

10 CFR 50.80
10 CFR 50.90
10 CFR 72.50RS-22-010
JAFP-22-0010
NMP13443
TMI-22-002

January 24, 2022

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454, STN 50-455, and 72-68

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. 50-317 and 50-318

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Independent Spent Fuel Storage Installation
Materials License No. SNM-2505
NRC Docket No. 72-08 and 72-78

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461 and 72-1046

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-2
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-10, 50-237, 50-249, and 72-37

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket Nos. 50-333 and 72-12

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374, and 72-70

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352, 50-353, and 72-65

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220, 50-410, and 72-1036

Peach Bottom Atomic Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-12
Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277, 50-278, and 72-29

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket Nos. 50-244 and 72-67

Salem Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272, 50-311, and 72-48

Three Mile Island Nuclear Station, Unit 1
Renewed Facility License No. DPR-50
NRC Docket No. 50-289 and 72-77

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295, 50-304, and 72-1037

- References:**
- 1) Letter from J. Bradley Fewell, Exelon Generation Company, LLC to U.S. Nuclear Regulatory Commission – "Application for Order Approving License Transfers and Proposed Conforming License Amendments," dated February 25, 2021 (ML21057A273)
 - 2) Letter from Blake A. Purnell, U.S. Nuclear Regulatory Commission, to David P. Rhoades, Exelon Generation Company, LLC – "Order Approving Transfer of Licenses and Draft Conforming License Amendments (EPID L-2021-LLM-0000)," dated November 16, 2021 (ML21277A248)

Subject: Supplemental Information in Response to Order Consenting to License Transfers and Approval of Draft Conforming License Amendments

By letter dated February 25, 2021 (Reference 1), and in accordance with Section 184 of the Atomic Energy Act of 1954, as amended (the "**Act**"), 10 CFR 50.80, 10 CFR 50.90, and 10 CFR 72.50, Exelon Generation Company, LLC ("**Exelon Generation**"), on behalf of itself and Exelon Corporation, Exelon FitzPatrick, LLC ("**Exelon FitzPatrick, LLC**"), Nine Mile Point Nuclear Station, LLC ("**NMP LLC**"), R.E. Ginna Nuclear Power Plant, LLC ("**Ginna LLC**"), and Calvert Cliffs Nuclear Power Plant, LLC ("**Calvert LLC**") (collectively, "**Applicants**"), requested certain written consents related to a proposed transaction in which Exelon Corporation will transfer its

100% ownership of Exelon Generation to a newly-created subsidiary that will then be spun-off to Exelon Corporation shareholders, becoming Exelon Generation's new ultimate parent company, so that neither the new ultimate parent company nor Exelon Generation nor its subsidiaries will be affiliated with Exelon Corporation ("**Spin Transaction**"). The Reference 1 submittal was supplemented by letters dated March 25, 2021 (ML21084A165), June 11, 2021 (ML21162A292), September 16, 2021 (ML21259A040), and September 29, 2021 (ML21272A276)

On November 16, 2021 (Reference 2), the U.S. Nuclear Regulatory Commission (NRC) issued an Order consenting to the license transfers, subject to the conditions described therein, along with approving supporting draft conforming license amendments. Section III of the Order describes specific conditions required to be met related to the approval of the indirect transfer of licenses for the nuclear power plants owned and/or operated by Exelon Generation. The attachment and supporting enclosures to this letter provides information addressing these specific conditions required by the November 16, 2021 Order.

Exelon Generation has reviewed the information supporting a finding of no significant hazards consideration, and conclusions of the environmental consideration, that were previously provided to the NRC in Reference 1 letter as supplemented. Exelon Generation has concluded that the information provided in this submittal does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon Generation has concluded that the information in this response does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

There are no regulatory commitments contained in this submittal.

Please contact David P. Helker (Exelon Generation) at 610-765-5525 if you have any questions or require any additional information regarding this submittal.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 24th day of January 2022.

Respectfully,

Darani M. Reddick
Director, Licensing
Exelon Generation Company, LLC

Attachment: Supplemental Information in Response to Order Consenting to License Transfers and Approval of Draft Conforming License Amendments

Enclosures: 1) Documentation Satisfying 10 CFR Part 140 Insurance Requirements
2) Documentation Satisfying 10 CFR 50.54(w) Insurance Requirements

cc: (w/ Attachment and Enclosures)

Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
Director, Office of Nuclear Reactor Regulation
Director, Office of Nuclear Material Safety and Safeguards
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant
NRC Senior Resident Inspector - Salem Generating Station
NRC Project Manager, NMSS - Three Mile Island Nuclear Station
NRC Project Manager, NRR - Exelon Generation Fleet
Illinois Emergency Management Agency - Division of Nuclear Safety
Director, Bureau of Radiation Protection - Pennsylvania Department of
Environmental Resources
W. DeHaas - Pennsylvania Bureau of Radiation Protection
S. Seaman - State of Maryland
P. Mulligan - New Jersey Bureau of Nuclear Engineering
A. L. Peterson, NYSERDA
B. Frymire, NYSPSC

ATTACHMENT

Supplemental Information in Response to Order Consenting to License Transfers and
Approval of Draft Conforming License Amendments

ATTACHMENT

Supplemental Information in Response to Order Consenting to License Transfers and Approval of
Draft Conforming License Amendments

By letter dated February 25, 2021 (ML21057A273), as supplemented by letters dated March 25, 2021 (ML21084A165), June 11, 2021 (ML21162A292), September 16, 2021 (ML21259A040), and September 29, 2021 (ML21272A276), Exelon Generation Company, LLC (Exelon Generation) requested U.S. Nuclear Regulatory Commission (NRC) consent to the indirect transfer of control of the licenses to support a proposed transaction in which Exelon Corporation will transfer its 100 percent ownership of Exelon Generation to a newly-created subsidiary (referred to as HoldCo in the application) that will then be spun off to Exelon Corporation shareholders, becoming Exelon Generation's new ultimate parent company.

By letter dated November 16, 2021 (ML21277A248), the NRC issued an Order consenting to the license transfers, subject to the conditions described therein, along with approving supporting draft conforming license amendments. Section III of the Order identified specific conditions that are required to be met in support of the approval of the indirect license transfers. These conditions are reiterated below.

1. SpinCo and New FitzPatrick, LLC shall provide satisfactory documentary evidence to the Director of the Office of Nuclear Reactor Regulation that, as of the date of the indirect license transfer, the licensees reflected in the amended licenses have obtained the appropriate amount of insurance required of a licensee under 10 CFR Part 140 and 10 CFR 50.54(w).
2. If EGC does not hold Facility Operating License Nos. DPR-39 and DPR-48 for Zion, Units 1 and 2, respectively, and the general license for the Zion ISFSI at the time of the closing of the spin transaction, then these licenses shall not be transferred to SpinCo as part the spin transaction.
3. At least 5 business days before the closing of the spin transaction, the Applicants shall submit, signed under oath or affirmation, the following information to the NRC in accordance with 10 CFR Parts 50 and 72: (1) the final legal entity names of HoldCo, SpinCo, New York HoldCo, and New FitzPatrick, LLC; (2) the state of incorporation and address for HoldCo; (3) the address for New York HoldCo; and (4) the names, addresses, and citizenship of the directors and principal officers of HoldCo and New York HoldCo.

It is further ordered that after receipt of all required regulatory approvals of the proposed indirect license transfer, the Applicants shall inform the Directors of the Office of Nuclear Reactor Regulation and the Office of Nuclear Material Safety and Safeguards in writing of such receipt no later than 5 business days prior to the date of the closing of the transfer.

Exelon Generation is providing the following information to address the specific conditions noted above from the November 16, 2021 Order approving the indirect transfer of licenses for the nuclear power plants owned and/or operated by Exelon Generation.

Item 1

The supporting enclosures to this letter provide information confirming that Constellation Energy Generation, LLC, and Constellation FitzPatrick, LLC, will have at the time of closing, the appropriate amount of insurance required under 10 CFR Part 140 and 10 CFR 50.54(w). Enclosure 1 provides documentation related to satisfying the insurance requirements associated with 10 CFR Part 140. Enclosure 2 provides documentation needed for satisfying the insurance requirements under 10 CFR 50.54(w).

Item 2

At the time of closing of the spin transaction on February 1, 2022, Exelon Generation does not expect to be the licensee for Facility Operating Nos. DPR-39 and DPR-48 for Zion Nuclear Power Station (Zion), Units 1 and 2, respectively, and the general license for the Zion Independent Spent Fuel Storage Installation (ISFSI). ZionSolutions, LLC, is currently the licensee and this is expected to remain unchanged at the time of the spin transaction.

Item 3

As part of the Spin Transaction, which is scheduled to close on February 1, 2022:

- Exelon Generation Company, LLC (referred to as "SpinCo" in the LTA) will be renamed **"Constellation Energy Generation, LLC."** It will remain the same Pennsylvania limited liability company as today, with a name change.
- Constellation Energy Generation, LLC will be a wholly owned subsidiary of **Constellation Energy Corporation** (referred to as "HoldCo" in the LTA), a Pennsylvania corporation. See Table 1 below for information regarding directors and principal officers of **Constellation Energy Corporation**.
- **Constellation Generation NY, LLC**, a New York limited liability company (referred to as "New York HoldCo" in the LTA), a wholly owned subsidiary of Constellation Energy Generation, LLC, will become the indirect parent of the entities that own FitzPatrick Unit 1, Ginna Unit 1, and Nine Mile Point Units 1 and 2 (82% ownership interest). See Table 2 below for information regarding directors and officers of **Constellation Generation NY, LLC**.
- Exelon FitzPatrick, LLC (referred to as "New FitzPatrick" in the LTA) will be renamed **Constellation FitzPatrick, LLC**. It will remain the same Delaware limited liability company as today, with a name change.

Table 1 shows general corporate information regarding Constellation Energy Corporation (referred to in LTA as "HoldCo"), which includes the names, addresses, and citizenship of the directors and principal officers.

Table 1

**GENERAL CORPORATE INFORMATION REGARDING
CONSTELLATION ENERGY CORPORATION (referred to in LTA as "HoldCo")**

Name:	Constellation Energy Corporation
State of Incorporation & Corporate Form:	Pennsylvania Corporation
Business Address:	1310 Point Street, 8 th Floor Baltimore, MD 21231
Board of Directors:	<u>Name, address, and citizenship of Directors</u> Robert J. Lawless, Chairman Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – Canada) Joseph Dominguez, Director Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Laurie Brias, Director Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Yves C. deBalmann, Director Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA/France) Bradley M. Halverson, Director Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Charles L. Harrington, Director Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA)

	<p>Rhonda S. Ferguson, Director Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Julie Holzrichter, Director Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Ashish K. Khandpur, Director Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Admiral John M. Richardson, Director Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p>
Principal Officers:	<p><u>Name, address, and citizenship of principal Officers</u></p> <p>Joseph Dominguez, President and Chief Executive Officer Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Daniel Eggers, Executive Vice President and Chief Financial Officer Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Kathleen Barrón, Executive Vice President and Chief Strategy Officer Business Address: 101 Constitution Avenue, Suite 400 East Washington, DC 20001 (Citizenship – USA)</p> <p>Michael Koehler, Executive Vice President and Chief Administration Officer Business Address: 1001 Louisiana Street, Suite 2300 Houston, TX 77002 (Citizenship – USA)</p>

	<p>Bryan Hanson, Executive Vice President and Chief Generation Officer Business Address: 4300 Winfield Road Warrenville, IL 60555 (Citizenship – USA)</p> <p>James McHugh, Executive Vice President and Chief Commercial Officer Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>David Dardis, Executive Vice President and General Counsel Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Matthew Bauer Vice President and Controller 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>This entity is not owned, controlled, or dominated by an alien, foreign corporation, or foreign government.</p>
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Table 2 shows general corporate information regarding Constellation Generation NY, LLC (referred to in LTA as "New York HoldCo"), which includes the names, addresses, and citizenship of the directors and principal officers.

Table 2

**GENERAL CORPORATE INFORMATION REGARDING
CONSTELLATION GENERATION NY, LLC (referred to in LTA as "New York HoldCo")**

Name:	Constellation Generation NY, LLC
State of Incorporation & Corporate Form:	New York Limited Liability Company
Business Address:	348 Lake Drive Oswego, NY 13126 Mailing address: 1310 Point Street, 8 th Floor Baltimore, MD 21231
Board of Directors or Management Committee:	None (to be member managed by Constellation Energy Generation, LLC)
Officers:	<u>Name, address, and citizenship of Officers</u> Bryan Hanson, Chief Executive Officer and President Business Address: 4300 Winfield Road Warrenville, IL 60555 (Citizenship – USA) Daniel Eggers, Chief Financial Officer Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Shane Smith, Treasurer Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Harold (Barry) Coulby, Assistant Treasurer Business Address: 1310 Point Street, 8 th Floor Baltimore, MD 21231 (Citizenship – USA) Archana Warner, Assistant Vice President, Tax Business Address: 4300 Winfield Road Warrenville, IL 60555 (Citizenship – USA)

	<p>Benjamin Haas, Assistant Vice President, Tax Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>Brian Buck, Assistant Secretary Business Address: 1310 Point Street, 8th Floor Baltimore, MD 21231 (Citizenship – USA)</p> <p>This entity is not owned, controlled, or dominated by an alien, foreign corporation, or foreign government.</p>
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Additional Condition

Exelon Generation has received all required regulatory approvals necessary to close the spin transaction described in the February 25, 2021, license transfer application (LTA), as supplemented. The spin transaction described in the LTA is scheduled to close on February 1, 2022.

ENCLOSURES

Documentation Confirming Amount of Insurance Required

Under 10 CFR Part 140 and 10 CFR 50.54(w) for Constellation Energy Generation, LLC, and
Constellation FitzPatrick, LLC

Supporting Enclosures:

Enclosure 1 – Documentation Satisfying 10 CFR Part 140 Insurance Requirements

Enclosure 2 – Documentation Satisfying 10 CFR 50.54(w) Insurance Requirements

Enclosure 1

Documentation Satisfying 10 CFR Part 140 Insurance Requirements



Jason Martinez, CPCU, ARM, ARe
Director, Underwriting

January 20, 2022

Attn: Document Control
Director, Office of Nuclear Regulatory Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**Re: Constellation Energy Generation, LLC
NRC Operating License Transfers for:**

- 1) Braidwood Nuclear Station Unit 1 and 2**
- 2) Byron Nuclear Station Unit 1 and 2**
- 3) Calvert Cliffs Nuclear Power Plant Unit 1 and 2**
- 4) Clinton Nuclear Station Unit 1**
- 5) Dresden Nuclear Power Station Unit 2 and 3**
- 6) James A. FitzPatrick Nuclear Power Plant**
- 7) Robert Emmet (R.E.) Ginna Nuclear Power Station**
- 8) LaSalle County Nuclear Station Unit 1 and 2**
- 9) Limerick Generating Station Unit 1 and 2**
- 10) Nine Mile Point Nuclear Station Unit 1 and 2**
- 11) Peach Bottom Atomic Power Station Unit 2 and 3**
- 12) Quad Cities Nuclear Power Station Unit 1 and 2**
- 13) Salem Nuclear Generating Station Unit 1 and 2 and Hope Creek Unit 1**
- 14) Three Mile Island Nuclear Station Unit 1 and 2**
- 15) Zion Nuclear Power Station**

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for Constellation Energy Generation, LLC for all the above captioned nuclear power stations.

As of the date of the license amendment, which is expected to be on or before February 1, 2022, we will amend the policy and certificates for the Braidwood Nuclear Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0294:** ANI will amend the named insured to "Constellation Energy Generation, LLC" in lieu of "Exelon Generation Company, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0645:** ANI will amend the named insureds to "Constellation Energy Generation, LLC" in lieu of "Exelon Generation Company, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC.

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- c. **SFP Certificate No. N -0108:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0108:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0115:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0115:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Byron Nuclear Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0277:** ANI will amend the named insured to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0634:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0093:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0093:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0101:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0101:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is

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assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Calvert Cliffs Nuclear Power Plant Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0216:** ANI will amend the named insured to “Calvert Cliffs Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “Calvert Cliffs Nuclear Power Plant, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0595:** ANI will amend the named insureds to “Calvert Cliffs Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “Calvert Cliffs Nuclear Power Plant, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0052:** ANI will amend the named insureds to “Calvert Cliffs Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “Calvert Cliffs Nuclear Power Plant, LLC and Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0052:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0053:** ANI will amend the named insureds to “Calvert Cliffs Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “Calvert Cliffs Nuclear Power Plant, LLC and Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0053:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Clinton Nuclear Station Unit 1 as follows:

- a. **Facility Form Policy No. NF -0261:** ANI will amend the named insured to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.

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- b. **Master Worker Certificate No. NW -0621:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0085:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0085:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Dresden Nuclear Power Station Unit 2 and 3 as follows:

- a. **Facility Form Policy No. NF -0043:** ANI will amend the named insured to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0514:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0002:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0002:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0003:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0003:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

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We will amend the policy and certificates for the James A. FitzPatrick Nuclear Power Plant as follows:

- a. **Facility Form Policy No. NF -0208:** ANI will amend the named insured to “Constellation FitzPatrick, LLC and Constellation Energy Generation, LLC” in lieu of “Exelon FitzPatrick, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0589:** ANI will amend the named insureds to “Constellation FitzPatrick, LLC and Constellation Energy Generation, LLC” in lieu of “Exelon FitzPatrick, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0047:** ANI will amend the named insureds to “Constellation FitzPatrick, LLC and Constellation Energy Generation, LLC” in lieu of “Exelon FitzPatrick, LLC and Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0047:** ANI will add Constellation FitzPatrick, LLC and Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation FitzPatrick, LLC is assuming all past and future liabilities of Exelon FitzPatrick, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the R.E. Ginna Nuclear Power Station as follows:

- a. **Facility Form Policy No. NF -0170:** ANI will amend the named insured to “R.E. Ginna Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “R.E. Ginna Nuclear Power Plant, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0561:** ANI will amend the named insureds to “R.E. Ginna Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “R.E. Ginna Nuclear Power Plant, LLC and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0014:** ANI will amend the named insureds to “R.E. Ginna Nuclear Power Plant, LLC and Constellation Energy Generation, LLC” in lieu of “R.E. Ginna Nuclear Power Plant, LLC and Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0014:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is

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assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the LaSalle County Nuclear Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0253:** ANI will amend the named insured to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0617:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0071:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0071:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0083:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0083:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Limerick Generating Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0284:** ANI will amend the named insured to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0640:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.

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- c. **SFP Certificate No. N -0098:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0098:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0118:** ANI will amend the named insureds to “Constellation Energy Generation, LLC” in lieu of “Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0118:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Nine Mile Point Nuclear Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0161:** ANI will amend the named insured to “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Constellation Energy Generation, LLC” in lieu of “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0557:** ANI will amend the named insureds to “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Constellation Energy Generation, LLC” in lieu of “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Exelon Generation Company, LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0012:** ANI will amend the named insureds to “Nine Mile Point Nuclear Station, LLC and Constellation Energy Generation, LLC” in lieu of “Nine Mile Point Nuclear Station, LLC and Exelon Generation Company, LLC”.
- d. **SFP Certificate No. N -0012:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

Attn: Document Control
January 20, 2022
Page 8

- e. **SFP Certificate No. N -0105:** ANI will amend the named insureds to “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Constellation Energy Generation, LLC” in lieu of “Nine Mile Point Nuclear Station, LLC, Long Island Lighting Company and Exelon Generation Company, LLC”.
- f. **SFP Certificate No. N -0105:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Peach Bottom Atomic Power Station Unit 2 and 3 as follows:

- a. **Facility Form Policy No. NF -0140:** ANI will amend the named insured to “Constellation Energy Generation, LLC and PSEG Nuclear LLC” in lieu of “Exelon Generation Company, LLC and PSEG Nuclear LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0544:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and PSEG Nuclear LLC” in lieu of “Exelon Generation Company, LLC and PSEG Nuclear LLC”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0008:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and PSEG Nuclear LLC” in lieu of “Exelon Generation Company, LLC and PSEG Nuclear LLC”.
- d. **SFP Certificate No. N -0008:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0009:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and PSEG Nuclear LLC” in lieu of “Exelon Generation Company, LLC and PSEG Nuclear LLC”.
- f. **SFP Certificate No. N -0009:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is

Attn: Document Control
January 20, 2022
Page 9

assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Quad Cities Nuclear Power Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0187:** ANI will amend the named insured to “Constellation Energy Generation, LLC and MidAmerican Energy Company” in lieu of “Exelon Generation Company, LLC and MidAmerican Energy Company”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0572:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and MidAmerican Energy Company” in lieu of “Exelon Generation Company, LLC and MidAmerican Energy Company”. The operator of the facility will also change to Constellation Energy Generation, LLC.
- c. **SFP Certificate No. N -0029:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and MidAmerican Energy Company” in lieu of “Exelon Generation Company, LLC and MidAmerican Energy Company”.
- d. **SFP Certificate No. N -0029:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0030:** ANI will amend the named insureds to “Constellation Energy Generation, LLC and MidAmerican Energy Company” in lieu of “Exelon Generation Company, LLC and MidAmerican Energy Company”.
- f. **SFP Certificate No. N -0030:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Salem Nuclear Generating Station Unit 1 and 2 and Hope Creek Unit 1 as follows:

- a. **Facility Form Policy No. NF -0230:** ANI will amend the named insured to “PSEG Nuclear LLC and Constellation Energy Generation, LLC” in lieu of “PSEG Nuclear LLC and Exelon Generation Company, LLC”.

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January 20, 2022
Page 10

- b. **Master Worker Certificate No. NW -0606:** ANI will amend the named insureds to "PSEG Nuclear LLC and Constellation Energy Generation, LLC" in lieu of "PSEG Nuclear LLC and Exelon Generation Company, LLC".
- c. **SFP Certificate No. N -0060:** ANI will amend the named insureds to "PSEG Nuclear LLC and Constellation Energy Generation, LLC" in lieu of "PSEG Nuclear LLC and Exelon Generation Company, LLC".
- d. **SFP Certificate No. N -0060:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.
- e. **SFP Certificate No. N -0072:** ANI will amend the named insureds to "PSEG Nuclear LLC and Constellation Energy Generation, LLC" in lieu of "PSEG Nuclear LLC and Exelon Generation Company, LLC".
- f. **SFP Certificate No. N -0072:** ANI will add Constellation Energy Generation, LLC to the Bond for payment of retrospective premiums. Constellation Energy Generation, LLC is assuming all past and future liabilities of Exelon Generation Company, LLC for the payment of retrospective premiums.

We will amend the policy and certificates for the Three Mile Island Nuclear Station Unit 1 and 2 as follows:

- a. **Facility Form Policy No. NF -0220:** ANI will amend the named insured to "Constellation Energy Generation, LLC and TMI-2 Solutions, LLC" in lieu of "Exelon Generation Company, LLC and TMI-2 Solutions, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC as respects Three Mile Island Unit 1. TMI-2 Solutions, LLC remains the operator for Three Mile Island Unit 2.
- b. **Master Worker Certificate No. NW -0688:** ANI will amend the named insureds to "Constellation Energy Generation, LLC and TMI-2 Solutions, LLC" in lieu of "Exelon Generation Company, LLC and TMI-2 Solutions, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC as respects Three Mile Island Unit 1. TMI-2 Solutions, LLC remains the operator for Three Mile Island Unit 2.

We will amend the policy and certificates for the Zion Nuclear Power Station as follows:

Attn: Document Control
January 20, 2022
Page 11

- a. **Facility Form Policy No. NF -0201:** ANI will amend the named insured to "Zion Solutions, LLC and Constellation Energy Generation, LLC" in lieu of "Zion Solutions, LLC and Exelon Generation Company, LLC".
- b. **Master Worker Certificate No. NW -0584:** ANI will amend the named insureds to "Zion Solutions, LLC and Constellation Energy Generation, LLC" in lieu of "Zion Solutions, LLC and Exelon Generation Company, LLC".

The commitment to write insurance for Constellation Energy Generation, LLC for all the above captioned nuclear power stations remains valid through March 1, 2022. In the event the license transfers occur after this date, ANI will review the existing circumstances prior to reinstating our commitment to provide insurance.

Please feel free to contact me with any questions or concerns.

Yours sincerely,



Jason Martinez, CPCU, ARM, Are
Director, Underwriting

C: Constellation – Mee, Michael; Tomala, Bob; Sayette, Richard
Marsh – Fowler, Kate; Susa, Tyler; Evans, Dan

Enclosure 2

Documentation Satisfying 10 CFR 50.54(w) Insurance Requirements



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

phone + 302 888 3000 fax + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Braidwood Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 fax + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Byron Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", followed by a long horizontal line extending to the right.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Calvert Cliffs Nuclear Power Plant, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+302 888 3000 +302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Clinton Power Plant, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", with a long horizontal flourish extending to the right.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
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Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

tel: + 302 888 3000 fax: + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Dresden Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

ref: + 302 888 3000 fax: + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Fitzpatrick Nuclear Power Plant, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", is written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
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Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Ginna Nuclear Power Plant, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

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Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
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Peter Cavanaugh (NEIL)



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1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 + 302 888 3007

January 19, 2022

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Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the LaSalle Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

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Scott Lauchlan
Director - Underwriting (Core Business)

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1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

tel: + 302 888 3000 fax: + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Limerick Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", with a long horizontal line extending to the right.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
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Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

phone + 302 888 3000 fax + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Nine Mile Point Nuclear Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", with a long, sweeping horizontal line extending to the right.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
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Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+302 888 3000 +302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Peach Bottom Atomic Power Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

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Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 + 302 888 3007

January 19, 2022

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Quad Cities Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Lauchlan", written over a horizontal line.

Scott Lauchlan
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)



Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+ 302 888 3000 + 302 888 3007

January 19, 2022

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Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Salem Nuclear Power Plant, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$1.06 billion for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchian", with a long horizontal flourish extending to the right.

Scott Lauchian
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
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Nuclear Electric Insurance Limited
1201 N Market St
Suite 1100
Wilmington, DE 19801
USA

+302 888 3000 +302 888 3007

January 19, 2022

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Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Three Mile Island Generating Station Unit 1, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$50 million for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchlan", with a long horizontal flourish extending to the right.

Scott Lauchlan
Director - Underwriting (Core Business)

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1201 N Market St
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Wilmington, DE 19801
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January 19, 2022

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Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re.: Exelon Generation Company, LLC- License Transfer to Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited is willing to write a Primary Property and Decontamination Liability Policy for the interest of Constellation Energy Generation, LLC in the Zion Nuclear Generating Station, subject to the payment of premium. A Primary Property and Decontamination Liability Policy will be effective upon close of the transfer of the facility license from Exelon Generation Company, LLC.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$50 million for this site.

This commitment to write a Primary Property and Decontamination Liability Policy for Constellation Energy Generation, LLC for a twelve-month policy period remains valid through February 14, 2022. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Lauchian", with a stylized flourish at the end.

Scott Lauchian
Director - Underwriting (Core Business)

cc: Kate Fowler (Marsh USA)
Steve Nusspickel (NEIL)
Robert Curtis (NEIL)
Ken Manne (NEIL)
Peter Cavanaugh (NEIL)