

From: [Deborah Cate](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 6:05:28 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

In order to possess a reactor operating license, a company must demonstrate that it is financially qualified and can provide assurance of sufficient funds to fully decommission the reactor. Exelon's proposed "SpinCo" meets neither criteria, and its license transfer application provides no evidence to the contrary.

Exelon states publicly and in its application that many of its reactors are not able to generate enough revenue to pay their operating and maintenance costs. Several others are financially dependent on temporary consumer subsidies from state governments. SpinCo will have no other sources of revenue except for electricity sales and subsidies, and cannot guarantee it will have sufficient funds to operate and maintain all of its reactors safely.

Neither can SpinCo provide assurance of decommissioning funding. In 2019, Callan Institute concluded that Exelon's decommissioning funds were between \$1.5 billion and \$7.4 billion short of the amounts needed for decommissioning. The company will have no other sources of decommissioning funding than the decommissioning trust funds. Because the reactors themselves are unprofitable and dependent on temporary, out-of-market subsidies, SpinCo will not be able to make up for decommissioning fund shortfalls and cost overruns.

What is more, the application does not provide the state in which SpinCo will be incorporated, nor the names of its executives and officers, as it has not even been incorporated. In effect, Exelon is asking NRC to violate its own statutory and regulatory requirements (per 10 CFR 50.80 and 50.33), and allow 28 reactor licenses and billions of dollars in decommissioning funds to be transferred to an unknown company.

Exelon is proposing this spin-off because it no longer sees a future in nuclear power, which is increasingly risky and uneconomical. So Exelon has decided to get rid of its nuclear power plants because no other company sees a future in them either. But the Atomic Energy Act and NRC's licensing requirements are intended to prevent exactly what Exelon is proposing. Putting nuclear reactors in the hands of financially unqualified companies that could put the public's health and safety at risk. NRC must dismiss Exelon's application: it is incomplete, SpinCo is not financially qualified, and cannot provide decommissioning funding assurance.

For my family's safety and the safety of all Central New Yorkers, I urge you to reject this dangerous petition. Thank you.

Sincerely,
Deborah Cate
2499 N 50th St
Philadelphia, PA 19131

From: [Carol Jagiello](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 4:58:11 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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This is madness, shut it down. A Fukushima out of control. Ongoing Chernobyl disaster...Japan to release treated Fukushima water into sea ...Chernobyl's smoldering

again,possibility' of another accident...Radioactive tritium leaks found at 48 US site

Sincerely,
Carol Jagiello
91 Wood Pl
Bloomingdale, NJ 07403

From: [Francis Kelley](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 4:30:10 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Reject this dangerous scam. Make them pay to decommission these plants.

Sincerely,
Francis Kelley
51 Prescott Ave
Riverside, RI 02915

From: [Charlene Woodcock](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 1:26:50 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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If insurance companies won't insure nuclear power plants at all, how can our government extend their licenses as the plants age out?? It is outrageously irresponsible. Surely Chernobyl

and Fukushima are evidence enough for their decommissioning NOW.

Sincerely,
Charlene Woodcock
2355 Virginia St
Berkeley, CA 94709

From: [ISABEL Sena](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 9:06:37 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

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This is a very dangerous proposition and you should do everything in your power to defeat it. Nuclear power is a threat to our health and environment that extends hundreds of years into

the future. Please stop this.

Sincerely,
ISABEL Sena
34-38 85th Street
Jackson Heights, NY 11372

From: [Matthew Eager](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Friday, June 11, 2021 7:36:20 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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The fact is, Exelon entered into this business decision knowing it would be responsible for decommissioning, and now must be held accountable. If there is buyer's remorse, that's their

problem, not mine and yours.

Sincerely,
Matthew Eager
133 Merritts Pond Road
Riverhead, NY 11901