

April 15, 2019

ZS-2019-0034

Mr. Ho Nieh, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Zion Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

Subject: Zion Nuclear Power Station, Units 1 and 2  
Pre-Notice of Disbursement from Decommissioning Trust

In accordance with the Zion Nuclear Power Station (ZNPS) Facility Operating Licenses, Condition 2.C.(14)(c), the decommissioning trust agreement must contain a requirement that no disbursements or payments shall be made from the trust without the trustee giving thirty (30) days prior written notice to the Director of the Office of Nuclear Reactor Regulation.

Article 2, Section 2.2 of the Master Terms for Trust Agreements of the Tax-Qualified Nuclear Decommissioning Master Trust Agreement and the Non-Tax Qualified Nuclear Decommissioning Master Trust Agreement by and between *ZionSolutions, LLC* ("*ZionSolutions*") and The Bank of New York Mellon as Trustee provides that distributions will be made in accordance with Article 2 of the Master Terms. The Master Terms for Trust Agreements Article 2: "Establishment of Separate Trusts and Dispositive Provisions", Section 2.2 "Payment of Nuclear Decommissioning Costs", paragraph (d), subparagraph (iv), provides that except for administrative costs and taxes as provided in Sections 2.5 and 4.1 of the Master Terms, no disbursement or payments for decommissioning costs shall be made from the trusts unless the Trustee or *ZionSolutions* provides thirty (30) days prior written notice, of such disbursement or payment, to the NRC Director, Office of Nuclear Reactor Regulation.

This letter provides the Director of the Office of Nuclear Reactor Regulation written notification of The Bank of New York Mellon's intent, upon receipt of a completed Disbursement Certificate from *ZionSolutions*, to make disbursements from the nuclear decommissioning trusts of ZNPS, Units 1 and 2. The disbursements will pay for decommissioning costs, as incurred, not to exceed (without a supplemental 30-day notice to the Director) \$5,886,074 at ZNPS, for both Units 1 and 2 combined, for the period June 2019 through November 2019. *ZionSolutions* has confirmed (or prior to the corresponding disbursement shall have confirmed) to us that the costs to be disbursed are legitimate decommissioning expenses.

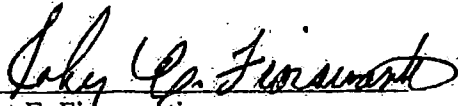
We plan to begin making disbursements from the nuclear decommissioning trusts for ZNPS Units 1 and 2, in the amount described above, thirty (30) days following the date of this letter, in the absence of any written notice of objection from the NRC.

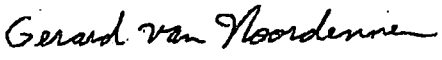
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ZionSolutions, LLC  
ZS-2019-0034  
Page 2 of 2

If you have any questions about this letter, please contact John E. Fioravanti at (412) 234-5431 or Gerard van Noordennen at (860) 462-9707.

Respectfully,

  
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John E. Fioravanti  
Vice President, Account Manager  
The Bank of New York Mellon

  
\_\_\_\_\_  
Gerard P. van Noordennen  
Vice President Regulatory Affairs  
ZionSolutions, LLC

cc: John Hickman, U.S. NRC  
Jennifer Dubose, EnergySolutions, LLC  
Service List

## **Zion Nuclear Power Station, Unit 1 and 2 License Transfer Service List**

### **cc:**

Ken Robuck  
President and CEO  
*EnergySolutions*  
299 South Main Street, Suite 1700  
Salt Lake City, UT 84111

John Sauger  
Executive VP & Chief Nuclear Officer  
Reactor D & D  
*EnergySolutions*  
121 W. Trade Street, Suite 2700  
Charlotte, NC 28202

Gerard van Noordennen  
VP Regulatory Affairs  
*EnergySolutions*  
121 W. Trade Street, Suite 2700  
Charlotte, NC 28202

Bruce Hinkley  
General Manager  
*ZionSolutions, LLC*  
2701 Deborah Avenue  
Zion, IL 60099

Jerry Houff  
Decommissioning Plant Manager  
*ZionSolutions, LLC*  
2701 Deborah Avenue  
Zion, IL 60099

Russ Workman  
General Counsel  
*EnergySolutions*  
299 South Main Street, Suite 1700  
Salt Lake City, UT 84111

Regional Administrator  
U.S. NRC, Region III  
2443 Warrenville Road  
Lisle, IL 60532-4352

Steven A. Reynolds  
Manager, Nuclear Facility Inspection  
Division of Nuclear Safety  
Illinois Emergency Management Agency  
245 W. Roosevelt Road, Units 55 & 56  
West Chicago, Illinois 60185

Kelly F. Grahn  
Decommissioning and Field Office Manager  
Bureau of Radiation Safety  
Illinois Emergency Management Agency  
245 W Roosevelt Road, Building 8, Suite 55  
West Chicago, IL 60185

William P. Mazzeno  
Emergency Management Coordinator  
Lake County Emergency Management Agency  
1303 N. Milwaukee Avenue  
Libertyville, IL 60048-1308

John E. Matthews  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004