



Nuclear Decommissioning Trust (NDT) Non-Radiological Subaccounts

NRC Pre-Application Meeting
September 18, 2025

Agenda

- Purpose
- Background
- Planned Submittal Strategy
- Tentative Timeline

Purpose

- Constellation is requesting exemptions to establish and fund subaccounts within the NDTs that would not be part of the funds necessary to provide funding assurance per 10 CFR 50.75.
- Subaccount funds will still be used for the purpose of decommissioning activities, ensuring site clean up and management of the spent fuel after the plants are shut down. Example activities include:
 - Disposal of retired major components during operations – early removal of environmental risk of storage of these on-site
 - Spent Fuel Management and Site Restoration
 - Disposal of Irradiated Hardware during operations
- Solicit feedback from the NRC on the information presented and gain insight on NRC's information needs and review batched submittal process and schedule considerations.

Background

INTERIM STAFF GUIDANCE (ISG) ON THE USE OF THE DECOMMISSIONING TRUST FUND (DTF) DURING OPERATIONS FOR MAJOR RADIOACTIVE COMPONENT DISPOSAL (REFS-ISG-2024-01):

- Exemption from NRC Regulations: A licensee may request an exemption in accordance with 10 CFR 50.12, to permit withdrawal of funds from the DTF for the removal and disposal of MRCs, prior to the cessation of operations and initiation of decommissioning.
- DTF Subaccounts: Licensees may establish subaccounts in existing decommissioning trusts funds to pay for decommissioning activities other than radiological decommissioning of the facility, including MRC off-site disposal during operations... However, DTF subaccounts designated for activities other than radiological decommissioning may be used at the discretion of the licensee at any time during operations or decommissioning. Funding DTF subaccounts can be accomplished in a variety of ways. Rate-regulated licensees typically have subaccounts funded by rate collections authorized by the Federal Energy Regulatory Commission (FERC) or state and local public utility commissions. Rate-regulated licensees may establish subaccounts after demonstrating that the portion of the trust dedicated to radiological decommissioning is sufficiently funded under NRC's regulations.

Planned Submittal Strategy

- Adequate decommissioning funding assurance will be maintained. Proposed exemptions will have no impact on Constellation's ability to provide adequate decommissioning funding assurance for any of these plants.
- Constellation will submit all applicable information suggested by the ISG for exemption submission.
- Subaccounts funding: earnings in excess of that credited by the NRC (2%) rather than exceeding the amount of decommissioning funding assurance (DFA) required by 10 CFR 50.75(b) and (c) for the associated station. This allows a backstop to ensure any funding credited in funding assurance calculations are not moved into the subaccounts.
- Constellation's evaluation will also be similar to ADAMS Accession Number ML25031A350 – existing Constellation exemption request (in review by NRC) for disposal of Dresden steam dryers.

Tentative Timeline

<u>Facility</u>	<u>Unit(s)</u>	<u>State</u>	<u>Target Submission Date</u>	<u>Approval Request Time</u>
Braidwood	1 and 2	IL	10/31/2025	9 months
Byron	1 and 2	IL	10/31/2025	9 months
LaSalle	1 and 2	IL	10/31/2025	9 months
Dresden	2 and 3	IL	12/31/2025	6 months
Quad Cities	1 and 2	IL	12/31/2025	6 months
Clinton	1	IL	4/15/2026	6 months
Calvert Cliffs	1 and 2	MD	4/15/2026	6 months
Salem	1 and 2	NJ	4/15/2026	6 months
Crane	1	PA	7/31/2026	6 months
Limerick	1 and 2	PA	7/31/2026	6 months
Peach Bottom	2 and 3	PA	7/31/2026	6 months