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10 CFR 140.21

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

Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324 / Renewed License Nos. DPR-71 and DPR-62

Catawba Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-413 and 50-414 / Renewed License Nos. NPF-35 and NPF-52

McGuire Nuclear Station, Unit Nos. 1 and 2
Docket Nos. 50-369 and 50-370 / Renewed License Nos. NPF-9 and NPF-17

Oconee Nuclear Station, Unit Nos. 1, 2 and 3
Docket Nos. 50-269, 50-270, 50-287 / Renewed License Nos. DPR-38, DPR-47, and DPR-55

Shearon Harris Nuclear Power Plant, Unit No. 1
Docket No. 50-400 / Renewed License No. NPF-63

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / Renewed License No. DPR-23

Subject: 10 CFR 140.21 Licensee Guarantees of Payment of Deferred Premiums

The requirements of 10 CFR 140.21 include annual submittal of evidence that each licensee maintains a guarantee of payment of deferred premium in the amount of \$20.5 million for each reactor it is licensed to operate. Duke Energy Carolinas, LLC and Duke Energy Progress, LLC maintain nuclear liability endorsements through Marsh USA for the Catawba Nuclear Station (CNS), McGuire Nuclear Station (MNS), Oconee Nuclear Station (ONS), Shearon Harris Nuclear Power Plant (SHNPP), Brunswick Steam Electric Plant (BSEP), and the H.B. Robinson Steam Electric Plant (HBRSEP) under the American Nuclear Insurer's (ANI) Master Policy – Nuclear Energy Liability Insurance (Secondary Financial Protection). This coverage includes a Bond of Payment of Retrospective Premiums and provides the basis for Duke Energy compliance with the provisions of 10 CFR 140.21(a). A certificate of insurance verifying ANI Nuclear Energy Liability insurance was sent by Marsh USA to the USNRC on February 24, 2020.

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Please address any comments or questions regarding this matter to Art Zaremba, Manager –
Fleet Licensing at (980) 373-2062.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Nolan". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

M. Christopher Nolan
Vice President, Nuclear Regulatory Affairs, Policy & Emergency Preparedness

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