



**Luminant**

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CP-201201309  
TXX-12161

10 CFR 50.80  
10 CFR 50.75

October 24, 2012

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Director, Office of Nuclear Reactor Regulation  
Washington, DC 20555

**SUBJECT:** Comanche Peak Nuclear Power Plant (CPNPP) and Independent Spent Fuel Storage Installation (ISFSI), Docket Nos. 50-445, 50-446, 72-74  
Additional Information Regarding Application for Order Approving Indirect and Internal Transfer of Licenses (CPNPP Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89)) (TAC NOS. ME9767 and ME9768)

**REFERENCE:** 1. Luminant Power Letter logged TXX-12149 from Rafael Flores to the NRC dated October 11, 2012, Application for Order Approving Indirect and Internal Transfer of Licenses (CPNPP Unit 1 Operating License (NPF-87) and CPNPP Unit 2 Operating License (NPF-89))

Dear Sir or Madam:

Luminant Generation Company LLC ("Luminant Power"), acting on behalf of Energy Future Holdings Corp. ("EFH"), Energy Future Competitive Holdings Company ("EFCH"), Texas Competitive Electric Holdings Company LLC, and Luminant Holding Company LLC, hereby submits additional information in connection with the indirect transfer of licenses requested in Reference 1.

As noted in Reference 1, Luminant Power will continue to provide financial assurance for decommissioning funding in accordance with 10 CFR 50.75(e)(1)(i) and (ii), using the external sinking fund method with access to non-bypassable charges to retail electric customers. A report regarding the status of these funds was submitted to the NRC on March 28, 2011, as Luminant Power's biennial 50.75(f) report (Accession number ML110960274). An update to this status report is provided in an Attachment to this letter.

A member of the STARS Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

A001  
NM5526

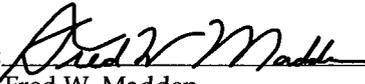
If the NRC requires additional information concerning this license transfer, please contact Fred Madden, Director Oversight and Regulatory Affairs, Luminant Power, tel: (254) 897-8601 and email: Fred.Madden@luminant.com.

This letter contains no new licensing basis commitments regarding Comanche Peak Nuclear Power Plant Units 1 and 2.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:   
Fred W. Madden  
Director, Oversight and Regulatory Affairs

Attachment - NRC Decommissioning Funding Status Report for  
Financial Assurance at December 31, 2011

c -  
E. J. Leeds, Director, Office of Nuclear Reactor Regulation  
E. E. Collins, Region IV  
B. K. Singal, NRR  
Resident Inspectors, Comanche Peak

## NRC Decommissioning Funding Status Report for Financial Assurance at December 31, 2011

### Luminant Generation Company LLC Comanche Peak Nuclear Power Plant (CPNPP)

<u>Information is submitted to provide Financial Assurance</u>	<u>Unit # 1</u>	<u>Unit # 2</u>
1. The minimum amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c).		
At December 31, 2011		
Using NRC 10 CFR 50.75(c) formulas	\$ 474.3 million	\$ 474.3 million
Site-specific study	\$ 593.0 million	\$ 693.8 million
2. The amount accumulated at the end of the calendar year preceding the date of the report for items included in 10 CFR 50.75 (b) and (c). Investment categories per Regulatory Guide 1.159 2.6.2.		
Cash	0%	0%
U.S. Equities	58%	58%
U.S. Fixed Income	42%	42%
	100%	100%
Market Value at December 31, 2011	\$ 267.8 million	\$ 306.6 million
3. A schedule of the annual amounts remaining to be collected for items in 10 CFR 50.75 (b) and (c).		
Years 2012 through 2029 (18 years)	7.5 million	7.3 million
Year 2030	1.2 million	7.3 million
Year 2031		7.3 million
Year 2032		7.3 million
Year 2033		1.2 million
Totals	\$ 135.4 million	\$ 153.8 million
4. The assumptions used regarding escalation in decommissioning costs, rates of earnings on decommissioning funds, and rates of other factors used in funding projections.		
Estimated Escalation rate for decommissioning costs	2.5248%	2.5043%
Estimated Earnings rates on decommissioning funds		
2012 through 2028	4.83%	4.83%
2029 through 2059	3.99%	3.99%
2060 and thereafter	3.07%	3.07%
Rates of other factors used in funding projections	None	None
5. Any power sale contracts upon which licensee is relying to certifying financial assurance.	None	None
6. Modifications to licensee's method of providing financial assurance since previous report.	None	None
7. Material changes to trust agreement.	None	None

**Notes:**

1. Labor (South) and Energy are based on BLS ( $L_x=2.277$ ,  $E_x=2.580$ ). Burial inflation factors are based on NUREG 1307, "Report on Waste Burial Charges," Revision 14 ( $B_x=12.280$ )
2. All forecast data are based on the decommissioning cost study filed with the Public Utility Commission on June 17, 2010 and is subject to approval by the Commission.