

Cooper Nuclear Station
Subsequent License Renewal
(SLR)





NPPD Board of Directors Meeting February 2024

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## Integrated Resource Planning Recommendation

• Start proceeding with the second relicense renewal process, as well as further refine the capital costs needed for the relicense. Also continue to monitor CNS operating costs and reevaluate relicensing if projected costs are significantly higher than assumptions in the IRP.

- IRP Assumptions
  - Used existing Rate Outlook from 2022 to 2027
  - Used escalated values for Rate Outlook beyond 2027
  - Added **\$156.6M** in 2027 for relicensing effort
  - In 2034 and beyond added capital improvements of **~\$15.6M** for ongoing life cycle management; cost is escalated 2% each year through 2052

# CNS SLR Feasibility Study Scope

- Scope included detailed assessment of process and CNS readiness to perform Subsequent License Renewal (SLR)
  - Elements of SLR
    - Scoping and screening
    - Aging Management Reviews
    - Operating experience
    - Nuclear Regulatory Commission (NRC) review and approval
    - Subsequent license renewal application (SLRA)
    - Implementation/Inspections
    - Environmental Impact
  - Reviewed previous CNS license renewal documentation
  - Reviewed industry experience with subsequent license renewal
  - Performed detailed risk review
  - Performed cost & schedule estimate

# **CNS SLR Feasibility Study Results**

- Results
  - No issues that would prevent successful NRC approval
    - No required commitments for upgrades or repairs were identified
    - No major issues anticipated during SLRA preparation and NRC review
    - No major environmental issues identified that would preclude SLR
    - No high-risk factors were identified

## **License Extension Cost Estimate**

Cost Estimate to develop, submit, approve and implement:

| Contract Support to develop submittal                     | \$8.0M |
|---|--------|
| CNS Project Team Support (5 to 7 People) plus SME reviews | \$4.0M |
| Specialty Vendor (GE, SIA, etc.)                          | \$7.0M |
| Environmental & Severe accident methodology assessment    | \$1.5M |
| Legal & Miscellaneous fees (travel, communications, etc.) | \$1.5M |
| NRC Review Fees   | \$8.0M |
| Risk Contingencies (10%)                                  | \$3.0M |
| Implementation inspections                                | \$16M  |
| Sub-Total   | \$49M  |
| IDC/A&G   | \$7.4M |
|   |        |

\$56.4M

**Project Total** 

#### Plant Reliability Projects to Support Additional 20-year Life Extension

- The following projects are to improve plant reliability (total cost \$58.4M):
  - Replacement of the low pressure (#1) feedwater heaters (original Equipment) -\$11.2M
  - Replacement/retube of condenser (original equipment) \$35.7M
  - Replacement of REC/RHR Heat Exchangers (original equipment) \$10M
  - Upgrade of Cathodic Protection (maintains underground assets) \$1.5M
- Total Cost including plant reliability improvement is \$114.8 M
  - Bounded by IRP assumptions of \$156.6M

# Timeline for License Extension Approval

- Application development requires up to 20 months
  - Includes long lead time analysis from specialty vendors requiring >12 months
    - Timeframe could increase as more plants apply for SLR using same specialty vendor
- NRC target time for review and approval is 22 months
  - Timeframe could increase as more sites apply for SLR increasing NRC workload
- Based on above recommendation for NRC submittal is 2026
  - Maximizes number of outages to implement required inspections
  - Minimizes the potential for new guidance to expand the scope

### Recommendation

Adopt resolution to allow CNS management to proceed with the second license extension project starting in 2024 for estimated cost of \$56,400,000.00



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## Questions

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