

From: Screnci, Diane
Sent: Thursday, February 03, 2022 11:40 AM
To: Eric Epstein
Subject: response to your mail

Hi Eric,

I'm responding to your email requesting information on the decommissioning trust funds for Three Mile Island Units 1 and 2. I've copied the questions and responded after each. The ADAMS Accession numbers are hyperlinks to the documents in ADAMS.

1) The funding assurance has grown from \$669,617,000 in 2019. What is the current "minimal amount" to decommission TMI-1? Is the amount still \$1,001,152 based on 2019 numbers?

As of December 31, 2020, Exelon estimated it would cost \$955,103,000 to complete radiological decommissioning at TMI-1. That report (ADAMS Accession number [ML21055A776](#)) was provided by Exelon Generation as required by 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (f)(1).

2) How much/% of the funds are in Qualified Funds (1) as opposed to Non-Qualified Funds (2)?

NRC regulations don't require information from licensees regarding portions of decommissioning trust funds designated as qualified vs. non-qualified. According to 10 CFR 50.75(f)(1) for operating reactor licensees and 10 CFR 50.82(a)(8)(v) for reactor licensees that are no longer operating, licensees are required to provide only the current total value of decommissioning trust funds at the end of the reporting year with no requirement to identify portions that fall into qualified or non-qualified sub-accounts. Therefore, we don't have this information for Unit 1.

3) Are both funds incorporated in Nevada as LLC?

As indicated by Exelon in a letter dated March 31, 2020 ([ML20091H084](#)), the trust fund agreements for TMI-1 were amended effective September 30, 2019, to reflect a "change of the company holding the trusts," from a Nevada LLC to an Illinois LLC. The holding company, known as Consolidation, was established by Exelon Generation to hold an interest in, manage, and distribute qualified and nonqualified funds for certain of their reactor decommissioning trusts. Consolidation is not the Trustee. The Trustee for this decommissioning trust is the Northern Trust Company, which is incorporated in the State of Delaware.

4) Do you have similar true up costs for TMI-2 and TMI-2 Solutions?

The licensee reported that as of December 31, 2020, ([ML21099A115](#)) the amount of remaining radiological decommissioning costs at TMI-2 is \$1,044,364,000.

5) How much of the funds/% at TMI-2 are in Qualified Funds as opposed to Non-Qualified Funds?

As indicated in response to your second question, the NRC does not require information from licensees regarding portions of decommissioning trust funds designated as qualified vs. non-qualified. While not required to do so, the licensee did provide that information in the case of TMI-2 ([ML21099A115](#)). As of December 31, 2020, of the \$862,549,586 in decommissioning trust funds for TMI-2, 100% are considered qualified funds.

6) Are both funds incorporated in Nevada as a LLC?

For TMI-2, the Trustee for the decommissioning trust is the Bank of New York Mellon, which is incorporated in the State of Delaware.

7) In the final paragraph, you announce that a DFS on decommissioning power reactors is going to be made available at the end of 2020. Since the report is a year old, could you please send me the 2020 and 2021 versions?

In a letter dated December 8, 2021, from the NRC to Exelon Generation Company, LLC, ([ML21342A154](#)), we indicated that a summary report completed by NRC staff reflecting decommissioning power reactor DFSs is expected to be completed and made publicly available by the end of calendar year 2020. Reference to the year 2020 was in error and should have said the end of calendar year 2021.

These summary reports are compiled by staff every two years following NRC's biennial review of decommissioning trust funds for operating reactors. The summary reports include a review of the most recent submittals for decommissioning reactors and the biennial report required of operating reactors. The most recent report, [SECY-21-0108](#), "Summary of Staff Biennial Review and Findings of the 2021 Decommissioning Funding Status Reports from Operating and Decommissioning Power Reactor Licensees," dated December 16, 2021, is the report referred to in the December 8, 2021, letter. The previous biennial report, [SECY-20-0001](#), "Summary of Staff Review and Findings of the Decommissioning Funding Status Reports from Operating and Decommissioning Power Reactor Licensees," was issued December 31, 2019. I have made the "SECY" numbers hyperlinks that will take you directly to the reports on the NRC website.

If you have any further questions, please contact me.

Sincerely,

Diane Screnci (she/her)
Sr. Public Affairs Officer
USNRC, Region I
610-337-5330