



Entergy Nuclear Operations, Inc
440 Hamilton Avenue
White Plains, NY 10601
Tel 914 272 3370

John F. McCann
Vice President – Nuclear Safety,
Emergency Planning and Licensing

ENOC-13-00009
March 29, 2013

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: **Financial Test for Decommissioning Funding Parent Guarantees for the year ending December 31, 2012**

Big Rock Point ISFSI
Docket 50-155 / 72-043
License No. DPR-6

Vermont Yankee Nuclear Power Station
Docket 50-271
License No. DPR-28

2013 APR - 8 A 10: 32
STATE OF VERMONT
DEPT OF PUBLIC SERVICE
MONTPELIER, VT.
05620-2601

REFERENCE: 1. Entergy letter BVY-10-008, "Decommissioning Funding Assurance Documentation" dated January 28, 2010 (ML 100470701).

Dear Sir or Madam:

This letter provides the documents to support the continued use of a parent company guarantee to provide financial assurance of decommissioning funds for the Vermont Yankee Nuclear Power Station and the Big Rock Point Independent Spent Fuel Storage Installation (ISFSI), pursuant to 10 CFR 50.75(e)(1)(iii)(B).

Use of the parent company guarantee for Vermont Yankee was initially established by Reference 1 for 2009 based upon financial data for the year ending December 31, 2008. Recital 8 of the Vermont Yankee parent company guarantee requires the guarantor to submit certain financial documents to the NRC annually within 90 days of the close of the parent guarantor's fiscal year. The updated information for fiscal year ending December 31, 2012 is provided herein.

The licensees requested that Entergy Corporation's independent certified public accountant, Deloitte & Touche, LLP, evaluate the company's off-balance sheet transactions and provide an opinion on whether those transactions could materially adversely affect the company's ability to pay for decommissioning costs, as required by 10 CFR 30 Appendix A. Deloitte & Touche, LLP stated that it does not provide opinions of that nature. Nevertheless, Entergy Corporation's management has concluded that the amount of decommissioning-related parent guarantees at issue is very small as compared to the balance sheet amounts, and in its opinion, off-balance sheet transactions would not be expected to affect the company's ability to pay for decommissioning costs. Additionally, Entergy Nuclear Operations notes that the \$40 million guarantee for Vermont Yankee is not required to meet current financial assurance requirements under 10 CFR 50.75 (c) given the license has been renewed for that plant. The company's off-

balance sheet transactions are described in its Securities and Exchange Commission filings, in particular, its 10-Q and 10-K filings.

There are no new commitments made in this letter. If you have any questions, please contact Mr. David Mannai, Senior Manager, Nuclear Safety & Licensing at 802-380-1175.

Sincerely,



JFM / djm / krk

- Attachments:
1. Entergy Corporation Parent Guarantee for Fiscal Year Ending 12/31/2012
 2. Independent Accountant's Report on Applying Agreed-Upon Procedures

cc:

Mr. J. A. Aluise (ENT)
Ms. W. C. Curry (ECH)
Mr. J.S. Forbes (ECH)
Mr. B. E. Green (TMBR)
Mr. D. J. Mannai (WPO)
Mr. J. F. McCann (WPO)
Mr. T. G. Mitchell (WPO)
Mr. M. Perito (WPO)
Mr. L. Jager Smith (ECH)

Mr. A. J. Vitale (PAL)
Mr. C. J. Wamser (VTY)

USNRC Regional Administrator, Region I
USNRC Regional Administrator, Region III

USNRC Project Manager, Palisades
USNRC Project Manager, Big Rock Point
USNRC Project Manager, Vermont Yankee
USNRC Resident Inspector, Vermont Yankee

Michigan Department of Environmental Quality
Michigan Public Service Commission
Vermont Department of Public Service
Downs Rachlin Martin PLLC / St. Johnsbury, VT

ENOC-13-00009
ATTACHMENT 1

Entergy Corporation Parent Guarantee for Fiscal Year Ending 12/31/2012
(3 pages)



ENTERGY CORPORATION
P.O. Box 61000
NEW ORLEANS, LA 70161
(504) 576-5477

ANDREW S. MARSH
EXECUTIVE VICE PRESIDENT AND
CHIEF FINANCIAL OFFICER

March 18, 2013

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Subject: Entergy Corporation Parent – Guarantee of Funds for Decommissioning: Letter from Chief Financial Officer to Demonstrate Financial Assurance

I am the chief financial officer of Entergy Corporation, 639 Loyola Avenue, New Orleans, LA 70113, a corporation. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Title 10, Part 50, of the *Code of Federal Regulations* (10 CFR Part 50).

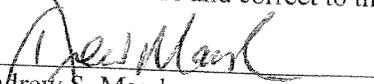
This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facilities owned or operated by subsidiaries of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for each facility:

| <u>Name of Facility</u> | <u>Location of Facility</u> | <u>Current Cost Estimate</u> | <u>Amount Being Guaranteed</u> |
|--|-----------------------------|------------------------------|--------------------------------|
| Vermont Yankee Nuclear Power Station License No. DPR-28 | Vernon, VT | \$620,842,653 ¹ | \$40,000,000 |
| Big Rock Point Independent Spent Fuel Storage Installation License Nos. DPR-06, SFGL-16 | Charlevoix, MI | \$ 1,550,000 ² | \$ 5,000,000 |

Entergy Corporation is required to file a Form 10-K with the U.S. Securities and Exchange Commission for the latest fiscal year.

The fiscal year of Entergy Corporation ends on December 31st. The figures for the following items (Financial Test II) marked with an asterisk are derived from Entergy Corporation's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended December 31, 2012.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.


Andrew S. Marsh
Executive Vice President and Chief Financial Officer

3/18/13
Date

¹ Per Status of Decommissioning Funding for Plants Operated by Entergy Nuclear Operations, Inc. for the year ending December 31, 2012 – 10 CFR 50.75(f)(1).

² See Accession No. ML12352A126.

FINANCIAL TEST: ALTERNATIVE II
(10 CFR Part 30 App. A. Section II A.2.)
Entergy Corporation Parent Guarantee of Funds For Decommissioning
Dollars in thousands

| | | |
|-----|--|----------------------|
| 1. | Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 and Big Rock Point Independent Spent Fuel Storage Installation, Licenses Nos. DPR-06, SFGL-16 (total cost of all cost estimates should be stated in paragraphs above) | \$45,000 |
| 2. | Current rating of most recent bond issuance of this firm Rating <u>BBB corporate credit rating as of January 25, 2013</u> Name of rating service <u>Standard & Poor's</u> | |
| 3. | Date of issuance of bond <u>See NOTE/below</u> | |
| 4. | Date of maturity of bond <u>See NOTE/below</u> | |
| *5. | Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line) | \$8,954,521 |
| *6. | Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States) | N/A |
| | | <u>Yes</u> <u>No</u> |
| 7. | Is line 5 at least \$10,000? | X |
| 8. | Is line 5 at least 6 times line 1? | X |
| 9. | Are at least 90 percent of firm's assets located in the United States? If not, complete line 10. | X |
| 10. | Is line 6 at least 6 times line 1? | N/A |
| 11. | Is the rating specified on line 2 "BBB" or better (if issued by Standard & Poor's) or "Baa" or better (if issued by Moody's)? | X |

NOTE/Entergy Corporation does not have any recent bond issuances. Ratings supplied above are the current credit ratings from the indicated rating agency. Entergy Corporation's last bond issuance had a rating of BBB-.

* Denotes figures derived from financial statements.

** Tangible net worth is defined as net worth minus goodwill, patents, trademarks, and copyrights.

**RECONCILING SCHEDULE
ENTERGY CORPORATION
YEAR ENDED DECEMBER 31, 2012
Dollars in thousands**

| <u>Line Number in CFO's Letter</u> | <u>Per Financial Statements</u> | <u>Recon- ciling Items</u> | <u>Per CFO's Letter</u> |
|---|---|------------------------------------|---------------------------------|
| Total Assets | \$43,202,502 | | |
| Less: Total Current Liabilities | (4,106,321) | | |
| Less: Total Non-Current Liabilities | (29,618,581) | | |
| Less: Goodwill | (377,172) | | |
| Less: Net Book Value of Vermont Yankee Nuclear Power Station and Big Rock Point | <u>(145,907)</u> | | |
| Tangible Net Worth | \$ 8,954,521 | | \$ 8,954,521 |

ENOC-13-00009
ATTACHMENT 2

Independent Accountant's Report on Applying Agreed-Upon Procedures
(5 pages)



Deloitte & Touche LLP
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701 Poydras Street
New Orleans, LA 70139-4200
USA

Tel: +1 504 581 2727
Fax: +1 504 561 7293
www.deloitte.com

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors
Entergy Corporation
New Orleans, Louisiana

We have performed the procedures enumerated below, which were agreed to by Entergy Corporation (the "Company"), solely to assist the Company in connection with the Company's and the U.S. Nuclear Regulatory Commission's ("NRC") evaluation of the Company's compliance with the requirements specified in Appendix A, Section II A.2 to Part 30 of 10 CFR, the Financial Test: Alternative II (the "Financial Test") as of December 31, 2012, included in the accompanying letter from the Chief Financial Officer of the Company dated March 18, 2013 to the NRC. The Company's management is responsible for compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

It should be understood that (1) we make no representations regarding the Company's determination and presentation of non-GAAP measures (such as tangible net worth), and (2) the non-GAAP measures presented may not be comparable to similarly titled measures reported by other companies. However, the following procedures were applied to the attached Schedules on pages 2 and 3 of Appendix A as indicated with respect to the symbols explained below.

- A. We compared these amounts to the Company's audited consolidated financial statements for the year ended December 31, 2012 and found such amounts to be in agreement.
- B. We compared the "Tangible Net Worth" amount as shown in the column "Per CFO's Letter" included in the Reconciling Schedule on page 3 of Appendix A to the "Tangible net worth" amount presented on line 5 of the Financial Test on page 2 of Appendix A and found such amounts to be in agreement.
- C. We proved the arithmetic accuracy and noted no exception after giving effect to rounding.
- D. We compared the "Net Book Value of Vermont Yankee Nuclear Power Station and Big Rock Point" as shown in the column "Per Financial Statements" included in the Reconciling Schedule on page 3 of Appendix A to internal accounting records prepared by employees of the Company. We make no comment with respect to the assumptions used in the preparation of the internal accounting records or schedules.

E. We compared the "Rating" on line 2 of the Financial Test on page 2 of Appendix A to the Standard & Poor's Rating Services Report for Entergy Corporation dated January 25, 2013 provided to us by employees of the Company and noted no differences.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the board of directors and management of the Company and the NRC, and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

March 18, 2013

Appendix A



ENTERGY CORPORATION
P.O. Box 61000
NEW ORLEANS, LA 70161
(504) 576-5477

ANDREW S. MARSH
EXECUTIVE VICE PRESIDENT AND
CHIEF FINANCIAL OFFICER

March 18, 2013

ATTN: Document Control Desk
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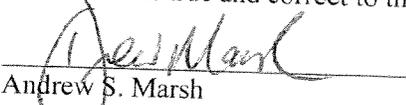
This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 50, the decommissioning of the following facilities owned or operated by subsidiaries of this firm. The current cost estimate or certified amount for decommissioning, and the amount being guaranteed, are shown for each facility:

| <u>Name of Facility</u> | <u>Location of Facility</u> | <u>Current Cost Estimate</u> | <u>Amount Being Guaranteed</u> |
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I hereby certify that the content of this letter is true and correct to the best of my knowledge.


Andrew S. Marsh
Executive Vice President and Chief Financial Officer

3/18/13
Date

¹ Per Status of Decommissioning Funding for Plants Operated by Entergy Nuclear Operations, Inc. for the year ending December 31, 2012 – 10 CFR 50.75(f)(1).

² See Accession No. ML12352A126.

FINANCIAL TEST: ALTERNATIVE II
(10 CFR Part 30 App. A. Section II A.2.)
Entergy Corporation Parent Guarantee of Funds For Decommissioning
Dollars in thousands

| | | |
|-----|--|----------------|
| 1. | Guaranteed amount for Vermont Yankee Nuclear Power Station, License No. DPR-28 and Big Rock Point Independent Spent Fuel Storage Installation, Licenses Nos. DPR-06, SFGL-16 (total cost of all cost estimates should be stated in paragraphs above) | \$45,000 |
| 2. | Current rating of most recent bond issuance of this firm Rating <u>BBB corporate credit rating as of January 25, 2013</u> E Name of rating service <u>Standard & Poor's</u> | |
| 3. | Date of issuance of bond <u>See NOTE/below</u> | |
| 4. | Date of maturity of bond <u>See NOTE/below</u> | |
| *5. | Tangible net worth** (if any portion of estimates for decommissioning is included in total liabilities on your firm's financial statements, you may add the amount of that portion to this line) | \$8,954,521 B |
| *6. | Total assets in United States (required only if less than 90 percent of firm's assets are located in the United States) | N/A |
| | | Yes No |
| 7. | Is line 5 at least \$10,000? | X C |
| 8. | Is line 5 at least 6 times line 1? | X C |
| 9. | Are at least 90 percent of firm's assets located in the United States? If not, complete line 10. | X |
| 10. | Is line 6 at least 6 times line 1? | N/A |
| 11. | Is the rating specified on line 2 "BBB" or better (if issued by Standard & Poor's) or "Baa" or better (if issued by Moody's)? | X |

NOTE/Entergy Corporation does not have any recent bond issuances. Ratings supplied above are the current credit ratings from the indicated rating agency. Entergy Corporation's last bond issuance had a rating of BBB-.

* Denotes figures derived from financial statements.

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RECONCILING SCHEDULE
 ENTERGY CORPORATION
 YEAR ENDED DECEMBER 31, 2012
 Dollars in thousands

| <u>Line Number in CFO's Letter</u> | <u>Per Financial Statements</u> | <u>Recon- ciling Items</u> | <u>Per CFO's Letter</u> |
|---|---|------------------------------------|---------------------------------|
| Total Assets | \$43,202,502 | A | |
| Less: Total Current Liabilities | (4,106,321) | A | |
| Less: Total Non-Current Liabilities | (29,618,581) | A | |
| Less: Goodwill | (377,172) | A | |
| Less: Net Book Value of Vermont Yankee Nuclear Power Station and Big Rock Point | <u>(145,907)</u> | D | |
| Tangible Net Worth | \$ 8,954,521 | C | \$ 8,954,521 |