### REQUEST FOR ADDITIONAL INFORMATION

# REGARDING PORTLAND GENERAL ELECTRIC COMPANY

### DECOMMISSIONING FUNDING PLAN UPDATE FOR

### TROJAN INDEPENDENT SPENT FUEL STORAGE INSTALLATION

# **DOCKET NO. 72-17**

# **Regulatory Requirement**

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

# **Background**

By letter dated December 10, 2015, Portland General Electric Company (PGEC) submitted, for U.S. Nuclear Regulatory Commission (NRC) staff review and approval, a decommissioning funding plan update (DFP Update) for the independent spent fuel storage installation at Trojan (Agencywide Documents Access and Management System Accession No. ML15349A939). The NRC staff reviewed PGEC's DFP update and believes PGEC's submittal was not sufficient to meet the intent of the requirement in 72.30(c). Specifically, the DFP update does not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

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For the ISFSI at Trojan, provide a revised DFP that includes the effect on decommissioning costs of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.