

# **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 A. 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 A. 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?

13 A. The 2013 Estimate total of \$225.4 million differs from the 2010 Estimate's projection  
14 of \$122 million for a number of reasons. The primary reason for the difference is that,  
15 based on DOE's delays in removing the spent fuel and GTCC waste, Yankee's  
16 operations are projected to extend an additional 11 years to 2033. Other reasons for  
17 the difference include the capital costs associated with new security requirements  
18 expected to result from regulation changes being considered by the NRC, and the  
19 incorporation of the new "site specific" ISFSI D&D cost estimate prepared by an  
20 independent third-party, as required by recently adopted NRC regulation. As I will  
21 discuss, other cost categories also changed, with some increasing and some  
22 decreasing.

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.

1 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 were 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 A. 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 **VI. ESCALATION RATE**

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 A. 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.

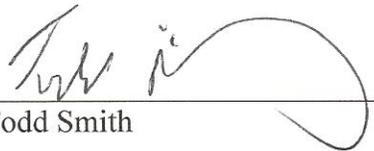
**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

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)

<b>Cost Categories</b>	<b>Costs 2013 - 2033</b>
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
<b>Grand Total</b>	<b>\$225,442,145</b>

**2013-2033 Summary  
(UNESCALATED)**

	Data										
<b>FERC Summary</b>	<b>Sum of 2013</b>	<b>Sum of 2014</b>	<b>Sum of 2015</b>	<b>Sum of 2016</b>	<b>Sum of 2017</b>	<b>Sum of 2018</b>	<b>Sum of 2019</b>	<b>Sum of 2020</b>	<b>Sum of 2021</b>	<b>Sum of 2022</b>	<b>Sum of 2023</b>
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	\$0	\$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	\$0	\$0	\$0
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0	\$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
<b>Grand Total</b>	<b>\$7,511,490</b>	<b>\$7,206,115</b>	<b>\$9,765,578</b>	<b>\$10,514,280</b>	<b>\$10,808,784</b>	<b>\$7,658,784</b>	<b>8,183,784</b>	<b>\$7,921,284</b>	<b>\$7,658,784</b>	<b>\$7,658,784</b>	<b>\$7,658,784</b>

**2013-2033 Summary  
(UNESCALATED)**

											<b>Sum of Totals</b>
<b>FERC Summary</b>	<b>Sum of 2024</b>	<b>Sum of 2025</b>	<b>Sum of 2026</b>	<b>Sum of 2027</b>	<b>Sum of 2028</b>	<b>Sum of 2029</b>	<b>Sum of 2030</b>	<b>Sum of 2031</b>	<b>Sum of 2032</b>	<b>Sum of 2033</b>	<b>2013 - 2033</b>
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
<b>Grand Total</b>	<b>\$7,658,784</b>	<b>\$8,446,284</b>	<b>\$7,658,784</b>	<b>\$7,658,784</b>	<b>\$7,658,784</b>	<b>\$7,658,784</b>	<b>\$8,867,738</b>	<b>\$9,090,488</b>	<b>\$11,609,158</b>	<b>\$5,662,778</b>	<b>\$174,516,816</b>

**Summary 2013 - 2033  
(ESCALATED)**

	Data										
<b>FERC Summary</b>	<b>Sum of 2013</b>	<b>Sum of 2014</b>	<b>Sum of 2015</b>	<b>Sum of 2016</b>	<b>Sum of 2017</b>	<b>Sum of 2018</b>	<b>Sum of 2019</b>	<b>Sum of 2020</b>	<b>Sum of 2021</b>	<b>Sum of 2022</b>	<b>Sum of 2023</b>
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	\$0
Outside Services - RAD D&D of ISFSI	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
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											
<b>Grand Total</b>	<b>\$7,511,490</b>	<b>\$7,386,268</b>	<b>\$10,259,960</b>	<b>\$11,322,730</b>	<b>\$11,930,875</b>	<b>\$8,665,211</b>	<b>\$9,490,680</b>	<b>\$9,415,917</b>	<b>\$9,331,485</b>	<b>\$9,564,772</b>	<b>\$9,803,891</b>

**Summary 2013 - 2033  
(ESCALATED)**

											<b>Sum of Totals</b>
<b>FERC Summary</b>	<b>Sum of 2024</b>	<b>Sum of 2025</b>	<b>Sum of 2026</b>	<b>Sum of 2027</b>	<b>Sum of 2028</b>	<b>Sum of 2029</b>	<b>Sum of 2030</b>	<b>Sum of 2031</b>	<b>Sum of 2032</b>	<b>Sum of 2033</b>	<b>2013 - 2033</b>
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
<b>Grand Total</b>	<b>\$10,048,988</b>	<b>\$11,359,313</b>	<b>\$10,557,718</b>	<b>\$10,821,661</b>	<b>\$11,092,203</b>	<b>\$11,369,508</b>	<b>\$13,493,312</b>	<b>\$14,178,059</b>	<b>\$18,558,982</b>	<b>\$9,279,121</b>	<b>\$225,442,145</b>

**EXHIBIT No. YA-302**

COMPARISON OF 2010 AND 2013 ESTIMATE

# 2013 Estimates Yankee Atomic Comparison to 2010 Estimate

Exhibit No. YA-302

	2010 Estimate	2013 Estimate	
Categories for FERC Summary	2010-22 Escalated (2.5%)	2010-2012 Actuals 2013-22 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	
Regulatory Fee's	\$ 5,307,349	\$ 4,254,845	
Rentals & Leases	\$ 367,197	\$ -	
Utilities	\$ 2,673,175	\$ 964,644	Revised Estimate for Purchased Power
<b>Grand Total</b>	<b>\$ 121,565,127</b>	<b>\$ 115,843,689</b>	
Footnotes:			

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

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Prepared for Yankee Atomic Power Company

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Knights Cost Engineering Services, LLC

December, 2012

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## 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**

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

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KCES 2012-900, Rev. 0

Site Costs with contingency		\$3,814,508	\$3,296,532	\$517,976
General Contractor		\$5,485,102	\$4,740,274	\$744,828
Site Costs		\$3,467,735	\$2,996,847	\$470,888
<b>YR ISFSI</b>		<b>\$8,952,837</b>	<b>\$7,737,121</b>	<b>\$1,215,716</b>
<b>PERIOD DEPENDENT COSTS</b>		<b>\$5,814,531</b>	<b>\$5,024,970</b>	<b>\$789,562</b>
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		
<b>ACTIVITIES</b>		<b>\$3,138,305</b>	<b>\$2,712,151</b>	<b>\$426,154</b>
1.3	<b>Project Engineering</b>	\$21,108	\$18,242	\$2,866
1.3.1	Procedure Development and Review - Offsite Preparation of QA and Safety Documents - Offsite (in parallel with 1.2.1)	\$10,554		
1.3.2	Site Mobilization and General Employee Training (GET)	\$106,669	\$92,184	\$14,485
1.4	Site Mobilization	\$27,198		
1.4.1	General Employee Training	\$71,738		
1.4.2	Site Specific Training	\$7,733		
1.4.3	Site Preparation - Performed by Staff	\$14,404	\$12,448	\$1,956
1.5	Initial Site Survey			
1.5.1	Setup work areas			
1.5.2	Decontamination Readiness Review			
1.5.3	<b>Disconnect all utilities to work areas.</b>	\$7,202	\$6,224	\$978
1.6	Electrical	\$3,601		
1.6.1	Ventilation	\$1,800		
1.6.2	Piping	\$1,800		
1.6.3	<b>Removal inside security fence</b>	<b>\$2,596,684</b>	<b>\$2,535,505</b>	<b>\$61,179</b>
1.7	Remove Guard Posts	\$3,305		\$3,305
1.7.1	Instrument Enclosure	\$8,375	\$0	\$8,375
1.7.2	Remove VCCs	\$1,208,823	\$1,208,823	\$0
1.7.3	1.7.3.1 Exterior Concrete	\$612,010	\$0	\$0
1.7.3.1	1.7.3.2 Steel liner	\$596,812		
1.7.3.2	Remove Concrete Pad	\$1,326,683	\$1,326,683	
1.7.4	Remove Fence and Towers	\$39,399		\$39,399
1.7.5	Remove Light Towers	\$10,100		\$10,100
1.7.6	<b>Removal outside security fence</b>	<b>\$334,315</b>		<b>\$334,315</b>
1.8				

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1.8.1	Remove Nuisance Fence	\$70,485		\$70,485
1.8.2	Retaining Wall	\$46,334		\$46,334
1.8.3	Conduit and wire - Instrument Enclosure to 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			
1.9	<b>Final Site Survey Structure gone - By DGC Staff</b>	\$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	<b>Outside areas</b>	\$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	<b>Final Project Report - Offsite</b>	\$10,554	\$9,121	\$1,433

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### 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 were 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.

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#### 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.
5. **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

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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.

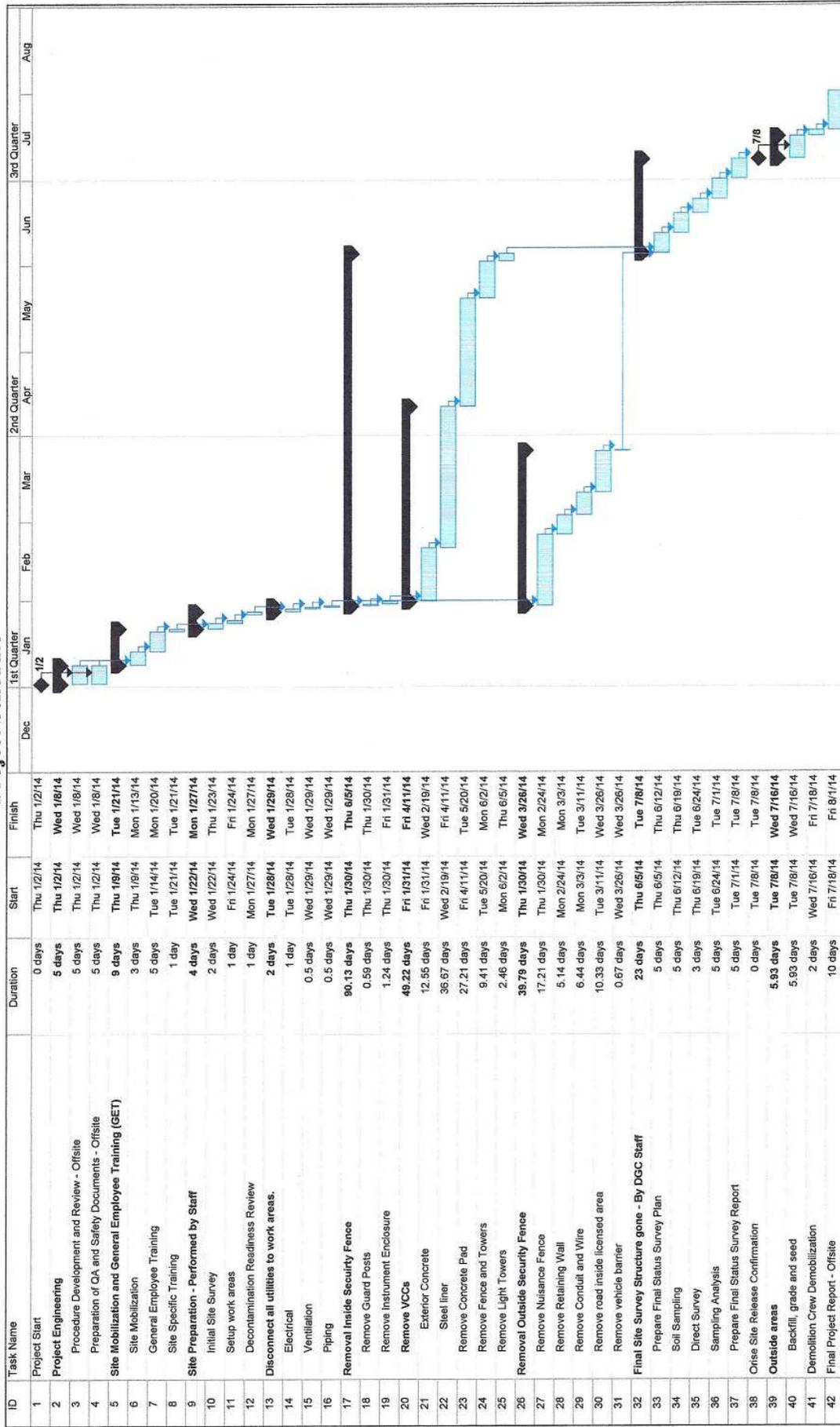
## 5.0 SCHEDULE

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.

**Figure 5-1  
Project Schedule**



## 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**

<u>Staff</u>	<u>Number</u>
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
	<u>20</u>

### 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.

TABLE 6-2  
DGC STAFF

<u>Position</u>	2012 Base <u>Salary</u>	Person <u>Level</u>
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	<u>1.00</u>
		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"

**APPENDIX A**





Yankee Rowe ISFSI Decommissioning Cost Estimate Details

Item	Unit	Rate	Quantity	Subtotal	Material	Equipment	Overhead	Profit	Subtotal	Other	Total
1.4.3 Site Specific Training	hr	\$4,832.92	37,898	\$183,000					\$183,000		\$183,000
1.5 Site Preparation - Performed by Staff											
1.5.1 Initial Site Survey	16 hr										
1.5.2 Setup work areas	8.00	1.00	1	8.00					8.00		8.00
1.5.3 Decontamination Readiness Review	16.00	1.00	16.00	256.00					256.00		256.00
1.6 Decommission all utilities to work areas.											
1.6.1 Electrical	B	8.00	1.00	8.00					8.00		8.00
1.6.2 Ventilation	B	4.00	1.00	4.00					4.00		4.00
1.6.3 Piping	B	4.00	1.00	4.00					4.00		4.00
1.7 Removal fields security fence											
1.7.1 Remove Chain Poles	A	32.00	1.00	32.00					32.00		32.00
1.7.2 Instrument Enclosure											
1.7.2.1 Exterior Concrete	Weight, lbs	1,115,032.20	30.87	\$344,800					\$344,800		\$344,800
1.7.2.2 Steel liner	Weight, lbs	1,115,032.20	30.87	\$344,800					\$344,800		\$344,800
1.7.4 Remove Concrete Pad											
1.7.4.1 Remove Concrete Pad	Volume	2,720.52	30.87	\$145,400					\$145,400		\$145,400
1.7.5 Remove Fence and Towers											
1.7.5.1 Remove Fence and Towers	Volume	39,319.90	435.41	\$1,108,460					\$1,108,460		\$1,108,460



Yankee Rowe SF/SI Decommissioning Cost Estimate Details

Code	Description	Unit	Qty	Rate	Amount	Material	Lab	Equip	Sub	Other	Permit	Travel	Cont	Overhead	Profit	Total
1.05	Pretest Fuel Status Survey Report	10	10	500.00	5,000.00											
1.10	Other Site Release Confirmation															
1.11	Outside areas															
1.11.1	Soilfill inside and seed															
1.12	Demolition Crew Demobilization															
1.13	Final Pretest Report - Offsite															

Code	Description	Unit	Qty	Rate	Amount
1.05	Pretest Fuel Status Survey Report	10	10	500.00	5,000.00
1.10	Other Site Release Confirmation				
1.11	Outside areas				
1.11.1	Soilfill inside and seed				
1.12	Demolition Crew Demobilization				
1.13	Final Pretest Report - Offsite				

Code	Description	Unit	Qty	Rate	Amount
1.05	Pretest Fuel Status Survey Report	10	10	500.00	5,000.00
1.10	Other Site Release Confirmation				
1.11	Outside areas				
1.11.1	Soilfill inside and seed				
1.12	Demolition Crew Demobilization				
1.13	Final Pretest Report - Offsite				