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Public Service Commission

March 18, 2016

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2016 MAR 18 PM 3:40  
COMMISSION  
CLERK

Mr. John T. Butler  
Assistant General Counsel – Regulatory  
700 Universe Boulevard  
Juno Beach, FL 33408-0420

**Re: Docket No. 150265-EI, Petition for approval of 2015 nuclear decommissioning study, by Florida Power & Light Company.**

Mr. Butler:

Staff has completed its review of Florida Power & Light Company's Responses to Staff's First Data Request in the above referenced docket and has some follow-up questions. Please provide your responses to the attached data and documents requests by April 20, 2016.

Should you have any questions, or need further information, please do not hesitate to contact me at (850) 413-6433.

Sincerely,

A handwritten signature in black ink, appearing to read "Devlin Higgins".

Devlin Higgins  
Public Utilities Analyst

Attachment

cc: Office of Public Counsel  
Office of Commission Clerk

1. For the purposes of the following request, please refer to Florida Power & Light's (FPL) response to Staff's First Data Request, No. 8.
  - a. Does this response indicate that FPL (or the State of Florida) must apply to *join* the Texas Low-Level Radioactive Waste Disposal Compact in order to dispose of waste at the Waste Control Specialists (WCS) facility in Texas?
  - b. Does FPL anticipate applying to join the Texas Low-Level Radioactive Waste Disposal Compact?
2. Please refer to FPL's response to Staff's First Data Request, No. 11. Please confirm that FPL's 2015 decommissioning cost analysis of both the Turkey Point and St. Lucie Plants assumes site restoration to a level in which the NRC will release both sites for unrestricted use.
3. Please refer to FPL's response to Staff's First Data Request, No. 20. In the response it is written that "[t]he most significant change was in the addition of campaign costs (in the 2015 estimate) for off-loading the fuel stored at the ISFSI to the DOE. These costs were not included in the 2010 estimate."
  - a. Please elaborate on why the costs were not included in the 2010 estimate, and are now first appearing in the 2015 estimate.
  - b. What is the typical weight of a single fuel assembly used in the Turkey Point and St. Lucie reactors (a single figure is sufficient if there is no material difference in fuel assembly weights)?
4. Please refer to FPL's response to Staff's First Data Request, No. 21. In the response it is written that "TLG's experience has revealed that previously assumed high waste packaging densities were not cost effective" in discussing Low-Level Radioactive Waste

(LLRW) packaging costs/volumes. Please elaborate on why high waste packaging densities are not considered cost effective for the purposes of FPL's 2015 decommissioning cost analysis.

5. Please refer to FPL's response to Staff's First Data Request, Nos. 23, 30, and 37. It is alluded in FPL's response to No. 23 that the company is planning to use certain soil/earthen material that has accumulated at the Turkey Point (TP) site for construction of a waste facility expansion.
  - a. Please elaborate on the waste facility being referred to here.
  - b. Please elaborate on the origin of this soil/earthen material. As in, what were the "past construction projects" that are referred to?
  - c. Will the soil in question be removed from the TP site before end-of-life/plant removal of Units 3 and 4?
  - d. If the response to (c.) is affirmative, will the costs associated with the soil in question be removed from future studies? Please explain.
  - e. If the response to (d.) is affirmative, will the Florida LLRW Inspection Fees corresponding to the additional soils/earthen material (FPL's response to No. 30) also be reduced in future studies?
  - f. If the response to (d.) is affirmative, will the transportation costs corresponding to the additional soils/earthen material (FPL's response to No. 37) also be reduced in future studies?
6. Please refer to FPL's response to Staff's First Data Request, No. 27.

- a. Please identify the updated (un-rounded) TP Units 3 and 4 estimated decommissioning cost figure as a result of the difference in assumed property taxes identified in this response.
  - b. Please submit an updated DECON Cost Summary schedule as found on Page xix of xx, of the Decommissioning Cost Analysis of Turkey Point Nuclear Plant, Units 3 and 4 (in 2015 Dollars) to account for the correction in property tax values.
  - c. Please submit an updated Schedule of Total Annual Expenditures (Table 3.1) as found in Section 3, Page 23 of 60, of the Decommissioning Cost Analysis of Turkey Point Nuclear Plant, Units 3 and 4 (in 2015 Dollars) to account for the correction in property tax values.
  - d. Please submit an updated inflation and funding analysis support schedule (i.e. support schedule G) for the TP Units with updated cost figures.
  - e. Please submit the Excel file associated with the company's response to subpart (d.), with cells unlocked and formulas intact.
7. Please refer to FPL's responses to Staff's First Data Request, Nos. 47, 51, 86, and 88 regarding the escalation factor.
- a. Please identify the escalation factor used to estimate the value of purchases of EOL M&S for each year (No. 47a.).
  - b. Please explain why FPL uses the annual escalation factors of 2.5 percent in determining the cost of unburned fuel remaining in the reactor at the end of plant life (Nos. 51 and 88).

- c. Please explain how the 17 month escalation factor of 3.50% is determined. Is it correct that if 2.50% annual escalation factor is used, the monthly escalation would be 0.208%, and the 17 month escalation would be 3.54% (Nos. 51 and 88)?
  - d. Please explain why "purchases assumes amount of issues escalated using Public Utility Private Fixed Income index."
  - e. What is the Public Utility Private Fixed Income index?
  - f. How does the annual escalation factor discussed in question 7(a.) – 7(c.) relate to the Public Utility Private Fixed Income index (No. 86)?
8. Referring to FPL's response to Staff's First Data Request, Nos. 47 and 86, please explain why a 4 year average inventory turnover rate was used.
9. Please refer to FPL's response to Staff's First Data Request, No. 52. Please briefly explain what is leading to increasing end-of-life (EOL) annual unamortized fuel costs for the St. Lucie Units, while the TP Units EOL annual unamortized fuel costs are decreasing.
10. Please refer to FPL's response to Staff's First Data Request, No. 56. Please briefly explain the reason(s) why the Trust Fund Balance for TP Unit 3 is the smallest by dollar amount of FPL's four nuclear units given it's the oldest plant and the first scheduled for shut-down/decommissioning.
11. Please refer to FPL's response to Staff's First Data Request, No. 60, Attachment No. 1, Page 29 of 29.
  - a. What request for additional information (RAI), presumably from the Nuclear Regulatory Commission (NRC), is being referred to here?

- b. Please provide a copy of the RAI response dated August 12, 2014 being referred to on this document (Page 29 of 29).
12. Please generally discuss how the company's 2010 decommissioning study for Turkey Point Units 3 & 4 addresses, if at all, the decommissioning or remediation of the plants onsite cooling canal system.
13. Referring to FPL's response to Staff's First Data Request, No. 89, please elaborate on the statement "FPL intends to optimize the fuel to be loaded in the last cycle to minimize the amount of unburned fuel remaining at shutdown (e.g., enrichment, number of fuel assemblies, etc.)."

Docket No. 150265-EI  
Staff's Second Data Request  
March 18, 2016

Documents

14. Please submit a copy of the Tri-State Motor Transit Radioactive Material Tariff used in formulating transportation costs for FPL's 2015 Decommissioning studies.