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BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DIRECT TESTIMONY

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FRANCIS W. SEYMORE

by
State Corporation Commission
of Kansas

TLG SERVICES, INC.

ON BEHALF OF

WESTAR ENERGY

DOCKET NO. 12-WSEE-112-RTS

I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Francis W. Seymore. My business address is 148 New
Milford Road East, Bridgewater, Connecticut 06752.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS
PROCEEDING?

A. I am testifying on behalf of Westar Energy, Inc. and Kansas Gas
and Electric Company (Westar).

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by TLG Services, Inc. (TLG), as Engineering
Manager. TLG is a wholly owned subsidiary of Entergy Nuclear,
Inc (ENI).

1 **Q. PLEASE BRIEFLY OUTLINE YOUR RESPONSIBILITIES AS**
2 **ENGINEERING MANAGER AT TLG.**

3 A. I am responsible for the technical engineering consulting services in
4 the areas of decontamination, decommissioning, waste
5 management, and general engineering for nuclear and fossil-fueled
6 generating stations.

7 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

8 A. I graduated from the Rensselaer Polytechnic Institute with a
9 Bachelor of Science degree in Nuclear Engineering in 1977. I
10 received a Master of Engineering degree in Nuclear Engineering
11 from Rensselaer in 1979.

12 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE.**

13 A. I was employed by Nuclear Energy Services in Danbury,
14 Connecticut, from 1979 until I left to join TLG in 1982. I joined TLG
15 Engineering in November 1982 and TLG in January 1994. When
16 TLG was purchased by ENI in September 2000, I was retained as
17 Manager of Design Engineering for ENI.

18 **Q. DO YOU HOLD ANY PROFESSIONAL LICENSES?**

19 A. Yes. I am a Licensed Professional Engineer in the State of
20 Connecticut (License 12775), and a Registered Professional
21 Engineer in the Commonwealth of Pennsylvania (PE-033109-E).

1 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY AT ANY
2 REGULATORY COMMISSION OR TESTIFIED BEFORE ANY
3 COURT?

4 A. Yes. I have filed testimony in the following rate cases or
5 proceedings:

- 6 • In April of 2010 I prepared testimony for submission to the
7 US Tax Court for Entergy Nuclear on the decommissioning
8 costs for the Pilgrim Nuclear Plant, Entergy Corporation v.
9 Commissioner, Docket No. 10557-08, but ultimately did not
10 need to be called at the trial due to an agreement between
11 the parties.
- 12 • In September of 2008 I was deposed before the Texas
13 Public Utilities Commission for Southwestern Public Service
14 Company on estimating the dismantling costs for their 28
15 fossil generating stations in Texas and New Mexico, PUC
16 Docket No. 35763.
- 17 • In May 2006, I testified before the California Public Utilities
18 Commission, for Pacific Gas and Electric Company on the
19 Nuclear Decommissioning Costs 2005 Triennial
20 Proceedings, Application 05-11-009.
- 21 • In March 2004, I was deposed before the U.S. Department
22 of Justice for Exelon Generation Company on
23 decommissioning cost estimates and their relation to spent

1 fuel disposition, Commonwealth Edison Company v. United
2 States, Case No. 98-621C.

3 • In January 1990, I testified before the New York State Public
4 Service Commission, for Rochester Gas & Electric Company
5 on the Robert E. Ginna Power Plant rate case, Docket 89-E-
6 166, 167 and 168.

7 • In December 1990, I testified before the Alabama Public
8 Service Commission, for Alabama Power Company on the
9 Joseph M. Farley Nuclear Plant, Docket U3295.

10 • In August 1989, I testified before the North Carolina Utilities
11 Commission, for Duke Power Company, Carolina Power &
12 Light, and Virginia Power Company on decommissioning
13 costs and waste volumes for decommissioning the Catawba
14 Nuclear Station and Brunswick Steam Electric Plant, Docket
15 E-100, Sub 56.

16 **Q WHAT EXPERIENCE DO YOU HAVE WITH THE PROCESS OF**
17 **DECOMMISSIONING AND THE ESTIMATION OF**
18 **DECOMMISSIONING COSTS?**

19 A. I have extensive experience in preparing decommissioning cost
20 studies. I am the chief architect of TLG's decommissioning cost
21 model DECCER, which has been used in preparing over 200
22 decommissioning cost estimates over the past 20 years.

1 I have been involved in all of the decommissioning cost
2 estimates performed for the Wolf Creek Generating Station since
3 1988.

4 I was responsible for several aspects of the detailed
5 engineering and planning of the Shippingport Station
6 Decommissioning Project from 1981 to 1982. Shippingport was a
7 72 Megawatt ("MW") light water breeder reactor and the first
8 commercial reactor in the U.S.

9 I was on site at the Three Mile Island Unit 2 recovery and
10 decommissioning program from 1982 to 1983, where I assisted in
11 the detailed planning for reactor disassembly and removal of the
12 damaged reactor core internals.

13 TLG developed the estimates, contractor bid specifications,
14 contractor selection, and provided on-site oversight of dismantling
15 activities for the coal-fired Comal Power Plant owned by the Lower
16 Colorado River Authority in New Braunfels, Texas.

17 TLG assisted Northern States Power Company in 1988/1989
18 with the preparation of the decommissioning plan for the Pathfinder
19 Atomic Power Plant. Pathfinder, located in Sioux Falls, South
20 Dakota, was a 60 MW reactor initially placed in SAFSTOR, a
21 mothballing option for decommissioning as recognized by the U.S.
22 Nuclear Regulatory Commission ("NRC"), (a safe storage
23 condition), after an abbreviated operating life. I assisted in

1 preparing detailed cost and schedule, and vessel activation
2 estimates. I analyzed the reactor vessel to be used as its own
3 shipping container, and prepared the decommissioning plan using
4 the NRC's DECON method in support of plant decommissioning.
5 The DECON method is the prompt dismantling option for
6 decommissioning as recognized by the NRC.

7 TLG worked with the Long Island Lighting Company in
8 planning for the decommissioning of the Shoreham Nuclear Power
9 Station. I supervised the preparation of the detailed reactor vessel
10 activation analysis, cost estimates, schedules, management
11 organization, waste volume estimates and preparation of a draft
12 decommissioning plan.

13 In 1990, TLG was selected by Cintichem, Inc. (a subsidiary
14 of Hoffman LaRoche) as a Co-Manager of the decommissioning of
15 a 10-MW thermal radio isotope production reactor with associated
16 hot cells and facilities. I prepared a reactor core activation analysis,
17 and assisted in the development of a cost and schedule estimate
18 for the project.

19 TLG has been involved in the engineering and planning
20 activities associated with the decommissioning of the Yankee
21 Rowe, Trojan Nuclear Plant, Rancho Seco Nuclear Generating
22 Station, and Big Rock Point nuclear units. I supervised the
23 activation analyses and preparation of decommissioning alternative

1 cost and schedule estimates. TLG also supported Portland
2 General Electric in the detailed planning required for completing the
3 removal and disposal of the reactor vessel and the highly
4 radioactive internal components.

5 I was also the project manager for performing dismantling
6 cost estimates for the fossil fuel units of Westar.

7 **Q HAVE YOU PREPARED OR COAUTHORED ANY STUDIES AND**
8 **REPORTS ON DECOMMISSIONING COST ESTIMATING AND**
9 **TECHNOLOGY?**

10 A. Yes. I was a contributor to the "Decommissioning Handbook" (DOE
11 reference number DOE/EV/10128-1) for the U.S. Department of
12 Energy ("DOE"). The Handbook reported then current
13 decommissioning technology (as of 1980), including
14 decontamination, piping and component removal, vessel
15 segmentation, concrete demolition, cost estimating and
16 environmental impacts.

17 At TLG in 1986, I was a major contributor to the "Guidelines
18 for Producing Commercial Nuclear Power Plant Decommissioning
19 Cost Estimates" (Publication AIF/NESP-036) for the Atomic
20 Industrial Forum ("AIF"), National Environmental Studies Project
21 ("NESP"). The Guidelines identify the elements of costs to be
22 included in the estimation of decommissioning activities for each of
23 the principal decommissioning alternatives. Specific guidance in

1 cost estimating methodology and reference cost data is provided in
2 this study. The major objective of this study is to provide a basis for
3 consistent cost estimating methodology.

4 TLG also prepared a study in 1986 entitled, "Identification
5 and Evaluation of Facilitation Techniques for Decommissioning
6 Light Water Power Reactors" (Publication No. NUREG/CR-3587)
7 for the NRC. The study evaluated the costs and benefits of
8 techniques to reduce occupational exposure and waste volume
9 from decommissioning. In addition, TLG prepared the
10 Decommissioning Plan and Environmental Report ("ER") for
11 Dresden Unit 1, and the ER for Indian Point Unit 1.

12 I have been involved in the preparation of dismantling
13 estimates for over 200 fossil units throughout the United States. I
14 have also been involved in the preparation of site-specific
15 decommissioning studies for approximately 90 percent of the
16 nuclear units in the United States.

17 II. ASSIGNMENT

18 **Q. WHAT IS YOUR ASSIGNMENT IN THIS PROCEEDING?**

19 A. I am presenting the results of the TLG study "Dismantling Cost
20 Study for Abilene CT 1, Hutchinson CT 4, Murray Gill Units 1 & 2,
21 Neosho Unit 3, Tecumseh CT 1 & 2, Generating Units", TLG
22 Document W21-1645-001, Exhibit FWS-1. This study provides cost
23 estimates for the dismantling of selected Westar fossil fueled

1 electric generating facilities, consisting of 7 separate units on 5
2 sites in Kansas, with a combined generating capacity of 401 MW.

3 **Q. WHAT IS COVERED BY THE TERM "DECOMMISSIONING," AS**
4 **USED WITH REFERENCE TO A GENERATING STATION?**

5 A. Decommissioning is the planned and orderly retirement of a
6 generating station. Upon retirement, the facility may either be
7 rendered safe indefinitely (through on-going maintenance, repair
8 and security measures), or dismantled. The TLG estimate
9 assumed that the units in question would be dismantled.

10 **Q. PLEASE DESCRIBE THE PLANT FACILITIES ADDRESSED BY**
11 **YOUR ESTIMATED DISMANTLING COST STUDY.**

12 A. The units in the study consist of both combustion turbines and
13 natural gas fired boiler steam generating plants. The scope of the
14 study includes the dismantling of the power generating systems
15 and enclosures, fuel handling and storage systems and structures,
16 cooling towers (when present). The cost estimate for dismantling
17 also includes removal of asbestos (where present). Structures are
18 removed to three feet below grade. The costs to control erosion
19 (establish ground cover) is also included. The costs for conducting
20 an environmental monitoring program after dismantling of the plant
21 site are included.

22 **Q. PLEASE SUMMARIZE THE COSTS IDENTIFIED IN THE**
23 **DISMANTLING STUDY.**

1 A. Dismantling and demolition of the selected 7 Westar units is
 2 estimated to cost approximately \$20,756,000 (2011 dollars). The
 3 total costs include a credit for the scrap metal generated and sold
 4 during the project. A summary of the cost by unit is presented in
 5 Table 1
 6

Table 1
Westar Summary of Dismantling Costs
 (Thousands of 2011 Dollars)*

Station	Unit	MWe rating	Type	Fuel	In Service	Station Cost
Abilene	1	77.4	Simple Cycle Combustion Turbine (CT)	natural gas	1973	682
Hutchinson	4	85.5	CT	oil	1975	750
Murray Gill	1	48	Steam Boiler	natural gas/oil	1952	10,850
	2	66	Steam Boiler	natural gas/oil	1954	
Neosho	3	66	Steam Boiler	natural gas/oil	1954	7,597
Tecumseh	1	28.8	CT	natural gas/oil	1972	877
	2	28.8	CT	natural gas/oil	1972	
Study Totals	7	401				\$20,756

*Note: Columns may not add due to rounding

7 **Q. WAS THE DISMANTLING STUDY PREPARED UNDER YOUR**
 8 **DIRECTION AND SUPERVISION?**

9 A. Yes. I developed the methodology used by TLG to estimate the
 10 costs to dismantle fossil-fueled power plants. During the
 11 preparation of the study, I was the Project Manager and provided
 12 guidance and interpretation to the TLG staff on how to estimate
 13 specific elements of cost. I reviewed the results of the estimate to

1 ensure the results were reasonable and consistent with the design
2 of the plant. Finally, I supervised the preparation of the report.

3 III. METHODOLOGY

4 **Q. WHAT TYPES OF COSTS ARE ANALYZED IN A DISMANTLING**
5 **STUDY?**

6 A. There are two major types of costs included and analyzed in a
7 dismantling study: activity-dependent costs and period-dependent
8 costs.

9 Activity-dependent costs are those associated with the
10 physical work of removing piping, components and structures and
11 transporting and disposing of the same. These costs represent
12 labor, materials, and special services (subcontracted) costs
13 associated with the work crews activities (hence, activity-dependent
14 costs). The summation of the durations to perform these activities
15 when properly sequenced provides the overall schedule for the
16 project.

17 Period-dependent costs are those elements whose value is
18 based upon the duration of a work activity. The project is divided
19 into three periods of work activity:

- 20 1. Characterization, Planning and Preparations, and
21 Asbestos Abatement;
- 22 2. Systems and Structures Dismantling; and
- 23 3. Site Restoration.

1 Period-dependent costs are adjusted to reflect the work
2 activities or resources required in each period.

3 **Q. WHAT PROCESS WAS USED FOR DEVELOPING THE**
4 **DISMANTLING COST STUDY?**

5 A. The general approach in assembling the estimate was to develop a
6 site-specific cost for each unit, based on a unit-specific equipment
7 and building materials inventory. The inventory of components
8 designated to be removed as part of the dismantling program was
9 established using site walk-downs (including discussions with
10 Westar operations and maintenance staff at each plant), and
11 inventory data from TLG's previous work on similar fossil plants.

12 The systems and structures inventories for the combustion
13 turbine sites were developed solely from the site walk-downs.

14 Activity dependent costs were estimated by applying the
15 appropriate unit cost factor against the unit inventory. The unit cost
16 factors consider local costs of labor, working conditions, and costs
17 of equipment and consumables.

18 Period-dependent costs were estimated by applying the
19 work activity duration against the monthly costs for owner and
20 contractor management, shared equipment, work site security, and
21 similar types of expenses.

22 Contingency was added to the estimate to account for
23 unpredictable project events.

1 A credit was applied against the project estimate for
2 expected scrap metal cost recovery. Scrap credit was estimated by
3 applying the inventory against unit prices for various types of scrap
4 metals generated during dismantling.

5 **Q. WHAT METHODOLOGY WAS USED TO PREPARE THE**
6 **DETAILED COST ESTIMATE?**

7 A. The methodology used to develop the detailed cost estimates for
8 the Reference Plants followed the basic approach presented in the
9 AIF/NESP-036 study report, "Guidelines for Producing Commercial
10 Nuclear Power Plant Decommissioning Cost Estimates," the DOE
11 "Decommissioning Handbook," and the American Association of
12 Cost Estimators paper "A Methodology for Determining the Cost of
13 Dismantling Fossil-Fueled Electric Power Plants." Obviously,
14 concerns that are unique to a nuclear power plant (e.g. radiation
15 protection) are not necessary for fossil power plants and, therefore,
16 none were included in the study. However, the basic methodology,
17 sometimes called the "bottoms-up" approach, which is widely
18 accepted by the electric power industry and regulatory
19 commissions, throughout the United States, including the Kansas
20 Corporation Commission (Commission). The dismantling of non-
21 contaminated systems and structures are addressed in the
22 aforementioned Guidelines and are directly applicable to the
23 dismantling of fossil-fuel power plants.

1 **Q. HOW WAS THIS METHODOLOGY APPLIED TO THE WESTAR**
2 **COST ESTIMATE?**

3 A. The aforementioned references use a unit cost factor method for
4 estimating decommissioning activity costs to standardize the
5 estimating calculations. Unit cost factors for activities such as
6 concrete removal (\$ per cubic yard), steel removal (\$ per ton), and
7 cutting costs (\$ per inch cut) were developed based on the labor
8 cost information provided. Consumable material and equipment
9 rental costs (crane and truck rental, operating costs for heavy
10 equipment, torch cutting gas consumption, etc.) were taken in large
11 part from R.S. Means, "Building Construction Cost Data 2011." The
12 activity-dependent cost for removal, shipping and disposal were
13 estimated using the item quantity (cubic yards, tons, inches, etc.)
14 developed from plant drawings and inventory documents. The
15 activity duration critical path derived from such key activities as
16 boiler removal, turbine removal etc., was used to determine the
17 total dismantling program schedule.

18 The program schedule is used to determine the period-
19 dependent costs such as program management, administration,
20 field engineering, equipment rental, and security.

21 In addition, costs were included for heavy equipment rental
22 or purchase, safety equipment and supplies, energy costs, permits,
23 and insurance. The activity-dependent and period-dependent costs

1 were added to develop the total dismantling costs. Contingency
2 was added to allow for the cost impact of unpredictable project
3 events. The total of the activity and period-dependent costs plus
4 contingency, less scrap credit, results in the total project cost.

5 **Q. FOR THE PURPOSES OF THE ESTIMATE, WHEN DID YOU**
6 **ASSUME THE UNITS AT EACH SITE WOULD BE**
7 **DISMANTLED?**

8 A. TLG did not make any assumptions regarding the timing of the
9 dismantling program. We assumed dismantling of each unit would
10 occur after its retirement.

11 **Q. WHAT ARE THE MAJOR ASSUMPTIONS THAT YOU USED TO**
12 **DEVELOP THE DISMANTLING ESTIMATE FOR THE WESTAR**
13 **STATIONS?**

14 A. The following major assumptions were used in developing the
15 dismantling estimate.

16 1. Estimated costs are stated in 2011 dollars.
17 Escalation/inflation of the costs over the remaining
18 operating life is not included.

19 2. The dismantling process will be an engineered
20 process rather than wrecking ball demolition.
21 Concerns for worker safety reinforce the need for a
22 controlled approach. Accordingly, all large
23 components are assumed to be lowered to grade for

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additional disassembly. The steel support structures and other site building structures are dismantled from the top. All plant equipment and their supporting mechanical and electrical systems are removed by disassembly and segmentation where necessary.

- 3. The demolition will be performed by a Dismantling Operations Contractor who will provide adequate staff and equipment to complete the dismantling.
- 4. Asbestos will be removed prior to the start of dismantling. Asbestos removal costs include costs for removal of asbestos containing roofing material on the boiler house and turbine buildings, removal of asbestos containing exterior paneling on the office and service buildings, and removal of the condenser water box mastic coating. Note that the newer stations are assumed to have very little asbestos, and the cost estimates for those stations reflect this assumption.
- 5. Structural steel, piping, electrical cable, etc., will be credited for scrap value. Plant equipment is assumed to have no value as salvage.
- 6. The estimate to dismantle the station does not address the value of the land.

- 1 7. On-site fuel inventories will be used and/or removed
2 prior to start of dismantling.
- 3 8. Acids and caustics will be removed. Ion exchangers
4 and filters will also be emptied in preparation for
5 dismantling.
- 6 9. Stores, spare parts, bulk chemical supplies, gas
7 storage containers, laboratory equipment, office
8 furniture, etc., will be removed by the owner in
9 preparation for dismantling.
- 10 10. Station transformer oil is assumed to be
11 Polychlorinated Biphenyl (PCB) free. Lubrication and
12 transformer oils are drained and removed from site by
13 a waste disposal contractor.
- 14 11. Essential systems (air, water, electrical, fire water,
15 etc.), required to support dismantling operations will
16 remain in service throughout the project until replaced
17 by temporary services.
- 18 12. Turbine building crane, miscellaneous hoists, and
19 trolleys will remain in service to support dismantling
20 until no longer needed.
- 21 13. Structures and foundations will be removed to three
22 feet below grade, with any resulting voids back-filled
23 to grade level.

- 1 14. The concrete structures will be blasted to the ground
2 and broken into rubble, and the foundations control-
3 blasted to break the concrete in place so that
4 groundwater drainage is provided. The rubble will be
5 used as clean fill; excess concrete rubble will be
6 disposed of off site as construction debris.
- 7 15. The dismantling of the electrical equipment terminates
8 at the switchyard. The switchyard itself is left intact.
- 9 16. The site will be graded; however, no effort will be
10 made to restore the original contour of the land.
11 Ground cover will be established for erosion control.
12 Structural fill is brought from off site for voids in
13 excess of the available concrete rubble for backfill.
- 14 17. Contingency is applied to project cost total.

15 **Q. WHAT WERE THE INPUTS TO THE COST ESTIMATING**
16 **MODEL, AND HOW WERE THESE VALUES DETERMINED?**

17 A. The estimate used the following input data:

18 **Craft Labor Costs** – Westar Energy provided fully-burdened
19 craft labor rates for commonly-used trades, such as operating
20 engineer, millwright, truck driver, etc.

21 **Staff Costs** – Westar Energy provided salary information,
22 and overhead and benefit rates, for a variety of current plant
23 positions.

1 **Systems Inventory** – A site-specific inventory was
2 established using site walk-downs, plant drawings, and in certain
3 instances, revising a previously developed inventory for a similar
4 plant (reference plant), to reflect differences between the Westar
5 unit and the reference plant. Where inventories from a reference
6 plant were used as a starting point, differences were incorporated
7 into the Westar unit inventory, in essence creating a site-specific
8 inventory for the Westar unit. To account for any difference in size
9 between the reference inventory and the Westar unit a size
10 adjustment to the reference unit inventory was applied.

11 **Structural Inventory** – In a similar fashion to the system
12 inventory, the structural steel, concrete, and other building data
13 points were first gathered from the data for similar units in TLG's
14 database. This information was then adjusted, based upon the
15 information TLG personnel gathered during the site walk downs.
16 Site plot plans were reviewed to obtain acreage and other site
17 restoration quantities.

18 **Other costs** – R.S. Means provided rates for such items as
19 small tool allowances, permits, fees, insurances, etc.

20 **Q. WHAT YEAR WAS USED FOR THE COST BASIS FOR THE**
21 **ESTIMATES?**

22 **A.** In all cases, the cost basis for the estimate is 2011.

1 **Q. HOW DID YOU ARRIVE AT THE VARIOUS CONTINGENCY**
2 **PERCENTAGES THAT YOU APPLIED?**

3 A. The AIF Guidelines previously mentioned suggests a 15%
4 contingency for clean systems and structures removal activities.
5 Therefore, the estimate uses a 15% contingency for all cost
6 elements with the exception of asbestos remediation. Since the
7 regulatory requirements imposed on asbestos remediation efforts
8 are similar to those working in a radioactively contaminated
9 environment, the Guidelines suggests a 25% contingency for the
10 removal of radioactively contaminated systems; therefore a 25%
11 contingency was applied to asbestos removal activities.

12 **Q. WHAT ARE THE MAJOR DIFFERENCES BETWEEN NUCLEAR**
13 **DECOMMISSIONING AND DISMANTLING FOSSIL POWER**
14 **PLANTS?**

15 A. The major difference is the presence of radioactivity at a nuclear
16 power plant. In order to decommission a nuclear plant, this
17 radioactive material must be removed to levels consistent with the
18 regulatory requirements. Once this has been completed, the
19 demolition of the remaining systems and structures is similar to the
20 scope of a fossil-fuel power plant dismantling project.

21 **Q. DOES YOUR EXPERIENCE IN THE DECOMMISSIONING OF**
22 **NUCLEAR POWER PLANTS AID IN THE CONDUCT OF A SITE-**

1 **SPECIFIC DISMANTLING STUDY OF A FOSSIL-FUELED**
2 **POWER PLANT?**

3 A. Yes. The parallelism in approach between nuclear plant
4 decommissioning and fossil plant dismantling enables us to rely on
5 the field experience from nuclear decommissioning to prepare fossil
6 plant studies. In particular, the following major areas of planning
7 and estimating exhibit similar characteristics.

8 1. Site Characterization

9 The process to identify hazardous and toxic materials
10 is similar for nuclear and fossil-fueled power plants.

11 2. Removal of Hazardous Material (Asbestos)

12 The effort required to remove asbestos-containing
13 materials in nuclear and fossil plants is similar.

14 3. Removal of Clean Equipment and Structures

15 The techniques used to remove systems and
16 structures components are expected to be the same.

17 4. Owner and Contractor Staff

18 Identification of utility and decommissioning
19 (dismantling) staffing composition and levels follows
20 the same process in both types of units. The specific
21 job functions and number of personnel will differ but
22 the logic is the same.

23 5. Scheduling

1 Schedule for both the demolition of the remaining
2 systems and structures in nuclear decommissioning
3 and fossil dismantling projects rely on estimating the
4 number of craft workers that can work safely and
5 efficiently.

6 6. Contingency

7 Contingency is a cost allowance for field-related
8 problems that are likely to occur. These problems
9 include tool and equipment breakdown, late deliveries
10 of supplies and equipment, and adverse weather.
11 These field problems occur in both nuclear and fossil
12 plant dismantling. Work removing radioactive
13 materials incurs a higher contingency.

14 In summary, the demolition of the remaining systems and
15 structures in nuclear plant decommissioning experience is directly
16 applicable to fossil plant dismantling.

17 **Q. IS IT POSSIBLE THAT FUTURE CHANGES IN TECHNOLOGY**
18 **AND REGULATION COULD AFFECT THE DISMANTLING**
19 **COSTS?**

20 A. Yes. The TLG cost estimate was based on current technology and
21 existing regulations. No provision is made to adjust for cost
22 changes associated with future changes in dismantling technology
23 and regulations. It is my recommendation that Westar Energy

1 thoroughly review this estimate periodically and revise it, if
2 necessary, to account for cost changes as influenced by future
3 technology and regulations.

4 **Q. HOW OFTEN SHOULD SUCH A REVIEW OCCUR?**

5 A. I understand that Westar performs and submits a new depreciation
6 study to the Commission every five years. In the absence of
7 extraordinary events that necessitate an earlier review, the
8 decommissioning plan should remain reasonably accurate if it is
9 revisited each time a new depreciation study is performed.

10 **IV. CONTINGENCY**

11 **Q. WHAT IS THE BASIS FOR CONTINGENCY?**

12 A. The purpose of the contingency is to allow for the costs of high
13 probability program problems, where the occurrence, duration, and
14 severity cannot be accurately predicted and have not been included
15 in the basic estimate. The inclusion of contingency in cost
16 estimation for both construction and dismantling is well accepted.
17 The Association for the Advancement of Cost Engineering
18 International (in its Cost Engineer's Notebook) defines contingency
19 as follows:

20 Contingency - specific provision for unforeseeable
21 elements of cost within the defined project scope;
22 particularly important where previous experience
23 relating estimates and actual costs has shown that
24 unforeseeable events which will increase costs are
25 likely to occur.

1 Past dismantling and decommissioning experience has
2 shown that problems are likely to occur and may have a cumulative
3 impact. These problem areas include:

4 Schedule slippages - leading to crew overtime
5 payments and/or project
6 extensions

7 Weather delays - loss of productivity,
8 overtime, slippages

9 Labor strikes - loss of productivity,
10 slippages

11 Workers injuries - production interruptions,
12 additional safety training,
13 workers compensation
14 claims, and possible
15 increased insurance pre-
16 miums

17 Material shipping - rescheduling of activities,
18 inefficiencies in
19 production,

20 Equipment breakdowns - rescheduling of activities,
21 out-of-scope back charges
22 from subcontractors

23 Regulatory inspections - insurance inspectors,
24 OSHA inspectors, federal
25 and state Environmental
26 Protection Agency
27 inspectors, state building
28 inspectors

29 Hazardous materials - special handling
30 requirements beyond
31 planned requirements

32 A more extensive discussion of contingency is included in
33 the AIF/NESP-036 Guidelines Study (Chapter 13) referred to
34 earlier. In that study, individual contingencies ranged from 10% to

1 75%, depending on the degree of difficulty judged to be appropriate
2 from actual experience. The overall contingency, when applied to
3 the appropriate components of nuclear plant decommissioning
4 costs, results in an average contingency for nuclear plants of up to
5 25%.

6 For fossil plant dismantling, the absence of radioactive
7 materials and their attendant potential problems simplifies the
8 dismantling process. Individual activity contingency estimates for
9 fossil-fueled power plants usually are in the range of 15%, and
10 greater if there are significant quantities of asbestos on site.
11 Independent of our preparation of this estimate for Westar Energy,
12 R.S. Means, "Building Construction Cost Data 2011," suggests that
13 a 15% contingency factor (for projects that are in the schematic
14 stage) be used.

15 V. SITE RESTORATION

16 **Q. ARE THERE ANY REGULATIONS OR CODES APPLICABLE TO**
17 **DISMANTLING?**

18 A. Yes. The International Building Code, widely adopted by most
19 states, requires that retired structures may not be left in an unsafe
20 condition. Specifically, Section 115.1, "Conditions," states:

21 Structures or existing equipment that are or hereafter
22 become unsafe, insanitary or deficient because of
23 inadequate means of egress facilities, inadequate
24 light and ventilation or which constitute a fire hazard,
25 or are otherwise dangerous to human life or the public
26 welfare, or that involve illegal or improper occupancy

1 or inadequate maintenance, shall be deemed an
2 unsafe condition. Unsafe structures shall be taken
3 down and removed or made safe, as the building
4 official deems necessary and as provided for in this
5 section. A vacant building that is not secured against
6 entry shall be deemed unsafe.

7 (Emphasis Added)

8 A retired power plant appears to fit this definition of an
9 unsafe structure that must be taken down and removed or made
10 safe and secure.

11 **Q. WHY IS DISMANTLING AFTER A POWER PLANT IS TAKEN**
12 **OUT OF SERVICE THE APPROPRIATE ALTERNATIVE?**

13 A. Precluding reconstruction, a retired fossil facility poses hazards
14 including large interior open areas, pits, shafts and underground
15 tunnels. With many of the plant services removed from service, the
16 structures would be unheated, dark, littered with concrete rubble
17 and structural debris obstructing means of egress. Condensation
18 and groundwater intrusion and bird infiltration would soon create
19 hazardous conditions, promoting unsanitary biological infestations,
20 accelerating corrosion and general facility deterioration. A
21 dedicated and systematic maintenance program is necessary to
22 maintain the facility in a "safe" condition. Security measures are
23 necessary to limit the liability inherent in casual or deliberate
24 intrusion by the public. These maintenance and surveillance
25 programs are expensive.

1 The steel and concrete or brick structures at fossil sites were
2 not designed to prevent deliberate intrusion. Large glass windows,
3 sheet metal siding, loading ramps and multiple ingress points allow
4 easy entry into the station confines. Visitation of older, shutdown
5 units has conclusively demonstrated both the speed and effects of
6 facility deterioration. Such deterioration includes broken windows,
7 leaking roofs, torn or damaged siding, obstructed stairwells with
8 poor egress, and unsanitary conditions caused by the effects of
9 weather, corrosion, ground water intrusion and vermin.

10 The alternative to perpetual caretaking and site surveillance
11 is to dismantle the site as soon as practical. This activity is the
12 most cost-effective when included within the schedule for site
13 remediation, due to resources available on-site and the expected
14 condition of the facilities.

15 The Commission has accepted TLG's cost estimate for
16 decommissioning the Wolf Creek Generating Station. That
17 estimate includes dismantling of the decommissioned structures,
18 following license termination (at the nuclear power plant), as an
19 appropriate measure to protect public health and safety. The same
20 safety concerns exist at retired fossil power stations, and for this
21 reason TLG recommends dismantling fossil power plant structures.

1 **VI. SALVAGE AND SCRAP**

2 **Q. HOW WAS SCRAP OR SALVAGE CREDIT INCLUDED IN THE**
3 **OVERALL ESTIMATE?**

4 A. Credit for carbon steel, stainless and high-chrome steel, copper-
5 nickel, and copper scrap is included in the fossil estimates based
6 on published scrap values. No credit, other than their scrap value,
7 was included for salvage of any components because these
8 components will be of an obsolete design and likely will be in poor
9 condition by the time these plants are dismantled. As such, these
10 materials were considered as scrap.

11 **VII. CONCLUSION**

12 **Q. WAS EXHIBIT FWS-1 PREPARED BY YOU OR UNDER YOUR**
13 **DIRECT SUPERVISION AND CONTROL?**

14 A. Yes.

15 **Q. THANK YOU.**

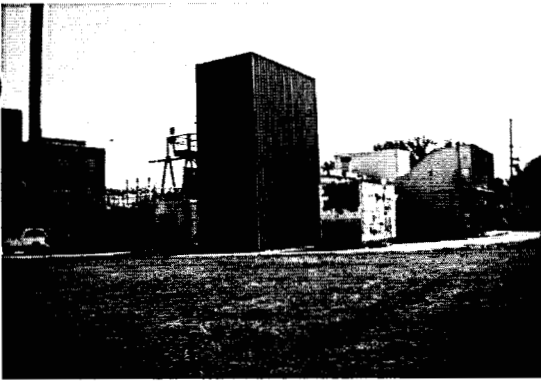


EXHIBIT FWS-1

DISMANTLING COST STUDY

for

ABILENE CT 1

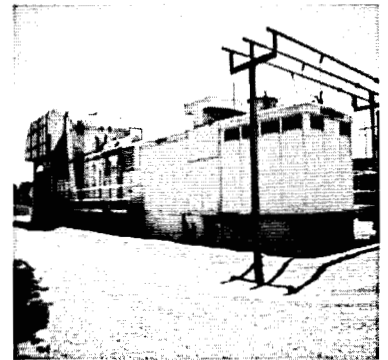
HUTCHINSON CT 4

MURRAY GILL UNITS 1 & 2

NEOSHO UNIT 3

TECUMSEH CT 1 & 2

**GENERATING
UNITS**



prepared for

Westar Energy

prepared by

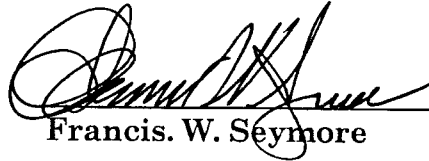
TLG Services, Inc.
An Entergy Company
148 New Milford Road East
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July 2011

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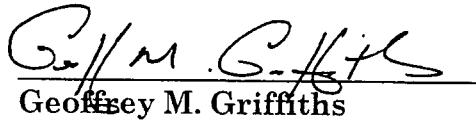
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Date

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Date

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REVISION LOG

Rev. No.	CRA No.	Date	Item Revised	Reason for Revision
0		07/26/2011		Original Issue

EXECUTIVE SUMMARY

This report, prepared by TLG Services, Inc. (TLG), provides estimated costs for the complete dismantling of the following electric generating units:

- Abilene Combustion Turbine 1
- Hutchinson Combustion Turbine 4
- Murray Gill, Units 1 and 2
- Neosho, Unit 3
- Tecumseh Combustion Turbine 1 & 2

Westar Energy, Inc. and Kansas Gas and Electric Company (collectively, Westar) owns these stations. All of the stations are located in Kansas.

The dismantling estimate includes the cost of removing the power generating equipment such as boilers, turbine generators, fuel handling equipment, system equipment, and structures for each of the above-referenced stations. The electrical switchyards are assumed to remain in place and are not included in the estimate.

The scope of the dismantling estimate includes the following significant cost elements:

- Isolation of the units in preparation for safe dismantling (ensuring systems are de-energized to ensure a safe dismantling environment)
- Abatement of asbestos containing materials prior to dismantling (where applicable)
- Labor, equipment, and material costs associated with the removal and disposition of all installed equipment
- Labor, equipment, and material costs associated with the demolition and disposition of buildings and foundations (to a depth of 3 feet below grade)
- Demolition contractor's on-site management, engineering, safety, and administrative staff
- Demolition contractor's expenses, including profit, insurance, permits, and fees
- Owner's on-site management, oversight, and security staff
- A cost credit associated with the disposition of scrap metals
- Cost contingency
- Ongoing environmental monitoring after the completion of the dismantling and demolition

The general approach to developing these estimates was to develop a site-specific estimate for each unit, based on a site-specific equipment and building materials inventory. The site-specific inventory was established using site walk-downs, plant drawings, and in certain instances, revising a previously developed inventory for a similar plant (reference plant), to reflect differences between the Westar unit and the reference plant. Where inventories from a reference plant were used as a starting point, differences were incorporated into the Westar unit inventory, in essence creating a site-specific inventory for the Westar unit. To account for any difference in size between the reference inventory and the Westar unit a size adjustment to the reference unit inventory was applied.

This cost estimate is prepared by applying unit cost factors (developed for each inventory item from prior dismantling experience or similar related experience) against the station specific inventory. Costs for project management, shared equipment and consumables, and similar types of costs are estimated on a period-dependent basis (i.e., the magnitude of the expense depends, in part, on the duration of the project and the types of activities taking place). While equipment salvage is not included, the potential value of scrap from materials generated in dismantling the boilers, plant components, and building structural steel is included as a credit in the dismantling cost estimate. Contingency is provided within this estimate to account for unpredictable project events.

This estimate includes the costs to remove all structures associated with the unit on the site to a nominal level of three feet below grade. Concerns for worker safety reinforce the need for a controlled approach. The cost estimates reflect demolition by controlled/engineered dismantling.

Limited site landscaping includes grading and seeding for drainage and erosion control.

The total dismantling costs, expressed in thousands of 2011 dollars, are provided at the end of this section.

SUMMARY OF DISMANTLING COSTS
(All costs are in thousands of 2011 dollars)

Station	Unit	MWe rating	Type	Fuel	In Service	Station Cost
Abilene	1	77.4	Combustion Turbine, Simple Cycle (CT)	Natural Gas/Oil	1973	682
Hutchinson	4	85.5	CT	Oil	1975	750
Murray Gill	1	48	Steam Boiler	Natural Gas/Oil	1952	10,850
	2	66	Steam Boiler	Natural Gas/Oil	1954	
Neosho	3	66	Steam Boiler	Natural Gas/Oil	1954	7,597
Tecumseh	1	28.8	CT	Natural Gas/Oil	1972	877
	2	28.8	CT	Natural Gas/Oil	1972	
Totals		401				\$20,756

1. INTRODUCTION

1.1 OBJECTIVE OF STUDY

The objective of this dismantling cost study prepared by TLG Services is to present an estimate of the costs to dismantle the designated Westar Energy's (Westar) fossil-fuel generating units in Kansas. This study is not intended to be a dismantling plan, but rather a cost estimate prepared to support current financial planning for future dismantling.

1.2 GENERATING UNIT DESCRIPTIONS

Abilene CT 1 is a simple cycle combustion turbine located at Abilene Energy Center, 1008 2000 Avenue, Abilene, Kansas. The generating unit is a Westinghouse air-cooled, gas-fired, combustion turbine rated at 77.4 MWe. The unit went operational in 1973.

Hutchinson CT 4 is a simple cycle combustion turbine located at Hutchinson Energy Center, 3200 E 30th Avenue, Hutchinson, Kansas. The generating unit is a Westinghouse hydrogen-cooled, oil-fired, combustion turbine rated at 85.5 MWe.

Murray Gill Unit 1 & Unit 2 are natural gas/oil fired Foster Wheeler steam boilers. Unit 1 has a General Electric generator rated at 46 MWe; Unit 2 has a Westinghouse generator rated at 66 MWe. The units are located at the Murray Gill Energy Center, 6100 W 55th Street, Wichita, Kansas. The units went operational in 1952 and 1954.

Neosho Unit 3 is a natural gas/oil fired Combustion Engineering steam boiler with a General Electric generator; the unit is rated at 66 MWe. It is located at 2365 22000 Road, Parsons, Kansas. The unit went operational in 1954.

Tecumseh CT 1 & 2 are simple cycle combustion turbines located at Tecumseh Energy Center, 5850 SE 2nd St, Tecumseh, Kansas. The twin generating units are General Electric air-cooled, oil-fired, combustion turbines rated at 28.8 MWe each. The units went operational in 1972.

1.3 SCOPE

The scope of the dismantling estimate includes the following significant cost elements:

- Preparation for safe dismantling; including hazardous materials characterization for such items as ACM (asbestos-containing materials), lead, mercury, PCBs, hydrocarbons in soil, etc., and isolation of the units in preparation for safe dismantling (e.g. ensuring systems are de-energized, fuel and chemical storage tanks are drained and cleaned, etc. (where applicable).
- Abatement of ACM prior to dismantling (where applicable)
- Labor, equipment, and material costs associated with the removal and disposition of all installed equipment
- Labor, equipment, and material costs associated with the demolition and disposition of buildings and foundations
- Demolition contractor's on-site management, engineering, safety, and administrative staff
- Demolition contractor's expenses, including insurance, permits, and fees.
- Owner's on-site management, oversight, and security staff
- A cost credit associated with the disposition of scrap metals
- Cost contingency
- Ongoing environmental monitoring of the facilities after the completion of the dismantling and demolition

Costs are provided for each station, identified by significant cost element. The cost per station includes the costs for dismantling the generating unit and the common station facilities. Costs are provided in 2011 dollars.

1.4 GENERAL APPROACH

The general approach in assembling the estimate was to develop a site-specific cost for each generating unit located at the station, based on a unit-specific equipment and building materials inventory. The inventory of components designated to be removed as part of the dismantling program was established using site walk-downs (including discussions with the Operations & Maintenance staff), equipment databases, and plant drawings. A similar

estimate was developed for dismantling systems and structures common to all units on site.

This cost estimate was prepared by applying unit cost factors (developed for each inventory item from prior dismantling experience or similar related experience) against the station specific inventory. Costs for project management, shared equipment and consumables, and similar types of costs are estimated on a period-dependent basis (i.e., the magnitude of the expense depends, in part, on the duration of the project and the types of activities taking place). While equipment salvage is not included, the potential value of scrap from materials generated in dismantling the boilers, plant components, and building structural steel is included as a credit in the dismantling cost estimate. Contingency is provided within this estimate to account for unpredictable project events.

This estimate includes the costs to remove all structures on the site to a nominal level of three feet below grade. Concerns for worker safety reinforce the need for a controlled approach. The cost estimates reflect demolition by controlled/engineered dismantling.

Limited site landscaping includes grading and seeding for drainage and erosion control.

Section 2 of this report identifies the activities and sequence of activities necessary to dismantle a generating station. Section 3 provides the specific bases for the estimate. Section 4 discusses scrap metal and associated credits to the dismantling costs. Section 5 provides the results. Appendices, noted throughout this report, provide additional information important to understanding this estimate.

2. DISMANTLING OPERATIONS

The estimate for dismantling the stations is based on the complete removal of the units and common station facilities (except where noted). The following sections describe the project organization, basic activities, and special equipment necessary for accomplishing the dismantling project.

2.1 PROJECT ORGANIZATION

For the purposes of this study, the dismantling project for each station is assumed to be managed by a Westar Project Director, who would have the primary responsibility for dismantling the station. A Dismantling Contractor, experienced in dismantling similar facilities, would be hired as the prime contractor for the removal of plant components and site facilities. The Dismantling Contractor's Project Manager would report to the Project Director. The Dismantling Contractor would manage and supervise the dismantling activities of the station and be responsible for completing the work in an expeditious and safe manner. Contractor personnel would manage and direct the labor force in accordance with approved procedures and in accordance with a health and safety program. The owner's staff would maintain and/or provide the engineering, safety, and environmental compliance oversight, and the security services necessary to support dismantling operations. Figures 2.1 and 2.2 identify typical organizations for the plant/utility staff and the associated contractor personnel during the dismantling phase of the project. The smaller facilities included within this estimate would have a commensurately smaller project organization (Abilene, Hutchinson, and Tecumseh).

2.2 POST-SHUTDOWN ACTIVITIES

The estimate is based on each station being shut down and placed into a post-shutdown configuration by the plant staff. The length of time that the facility is in this configuration is indeterminate, consequently the costs for maintaining the facility in this configuration is not included within the scope of this dismantling estimate. The activities to be completed post-shutdown, but prior to station dismantling, include:

- Removal of consumables and supplies not needed in the post-shutdown configuration
- Removal of residual fuels (including fuel oil)
- Removal of acids and caustics; flushing and cleaning of storage tanks

- Cleaning of equipment, e.g., filters and holding tanks
- Removal of hazardous waste and combustible materials
- If the unit is to be maintained in a condition where lighting, electricity, heating, water, sanitary, and similar services are to remain active, reconfigure these systems to minimize maintenance requirements
- Disposition of surplus bulk chemicals and gas storage containers
- Completion of a hazardous materials survey of the station
- Installation of any appropriate physical barriers (sealing circulating water system) and/or security barriers
- Maintenance of the facility (maintaining roofs and windows, drain systems, and electrical systems to preclude creating hazardous working conditions in the future)

Except for the hazardous materials survey, costs to conduct these activities have not been included in this estimate. The plant operations and maintenance staff would be expected to perform these activities in the interval of time between final plant shutdown, and the onset of the dismantling program.

2.3 DISMANTLING PROGRAM

The actual dismantling program begins once the station owner has decided to dismantle the site, either immediately following final shutdown, or after a period of storage following final shutdown. The dismantling program has been organized into three distinct periods: Period 1 - Engineering/Planning and Asbestos and Other Hazardous Material Abatement (if necessary); Period 2 - Dismantling Operations; and Period 3 - Site Restoration. This section summarizes the activities performed under each Period of the program.

For the purposes of this estimate it is assumed that once the decision to dismantle has been made and a project start date established, the work in each of these periods will be completed successively (no delay between periods). This report does not attempt to describe all of the activities necessary to dismantle a station, but identifies representative activities appropriate to this type of project.

2.3.1 Period 1- Engineering/Planning and Asbestos Abatement

Engineering/Planning:

A preliminary planning phase of the program begins once it is has been determined that a station will be dismantled and the project has been authorized to proceed. During this phase, the owner assembles its dismantling management organization, makes appropriate decisions regarding the extent of dismantling and the approach to managing the activities, and accomplishes those site preparation activities necessary to transition from a plant shutdown configuration to site dismantling. For purposes of this estimate it is assumed that the intent is to dismantle the entire station as a single project. Costs incurred during this preliminary phase of the program are included in the dismantling costs presented in this study.

The Owner prepares the stations for dismantling by performing the following activities:

- Prepare specifications that identify and describe the objectives and major work activities to be accomplished (establishing the final site configuration)
- Assemble plant documentation that may be relevant to dismantling (drawings, hazardous material reports, environmental studies, etc.)
- Select an asbestos abatement contractor (if required) and Dismantling Contractor
- Assemble and mobilize the management and oversight team responsible for the project

Asbestos Abatement (if applicable)

The asbestos abatement contractor prepares for this work by thoroughly understanding the scope of the asbestos remediation work and obtaining the permits necessary to initiate the work. Abatement of asbestos is considered an important prerequisite to dismantling the station's systems and structures. The method by which asbestos is abated is strictly controlled by federal and/or state regulations and includes the following requirements:

- Work will be done inside enclosures designed to capture any asbestos-containing particles. With the exception of removal of small quantities of asbestos in local areas, it would be expected that most work will be

done in large enclosures (containment tents). The enclosures will have a filtered exhaust and be maintained under negative air pressure (air will leak into the enclosure rather than leak out).

- The air outside of the enclosures will be monitored to ensure barriers are effective.
- Workers, while working inside enclosures, will wear respiratory protective equipment as well as protective clothing.
- All materials removed from the enclosure will be packaged in accordance with regulations (minimum double-bag), and will be removed via a materials handling access area.
- Workers will enter and exit the enclosures through a personnel decontamination chamber in a controlled manner (ensuring asbestos contamination does not spread beyond the containment).
- After the asbestos abatement is complete, the effectiveness of the process will be established via regulatory-specified processes (generally verifying that there is no asbestos containing material capable of becoming airborne).
- Asbestos containing materials will be disposed of at a properly licensed disposal facility.
- After ensuring that all asbestos has been removed, the enclosures will be taken down in accordance with regulatory requirements and disposed of at a licensed facility.

Dismantling Preparations

The dismantling contractor prepares the station for dismantling by performing the following activities:

- Installing environmental barriers and monitoring equipment
- Reviewing plant drawings and specifications that may be useful for the dismantling project
- Identifying the processes to achieve the final desired station configuration
- Identifying the major work sequence
- Preparing dismantling activity specifications and work orders/forms
- Preparing detailed dismantling procedures

- Preparing a dismantling plan
- Preparing permit application(s) for plant demolition
- Mobilizing site staff
- Configuring temporary services/facilities to support dismantling operations
- Arranging for heavy lift and dismantling equipment, rigging, and tooling
- Hiring the local labor force

2.3.2 Period 2 - Dismantling Operations

Dismantling activities are initiated after completing the engineering and planning process, and after asbestos abatement is complete. The sequence of activities will be determined at the time of dismantling, but typically a sequence would include the following items (not all activities will be required for each station, particularly those with Combustion Gas Turbines):

- Removing above-ground storage tanks
- Removing large equipment from rooftops or at higher elevations
- Removing equipment that must be removed prior to start of boiler structure removal, including air and flue gas ducts, etc.
- Removing the top of the boiler enclosure to allow access to the platens
- Removing the boiler waterwalls
- Removing steam drum and deaerator by severing all connections and lowering to grade
- Removing boiler structural steel
- Disassembling the turbine/generator and condenser
- Removing all other equipment and components required prior to structures demolition
- Removing the turbine building superstructure and interior floors
- Blasting/dismantling the concrete turbine-generator pedestal(s)
- Removing siding from buildings
- Dismantling steel framing

- Demolishing structural concrete
- Removing the stack(s)
- Removing cooling tower(s) and / or cooling water intake and discharge structures
- Removing all other site structures within the scope of the dismantling program
- Sorting and organizing materials for pickup by the scrap dealer(s)
- Size reducing concrete rubble to enhance its suitability for backfill
- Removing any temporary services used to support the dismantling effort (lighting / ventilation / electrical / groundwater management)

2.3.3 Period 3 - Site Restoration

Site restoration activities are initiated following completion of the dismantling operations. The objective of site restoration in this estimate is to restore the station grounds to a configuration that does not pose a safety hazard; and plant vegetation for erosion control. As such, landscaping will be limited to grading, placement of top soil, and seeding. Site restoration as used in this estimate is not intended to re-configure the station for redevelopment, e.g. use as a recreational or industrial facility.

A typical site restoration sequence would be:

- Backfill below grade voids with recycled concrete rubble (reinforcing steel removed from concrete) or with additional fill, if necessary
- General grading of the station
- Placement of top soil or other suitable surface material necessary to maintain erosion control
- Landscaping to the extent necessary to re-vegetate the station (grass or similar plant materials), and
- Demobilizing personnel and equipment

**FIGURE 2.1
DISMANTLING PROJECT ORGANIZATION
UTILITY STAFF**

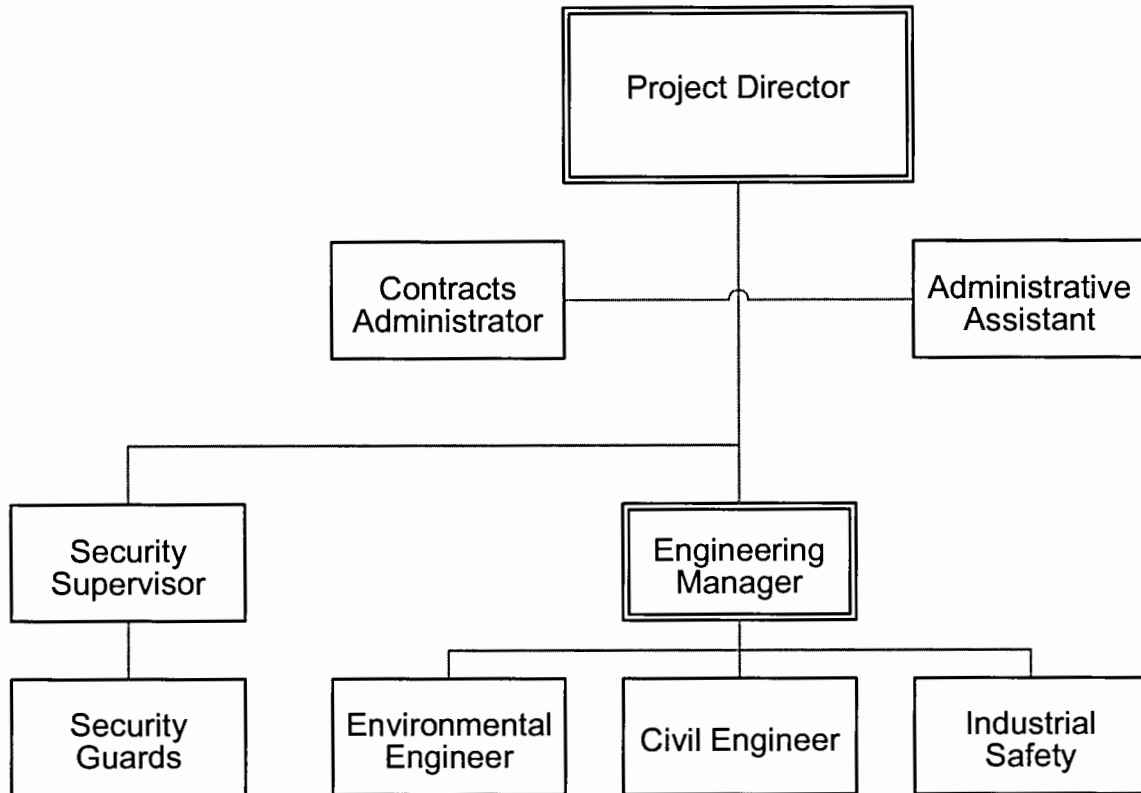
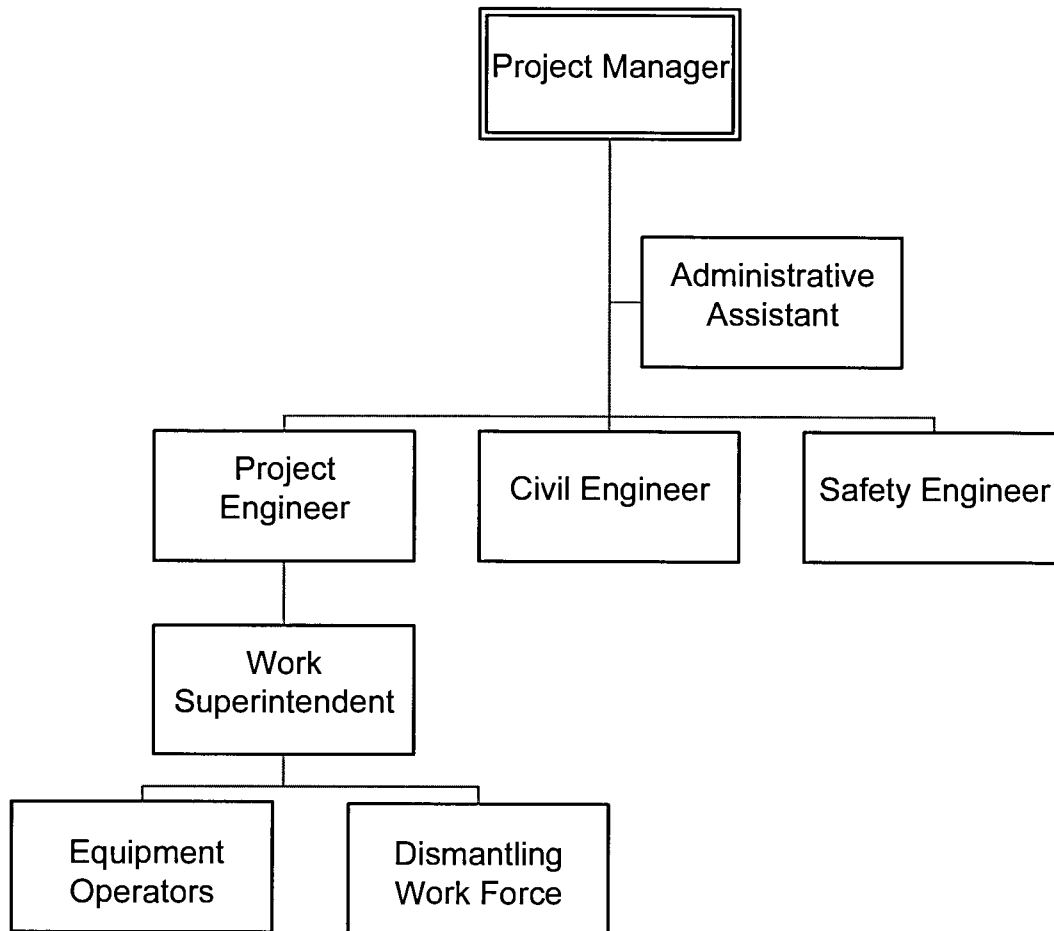


FIGURE 2.2
DISMANTLING PROJECT ORGANIZATION
DISMANTLING CONTRACTOR STAFF



3. COST ESTIMATE

The basis, methodology, and assumptions for the site-specific cost estimate are described in the following paragraphs.

3.1 BASIS OF ESTIMATE

Inventory of Materials to be Removed

The inventory is an essential element of the estimate, since dismantling costs are determined by applying unit cost factors against the corresponding inventory quantities. TLG developed the inventory by conducting a walk-down of the station, and extracting information from station-specific drawings and photos. The inventory used in developing the estimate for each station is provided in Appendix B.

Where TLG had previously developed inventory information for a boiler and turbine of similar size, fuel type and vintage, referred to as "reference unit", this information was used to represent the boiler / turbine systems inventory for the comparable Westar unit. The inventory was adjusted to reflect the difference between the rating of the Westar unit boiler / turbine and the rating of the reference unit; see Appendix A for further details.

There are expected differences in other facilities, even if the boiler and turbine are similar between comparable units. These include systems and structures associated with cooling water intake and discharge, fuel handling, exhaust gas, maintenance buildings and shops, pollution-control, and the quantity and extent of asbestos containing material (if applicable). For example, the reference plant inventory used for Neosho was based on a refractory lined steel chimney. Since the chimney at Neosho is concrete and has differing dimensions; field measurements of the chimney at Neosho were taken, and applied to the site-specific inventory. This new data replaced the reference plant data. For these systems and structures

Economic Cost Drivers

In developing an estimate, the cost of labor, equipment and material, credit for scrap, and similar costs will influence the results of the estimate. The basis for the significant cost drivers are:

1. Craft labor rates are based on existing contracts with craft labor contractors. These rates were provided by Westar (Ref. 1).

2. Utility labor rates are based on current labor costs for positions likely to be employed during the dismantling project. These rates were provided by Westar (Ref. 2).
3. Material and equipment costs for conventional demolition and/or construction activities, Contractors Insurance, Small Tools Allowance, Permit / Fees, and Contractor's Fee are based on R.S. Means Construction Cost Data (Ref. 3).
4. Scrap metal prices are based on Recycler's World published indices (Ref. 4).
5. Contingency, contractor fee, contractor insurance, environmental sampling, and permits & fees are based upon R.S. Means Construction Cost Data.
6. Costs in this estimate are in 2011 dollars.
7. Property taxes (or payments in lieu of taxes) are not included within the estimate.
8. The estimate to dismantle the stations does not address credit associated with the residual value of the land.

3.2 METHODOLOGY

The methodology used to develop the cost estimate follows the basic approach presented in the AIF/NESP-036, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates" (Ref. 5) and the US DOE "Decommissioning Handbook" (Ref. 6). These publications utilize a unit factor method for estimating decommissioning activity costs to simplify the estimating calculations. Unit cost factors for concrete removal (\$/cubic yard), steel removal (\$/ton), and cutting costs (\$/in) are developed from the labor cost information from R. S. Means. The activity-dependent costs are estimated using item quantities (cubic yards, tons, inches, etc.) developed from plant drawings and inventory documents. The unit factors used in this study reflect the latest available information on worker productivity in plant dismantling. A sample unit cost factor is provided in Appendix C. A list of unit cost factors is provided in Appendix D.

An activity duration critical path is developed to determine the total dismantling program schedule. This program schedule is then used to determine the period-dependent costs for program management, administration, field engineering, equipment rental, quality assurance, and security. TLG estimated typical salary and hourly rates for personnel associated with period-dependent costs. The costs for conventional demolition of structures, materials, backfill, landscaping, and equipment rental are

obtained from R.S. Means. Examples of such unit factor development are presented in AIF/NESP-036.

The unit cost factor method provides a demonstrable basis for establishing reliable cost estimates. The detail of activities for labor costs, equipment and consumables costs provide assurance that cost elements have not been omitted. Detailed unit cost factors, coupled with the site-specific inventory of piping, components and structures provide confidence in the cost estimates.

The activity-dependent and period-dependent costs are combined with applicable collateral costs to yield the direct decommissioning cost. A contingency is then applied. "Contingencies" are defined in the Association for the Advancement of Cost Engineering "Project and Cost Engineers' Handbook" (Ref. 7) as "specific provision for unforeseeable elements of cost within the defined project scope; particularly important where previous experience relating estimates and actual costs has shown that unforeseeable events which will increase costs are likely to occur." The cost elements in this estimate are based on ideal conditions; therefore, a contingency factor has been applied.

Examples of items that could occur but have not otherwise been accounted for in this estimate include: labor work stoppages, bad weather delays, equipment/tool breakage, changes in the anticipated plant shutdown conditions, etc. These types of unforeseeable events are discussed in the AIF/NESP-036 study. Guidelines are also provided for applying contingency.

3.3 ASSUMPTIONS

The following assumptions were used in developing the dismantling estimate.

Pre-requisite Activities

1. Dismantling of the station will not commence until all units are retired (cost estimate is not based on independent dismantling of units while adjacent units are operating).
2. The arrangements of the unit facilities as they exist in 2011 based upon walk-downs conducted by TLG, and databases and drawings for similar units in TLG's database.
3. The dismantling process will be an engineered process with substantial consideration for industrial (worker) safety.

4. The demolition will be performed by a Dismantling Contractor who is responsible to provide adequate staff and equipment to complete the dismantling in a safe manner.
5. Site security costs to restrict access to the demolition project by unauthorized personnel are included.
6. On-site fuel inventories will be used and/or removed prior to start of dismantling.
7. Tanks will be emptied by operations and maintenance staff after shutdown.
8. Acids, caustics, and similar hazardous materials will be removed by operations and maintenance staff after shutdown.
9. Consumables, such as ion exchange materials and filters, will also be removed by operations and maintenance staff after shutdown.
10. Stores, spare parts, gas storage containers, laboratory equipment, office furniture, etc., will be removed by the owner after shutdown.
11. Oils used in station transformers are PCB-free. Lubricating and transformer oils are drained and removed by operations and maintenance staff after shutdown.
12. Asbestos (if present) will be removed prior to the start of dismantling. Asbestos insulation and PACM (presumed asbestos containing materials) will be disposed of at licensed facilities. Quantities of asbestos are based on owner-provided information where available. Where such information was not available, the quantities of asbestos were estimated.
13. Prior to initiating dismantling, essentially all live circuits will have been de-energized (to preclude creating an industrial hazard). If required, temporary services systems (air, water, electrical, fire water, etc.) will be used to support dismantling operations and will remain in service throughout the project until no longer required.

Economic Assumptions

14. Post-shutdown "dormancy" costs (i.e., security and maintenance on any of the units retired prematurely) are not included in the study.
15. Escalation/inflation of the costs over the remaining operating life is not included.
16. A 12.5% fee is added to the Demolition Contractor's cost to account for its overhead and profit.

17. A 25% contingency is applied to asbestos remediation activities.
18. A 15% contingency is applied to all remaining dismantling-related costs.
19. An allowance has been included for post-dismantling environmental monitoring costs.
20. A credit for scrap metal cost recovery is included in the estimates. Retired plant equipment is assumed to have no value as salvage (sold for re-use).

Physical Work Assumptions

21. The costs for disposition (if required) of contaminated soil (e.g., PCBs, hydrocarbons, lead, asbestos, mercury, acids or caustics) are outside the scope of this estimate.
22. Large equipment, components, and commodities (piping, cable, conduit, etc.) will be removed prior to structures demolition.
23. An environmental hazards crew will be maintained throughout the demolition period to address such items as lead paint and asbestos that was inaccessible during the asbestos remediation period (where applicable).
24. Turbine pedestals and powerhouse building foundations will be removed by controlled blasting and back-filled to grade.
25. Structures and foundations will be removed to a depth of three feet below grade, with any resulting voids back-filled to grade level.
26. Chimney stacks will be blasted to the ground and broken into rubble, the steel liners cut and removed, and the foundations control-blasted to break the concrete in place so that groundwater drainage is provided.
27. The dismantling of the electrical equipment terminates at the switch yard boundary. The switch yard is left intact.
28. Concrete rubble generated during dismantling will be used as fill where needed.
29. The site will be graded; however, no effort was included in this estimate to restore the original contour of the land. Ground cover will be established for erosion control.
30. Roads, parking lots, etc., are removed after the facility is dismantled (with the exception of the immediate area around the switchyard).

Scheduling Assumptions

31. All work is performed during an eight-hour workday, five days per week, with no overtime.
32. Multiple crews work parallel activities to the maximum extent possible, consistent with efficiency (adequate access for cutting, removal, and laydown space) and with industrial safety appropriate for demolition of heavy components and structures.
33. Scheduling was calculated without constraints on availability of labor, equipment, or materials.

3.4 UNIT-SPECIFIC NOTES

3.4.1 Abilene CT 1

A complete inventory of system components and concrete structures was obtained from the site walk down by TLG.

3.4.2 Hutchinson CT 4

This unit was determined to be identical with Abilene Unit 1, except for certain features obtained from the site walk down by TLG.

3.4.3 Murray Gill Units 1 & 2

The power-block systems and structures inventories for Units 1 & 2 were taken from the TLG data base of units with similar generating capacity and fuel type. The inventory of non-power block systems and structures was developed from information recorded during the site walk down.

3.4.4 Neosho Unit 3

The power-block systems and structures inventory for Unit 3 was taken from the TLG data base of units with similar generating capacity and fuel type. The inventory of non-power block systems and structures was developed from information recorded during the site walk down.

3.4.5 Tecumseh CT 1 & 2

A complete inventory of system components and concrete structures was obtained from the site walk down by TLG.

4. SCRAP METAL CREDITS

The dismantling of a fossil plant typically occurs after a lengthy plant operating life. The existing installed plant equipment is considered obsolete and suitable for scrap as deadweight quantities only. Dismantling techniques assumed by TLG for equipment in this analysis are not consistent with removal techniques required for salvage (resale) of equipment. Experience has indicated that buyers prefer equipment stripped down to very specific requirements before they would consider purchase. This can require expensive work to remove the equipment from its installed location, which is inconsistent with the rapid dismantling approach assumed in this estimate. Since placing any salvage value on this machinery and equipment would be speculative, and the value would be expected to be small in comparison to the overall cost of dismantling, this study does not attempt to quantify the value that an owner may realize from salvaging installed plant equipment.

Furniture, tools, mobile equipment such as forklifts, trucks, bulldozers, and other property is removed at no cost or credit to the dismantling project. Disposition may include relocation to other Westar facilities. Spare parts are assumed to be made available for alternative use within the Westar system.

The materials used in the equipment and buildings are however expected to be suitable for recycle as scrap metals. As such, an estimated value of the scrap metal credit has been developed and applied to each station's cost estimate. The value of scrap was estimated using current market values extracted from published sources and applying this value to the estimated quantities of materials generated from the dismantling project. There were four basic types of metals used in the scrap estimates; carbon steel (the most common material used at the station), copper, stainless steel (high alloy steel) and aluminum. The scrap credit, in addition to considering the quantity and types of materials, also considered the cost of handling and transporting these materials to a major scrap processing location (Houston, TX area) where scrap is extensively used or sold. The value of the scrap credit is reduced to account for transportation costs from Kansas to Texas.

The basis for the value of scrap metal is summarized in Table 4.1. A summary of the scrap quantities, by material type, produced from dismantling each unit is provided in Table 4.2. An estimate of the total scrap credit, after the scrap quantities have been applied against the scrap metal prices, is provided in Table 4.3.

TABLE 4.1
BASIS FOR SCRAP METAL VALUE
(2011 Dollars)

Type of Material	Scrap Category ¹	Market Value ²	Units	Transport Cost ³	Scrap Metal Credit ⁴ (per ton)
Carbon Steel	Cast Iron	269.67	Per Ton	72.56	197.11
	No. 1	337.09	Per Ton	72.56	264.52
	Mixed Scrap	269.67	Per Ton	72.56	197.11
	Galvanized	67.42	Per Ton	72.56	0.00
Stainless Steel	SS-1	1.20	Per Pound	0.04	2,333.74
Copper	Insulated Cable	1.85	Per Pound	0.04	3,618.94
	No. 2 Copper	2.95	Per Pound	0.04	5,834.23
	Copper-Nickel	6.40	Per Pound	0.04	12,733.74
	Large Motor	0.44	Per Pound	0.04	812.86

Note 1: Scrap categories are consistent with information provided in Recycler's World

Note 2: The market value for scrap metal used in this estimate is based on Recycler's World U.S. Scrap Metal Index Historical Market Price. Values shown represent the average over a 12 month period from April 1, 2010 to March 31, 2011.

Note 3: The estimated cost for handling and transporting the materials to a major scrap processing center in the Houston, TX area is \$72.27 / ton or \$0.036 / pound.

Note 4: The scrap metal credit reflects the market value of scrap adjusted for handling and transport cost to local scrap metal recycler.

TABLE 4.2
QUANTITY OF SCRAP METALS
(pounds)

Name	Carbon Steel			Stainless Steel	Galvanized Steel	Copper			Copper Nickel	Total
	Cast Iron	No. 1	Mixed Scrap	SS-1		Insul Cbl	No. 2 Cu	Large Mtr		
Abilene CT 1	14,515	265,173	896,533	2,798	10,000	-	93,574	169,298	-	1,451,890
Hutchinson CT 4	26,241	359,253	912,852	2,514	10,000	-	99,013	169,298	-	1,579,172
Murray Gill Units 1 &	1,091,368	8,279,126	16,042,940	255,830	268,137	116,406	111,266	874,057	223,349	27,262,481
Neosho Unit 3	598,711	6,677,996	12,164,347	138,844	112,794	63,744	63,384	433,452	144,303	20,397,575
Tecumseh CT 1 	17,154	806,800	899,846	5,274	10,000	-	92,963	92,398	-	1,924,434
Total	1,747,988	16,388,348	30,916,518	405,261	410,932	180,150	460,200	1,738,503	367,653	52,615,552

TABLE 4.3
SCRAP METAL CREDITS
(thousands of 2011 dollars)

Name	Carbon Steel			Stainless Steel	Galvanized Steel	Copper			Copper Nickel	Total
	Cast Iron	No. 1	Mixed Scrap	SS-1		Insul Cbl	No. 2 Cu	Large Mtr		
Abilene CT 1	\$ 1	\$ 35	\$ 88	\$ 3	\$ 0	\$ -	\$ 273	\$ 69	\$ -	470
Hutchinson CT 4	\$ 3	\$ 48	\$ 90	\$ 3	\$ 0	\$ -	\$ 289	\$ 69	\$ -	501
Murray Gill Units 1 &	\$ 108	\$ 1,095	\$ 1,581	\$ 299	\$ 0	\$ 211	\$ 325	\$ 355	\$ 1,422	5,395
Neosho Unit 3	\$ 59	\$ 883	\$ 1,199	\$ 162	\$ 0	\$ 115	\$ 185	\$ 176	\$ 919	3,698
Tecumseh CT 1 & 2	\$ 2	\$ 107	\$ 89	\$ 6	\$ 0	\$ -	\$ 271	\$ 38	\$ -	512
Total	\$ 172	\$ 2,168	\$ 3,047	\$ 473	\$ 0	\$ 326	\$ 1,342	\$ 707	\$ 2,341	\$ 10,575

5. RESULTS

An estimate for dismantling certain of the Westar fossil-fuel generating stations in Kansas was developed by applying the system and structures inventories against the associated unit cost factors and accounting for program support costs. A summary of each station's major cost categories is presented in Table 5.1. Breakdowns of the major cost categories by unit and common facilities are provided in Tables 5.2a through e.

The following is an explanation of the contents of each line item in these tables:

Station Unit Rating (MWe) – This is the nominal electrical rating of each unit at the station. In Table 5.1 this represents the sum of all units on site.

Demolition Preparations / Temporary Services – The cost associated with ensuring that all energized systems have been isolated from the buildings scheduled for dismantling and the cost for installing temporary services to support the dismantling.

Scaffolding / Worker Access – The cost associated with providing safe access to areas of the station being dismantled.

Asbestos Remediation – The cost associated with remediating asbestos from the station prior to initiating dismantling activities. It should be noted that dismantling can proceed much more efficiently if asbestos containing materials have been removed.

Equipment Removal – The cost associated with removing all station equipment (piping, valves, heat exchangers, tanks, electrical equipment, etc.).

Boiler(s) – The cost associated with removing the boiler.

Structures Demolition – The cost associated with demolishing the buildings and concrete foundations (to three feet below grade).

Backfill / Grade / Landscaping – The cost associated with backfilling below grade voids, and grading and landscaping the grounds to preclude erosion of soils.

Ongoing Environmental Monitoring (quarterly for 5 years) – The cost associated with monitoring the environment around the station after the completion of dismantling activities.

Utility Management / Oversight – The staff directly assigned to manage the dismantling project, including planning, execution, oversight, and restoration.

Demolition Contractor Staff – The contractor’s staff assigned to manage, engineer, and supervise the dismantling project.

Security – Personnel assigned to control access to the dismantling site.

Property Taxes – Not included in this estimate.

Shared Heavy Equipment / Operating Engineers – The cost for renting / operating equipment in general use throughout the dismantling project (cranes, trucks, forklifts, front-end loaders, etc.).

Small Tool Allowance – The cost for procuring small tools.

Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.) – The cost for procuring utility services and office supplies.

Permits – The cost of obtaining permits.

Demolition Contractors Insurance – The cost of the demolition contractors insurance.

Demolition Contractors Fee – A fee applied to contractor activities.

Contingency – The cost to cover expenses for unforeseen events that are likely to occur.

Scrap Credit – A credit to the project for the recovery of scrap metals.

Unit (Table 5.2) – Costs directly attributed to the physical work associated with dismantling a generating unit.

Common (Table 5.2) – Costs directly attributed to the physical work associated with dismantling facilities shared by more than one unit.

Station (Tables 5.2) – Costs associated with supporting the physical dismantling work for each station. Note that the costs stated are limited to the work scope identified by Westar for each site.

This study provides an estimate for dismantling under current requirements, based on present-day costs and available technology. As inputs to the cost model change over time, such as labor rates, equipment costs, scrap metal value, etc., this cost estimate should be reviewed and updated to reflect these changes.

TABLE 5.1
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities (Costs)	Abilene CT 1	Hutchinson CT 4	Murray Gill Units 1 & 2	Neosho Unit 3	Tecumseh CT 1 & 2	Fleet Totals
Station Rating (MWe)	77	86	114	66	58	401
Characterization / Temporary Services	90,423	91,423	419,385	211,693	79,423	892,348
Worker Access	-	-	212,302	110,678	-	322,980
Asbestos Remediation	-	-	1,809,603	1,184,307	-	2,993,910
Equipment Removal	157,337	165,206	1,794,027	1,672,706	300,247	4,089,523
Boiler(s)	-	-	1,065,255	742,153	-	1,807,408
Structures Demolition	109,002	131,555	1,434,739	980,313	173,668	2,829,277
Backfill / Grade / Landscaping	37,986	43,176	446,458	229,673	62,778	820,071
Ongoing environ. monitoring (quarterly for 5 years)	38,000	38,000	250,000	241,000	38,000	605,000
Utility Management / Oversight	102,096	109,659	1,204,112	694,206	105,577	2,215,650
Demolition Contractor Mgmt / Super. / Safety Staff	108,802	118,487	1,567,395	1,026,461	88,957	2,910,102
Security	59,142	63,578	334,153	335,632	62,099	854,605
Property Taxes	0	0	0	0	0	0
Project Expenses						
Shared Heavy Equipment / Operating Engineers	179,915	196,404	1,674,781	1,047,623	143,453	3,242,176
Small Tool Allowance	4,417	4,874	85,630	62,073	7,184	164,177
Utilities Allowance	6,924	7,444	39,123	39,296	7,271	100,059
Permits	9,160	9,957	134,984	94,350	11,262	259,713
Demolition Contractors Insurance	21,554	23,430	317,623	222,010	26,501	611,117
Demolition Contractors Fee	77,090	84,184	1,179,239	824,609	101,473	2,266,595
Sub-Total	1,001,848	1,087,377	13,968,809	9,718,781	1,207,892	26,984,708
Contingency	150,277	163,107	2,276,282	1,576,248	181,184	4,347,097
Project Total (before scrap credit)	1,152,125	1,250,484	16,245,091	11,295,029	1,389,076	31,331,806
Scrap Credit	(469,898)	(500,642)	(5,394,679)	(3,698,278)	(511,974)	(10,575,471)
Project Total	682,227	749,842	10,850,412	7,596,751	877,102	20,756,335

TABLE 5.2a
ABILENE COMBUSTION TURBINE 1
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities	Unit 1	Station	Station Total
Abilene Unit Rating (MWe)	77		
Characterization / Temporary Services	49,000	41,423	90,423
Worker Access	-		0
Asbestos Remediation	-		0
Equipment Removal	157,337		157,337
Boiler(s)	-		0
Structures Demolition	109,002		109,002
Backfill / Grade / Landscaping	37,986	-	37,986
Ongoing environmental monitoring (quarterly for 5 years)		38,000	38,000
Utility Management / Oversight		102,096	102,096
Demolition Contractor Management / Supervisory / Safety Staff		108,802	108,802
Security		59,142	59,142
Property Taxes	-	-	0
Project Expenses			
Shared Heavy Equipment / Operating Engineers		179,915	179,915
Small Tool Allowance	4,417	n/a	4,417
Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.)		6,924	6,924
Permits		9,160	9,160
Demolition Contractors Insurance		21,554	21,554
Demolition Contractors Fee		77,090	77,090
Sub-Total			1,001,848
Contingency			150,277
Project Total (before scrap credit)			1,152,125
Scrap Credit	(469,898)	-	(469,898)
Project Total			682,227

TABLE 5.2b
HUTCHINSON COMBUSTION TURBINE 4
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities	Unit 4	Station	Station Total
Hutchinson Unit Rating (MWe)	86		
Characterization / Temporary Services	50,000	41,423	91,423
Worker Access	-		0
Asbestos Remediation	-		0
Equipment Removal	165,206		165,206
Boiler(s)	-		0
Structures Demolition	131,555		131,555
Backfill / Grade / Landscaping	43,176	-	43,176
Ongoing environmental monitoring (quarterly for 5 years)		38,000	38,000
Utility Management / Oversight		109,659	109,659
Demolition Contractor Management / Supervisory / Safety Staff		118,487	118,487
Security		63,578	63,578
Property Taxes	-	-	0
Project Expenses			
Shared Heavy Equipment / Operating Engineers		196,404	196,404
Small Tool Allowance	4,874	n/a	4,874
Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.)		7,444	7,444
Permits		9,957	9,957
Demolition Contractors Insurance		23,430	23,430
Demolition Contractors Fee		84,184	84,184
Sub-Total			1,087,377
Contingency (excluding activities currently under contract)			163,107
Project Total (before scrap credit)			1,250,484
Scrap Credit	(500,642)	-	(500,642)
Project Total			749,842

TABLE 5.2c
MURRAY GILL UNITS 1 & 2
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities	Unit 1	Unit 2	Common	Station	Station Total
Murray Gill Unit Rating (MWe)	48	66	114		
Characterization / Temporary Services	42,000	46,000	-	331,385	419,385
Worker Access	101,623	110,678	-		212,302
Asbestos Remediation	631,995	1,177,608	-		1,809,603
Equipment Removal	674,698	1,054,356	64,973		1,794,027
Boiler(s)	323,102	742,153	-		1,065,255
Structures Demolition	458,333	797,480	178,926		1,434,739
Backfill / Grade / Landscaping	141,025	192,715	112,719	-	446,458
Ongoing environmental monitoring (quarterly for 5 years)				250,000	250,000
Utility Management / Oversight				1,204,112	1,204,112
Demolition Contractor Management / Supervisory / Safety Staff				1,567,395	1,567,395
Security				334,153	334,153
Property Taxes	-	-	-	-	0
Project Expenses					
Shared Heavy Equipment / Operating Engineers				1,674,781	1,674,781
Small Tool Allowance	29,660	51,512	4,458	n/a	85,630
Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.)				39,123	39,123
Permits				134,984	134,984
Demolition Contractors Insurance				317,623	317,623
Demolition Contractors Fee				1,179,239	1,179,239
Sub-Total					13,968,809
Contingency					2,276,282
Project Total (before scrap credit)					16,245,091
Scrap Credit	(1,808,604)	(3,421,211)	(164,864)	-	(5,394,679)
Project Total					10,850,412

TABLE 5.2d
NEOSHO UNIT 3
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities	Unit 3	Common	Station	Station Total
Neosho Unit Rating (MWe)	66	66		
Characterization / Temporary Services	46,000	-	165,693	211,693
Worker Access	110,678	-		110,678
Asbestos Remediation	1,184,307	-		1,184,307
Equipment Removal	1,132,777	539,929		1,672,706
Boiler(s)	742,153	-		742,153
Structures Demolition	797,480	182,833		980,313
Backfill / Grade / Landscaping	116,976	112,697	-	229,673
Ongoing environmental monitoring (quarterly for 5 years)			241,000	241,000
Utility Management / Oversight			694,206	694,206
Demolition Contractor Management / Supervisory / Safety Staff			1,026,461	1,026,461
Security			335,632	335,632
Property Taxes	-	-	-	0
Project Expenses				
Shared Heavy Equipment / Operating Engineers			1,047,623	1,047,623
Small Tool Allowance	51,630	10,443	n/a	62,073
Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.)			39,296	39,296
Permits			94,350	94,350
Demolition Contractors Insurance			222,010	222,010
Demolition Contractors Fee			824,609	824,609
Sub-Total				9,718,781
Contingency				1,576,248
Project Total (before scrap credit)				11,295,029
Scrap Credit	(3,438,380)	(259,898)	-	(3,698,278)
Project Total				7,596,751

TABLE 5.2e
TECUMSEH COMBUSTION TURBINE 1 & 2
SUMMARY OF ACTIVITY COSTS
(2011 Dollars)

Activities	Unit 1	Unit 2	Common	Station	Station Total
Tecumseh Unit Rating (MWe)	29	29	58		
Characterization / Temporary Services	38,000		-	41,423	79,423
Worker Access	-	-	-		0
Asbestos Remediation	-	-	-		0
Equipment Removal	71,125	74,586	154,536		300,247
Boiler(s)	-	-	-		0
Structures Demolition	74,103	74,103	25,462		173,668
Backfill / Grade / Landscaping	7,466	7,466	47,846	-	62,778
Activities currently under contract				0	0
Ongoing environmental monitoring (quarterly for 5 years)				38,000	38,000
Utility Management / Oversight				105,577	105,577
Demolition Contractor Management / Supervisory / Safety Staff				88,957	88,957
Security				62,099	62,099
Property Taxes	-	-	-	-	0
Project Expenses					
Shared Heavy Equipment / Operating Engineers				143,453	143,453
Small Tool Allowance	2,384	1,952	2,848	n/a	7,184
Utilities Allowance (Office Equip & supplies / Telephone, Electric etc.)				7,271	7,271
Permits				11,262	11,262
Demolition Contractors Insurance				26,501	26,501
Demolition Contractors Fee				101,473	101,473
Sub-Total					1,207,892
Contingency					181,184
Project Total (before scrap credit)					1,389,076
Scrap Credit	(221,786)	(222,208)	(67,980)	-	(511,974)
Project Total					877,102

6. REFERENCES

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**APPENDIX A
ESTIMATING INVENTORIES FOR SIMILAR SIZE UNITS**

APPENDIX A

ESTIMATING INVENTORIES FOR SIMILAR SIZE UNITS

In order to cost-effectively develop estimates TLG recognized that units of a similar size and fuel type share many common characteristics. For instance, plant systems (feedwater, steam, condensate, coal-handling, generating, lubricating oil, electrical power distribution, etc.) would be designed to serve the same functions, contain similar components, and be similar in size. Similarly, the structures necessary to support these systems, including boiler building, turbine building, intake and discharge structures, and fuel handling would be designed to serve the same functions and would also be similar in size. Site-specific inventories have been developed for similar units using a combination of drawings, site walk downs, and databases. These reference unit inventories were extrapolated to represent inventories of equipment and structures for similar Westar units. This approach is referred to by AACE International (The Association for the Advancement of Cost Estimating) as a "scale of operations method" (Ref. 7).

The basic approach to the extrapolation is the following:

$$Q_2 = Q_1 * (C_2/C_1)^x$$

C_1 = Rating of Representative Unit (MWe)

C_2 = Rating of Similar Unit (MWe)

Q_1 = Quantity of Material Representative Unit (by component)

Q_2 = Quantity of Material Similar Unit (by component)

x = constant (0.65 for equipment, 0.5 for structures) (estimators judgment)

The basic concept is that a similar unit, with a rating 20% greater than a representative unit, does not have a 20% increase in inventory. Using the scale of operation method, the component would have a $(120\%/100\%)^{0.65} = 112.6\%$, or a 12.6% increase in size or quantity. Practically, this is interpreted to mean that a pipe carrying 20% more fluid (e.g. feedwater) would be approximately 12.6% larger in size.

For units that are essentially identical, but may have slight differences in electrical ratings due to local conditions (efficiency of units), the inventories are also considered identical.

**APPENDIX B
SUMMARY OF STATION SYSTEM AND STRUCTURES INVENTORIES**

TABLE B
SUMMARY OF STATION SYSTEMS AND STRUCTURES INVENTORIES

Index	System/Structure Inventory Data Point	Abilene	Hutchinson	Murray Gill	Neosho	Tecumseh
2	Piping 0.25 to 2 inches diameter, linear foot	574	-	-	14,065	630
3	Piping >2 to 4 inches diameter, linear foot	383	383	13,922	9,377	420
4	Piping >4 to 8 inches diameter, linear foot	255	255	9,281	6,251	280
5	Piping >8 to 14 inches diameter, linear foot	-	300	6,187	4,167	-
6	Piping >14 to 20 inches diameter, linear foot	-	-	2,311	1,211	-
7	Piping >20 to 36 inches diameter, linear foot	-	-	1,970	2,280	-
8	Piping >36 inches diameter, linear foot	-	-	364	124	-
9	Valves <2 inches	66	66	1,004	734	78
10	Valves >2 to 4 inches	44	44	669	489	52
11	Valves >4 to 8 inches	22	22	446	326	26
12	Valves >8 to 14 inches	-	11	223	163	-
13	Valves >14 to 20 inches	-	-	46	21	-
14	Valves >20 to 36 inches	-	-	37	31	-
15	Valves >36 inches	-	-	15	8	-
24	Pipe hangers for small bore piping, each	38	15	557	938	42
25	Pipe hangers for large bore piping, each	10	22	805	561	11
26	Pump and motor set < 300 pounds	-	-	40	21	11
27	Pumps, 300-1000 pound pump	-	-	6	2	-
28	Pumps, >1000-10,000 pound pump	-	-	8	4	-
29	Pumps, >10,000 pound pump	-	-	11	4	-
32	Pump motors, 300-1000 pound pump	-	-	13	2	-
33	Pump motors, >1000-10,000 pound pump	-	-	8	4	2
34	Pump motors, >10,000 pound pump	4	4	9	4	2
38	Main turbine-generator (pounds per MW(e) input)	-	-	2	1	-
39	Heat exchanger <3000 pound	-	-	19	13	-
40	Heat exchanger >3000 pound	-	-	17	10	-
41	Feedwater heater/deaerator	-	-	10	5	-
49	Main condenser (pounds per MW(e) input)	-	-	2	1	-
51	Tanks, <300 gallons, filters, and ion exchangers	3	3	8	2	10
52	Tanks, 300-3000 gallons	2	2	5	4	-
53	Tanks, >3000 gallons, square foot surface	376	752	8,724	55,825	20,615
54	Electrical equipment, <300 pound	16	16	385	239	112
55	Electrical equipment, 300-1000 pound	10	10	66	59	38
56	Electrical equipment, 1000-10,000 pound	12	12	43	15	10
57	Electrical equipment, >10,000 pound	6	6	16	8	4
59	Electrical transformers < 30 tons	1	1	2	2	-
60	Electrical transformers > 30 tons	2	2	2	1	4
64	Fluorescent light fixture	-	-	87	68	-
65	Incandescent light fixture	-	-	339	210	-

TABLE B
SUMMARY OF SYSTEMS AND STRUCTURES INVENTORIES
(Continued)

Index	System/Structure Inventory Data Point	Abilene	Hutchinson	Murray Gill	Neosho	Tecumseh
66	Electrical cable tray, linear foot	-	-	5,018	3,128	-
67	Electrical conduit, linear foot	-	-	24,874	12,874	-
69	Mechanical equipment, <300 pound	10	10	428	267	-
70	Mechanical equipment, 300-1000 pound	53	53	130	109	24
71	Mechanical equipment, 1000-10,000 pound	56	56	21	4	38
72	Mechanical equipment, >10,000 pound	9	9	1	-	8
76	HVAC equipment, <300 pound	-	-	6	1	-
78	HVAC equipment, 1000-10,000 pound	-	-	2	-	-
82	HVAC ductwork, pound	-	-	25,358	-	-
201	Standard reinforced concrete, cubic yard	904	1,192	2,231	2,947	887
202	Grade slab concrete, cubic yard	-	-	1,306	786	-
206	Heavily rein concrete w/#9 rebar, cubic yard	-	-	1,061	525	-
221	Mechanical draft cooling tower, cubic yard	-	-	40,976	40,976	-
222	Hollow masonry block wall, cubic yard	-	-	-	40	-
229	Backfill of below grade voids, cubic yard	467	467	13,269	5,142	763
235	Building by volume, cubic foot	19,980	19,980	699,705	837,085	28,665
236	Building metal siding, square foot	-	-	35,600	-	-
242	Standard asphalt roofing, square foot	-	-	10,000	-	-
255	Overhead cranes/monorails >10 - 50 ton capacity, each	-	-	2	1	-
260	Structural steel, pounds	80,500	99,347	6,012,653	3,942,572	207,586
262	Steel floor grating, square foot	-	-	18,519	8,619	-
268	Placement of scaffolding in clean areas, square foot	-	-	29,849	15,561	-
270	Landscaping with topsoil, acre	-	-	2	1	1
271	Landscaping w/o topsoil, acre	1	1	15	15	-
272	Chain link fencing, linear foot	1,000	1,000	2,000	4,000	1,000
274	Asphalt pavement, square foot	6,000	6,000	16,000	16,000	2,000
291	Carbon steel plate 1/4 inch thick, square foot	9,222	9,222	-	-	21,782
294	Carbon steel plate 1/2 inch thick, square foot	-	-	4,259	4,259	-
359	Steam drum removal (fossil)	-	-	2	1	-
360	Water drum removal (fossil)	-	-	2	-	-
361	Upper/lower waterwall headers (fossil)	-	-	13	10	-
362	Top sup boiler waterwall (8'x8' section), inches cut	-	-	64,337	45,775	-
369	Boiler convective superheater platens	-	-	174	116	-
372	Boiler economizer platens	-	-	70	70	-
376	Process ductwork (8'x8' section), inches cut	-	-	217,199	131,984	-
378	Non-asbestos insulated regenerative air preheaters	-	-	1	-	-
381	Non-insulated recuperative air preheaters	-	-	4	4	-
382	Induced, forced, primary draft fans	-	-	4	2	-

APPENDIX C
UNIT COST FACTOR DEVELOPMENT

APPENDIX C

UNIT COST FACTOR DEVELOPMENT

Example: Unit Factor for Removal of Heat Exchanger < 3,000 pounds

1. SCOPE

Heat exchangers weighing < 3,000 lb. will be removed in one piece using a crane or small hoist. They will be disconnected from the inlet and outlet piping. The heat exchanger will be sent to the laydown area.

2. CALCULATIONS

Act ID	Activity Description	Activity Duration	Critical Duration
a	Remove insulation	20	(b)
b	Mount pipe cutters	60	60
c	Disconnect inlet and outlet lines	60	60
d	Rig for removal	30	30
e	Unbolt from mounts	30	30
f	Remove, send to packing area	<u>60</u>	<u>60</u>
	Totals (Activity/Critical)	260	240

Duration adjustment(s):

+ Work break adjustment (8.33 % of productive duration)	<u>20</u>
Total work duration (minutes)	260

*** Total duration = 4.333 hr ***

3. LABOR REQUIRED

Crew	Number	Duration (hr)	Rate (\$/hr)	Cost (\$)
Laborers	3.0	4.333	37.90	492.66
Craftsmen	2.0	4.333	50.48	437.46
Foreman	1.0	4.333	55.18	239.09
General Foreman	0.25	4.333	56.18	60.86
Fire Watch	0.05	4.333	37.90	<u>8.21</u>
Total labor cost				1,238.28

4. EQUIPMENT & CONSUMABLES COSTS

Equipment Costs	none
Consumables/Materials Costs	
Gas torch consumables 1 @ \$10.10/hr x 1 hr {1}	<u>10.10</u>
Subtotal cost of equipment and materials	10.10
Overhead & profit on equipment and materials @ 15.30%	<u>1.55</u>
Total costs, equipment & material	11.65
TOTAL COST Removal of heat exchanger <3000 pound:	\$1,249.93
Total labor cost:	\$1,238.28
Total equipment/material costs:	\$11.65
Total craft labor man-hours required per unit:	27.298

5. NOTES AND REFERENCES

- Durations are shown in minutes. The integrated duration accounts for those activities that can be performed in conjunction with other activities, indicated by the alpha designator of the concurrent activity. This results in an overall decrease in the sequenced duration.
- Work difficulty factors were developed in conjunction with the AIF program to standardize decommissioning cost studies and are delineated in the "Guidelines" study (Reference 2, Vol. 1, Chapter 5).
- References for equipment and consumables costs:

1. R.S. Means (2011) Division 01 54 33, Section 40-6360 Page 664

**APPENDIX D
UNIT COST FACTOR LISTING**

TABLE D
UNIT COST FACTOR LISTING
(Costs are in 2011 dollars/Scrap Weights in pounds)

UCF #	Description	Unit Cost Factors			Scrap Weight							
		Total Cost	Labor Cost	Labor Hours	Cast Iron	Carbon Steel No. 1	Mixed Scrap	SS-1	Galv. Steel	Insul Cable	No. 2 Copper	Large Motor
2	Piping 0.25 to 2 inches diameter, linear foot	4.47	4.44	0.1	-	4	-	0.5	-	-	-	-
3	Piping >2 to 4 inches diameter, linear foot	6.43	6.37	0.2	-	7	-	0.9	-	-	0.4	-
4	Piping >4 to 8 inches diameter, linear foot	12.56	12.49	0.3	-	22	-	-	-	-	-	-
5	Piping >8 to 14 inches diameter, linear foot	17.50	17.40	0.4	-	57	-	-	-	-	-	-
6	Piping >14 to 20 inches diameter, linear foot	25.04	24.74	0.6	-	-	120	-	-	-	-	-
7	Piping >20 to 36 inches diameter, linear foot	39.52	39.14	0.9	-	-	221	-	-	-	-	-
8	Piping >36 inches diameter, linear foot	48.21	47.82	1.1	-	-	417	-	-	-	-	-
9	Valves <2 inches	89.90	89.52	2.0	-	-	-	-	-	-	-	-
10	Valves >2 to 4 inches	83.89	83.30	1.9	-	75	-	8.8	-	-	4.4	-
11	Valves >4 to 8 inches	125.64	124.86	2.8	-	510	-	-	-	-	-	-
12	Valves >8 to 14 inches	174.97	174.00	4.1	-	1,066	-	-	-	-	-	-
13	Valves >14 to 20 inches	250.37	247.45	5.8	-	-	2,040	-	-	-	-	-
14	Valves >20 to 36 inches	395.22	391.35	9.1	-	-	3,334	-	-	-	-	-
15	Valves >36 inches	482.11	478.24	11.1	-	-	11,535	-	-	-	-	-
24	Pipe hangers for small bore piping, each	27.64	24.72	0.6	-	10	-	-	-	-	-	-
25	Pipe hangers for large bore piping, each	99.20	93.38	2.3	-	50	-	-	-	-	-	-
26	Pump and motor set < 300 pounds	211.11	206.26	4.7	-	-	50	12.5	-	-	-	62.3
27	Pumps, 300-1000 pound pump	587.22	579.45	12.7	-	293	49	48.9	-	-	-	-
28	Pumps, >1000-10,000 pound pump	2,325.08	2,313.43	51.3	-	2,834	472	472.3	-	-	-	-
29	Pumps, >10,000 pound pump	4,493.80	4,458.86	98.9	-	43,693	7,282	7,282.1	-	-	-	-
32	Pump motors, 300-1000 pound pump	246.68	246.68	5.4	-	-	-	-	-	-	-	307.8
33	Pump motors, >1000-10,000 pound pump	967.89	967.89	21.5	-	-	-	-	-	-	-	3,531.6
34	Pump motors, >10,000 pound pump	2,177.74	2,177.74	48.3	-	-	-	-	-	-	-	42,324.5
38	Main turbine-generator (pounds per MW(e) input)	143,236.28	142,490.98	3,042.0	-	-	851,500	-	-	-	-	851,500.0
39	Heat exchanger <3000 pound	1,249.93	1,238.28	27.3	-	-	416	623.4	-	-	-	-
40	Heat exchanger >3000 pound	3,142.43	3,095.85	68.3	-	-	5,599	8,397.9	-	-	-	-
41	Feedwater heater/deaerator	7,875.69	7,782.53	172.6	-	-	12,000	18,000.0	-	-	-	-
49	Main condenser (pounds per MW(e) input)	393,656.06	377,116.16	8,243.6	-	149,400	149,400	199,200.0	-	-	-	-
51	Tanks, <300 gallons, filters, and ion exchangers	271.64	265.82	6.0	-	-	401	401.2	-	-	-	-
52	Tanks, 300-3000 gallons	858.15	846.50	19.1	-	-	2,700	300.0	-	-	-	-
53	Tanks, >3000 gallons, square foot surface	7.19	7.04	0.2	-	-	21	-	-	-	-	-
54	Electrical equipment, <300 pound	115.36	115.36	2.6	-	-	56	-	-	-	2.9	-
55	Electrical equipment, 300-1000 pound	401.60	401.60	8.8	-	-	624	-	-	-	32.8	-
56	Electrical equipment, 1000-10,000 pound	803.22	803.22	17.6	-	-	2,212	-	-	-	116.4	-
57	Electrical equipment, >10,000 pound	1,918.68	1,918.68	41.0	-	-	19,950	-	-	-	1,050.0	-
59	Electrical transformers < 30 tons	1,332.50	1,332.50	28.4	-	-	11,250	-	-	-	3,750.0	-
60	Electrical transformers > 30 tons	3,837.37	3,837.37	81.9	-	-	375,000	-	-	-	125,000.0	-

TABLE D (continued)
UNIT COST FACTOR LISTING
(Costs are in 2011 dollars/Scrap Weights in pounds)

UCF #	Description	Unit Cost Factors			Scrap Weight							
		Total Cost	Labor Cost	Labor Hours	Cast Iron	Carbon Steel No. 1	Mixed Scrap	SS-1	Galv. Steel	Insul Cable	No. 2 Copper	Large Motor
64	Fluorescent light fixture	47.81	47.81	1.1	-	-	-	-	-	-	-	-
65	Incandescent light fixture	23.67	23.67	0.6	-	-	-	-	-	-	-	-
66	Electrical cable tray, linear foot	10.78	10.58	0.2	-	-	-	-	6.6	6.6	-	-
67	Electrical conduit, linear foot	4.71	4.61	0.1	-	-	-	-	3.4	3.4	-	-
69	Mechanical equipment, <300 pound	115.36	115.36	2.6	-	-	127	-	-	-	-	-
70	Mechanical equipment, 300-1000 pound	401.60	401.60	8.8	-	-	641	-	-	-	-	-
71	Mechanical equipment, 1000-10,000 pound	803.22	803.22	17.6	-	-	4,184	-	-	-	-	-
72	Mechanical equipment, >10,000 pound	1,918.68	1,918.68	41.0	-	-	11,938	-	-	-	-	-
76	HVAC equipment, <300 pound	139.50	139.50	3.1	-	-	184	-	-	-	-	-
78	HVAC equipment, 1000-10,000 pound	961.74	961.74	21.0	-	-	3,813	-	-	-	-	-
82	HVAC ductwork, pound	0.45	0.45	0.0	-	-	-	-	1.0	-	-	-
201	Standard reinforced concrete, cubic yard	65.77	28.78	0.6	-	183	-	-	-	-	-	-
202	Grade slab concrete, cubic yard	88.07	43.17	1.0	-	183	-	-	-	-	-	-
206	Heavily rein concrete w/#9 rebar, cubic yard	109.52	36.73	0.8	-	730	-	-	-	-	-	-
221	Mechanical draft cooling tower, cubic yard	2.95	2.06	0.0	-	-	-	-	-	-	-	-
222	Hollow masonry block wall, cubic yard	86.04	54.53	1.4	-	66	-	-	-	-	-	-
229	Backfill of below grade voids, cubic yard	29.55	2.94	0.1	-	-	-	-	-	-	-	-
235	Building by volume, cubic foot	0.27	0.15	-	-	-	1	-	-	-	-	-
236	Building metal siding, square foot	1.03	0.80	0.0	-	-	-	-	2.4	-	-	-
242	Standard asphalt roofing, square foot	1.98	1.98	0.1	-	-	-	-	-	-	-	-
255	Overhead cranes/monorails >10 - 50 ton capacity, each	1,353.09	1,353.09	28.3	-	-	298,832	-	-	-	3,018.5	-
260	Structural steel, pounds	0.19	0.14	-	-	1	-	-	-	-	-	-
262	Steel floor grating, square foot	4.04	3.84	0.1	-	-	6	-	1.1	-	-	-
268	Placement of scaffolding in clean areas, square foot	15.94	4.17	0.1	-	-	-	-	-	-	-	-
270	Landscaping with topsoil, acre	26,812.44	2,434.70	52.6	-	-	-	-	-	-	-	-
271	Landscaping w/o topsoil, acre	1,047.09	269.21	5.3	-	-	-	-	-	-	-	-
272	Chain link fencing, linear foot	2.93	2.27	0.1	-	-	-	-	10.0	-	-	-
274	Asphalt pavement, square foot	0.79	0.52	0.0	-	-	-	-	-	-	-	-
291	Carbon steel plate 1/4 inch thick, square foot	3.13	2.53	0.1	-	-	10	-	-	-	-	-
294	Carbon steel plate 1/2 inch thick, square foot	3.30	2.66	0.1	-	-	20	-	-	-	-	-
359	Steam drum removal (fossil)	16,916.15	16,838.51	411.6	-	-	480,000	-	-	-	-	-
360	Water drum removal (fossil)	6,283.12	6,268.57	153.2	-	-	320,000	-	-	-	-	-
361	Upper/lower waterwall headers (fossil)	4,740.67	4,726.12	115.5	-	-	120,000	-	-	-	-	-
362	Top sup boiler waterwall (8'x8' section), inches cut	0.57	0.55	0.0	-	-	11	-	-	-	-	-
369	Boiler convective superheater platens	1,344.83	1,243.91	29.6	-	-	19,501	-	-	-	-	-
372	Boiler economizer platens	724.10	669.76	15.9	-	-	11,703	-	-	-	-	-
376	Process ductwork (8'x8' section), inches cut	0.28	0.27	0.0	-	-	0	-	-	-	-	-
378	Non-asbestos insulated regenerative air preheaters	8,620.58	7,712.25	188.5	-	-	1,376,000	-	-	-	-	-
381	Non-insulated recuperative air preheaters	4,390.24	3,867.94	93.4	-	-	1,376,000	-	-	-	-	-
382	Induced, forced, primary draft fans	1,363.04	1,339.75	31.9	-	-	30,000	-	-	-	-	3,531.6