December 1, 2011

Brian K. Cherry  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA  94177

Subject: Request for Approval of a Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

Dear Mr. Cherry:

Advice Letter 3932-E is effective November 21, 2011.

Sincerely,

Edward F. Randolph, Director  
Energy Division
October 20, 2011

Advice 3932-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Request for Approval of a Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

Purpose

Pacific Gas and Electric Company (PG&E) hereby submits its updated schedule of anticipated disbursement requests from the Humboldt Bay Unit 3 Nuclear Decommissioning Master Trusts (Trusts) to fund decommissioning activities at Humboldt Bay Power Plant Unit 3 (HBPP Unit 3) for the remainder of calendar year 2011 and for January 2012 through December 2013. Total expected expenditures through December 2013 are $190.6 million.

Through this advice letter, PG&E requests approval of a disbursement of up to $12 million for planned expenditures through the remainder of 2011 and up to $93.1 million for planned expenditures through 2012. PG&E will request approval of the disbursement of the remaining amounts in future Advice Letter filings. PG&E is identifying the total planned withdrawals through 2013 now because 2013 marks the completion of the major component removal phase at HBPP Unit 3.

PG&E has collected revenues to fund the decommissioning Trusts, and drawing upon the Trusts for these activities will not result in any rate change, cause the withdrawal of service, or conflict with any rate schedule or rule.

Background

HBPP Unit 3 is a 65 megawatt boiling water reactor that began commercial operation in 1963, ceased operation in 1976, and was placed in the SAFSTOR custodial mode in 1988 to await final decommissioning. In Decision D.03-10-014, the California Public Utilities Commission (CPUC or the Commission) approved a decommissioning plan to commence decommissioning HBPP Unit 3 in 2006 (later extended to 2009). The Trusts were established in D.85-12-022, to allow PG&E “to recover from its ratepayers the cost of decommissioning the prudently constructed plant at
Humboldt Bay Power Plant Unit 3.” Funds for the Trusts were collected from PG&E’s ratepayers from 1988 through 1991 per D.85-12-022, and from 2003 through 2009 per CPUC D.03-020-014 and D.07-01-003; and are now being collected through D.10-07-047, which approved PG&E’s 2009 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP) Application. As of June 30, 2011, the Trusts had a liquidation value of $291.8 million, a market value of $301.4 million, and an expense equivalent liquidated value of $317.1 million.\(^1\) $190.6 million represents approximately 60 percent of the total expense equivalent liquidated value.

The Commission previously authorized Trust disbursements to fund preparatory activities in anticipation of the decommissioning of HBPP Unit 3. In Resolution E-4258, the Commission approved PG&E’s request for authorization to access the Trusts for Interim Disbursements (as defined in the Trusts Agreements) to fund decommissioning activities. Resolution E-4258 further directed that PG&E continue to seek specific disbursements through Advice Letter filings. In D.11-07-003, the Commission specified the information to be included in future filings.

In Advice Letter 3649-E PG&E identified $119.9 million in anticipated Trust disbursements to fund activities from May 2010 through December 2011. In response to a request from the Energy Division, PG&E submitted a supplement to Advice Letter 3649-E which reduced the requested disbursement authorization to $90.5 million.\(^2\) PG&E stated in Advice Letter 3649-E-A that the difference between that amount and the $119.9 million requested in Advice Letter 3649-E arises out of the acceleration of decommissioning scopes of work from 2011/2012 into 2010/2011, and that PG&E would seek the remainder through future advice letter authorization requests. The $12 million for 2011 requested in this Advice Letter is intended to fund the remainder of the activities identified in Advice Letter 3649-E to be completed in 2011. As shown in Attachment 1, this amount will result in total authorized disbursements through 2011 equaling the estimate ($262 million) identified in the TLG Decommissioning Cost Estimate approved in D.10-07-047.

The additional $178.6 million identified in this filing is intended to fund the following specific tasks: 1) Operation and maintenance of the Independent Spent Fuel Storage Installation (ISFSI) $8.2 million ($4.0 million in 2012 and $4.2 million in 2013); 2) Reactor Vessel Removal $28.7 million ($19.7 million in 2012 and $9.0 million in 2013); 3) Purchase tools, equipment, & health physics supplies $5.7 million ($3.3 million in 2012 and $2.4 million in 2013); 4) Field work and site infrastructure $24.5 million ($11.9 million in 2012 and $12.6 million in 2013); 5)

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\(^1\) The liquidation value of the trusts reflects the amount available, after taxes, to pay for nuclear decommissioning projects.

\(^2\) Advice Letter 3649-E-A was authorized effective as of May 21, 2010.
Decommissioning labor expenses including specialty consultants $61.2 million ($32.2 million through 2012 and $29.1 million in 2013); 6) Packaging, transporting, and disposal of waste $27.7 million ($14.2 million in 2012 and $13.5 million in 2013); and 7) Prepare buildings for decontamination and demolition of structures, $22.6 million ($7.8 million in 2012 and $14.8 million in 2013). As stated above, PG&E is requesting authorization at this time to withdraw up to $93.1 million to fund anticipated decommissioning activities in 2012.

These activities were included in the TLG Decommissioning Cost Estimate approved in D.10-07-047. They are distinct from the operations and maintenance activities performed under SAFSTOR, and consistent with prior Commission decisions. PG&E is not requesting any funding for SAFSTOR through this Advice Letter.

In accordance with D.11-07-003, PG&E is providing the following additional information:

Attachment 1 – Graph tracking NDCTP forecast and actual decommissioning expenditures

Attachment 2 – Description of planned scopes of work

Attachment 3 – Summary of previous Advice Letter approvals and Trust withdrawals and anticipated disbursements

Attachment 4 – Correlation of budget categories to TLG Decommissioning Cost Estimate

As with previously approved disbursements from the Trusts, PG&E will maintain separate accounting to record costs of these activities, and the related transactions with the Trusts, to permit cost monitoring. In accordance with Ordering Paragraph 2 of Resolution E-4268, PG&E will seek disbursement from the Trusts for activities granted herein only after PG&E has incurred and paid the costs for the activities, or through the advance withdrawal procedures authorized in Section 2.01(5) of the Trusts. To date, PG&E has not utilized these advance withdrawal procedures; instead, on a periodic basis, PG&E requests withdrawals from the Trusts for the costs of internal services and vendors actually paid. Actual expenditures will be reviewed after completion in subsequent NDCTPs.
Protests

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, by facsimile or electronically, any of which must be received no later than November 9, 2011, which is 20 days from the date of this filing. Protests should be mailed to:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-mail: jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest also should be sent via U.S. Mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

Facsimile: (415) 973-6520
E-mail: PGETariffs@pge.com

Effective Date

PG&E requests that this Tier 2 advice filing become effective upon regular notice, November 21, 2011.

Notice

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for the 2009 Nuclear Decommissioning Cost Triennial Proceeding. Address changes to the General Order 96-B service list and all
electronic approvals should be directed to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission’s Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at http://www.pge.com/tariffs/.

Vice President – Regulation and Rates

cc: Service List A.09-04-007

Attachments
Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

**Utility type:**
- ☑ ELC
- ☑ GAS
- ☐ PLC
- ☐ HEAT
- ☐ WATER

**Contact Person:** Greg Backens

**Phone #:** 415-973-4390

**E-mail:** gab4@pge.com

**EXPLANATION OF UTILITY TYPE**

<table>
<thead>
<tr>
<th>ELC = Electric</th>
<th>GAS = Gas</th>
<th>PLC = Pipeline</th>
<th>HEAT = Heat</th>
<th>WATER = Water</th>
</tr>
</thead>
</table>

**Advice Letter (AL) #:** 3932-E

**Tier:** 2

**Subject of AL:** Request for Approval of a Disbursement of Funds from the Humboldt Bay Power Plant Unit 3 Nuclear Decommissioning Trusts

**Keywords** (choose from CPUC listing): Nuclear

**AL filing type:** □ Monthly □ Quarterly □ Annual ☑ One-Time □ Other _____________________________

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: N/A

Does AL replace a withdrawn or rejected AL? No. If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Is AL requesting confidential treatment? No. If so, what information is the utility seeking confidential treatment for: N/A

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: N/A

Resolution Required? □ Yes ☑ No

**Requested effective date:** November 21, 2011

**No. of tariff sheets:** N/A

**Estimated system annual revenue effect (%):** N/A

**Estimated system average rate effect (%):** N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

**Tariff schedules affected:** N/A

Service affected and changes proposed: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**CPUC, Energy Division**

**Tariff Files, Room 4005**

**DMS Branch**

505 Van Ness Ave., San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

**Pacific Gas and Electric Company**

Attn: Brian K. Cherry, Vice President, Regulation and Rates

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com
Attachment 1

Graph Tracking NDCTP Forecast
And Actual Decommissioning Expenditures

HBPP Nuclear Decommissioning Cash Flow

Comparison Forecast to Actual Expenditures

<table>
<thead>
<tr>
<th>Year</th>
<th>Baseline TLG Estimate (2008 $)</th>
<th>Escalated TLG Estimate</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior</td>
<td>-</td>
<td>-</td>
<td>90M</td>
</tr>
<tr>
<td>2009</td>
<td>75M¹</td>
<td>78M¹</td>
<td>36M</td>
</tr>
<tr>
<td>2010</td>
<td>46M</td>
<td>49M</td>
<td>63M</td>
</tr>
<tr>
<td>2011</td>
<td>55M</td>
<td>62M</td>
<td>73M²</td>
</tr>
<tr>
<td>2012</td>
<td>68M</td>
<td>81M</td>
<td>93M²</td>
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<tr>
<td>2013</td>
<td>83M</td>
<td>105M</td>
<td>86M²</td>
</tr>
<tr>
<td>2014</td>
<td>41M</td>
<td>53M</td>
<td>-</td>
</tr>
<tr>
<td>2015</td>
<td>37M</td>
<td>49M</td>
<td>-</td>
</tr>
</tbody>
</table>

¹ $16.9 million expended in 2008 included in 2009 Trust Funding Estimate
² Current Forecast
1. **Operation and Maintenance of the ISFSI**

The used fuel at Humboldt Bay was moved to the Independent Spent Fuel Storage Installation (ISFSI) in 2008. With the placement of the fuel at the ISFSI, PG&E commenced incurring operation and maintenance (O&M) expenses associated with the ISFSI. PG&E received initial funding of $4 million through Advice Letter 3147-E; and an additional $2.5 million, and $7.2 million through Advice Letters 3843-E, and 3649-E, respectively, for this scope. The ongoing costs for O&M of the ISFSI, security at the ISFSI, NRC fees, and NRC inspections through December 2013 are an additional $8.2 million.

2. **Segmentation and Disposal of Reactor Vessel Shell**

The segmentation, removal, and disposal of the reactor vessel shell is planned to begin in 2012 following the removal of the reactor vessel internals. The total estimate for this scope of work is $28.7 million through 2013. Costs for the planning, preparation, and internal removals of the Reactor Vessel were covered in Advice Letter 3649-E.

3. **Purchase Tools and Equipment**

An adequate tool and equipment supply, including decontamination and health physics supplies are needed to perform the decommissioning activities. In addition to the typical hand tools and personnel protective equipment (PPE) inventories, this category includes, but is not limited to: building and equipment maintenance materials, site equipment refueling costs, weather protection supplies, unique equipment rental (e.g., light stanchions, man-lifts, generators, pumps, fans, heaters), crane / hoist inspection services, and safety equipment. The tools and equipment purchased will be limited to that needed for the scope of work during this phase. The total estimate for tools and equipment for this phase is $5.7 million.

4. **Field Work and Site Infrastructure**

This request includes the dismantling and preparation for disposal of the remaining systems and components within the RCA boundary. This includes, but is not limited to: tanks and vessels, pumps, piping and valves, fans, ducts, electrical cable and raceway, asbestos-containing insulation, panels and coatings, and embedded piping. This also includes scaffolding and other associated, additional costs. This request includes costs for design, fabrication, and operation of a groundwater management and treatment system. The existing high water table at the HBPP site introduces unique challenges for water management associated with building demolition and substructure and soil excavations. The system will be installed in 2012 and remain in operation through soil excavation. The estimate for this scope is $24.5 million.

5. **Decommissioning Labor Expenses**

Labor costs include management positions, safety oversight, procurement, finance, licensing support, radiation protection, and engineering. Other work activities performed during this period will include bid scope preparation, bid evaluation, selection of demolition contractors, and contract administration. This request also includes historical site assessment, historical resource mitigation, environmental regulatory compliance, and safety meetings. The estimate for this scope of work through 2013 is $61.2 million.
6. Packaging, Transporting and Disposal of Waste

Components removed in the decontamination and dismantling of HBPP Unit 3 will be routed to an on-site central packaging and processing area. This includes the processing of dry active waste (DAW), resins, filter media, metallic and non-metallic components generated in the decommissioning. Contaminated material will be characterized, packaged and transported for disposal at the appropriate waste disposal facility. PG&E received initial funding of $34 million through Advice Letter 3649-E and an additional $13.9 million to implement the Waste Management and Transportation Plan through Advice Letter 3483-E. The estimate for packaging, transporting and disposal of waste through December 2013 is $27.7 million.

7. Prepare Buildings for Decontamination and Demolition of Structures

This request includes decontamination and/or grouting of embedded pipe and shaving the surfaces of the concrete structures. These activities also include removal of LRW concrete tunnel, removal of activated concrete from the drywell; and removal of liner plates as necessary to access the concrete surfaces behind the liners. Demolition of Security Alarm Station, Stack Base, Hot Machine Shop, and Turbine Building are planned to take place in 2012 and 2013. The approved budgets for these scopes of work total $22.6 million.
Previously identified activities include design, development, operations and maintenance of the Independent Spent Fuel Storage Installation; mitigation of Caisson In-Leakage; initial sampling, surveys, and radiological characterization of plant systems; environmental studies and permitting; preparations and removal of equipment and plant systems from the turbine building, refueling building and yard facilities; disposal of Class A and low level waste; as well as other preparatory activities for decommissioning.

The total amount authorized in previous advice letter requests is $249.0 million, with ISFSI related requests at $61.4 million and Non-ISFSI related at $187.6 million. The amount actually expended through August 2011 totals $237.0 million. The amount estimated to be spent from September 2011 through 2013 totals $190.6 million.

The following table compares the actual expenditures for each activity to the amounts authorized.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>ISFSI O&amp;M</td>
<td>4,000,000</td>
<td>2,500,000</td>
<td>7,200,000</td>
<td>12,352,839</td>
<td>1,589,504</td>
<td>359,003</td>
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<tr>
<td>Reactor Vessel</td>
<td>100,000</td>
<td>1,100,000</td>
<td>1,700,000</td>
<td>20,100,000</td>
<td>8,345,990</td>
<td>1,185,402</td>
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<tr>
<td>Tools &amp; Equipment</td>
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<td>6,900,000</td>
<td>5,100,000</td>
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<td>Field Work</td>
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<td>11,500,000</td>
<td>16,500,000</td>
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<td>7,717,601</td>
<td>2,813,311</td>
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<td>Staffing</td>
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<td>37,000,000</td>
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<td>8,183,525</td>
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<tr>
<td>Waste Disposal</td>
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<td>5,600,000</td>
<td>13,900,000</td>
<td>34,000,000</td>
<td>15,757,075</td>
<td>34,308,386</td>
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<td>Building Demolition</td>
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<td>34,000,000</td>
<td>37,000,000</td>
<td>3,321,911</td>
<td>315,066</td>
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<td>Other</td>
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<td>0</td>
<td>0</td>
<td>3,321,911</td>
<td>-2,056,977</td>
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<tr>
<td><strong>Subtotal</strong></td>
<td>100,000</td>
<td>21,200,000</td>
<td>57,300,000</td>
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<td>147,140,270</td>
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<td>Miscellaneous</td>
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<td>-29,400,000</td>
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<td>-12,024,447</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>69,319,300</strong></td>
<td><strong>31,900,000</strong></td>
<td><strong>57,300,000</strong></td>
<td><strong>90,500,000</strong></td>
<td><strong>237,036,068</strong></td>
<td><strong>24,964,025</strong></td>
</tr>
</tbody>
</table>

1 Amount by which Advice Letter 3649-E requested total was reduced in Advice Letter 3649-E-S.
The previous requests for staffing were significantly lower than actually spent. The baseline TLG nominal budget for staffing during this time is $75.4 million, slightly less than the amount forecasted to spend through December 2011 (see table below). Under runs in other areas of the previous advice letters offset the overrun in staffing.

<table>
<thead>
<tr>
<th>PG&amp;E</th>
<th>TLG Estimate 2009 – 2011</th>
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<tbody>
<tr>
<td>Staffing and Specialty Consultants</td>
<td>80,546,312</td>
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</table>

The difference is due to the increased number of Radiation Protection personnel required due to the unique alpha hazards, the mitigative actions for worker safety, and the early preparation of specifications to support the accelerated decontamination and demolition schedule.
## Correlation of Budget Categories to TLG Decommissioning Cost Estimate

### ISFSI O & M (including Security Staffing)

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
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<tbody>
<tr>
<td>3b.4.8</td>
<td>NRC Fees</td>
</tr>
<tr>
<td>3b.4.11</td>
<td>ISFSI Operating Costs</td>
</tr>
<tr>
<td>3b.4.12</td>
<td>Security Staff Cost</td>
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<tr>
<td>4a.4.8</td>
<td>NRC Fees</td>
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<tr>
<td>4a.4.11</td>
<td>ISFSI Operating Costs</td>
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<td>4a.4.12</td>
<td>Security Staff Cost</td>
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<tr>
<td>4b.4.8</td>
<td>NRC Fees</td>
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<td>4b.4.12</td>
<td>ISFSI Operating Costs</td>
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<td>4b.4.13</td>
<td>Security Staff Cost</td>
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<tr>
<td>4c.4.8</td>
<td>NRC Fees</td>
</tr>
<tr>
<td>4c.4.12</td>
<td>ISFSI Operating Costs</td>
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<tr>
<td>4c.4.13</td>
<td>Security Staff Cost</td>
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<tr>
<td>4d.4.7</td>
<td>NRC Fees</td>
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<tr>
<td>4d.4.11</td>
<td>ISFSI Operating Costs</td>
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<tr>
<td>4d.4.12</td>
<td>Security Staff Cost</td>
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### Reactor Vessel

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>4a.2.2</td>
<td>Activation Analysis of Reactor</td>
</tr>
<tr>
<td>4b.1.1.1</td>
<td>CRDMs &amp; NIs Removal</td>
</tr>
<tr>
<td>4b.1.1.2</td>
<td>Reactor Vessel Internals</td>
</tr>
<tr>
<td>4b.1.1.3</td>
<td>Reactor Vessel</td>
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</table>

### Tools, Equipment and Health Physics Supplies

#### Tools and Equipment

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>3b.2.12</td>
<td>Procure Initial Inventory of Tools and Equipment</td>
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<tr>
<td>3b.3.1</td>
<td>Decon equipment</td>
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<tr>
<td>3b.3.3</td>
<td>Pipe cutting equipment</td>
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<tr>
<td>3b.4.1</td>
<td>Decon supplies</td>
</tr>
<tr>
<td>3b.4.4</td>
<td>Health physics supplies</td>
</tr>
<tr>
<td>4a.3.2</td>
<td>Small tool allowance</td>
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<tr>
<td>4a.4.1</td>
<td>Decon supplies</td>
</tr>
<tr>
<td>4a.4.4</td>
<td>Health physics supplies</td>
</tr>
</tbody>
</table>

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2 References are to the TLG Decommissioning Cost Estimate approved in D.10-07-047.
### 4a.3.2 Small tool allowance
### 4a.4.1 Decon supplies
### 4a.4.4 Health physics supplies
### 4b.3.2 Small tool allowance
### 4b.4.1 Decon supplies
### 4b.4.4 Health physics supplies
### 4c.3.2 Small tool allowance
### 4c.4.1 Decon supplies
### 4c.4.4 Health physics supplies
### 4c.4.5 Heavy equipment rental
### 4d.3.1 Small Tool Allowance
### 4d.4.3 Health physics supplies
### 4d.4.4 Heavy equipment rental

### Field Work and Site Infrastructure/Mods

#### Special Projects

<table>
<thead>
<tr>
<th>3b.2.1</th>
<th>Additional Support Facilities - Radiological Protection</th>
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<tbody>
<tr>
<td>3b.2.2</td>
<td>Additional Support Facilities - Access, Fencing, Laydown Areas</td>
</tr>
<tr>
<td>3b.2.3</td>
<td>Personnel &amp; Material Access RB Access Shaft</td>
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<tr>
<td>3b.2.6</td>
<td>Employee Emergency Notification System</td>
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<tr>
<td>3b.2.7</td>
<td>Infrastructure for Facility Modifications</td>
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<td>3b.2.9</td>
<td>Rebuild Refueling Building Crane</td>
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<tr>
<td>4a.2.1</td>
<td>Modifications Supporting Access for Equipment Removal</td>
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<tr>
<td>4b.2.3</td>
<td>Expand Waste Packaging Laydown Area</td>
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#### Systems Removal

<table>
<thead>
<tr>
<th>4a.1.1</th>
<th>Main Turbine/Generator</th>
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<tbody>
<tr>
<td>4a.1.2</td>
<td>Main Condensers</td>
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<tr>
<td>4a.1.3</td>
<td>Remove Spent Fuel Racks</td>
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<tr>
<td>4a.1.4</td>
<td>Fuel Pool Cleanup</td>
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<tr>
<td>4a.1.5.1</td>
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**Emergent Work**

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**Staffing and Specialty Consultants**

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### Packaging, Transportation and Disposal

**Waste Disposal**

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## 4b.1.2.3 RB2-9
## 4b.1.2.4 RW1-1
## 4b.1.2.5 RW1-2
## 4b.1.2.6 RW1-3
## 4b.1.2.7 RW1-4
## 4b.1.2.8 RW1-5
## 4b.1.2.9 RW1-6
## 4b.1.2.10 RW1-7
## 4b.1.2.11 RW1-8
## 4b.1.2.12 RW1-9

### 4b.2.1 Discharge Piping

### 4b.3.1 Process liquid waste

### 4b.4.6 Disposal of DAW generated

### 4b.4.11 Radwaste Processing Equipment/Services

## 4c.1.1.1 HMS1-1
## 4c.1.1.2 HMS1-2
## 4c.1.1.3 HMSP
## 4c.1.1.8 OTS-5
## 4c.1.1.10 RB1-1
## 4c.1.1.11 RB1-2
## 4c.1.1.12 RB1-3
## 4c.1.1.13 RB1-4
## 4c.1.1.14 RB1-5
## 4c.1.1.15 RB1-6
## 4c.1.1.16 RB3-2
## 4c.1.1.17 RB4-2
## 4c.1.1.18 RB5-1
## 4c.1.1.19 RB5-1 (HVAC Scope)
## 4c.1.1.20 RBP
## 4c.1.1.23 TB7-3
## 4c.1.1.24 TB7-4
## 4c.1.1.25 TB7-5
## 4c.1.1.26 TB7-6
## 4c.1.1.29 YD1-2
## 4c.1.1.30 YD1-5
## 4c.1.1.31 YD2-1
## 4c.1.1.32 YD2-2
## 4c.1.1.33 YD2-3
## 4c.1.1.34 YD2-4
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### Building Demolition (including decontamination)

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### Additional Costs

| 4b.2.1 Discharge Piping                                  |
| 4b.2.2 Asbestos Removal                                  |
| 4c.2.1 Contaminated Soil Removal                         |
| 4c.2.2 Replacement of Drains and Catch Basins           |
| 4c.2.3 Caisson Mixed Waste Removal                       |
### 4c.2.4 Site work supporting spent fuel pool removal
### 4c.2.5 Removal of 3 spent fuel pool walls
### 4c.2.6 Removal of Yard Pipe Tunnel
### 4c.2.7 Contaminated Soil & Concrete Storage Facility

### Other

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