff positions and costs were supplied by the Company and represent July, 2012 salary and benefit data.
- Subcontractor base labor rates and fringe benefits were taken directly from the 2012 R. S. Means Heavy Construction Cost Data and adjusted to Massachusetts based on the City Cost Indexes for Pittsfield, MA.
- 6. Activity labor costs do not include any allowance for delays between activities, nor is there any cost allowance for craft labor retained on-site while waiting for work to become available.
- 7. All **skilled laborers** will be supplied locally and hired by the Decommissioning General Contractor (DGC).
- 8. The cost for **Utility personnel** assisting the DGC to develop decommissioning activity specifications is included in the Utility Staff costs.
- 9. The separate DGC staff salaries, including overhead and profit, were determined by KCES.
- 10. **Transportation** costs are based on actual mileage from YR to Memphis, TN processing facility utilized in the estimate.
- 11. **The ISFSI Concrete Pad, VCC exterior concrete and VCC liner steel** are assumed to be Class A waste. This waste will be disposed of at the Studsvik processing facility in Tennessee. A disposal rate of \$0.13 per pound has been used in this estimate and is based on information provided by Studsvik.
- 12. The following buildings are disposed of as Clean waste in local landfill. A disposal rate of \$91.80 per ton has been used in this estimate and is based on information provided in the 2012 R. S. Means Building Construction Cost Data.

Guard Posts Instrument Enclosure

Page 8 of 15

Knight Cost Engineering Services, LLC

Security Fence Light Towers Nuisance Fence Retaining Wall Conduit and wire - Instrument Enclosure to Utility Pole Road inside licensed area Vehicle barrier

- 13. All costs used in these calculations were current on July, 2012.
- 14. The costs of all **required safety analyses and safety measures** for the protection of the general public, the environment, and decommissioning workers are included in the cost estimates.
- 15. It is assumed that all MPCs containing both spent fuel and GTCC will have been removed from site prior to the start of decommissioning.
- 16. Property taxes are included in the estimate at the current cost of \$200,000 per year.
- 17. Fees are included in the estimate at the current cost of \$325,000 per year.
- 18. Insurance costs are included in the estimate at the current cost of \$631,000 per year.
- 19. Legal costs are included in the estimate at the current cost of \$200,000 per year.
- 20. The decommissioning will be performed under the current regulations.
- 21. Removal of the pad and concrete overpacks will be performed in Tyvek coveralls. **Productivity rates** have been adjusted to account for this.
- 22. No **subsurface material** is assumed to require remediation regarding radionuclides. This assumption is justified because: 1) the ISFSI area was confirmed to be clean of radiological contaminants prior to the construction of the ISFSI; 2) the ISFSI area will be maintained clean of loose radiological contaminants during the storage period; 3) the irradiated fuel and GTCC waste are stored in sealed canisters; 4) nuclear activation of the VCCs, VCCs liners, and ISFSI pad are anticipated; the activation products will remain fixed during the storage period; and 5) if contamination of subsurface material occurs during decommissioning activities, the contamination is expected to remain below the decommissioning criteria of 25 millirem per year Total Effective Dose Equivalent.

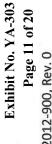
#### 5.0 SCHEDULE

A scenario-specific schedule has been developed for estimate.

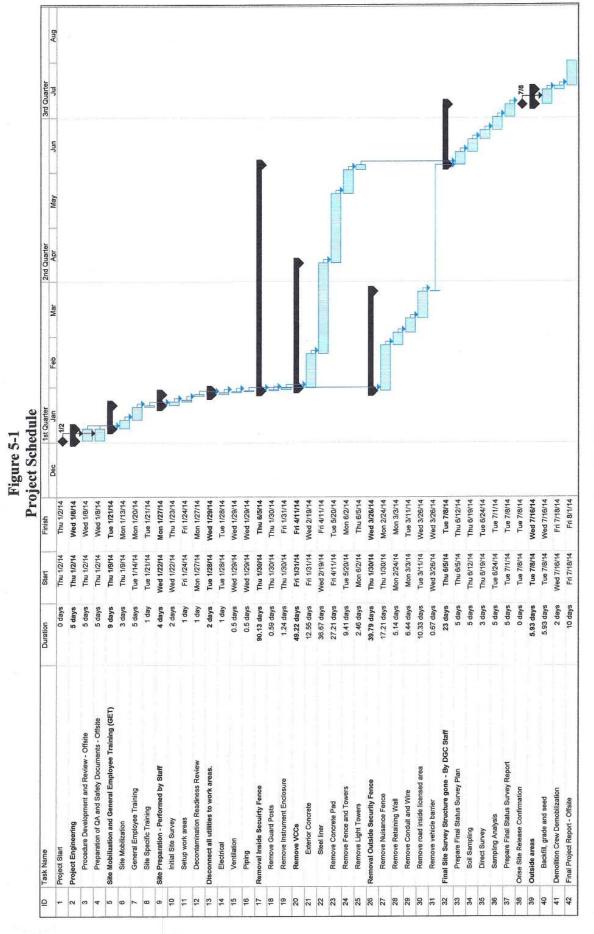
Activity durations were determined based on the unit cost factor approach. Plant material inventory quantities were developed from site specific material. Unit rates for cost, man hours and schedule hours were applied to the material quantities. From this calculation the removal or decontamination cost, total man hours and total schedule hours were determined for an activity. The schedule hours are then entered into the schedule to determine project duration. Two work crews are assumed for the concrete pad and concrete overpacks. All other work was assumed to be performed by one crew. Work outside of the security fence will be performed in parallel with the work inside the fence. The total project duration is 6.96 months.

Figure 5-1 provides the detailed decommissioning schedule.









Page 11 of 15

#### 6.0 PROJECT MANAGEMENT

There are three components to project management during decommissioning, Oversight Staff (staff), Decommissioning General Contractor Staff (DGC) and Security. The person levels for each are identified below.

#### 6.1 OVERSIGHT STAFF

The staff size is currently at a level of 18 and is assumed to be maintained at this level and at a similar configuration during the decommissioning. In addition, one final status survey resource will be added and one licensing person will be added to assist in the decommissioning. The staff will provide DGC oversight as well as maintain license compliance. Table 7-1 provides a summary of this staff.

#### TABLE 6-1 OVERSIGHT STAFF

Staff	Number
President	1
Cask Relicensing Project Manager	1
Workers Concerns Manager	1
Business Manager	1
ISFSI Manager	2
ISFSI QA Manager	1
Director Government Relations	1
General Counsel	1
Business Administrator	1
Treasurer	1
Accountant	1
Benefits Manager	1
IT Services	1
ISFSI Operations Specialist	2
Program Manager	1
ISFSI Administrator	1
Licensing Engineer	1
Security Manager	1
	20

#### 6.2 DECOMMISSIONING GENERAL CONTRACTOR

The DGC will be responsible for all of the physical work. The staff will oversee the work crews., schedule work and supply HP support. The DGC will be responsible for finishing the project on time and on budget. Table 7-2 provides a summary of the DGC staff.

Exhibit No. YA-303 Page 13 of 20

#### Knight Cost Engineering Services, LLC

KCES 2012-900, Rev. 0

#### TABLE 6-2 DGC STAFF

	2012	Person
	Base	-
Position	Salary	Level
Project Superintendent	\$148,000	1.00
QA Auditor/Inspector	\$70,000	1.00
Health & Safety Supervisor	\$117,000	1.00
Packaging/Shipping Specialist	\$70,000	1.00
Cost Control Accountant	\$55,000	1.00
Scheduler II	\$60,000	1.00
Demolition Specialist	\$86,000	1.00
Industrial Safety	\$86,000	1.00
Engineering Supervisor	\$117,000	1.00
Project Supervisor	\$79,000	1.00
Decontamination Tech	\$55,000	2.00
Instrumentation Tech	\$55,000	1.00
Tool Crib Attendant	\$43,000	1.00

14.00

#### **6.3 SECURITY**

Once spent fuel has been removed from the site the security force will be significantly reduced. This estimate assumes a force of 13 guards and one manager. This will allow a security person level of 5 guards during work time and two guards all other times. The guard force was assumed to consist of various levels of guards and the rate used has been adjusted accordingly.

#### 7.0 References

- 1. R.S. Means, Inc, Building Construction Cost Data, Kingston, Massachusetts, 2012.
- 2. Regulatory Guide 1.202, "Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors"
- 3. NUREG-1713, "Standard Review Plan for Decommissioning Cost Estimates for Nuclear Power Reactors"
- 4. NUREG-1757, "Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping and Timeliness"

Knight Cost Engineering Services, LLC

Exhibit No. YA-303 Page 15 of 20

KCES 2012-900, Rev. 0

### APPENDIX A

13.68% Nen-radiological Remonal S	182,755,12		8	110,0185	\$517,976	\$744,828	\$470,888	\$1.216.716	\$788,562	10,008				222				B44,132	\$05.684	\$27,158	\$318,674							
88.42% Radiological Removal \$	\$8,510,833		05	\$5,214,301	\$3,296,632	\$4,740,274	\$2,996,847	121.737.121	\$5,024,970	\$2,995,847								\$280,868	5545,316 5172 647	\$172.042	\$2,028,122							
Total Cost	\$9,849,120	\$895,284	05	\$6,033,612	\$3,814,508	\$5,485,102	\$3.467.735	\$8.962.837	\$5,814,531	\$57,789,E\$			021-3399° (B.		5889.D14			\$325,000	\$631,000	1200,000	\$2,346,796	\$1,209,290		\$512,621			\$624,865	
Activate Wate Cost																												
Cost Cost																												
Clean Wate Cost			8	102,8052	08	\$190,301	80	\$150,301	05																			
Missed Waste Clat																												
Hazardous Wate Cost																												
LSA Weste Cont			05	\$2,114,922	95	\$1,922,657	0\$	\$1,822,667	9																			
Lebor Cost			05	\$2,946,107		\$2,678,280	\$2,111,736			\$2,111,735			227.727.16		\$889,014						\$1,721,911	\$1.209.290		\$512,621				
Materiale, Consumables, & Equipment			05	\$763.251	009'169'15	\$683,864	\$1,356,000	\$2,049,864	\$1,980,885	\$1,356,000								\$325,000	\$631,000	1200,000	\$624,885						5624.805	
Astivated Waste Volume (ct)																												
Lead Wasse Volume (20)																												
Clean Wate Volume (cf)						548,352		648,352																				
Mixed Wate Voltane (cf)																												
LANVaue Barachen Ballert Mood Clean Lots Artened LANVaue Barachen Ballert Woos Ware Wees Mens Den XM.001 Weet-Yold.01 Yohner.02 Yohner.02 Yohner.02 Yohner.03																												
Hicardous Wash Vol (cf)																												
LSA Wate inp. Vol.660						124.427	0	12X.N8																				
) Markan						34,684	692,955	74.473	61,439	39,789			24.114 FTEs 2.2.2.2.2.1.1 2.2.2.2.1.1 2.2.2.2.1 2.2.2.2.	50.00	15,674						21,660	14.114		7,536				
Adjuated													m-hours 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 1,206,71 2,411,45	1.206.71 1.206.71 1.206.71 1.206.71 2.4.114.29		Man-hours 15.674.29	15,074,29						mechours 1,005.71 7,2005.7	1	Men-hours	3.014.29 1.507.14 1.507.14 1.507.14 7.535.71		
													Cont Na \$97,005 \$55,167 \$55,165 \$51,67 \$51,67 \$51,67 \$51,67 \$16,074 \$50,200 \$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$16,075\$\$1	\$71,184 \$50,941 \$59,603 \$63,806 \$63,806	6.83 Monthe	Cost Ma \$884,361	Coef \$54.745 \$3.001 \$52.969 \$31.198 \$32.253 \$832.253						Cont \$144.088 \$120.57 \$120.57 \$120.57 \$120.57 \$120.591 \$170.598 \$120.591 \$170.598 \$170.599 \$170.599 \$170.599 \$170.599 \$170.599 \$170.599	7.24 Mont	100	\$100.965 \$70.064 \$130.070 \$105.722 \$612.621		
Unconstated Durtion (Na.sc(Hours) Prod. Partor											8 mont		Feelor 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00%			Use Factor 100.00%	Use Factor 30,00% 30,00% 30,00% 30,00%						Fractor 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00%			100.00% 100.00% 100.00%		
Uncontela (Na.ef)											30.14 6.95		1444* Use F 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021 15021		30.14 weeks	30.14 Use F	Mortha Use F 6.83 6.83 6.83 6.83 6.83					27.14	Advert Use F (195.71 19	27,14 weeks		17.081 17.081 17.081 17.081	210 227 560 738 738 464	
Crew											ē	and HP Succion)	Duration, di 151 151 150 150 150 151 151 150 155 155	皆数数数		Duration, vo 30	Duration, Mc	B VOORE	1.00 years	uman o		2	Duradon, 4 13 13 13 13 13 13 13 13 13 13 13 13 13		Duration, c		Cont Cont 53,210 53,2210 53,2273 53,560 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,738 5,748 5,748 5,748 5,748 5,749 5,	
											darw7dave/vit = vecriting dave	mali tool coats an	Ruin 50053 511,54 511,54 511,54 510,69 510,69 510,69 543,75 544,75 545,755,755 545,755,755,755,755,755,755,755,755,755,	500.04 542.25 549.50 \$52.92	iara/7daya/vek =	Rate \$42.42	\$/month \$26,323.00 \$1,443.00 \$15,000.00 \$15,000.00 \$315,000.00 \$315,000.00	0.1	0.1	5 2		dars/7davs/v/k = vvorking davs	Raio \$133.27 \$133.27 \$133.27 \$133.27 \$133.20 \$133.40 \$135.40 \$141.30 \$141.30 \$141.30 \$141.30 \$141.30 \$141.30 \$141.30 \$141.30 \$143.40\$\$143.40\$\$	dars/7dars/vk =	orking davs Rate	500.34 551.00 550.30 570.15	Rate 5221 51,206 51,206 5255 51,206 51,206	
											211.00 ds	to determine s	Number 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	8	211.00 di	Numbor 13	2	a.				150.00 db	Number 13			NB	See to See to	
			160010	10.00%								4,730,014 (Used	N Marine Marine N					\$325,000.00 per wer	\$631,000.00 per wear	\$200.000.00 per vest		2					0 <b>0</b> 0	
				NCV									loci Manacer anacor (includ Relations r statist (includ			nded rate						maral Contractor	el eviaer Seeclasitel ant or or	***			a and a second	
	Grand Total Building	Contingency =	Tax on General Contractor	General Contractor with confinee	Site Costs with continuency	General Contractor	Costs	151	PERIOD DEPENDENT COSTS	YR Sile Costs	Project duration	Lettor cost =	<ol> <li>Transic Neurosciencia Sulf Problem Cark Reduction To All Reduction Cark Reduction Registration Registration (Deviced Observation Registration Deviced Observation Registration</li></ol>	Program Manager ISF31 Administrator Licentina Ensineer Security Manager	.2 Security Staff Project duration =	Staff Searthr Guards - thon	Medical Decial Antrico Antrino Usulforme	1.1.3 Fees	1.1.4 Insurance		General Contractor	1.2.1 Decommissionina Gee Project duration =	Staff Staff Staff Specifications CAAND/Childronia Cabin A Staffor Space Parakasina Shopon A Scheduki 1 Coltravial Safer Induratiol Safer Future Starevisor Protest Sparevisor Protest Sparevisor	1.2.3 Waste Packacing Cre Project duration =	Starf	Laborens H.P. Tech. Load Oper. Foremen	1.2.3 Equipment & Matrick Equipment Reprints Reprints Promotic shiping hum Chiping human si compras Puchas an si compras Jackhammer	
	Gran	Cont	Tax o	Gene	SileC	Gene	Site Costs	YR ISFSI	PUN	11					1,12			4	2 5	1	2	40 1		2			-	

ning Cost Estimate Details Yankee Rowe ISFSI Dec

07 10 /	13.66% Non-residenciant Removed 5			5428.154 \$2.006		\$14,405			
rage 1 / 01 20	MA 47% MA 47\% MA			\$2,712,151 \$18,242		\$02.184			
	Zanki Line			50 \$31,130,305 \$21,108 \$10,554	\$10,554	\$106,569 \$27,198		902.174	
	Lot Annual Water Water Date Coli			8 8					
	Chem Notate CBR			10C0612 02					
	Manual Manual Water Values Coals Coal			8 8					
	LiAborchan LiAb Week			1202 2205 18 105 200	x	7 8		8	
	A labor labo			995,979 \$969,369 50,152 50,964 510,054	\$10,664	\$37,075 \$69,594 \$4,000 \$23,196		502.025	
	Advined Material Water Valencial & Equipment			ø		8 *		2	
L'Estimate Details	Mand Oten Level Wase Wase Wase Manufat Manufat Manufat			0 20E.6440 0 0					
Yankee Rove ISFS! Decommissioning Cost Estimate Datals				• •					×.
ae Rove ISFSI De	Hannakana Balanan Masa Visidi Zahamarian Masa Visidi Zahamarian			• •					
Yank	LEAN Water House Day, 184660 Water, 184660	Cont 10,067 3,072 3,872 623 1,837	3,968 4,573 10,472	54427 0	tenhours 80 20 20				
	L Machana Da	Unit Cost 7 36 15 196	36	13,034 240 120 120 120 130 120	120 120 6.487 6.487 2.034 10.554	683 312		35	Total
	Adjured Destries	4.14 Mortina No. Unit City 10000 1100 1000 1100 1000 1100 1000 1100 1000000	1 008.868 766.128	2,178 2,178 80 80 80,487 85,487 85,487 810,564 810,5654	ę	24		don Munagement univ 40.00	Labor Coats
	bisection build build	4,14 6,50 5,50 5,50 5,50 5,50 3,30 3,30 3,30 3	88	2.178 2.178 86 66 70 70 70 70 70 70 70 70 70 70 70 70 70		72 1,000	of Description Code Codensity of code of Description Code Codensity of Code Code Code Code Code Code Code Code Code Code Code Code Code Code Code Code Code	23.118.01 For Contracto 4.0 1.00 P Mode Contracto A D 1.00 P Mode Consortier costs In the Parto Consortier costs In the Contractor costs	Period Decendent cents Period Decendent cents
	Dite Disability (Construction) (Cons	10.00 weeks	21 21 22 200% 8.00%	Rate Durat Sa1.05 S101.68 S101.68	Ratio Duration \$51.08 \$101.09 \$101.69		Could Share with Per- tage of the second sec	400 00 110 110 110 110 110 110 110 110 1	44M MAN
	2000 2000 2000 2000 2000 2000 2000 200	anvik = anvik = 0000 dave 0000 dave 90.00 dave 90	4.14 month 0.35 wear 54,790,014 labor or 5642,487	Number 2 2 58 4 510 4 510			21	24 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	
	83.4×88.4×4	125.00 dever7da 90.00 werkins. • 2 merutas • 7 merutas • 7 merutas • 7 merutas • 7 merutas • 7 merutas • 7 merutas	contraction of the contraction o	Officiality	is - Ofbile (in parallel with	(GET)	end and and the and the the the the the the the the the the	24 beet 27 27 26 25 26 26 26 26 26 26 26 26 26 26 26 26 26	9 <b>4</b>
	a non contra contra contra fit contrary dia non non contrary	Countily 1	T.D.S. Bioseaseve for aver. crev. & menagements (Bioseaseve for aver. crev. & menagement) Small Tools. 28: of total laber costs = DOC OH &P on equipment and mathetalt	admentra Procedure Dreetscriment and Review - C Staff Proced Sconsiliet Project Manusure Contribet Visaith Physical	Preparation of CA and Safety Documen Staff Protect Seeclating Protect Manager Certified Health Physical	and Goneral Employee Training Abhitzation	Physics (Speciminal Control (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control) (Control	a of muture of entropic and arrito staff cost = locat = al Emeloy al Emeloy	2 Concentration 7 1 Instrumention 7 1 Instrumention 6 2 Exatlo 2 Exatlo 2 Confinement 2 Confinement 2 Confinement
	Addition of the state of the st	Protect duration Consumbles Convexits Shore covers Later dovers Rabber oversion Rober oversion Dostrators Dostrators	TLDs Bloasans for a Ginaators for a Small Tools - 23 DGC OH &P on	ACTIVITIES 1.3 Protect Endinom 1.3.1 Proc Protect Protect	1.3.2 Pros Bund Pros Cent	1.4 She Mobilization 1.4.1 She h	dia Pres	etano etano Familia Familia Familia Familia Conversion	

Exhibit No. YA-303 Page 17 of 20

Exhibit No. YA-303 Page 18 of 20

Yankee Rowe ISFS! Decommissioning Cost Estimate Details

8% otonical wal \$			51,850		9265		\$61,179	10 205			\$8.375												980' 80'S
% t3.56% pical Non-radiotodical al S Removel S			\$12,448		\$6,224		\$2,535,505							\$1,208,823						\$1,326,653			
88.42% Rediotodical at Removal \$	SE7.12		\$14,404 \$0	ş ş	\$7,202	100715	\$1,800 \$2,508,684 \$2		utoment.		\$8,375	udorneed.		\$1.208.823 \$1 \$612.010	ulpreet.		\$596,812			\$1,328,683	automent.		66E,4E\$
Activated Wate Cost Total Cost			ŝ			• •	S \$2.59		with Indexulto eq			: with hydraulio eq		50 51 52 53 53 54 55	c with hydraulic ec		200			\$1.3	k with Indendic e		<b>10</b>
Lead Acti Wate WA							8		rate for this worl			o raile for this wor		95	e rate for this wor						e rate for Bris wo		
Clean Wate Cost							\$97,95	5944	ole, uso the same		\$3,400	cle, uso the same		88	ols, use the same		8			80	ols, use the sam		029'15
Mixed Wate Coll							95		de using hand to			de using hand to		8	ade using hand to						ade using hasd t		
Handon Wate Col							57 \$0		for a slab on or		8	i for a slab on gre			i for a slab on cri		119			989	s for a elab on dr		20
LEA Warks	cz/123		404		\$7.202	100/15	\$1,800 \$1,922,857 \$987,763 \$1,922,857		day. This rate is for a slat		\$16,42	rdar. This rate is		4,656 \$814,167 654 \$511,358	r dav. This rate is for		118/206S 100			\$218,193 \$1,108,490	e dae. This role is for a sits		827.728
uh, Aties, InherCoal	5		\$14,404		50 S7	8 5	\$1, \$0 \$667	2	cemanos Use 2012 Means pa 50, 02 41 13,33 4320, 25 c. v. per day.		¥	Estimated Use 2012 Means pg 50, 02 41 13.33 4220, 25 a. y. per dar. "This rate is for a		\$0 \$384,655	Use 2012 Means on 60, 02 41 13.33 4320, 25 c. y. per day.		100,4825			\$218	Uee 2012 Mesns og 50, 02 41 13.33 4200, 25 c. r. oer der.		65
Activated Materials, Water Consumbles, Volume (cf) & Equipment							٥		50, 02 41 13.33			z 60. 02 41 13.33		0	a 60, 02 41 13.33						a 50. 02 41 13.30		
Lend Act Waste W Yohmefel) Yelu							0		to 2012 Means p			ilimated te 2012 Means p		Ð	te 2012 Means p			Unit Cost factor #2.			ee 2012 Means o		
Clean Wate Volume (cf)							2,171		870 F.		1,062	8.00 1.83	000	° 0	200.85	200.96	o	696.69 508.69		ø	406.45	435.41	Ð,
Meed Wate Yolumt.(cf)							0	5				5		0	PLF 5.35			100 100			PLF 1.36		
Bulliert Volume (sc)							0	1	ou. vd./dev			hrston. cu, yd.idary		0	cu. vd./dav			hrefea. A.			val/by .uo		
Haombras Wissie Vol (cD							2		2500		0	1 8.00	N	8 8	62 <u>26.00</u>	я	50	31 0.06		11	* 0 +13 25.00	13 ire Diamond Wile A outling	0
LSA Wate Day Vol (of)			a		8	8 X	24 54.427	• 3	62 G			A. bound		N3 19.050 06 16.220	- 8			Based		3,048 35,377	R. boxes 0 377 5	277 113 Diamond Wire outling South	527 bet for
Machours	16,200 8,450 7,916 4,342 0 37,908 215						a	71 Adjusted Volume, cu.	4 F E			Adjustod Voluma, cu. ft. 680 ft. 211			. Adjusted Volume, cu. fl. 16,320		1111 C	100	F Tctail \$ 0 2 302,811		Adlant Volume.		Adlus
Adjunted Detrotion	\$3,098.34 \$965.58 \$0.00 \$4,832.62 84,832.62		32.00	808			4,00	Vol. Rec fecto	-30.02	Dispose \$609.0 \$0.00		Vol. Redue. factor 60.00% -30.00%	Disposal \$2,915.2 \$0.00	2	Vol. F	<ul> <li>Disposel, S \$0.00</li> <li>\$244,795.20</li> </ul>		a factor 20.00%	5 Diacoual, 5 50.00 3 \$144,980.82	0 435.41	Vol. Reduc. actor 30.00%	5 Disposal. 5 \$0.00 1 \$530.853.50	
	\$16,200,00 \$9,450,00 \$4,069,00 \$3,375,00 \$33,075,00 1.00	endert contra endert contra	0 1.00 00.1	806 1.00			4.00 1.00	5 1.00 Fi. Weisti Lite	00'000'6	Trenetor \$134. \$0.0	10 1.00	Pt. Weiahi. Lina 24,392.06	Transport.\$ \$485.17 \$0.00	201 1.00	1. WeldM. Lbs 1,883,040.00	Transsort. 5 80.00 \$245,838.38	557 1.00	Pt. Weitht. Lbs 1,115,083.20	<ul> <li>Transport, 5 \$0.00</li> <li>\$145,460,13</li> </ul>	435 1.00	<ol> <li>Welahi. Lbs 0.00</li> <li>4.081.850.00</li> </ol>	Transport.5 \$0.00 \$532.461.31	75 1.00
Uncorrected Duration (No. of Hours)	9 77 77 9	With Period Dev With Period De	32.00		16.00	6 4	4.00	Volume, on F	00.08	<ul> <li>Container, S \$0.00</li> <li>\$0.00</li> </ul>		Volume, cu. 7 1780.40 162.62	a Container, \$ \$0.00 \$0.00		Volume, cu. Fl. 12.653.00	rs Container, S \$0.00 \$20.922.67		Volume, cu. 2.276.68	rs Contelher. 5 \$0.00 \$12.359.61		Volume, cu. Fl. 27,213.00	rs Container, \$ \$0.00 \$45.366.00	
Case	8200 8212 8212	Cost. Shr 80.000 80.000 80.00 80.00 80.000 80.00 80.00 80.00 80.00 80.00	8			n e)	£	A Arees. act. R.		No. of coststner 0.48 0.00	۲	Area, et. fl.	No. of container 1.76 0.00	٩	Ares, sa, ft.	No. of containe 6.00 52.31	<	Area, sq. ft. 9,040	No. of containe 0.00 30.87	۲	Ares, so. 8.	No. of containers 0.00 113.39	×
	4 hour and 1 hour and hour	Rate. Shr 2000 2000 2000 2000 2000 2000 2000 20		127				Lengh, ft.		Votume 272.40 0.00		Lenath, ft.	Volume 1,091.60 0.00		Number 16	Volume 0.00 16.318.68		Number 16	Volume 0.00 2.730.82		Number	Volume 0.00 35.378.90	
	77 Ø	or Maliet		54 P2				Number	**	Weidtl. Da		Number 1	Weidhi, ibs			WeldML Ibs 0,00 1,883,040,00			Weidhl, Ibs 1.115,083,20			Weight, Ibs 0.00 4,081,950.00	
	assume all certified	Menager Alter Manager A Safety Support A Safety Support Control Aboounted Man Safety Supervices Supervices Supervices To Attendant Control Con		taled Duration				ŝ	Concrete Pad	mission		Inventory Building Constate Pad	Waste Clean Contaminated		or ve concrete			Remove steel	e mnated		lirrenton Remove concrete	e Trinsted	6
	fication -	1 Project CA Alexi Project Project Coar (Disc Coar (Dis	eformed by Staff e Surver	Estim work areas ternination Reading	e to work areas.	_ =	Plaina Ide security fance	Remove Guard Posts Invest	Cont	Waste Clean Contarry	nt Enclosure	Buildi Conor		VCCs Concrete	Investory Insted Removes	Weste Clean Cortan	5	Inverti Remo	Waste Clean Contan	Remove Concrete Pad	Inventory Insted Remove c	Vvaste Ciean Contam	a Fance and Tow
	In-Vino In-Vino Prnecisal (3) Blood Teste OSHA record	<b>B</b> S	Preparation - Performed	Selup	connect all utilitie	1.6.7 Electrical 1.6.2 Verificitio	1.6.3 Ploing Removal Inside secu		Clean		2 Instrume	Clean		1.7.3 Remove VCCa 1.7.3.1 Extentor Concrete	Contaminated		1.7.3.2 Sleellner	Contam		1.7.4 Remove	Cottani		1.7.5 Remove Fenoe
	CP1		1.5 StePr	162	1.6 Discon		1.7 Ren				1.72			5						17			9

Exhibit No. YA-303 Page 19 of 20

53.373 \$3.395 \$70,485 \$46,334 \$23.208 190,915 \$10.100 13.56% Ion-radiological Removal \$ 121,605 86.42% Radiological Removal \$ \$46,334 equipme equipme \$23,208 \$3.373 \$25,000 \$10,100 \$70,485 219,0213 334,315 Tetal Cost hydraulie. Allasted Cost Need No. \$27,840 233 1905 \$250 1.497 153,705 Wunte Missel Waste Cent workburs Waste Cost 8 This rate is for a This rate is for a 8 8 LSA Weete Cost \$18,494 24.65 Use 2012 Means co 50, 02 41 13.33 4200, 25 c. y. ber dar. 19.43 Use 2012 Means co 50, 02 41 13.33 4200, 25 c. y. ber dar. 41.09 \$2.412 Labor One \$37,210 \$23,175 \$9,850 150.278 188.987 Use 2012 Meens no 50. 02 41 13.33 4320, 25 e. estimated Materials, Consumables, & Equipment \$25.000 1940 Wears 02 41 13.60 1700 Weans, D. 535 26 05 05.10 1 Weans 31 23 15.13 0060 Keans 31 23 23.14 3020 2012 RS Means 31 23 16,13 0060 2012 mean, p463, 22 06 5,10 2100 2012 RS Means 31 23 23 14 3020 2012 RS Meers 02 41 13.60 1700 Estimated Estimated 1112 RS Meane, p. 535 26 05 05.10 012 RS Meane 31 23 16.13 0060 012 RS Meane 31 23 23.14 3020 RS Means 02 41 13.17 5050 Antivated Wate Volume (cf) Lend Wate Volume (cl) 2012 Clean Waste Volame (cl) 871 9.29 33.00 33.00 75.29 181,848 629 520,000 25,389 \$2.67 \$2.67 0.93 50.4 0.15 51.40 88 5.57 0.70 5.49 0.90 62.50 62.50 37.67 0.55 0.44 0.44 8.00 8.00 879 PL 1 PLF 1,00 1,00 1,00 1,00 1,00 PLF 1.00 1.00 Mixed Wante Volume (cf) 18 1.00 001001001000 888 님 5 Beilast Volume (cf) cu. vd./dav L. Frdav cu. vd./dav ou. vd./dev cu. vd./dev ce, vd./dev hre LFIday cu. vd./day ou. vd./day hns/ea hns/ea Riday L.F.iday cu. vd./day hrafea hrafea S.Y.Aarv futiav hraves Heardous Waste Vol (cf) 445 200.00 200 1.225 0.50 0.50 0.50 4,00 200.00 25,00 8 445 050 050 225 LSA Wate 249-Vol (cD \$ of tunes Fol 1 of boxes # of Pol a of brees bcoel ratial to 1.16.2 & 1.16.3 247 Adjuated Volume. cu. ft. 2.704 1.503 4.507 Adjusted folume, cu. ft. 25,369 25,369 138 996 155 155 155 2,047 Adjusted Volume. cu. fl. Activated Activation Totsl, \$ 153,705 0 Total. \$ 27,840 0 Marbour folume. cu, fl Adjuated olume, cu. f Adhated Volume, cu. f Total. S 1.497 0 Total, \$ 33 Total. 5 1.670 0 Total.\$ Silei S 84.00 41.05 Vol. Radac. factor 30.00% 1600.05-3500.0 3500.0 19,65 2000 2000 2000 2000 318 137.87 %0000 %0000 %0000 Disposal, 5 \$23,565,00 \$0.00 Disposal, \$ \$28.02 \$0.00 Diaposel, S \$131.774.77 \$0.00 Sisposal, \$ \$1,431.74 \$0.00 Discosal. \$ \$1.283.61 \$0.00 Vol. Reduc. factor S214.11 \$214.11 \$0.00 Vol. Reduc. fector \$823.81 \$823.81 \$0.00 Adjusted Derition factor ol. Reduc. fector dave davs Transport. 5 \$213.82 \$0.00 Transport, 5 \$3.972.22 \$0.00 Transport. 5 \$4,66 \$0,00 Transport. \$ \$21,930.56 \$0.00 Volume, cu. Fl. 19530,00 Weight, Lbs Pred. Fastor WoldM. Lbs Welcht, Lhs 312,000,00 208,000,00 1.00 Transport. S \$236.26 \$0.00 44,158.25 1.00 1.08 Weight, Libe. 1,00 fransport, 5 \$137,10 \$0.00 1.0 23.314.50 8 11,304.00 S35.63 \$0,00 10 17,196.00 Weight, Lbs Ş (normeted Duration (No. of Hour) Volume, cu. P. Volume, cu. Fl. 2060.00 1386.67 5 lume. cu. Fl. 830 14 830 olume, ou. Ft. Container, S \$0.00 \$0.00 Container, 5 \$0.00 \$0.00 Cortsiner, 5 \$0,00 \$0,00 miainer, S \$0.00 \$0.00 stainer. 5 \$0,00 \$0,00 tume, cu. Fl. ime. cu. Fl. Container, \$ \$0.00 \$0.00 ontainer, 5 \$0.00 \$0.00 39,060 516.67 29.74 155.43 310.00 1.78 3.708 3.708 23.06 294.38 1.41 1.800 1.800 28.19 75.36 114,64 . . . No. of containers 0.50 0.00 . of containers 0.67 0.00 0. of containers 0.13 0.00 o. of containers 0.78 0.00 B la. af container 14.44 0.00 Volaht, Ibs 2,870,910 Cterr Anna, sq. ft. Area. sq. fl. Area, 50. 6. of contain 79.75 0.00 Area, ag. ft Area. so. fl. Area, so. fl 0.02 0.02 4 24 PO 4 < m Volume 520.000.00 0.00 Volume 15,359.00 Volume 149.03 0.00 enoth. ft. 1,238 1,545 lumber Volume 701.84 0.00 BE HOL /olume 629.22 0.00 Number 1 umber folume 13.74 0.00 days = days = 6 nath. fl . . Vielahi, Iba 17,948.00 0.00 Weizht, Ibs Asidit. Ibs 4,506.67 0.00 IBN Pola Feet Meinth. Ibs 0.00 0.00 Veicht. Ibs Weight, Iba leicht. Ibs Number Number Feet Number 88 88 \* \* 88 Inventory ' Ground Cable Excernt burled plee Blackfill R. Dover Tover base Inventory Fance Ground Cable Excende buried pipe Backfill Poles Footlings Inventory Excerte buried pite Buried site, clean Backfill Waste Clean Contaminated Waate Clean Contaminated Waste Clean Contaminated Istrument Enc Waste Clean Contaminated Nonsel an Pavemont Inventory Foundation Gate assem Inventory Wat Footing Wasto Clean Contamilis contamilis Irrentory Fence Pales Fodinas Waste Clean Contami Vasto Clean Contami Fance Prepare Final Statue Final Site Survey Structure sons Removal outside security fence Sampling Analysis Renovo Nuisanoe Direct Survey Soli Sampling Miscellaneou Ramove Liph Concluit at Retaining Clean Cloan 191 192 193 194 13.10 1.4.1 1.8.4 1.65 1.7.6 1.8.2 1.8.3

61

8

rankee Rowe ISFSi Decommissioning Cost Estimate Detail

Exhibit No. YA-303 Page 20 of 20

Yankee Rows ISFSI Decommissioning Cost Estimate Details

													147) 147						
13.56% Non-radiological Ramoval \$				80		\$2.904	\$2,904				\$2,643					\$1.433			28
85.42% Ratioiosioal N Remoral \$				80							\$16,822					121,68			
						\$2,504	\$2,004				\$19,405					\$10.554			
TotalCont						\$0 \$2	\$2				\$19.					\$10			
Attiveed Wester Cost																			
Lead Watte Oott						20 20													
Clean Weste Cost													,Al						
Nineel Waste Conf						8													
Hazardoue Waste Cost						50													
LSA Waste Cel						8													
Labor Cost						05					\$15,465					\$10,554			
Materials, Consumbles, A.Bastemot						\$2,904	\$2,904	88			24,000								
Activated Wate C Volume (cf) A						000		31 22 16.10 0											
Lead Wate Xoleme (st)						00.0		2009 RS Menns 31 22 16, 10 0100 2009 RS Menns 32 92 19, 13 1000											
Clean Wate folgme.(ct)						0.00		99 30	47.42										
Mixed Wate Volume (cD						000		PLF 1.00		24 0400									
Ballant Yobuma (of)						0.00		sq fh'8 hr dav sq fh'8 hr dav		2011 RS Means 22 22 19 13 1000 2011 RS Means 31 05 18 10 0800 + 0800 & 31 23 23 24 0400									
Hazardous Watte Yol (cf)						0.00		19000 su / 80100 su /		9,13 1000 6,10 0800 + 0									
ata Haza L(cf) Wants						0		202	0	Means 32 92 11 Means 31 05 1									
LEA Wante Dim Joh (ef)	16.4					332	332	f. f. boons	0		206					120	Man-houre 80 20 120		
Markan	days - five days overlap with 1.16.4							Adjusted # of 1 Volume, ou. ft. b		Total, 5 2,904 2,904 2,904							Mechan		
Adjusted Dankien	va - five days					47,42	47.42	Vol. Reduc. factor 0.00% 0.00%		Cost. Stou. yd. \$34.67	16				inagement on)	80.00	Cont \$5,467 \$2,034 \$2,034 \$10,554		
Brok Estor	5 da	2				1.00	1,00			ma, cu. Ft. O		costs cost cost	costs		Contractor Ma	1.00	PUF 1.00 1.00 1.00		
Unconnected Decetion (Dio(CHOMP) Dr			\$25,000.00			47.42	47.42	Area .so. fl. Volume.cu. Fl. 87,120 87,120		Matwriel, SGY Equipment, SGY Volume, cu. Pt. Cost. Sou. vd. \$0.20 \$34.67	36	With Period Dependent costs With Period Dependent costs	lod Dependent		\$15,455.34 \$4,000,00 For Contractor Management only	80.00	Currelise 8.6 8.8 8.8 8.8 8.8 8 8.8 8 8 8 8 8 8 8		
Unconnets	Ę							Area. 51		SY Equipm									
Crew	8	808	* seignes			۲	۲	Depth				Cust, \$ht \$0.00\$00 \$0.00 \$00 \$	\$0,00 \$172,00 \$464,31 \$140,20 \$180,31 \$180,31 \$180,31	222 2	\$966.58	¥	Rate 581.06 5101.09 5101.09		
	a step		99					Wath		Installation, \$45P		Rado, Shr	90, 300, 300 200, 15 204, 60	****2	**		Number		
	10		per sample x							Area, sc. R. 87,120.00		ates			8 D				
	port									Waste A Seed and equipment 1 Structural III		Project Superiority Constructions     Construction	Aftendant	oding trailers					
	atus Sunwy Ru		1500.00	stion	allei with 1.8,		bees br	Inventory Grade Seed		Waste Seed and a Structural h	stion	<ul> <li>Project Sa</li> <li>Project Sa</li> <li>CAAdity CAAdity</li> <li>CAAdity S</li> <li>Health &amp; S</li> <li>Prosect Sa</li> <li>Prosect Sa</li> <li>Cost Continue</li> <li>Cost Continue</li> <li>Cost Continue</li> <li>Cost Continue</li> <li>Prosect Sa</li> <li>Prosect Sa</li> <li>Prosect Sa</li> </ul>	1 Tool Crib J 2 Equip Ose 7 Laborer 2 Foreman 2 Craftsman 17	qulpment, insk ed meterial anup		0	st Physicst		
	1.9.5 Prepare Final Status Survey Report		No.	lease Confirm	This activity will occur in perallel with 1.8,	<u></u>	Backfill, and a and seed				ew Demobiliza	G		Revum verted oquipment, inoloding trailers Discose of unused material General site citeanup Travet home	Total Cost = Travel cost =	Report - Officia	Staff Project Stancialist Project Manager Certified Health Phraicst		
	19.5 Pn		Samplina analysis	1.10 Orise Site Release Confirmation	This activity w	1.11 Cutside areas	1.11.1 80				1.12 Demolition Crew Demobilization	o		£6¢₽́	Ϋ́	1.13 Final Protect Report - Officio	σα ά Ο		
				1.10		111					1.12					1.13			