



March 25, 2021

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Serial No. 21-109
NRA/ENC R0
Docket No. 50-395
License No. NPF-12

DOMINION ENERGY SOUTH CAROLINA (DESC)
VIRGIL C. SUMMER NUCLEAR STATION (VCSNS) UNIT 1
DECOMMISSIONING FUNDING STATUS REPORT

Pursuant to 10 CFR 50.75(f)(1), Dominion Energy South Carolina, Inc. is providing a report on the status of decommissioning funding for its two-thirds ownership share of Virgil C. Summer Nuclear Station. Dominion Energy South Carolina, Inc. (previously known as South Carolina Electric & Gas Company) and the South Carolina Public Service Authority (Santee Cooper) have undivided ownership interests of two-thirds and one-third respectively in the V. C. Summer Nuclear Station. Santee Cooper discloses information pursuant to 10 CFR 50.75(f)(1) relative to its one-third ownership share in a separate submittal.

The required report is provided in the attachments to this letter.

Please contact Mr. Craig D. Sly at (804) 273-2784 if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark D. Sartain", followed by a horizontal line.

Mark D. Sartain

Vice President – Nuclear Engineering and Fleet Support
Dominion Energy South Carolina, Inc.

Attachments:

1. Decommissioning Funding Status Report for Virgil C. Summer Nuclear Station, Unit 1; Summary Information as of December 31, 2020
2. Calculation of Amount of Decommissioning Funds Estimated to be Required Pursuant to 10 CFR 50.75 (b) and (c)
3. Explanation of Financial Assurance Mechanism and Amounts Remaining to be Collected
4. NEIL Certificate of Insurance

cc: US Nuclear Regulatory Commission, Region II
Marquis One Tower
245 Peachtree Center Avenue, NE, Suite 1200
Atlanta, Georgia 30303-1257

NRC Senior Resident Inspector
V.C. Summer Nuclear Station

Mr. Vaughn Thomas
NRC Project Manager - V.C. Summer Nuclear Station
U. S. Nuclear Regulatory Commission
Mail Stop 04 F-12
11555 Rockville Pike
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Mr. G. J. Lindamood
Santee Cooper – Nuclear Coordinator
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ATTACHMENT 1

**DECOMMISSIONING FUNDING STATUS REPORT FOR VIRGIL C. SUMMER
NUCLEAR STATION, UNIT 1**

SUMMARY INFORMATION AS OF DECEMBER 31, 2020

**Virgil C. Summer Nuclear Station Unit 1
Dominion Energy South Carolina, Inc.**

**Decommissioning Funding Status Report for
Virgil C. Summer Nuclear Station, Unit 1
Summary Information as of December 31, 2020**

The following information is submitted pursuant to the requirement of 10 CFR 50.75(f)(1):

The amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c);

The amount of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c) for Dominion Energy South Carolina, Inc.'s (DESC) two-thirds ownership of VCSNS is \$311,947,067 (2020 dollars). Please see Attachment 2 for the calculation of this amount.

The amount accumulated at the end of the calendar year preceding the date of the report;

Note: DESC does not maintain separate trusts for funds designated to cover radiological decommissioning costs and funds to cover other decommissioning costs. Of the accumulated funds in the trust, approximately 88.69% are considered to be related to funding costs included in the NRC's definition of decommissioning pursuant to 10 CFR 50.75 (b) and (c), while the remaining 11.31% are considered to be related to other decommissioning costs. The 88.69% is the ratio of:

- 1) The total radiological decommissioning cost estimate from a 1991 site-specific decommissioning cost study prepared for VCSNS, and
- 2) The total amount that served as the basis for collections through electric rates in an electric rate order issued by the Public Service Commission of South Carolina (SCPSC) in 1993. The calculation is as follows:

Site-specific study (1991) estimate of decommissioning costs pursuant to NRC definition (two-thirds portion)	\$118,256,667
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Customer collection basis (two-thirds portion)	133,333,333
Percent of costs/collections related to items included in NRC definition of decommissioning	88.69%

As such, 88.69% of the decommissioning fund balance, after-tax collections and program costs, are presented in The Financial Assurance Model in Attachment 3.

The total trust fund balance on December 31, 2020, was \$238,078,522 after tax. This balance includes cash and the cash surrender values of life insurance policies. Advances of \$54,890,000 from DESC to fund premium payments have not been deducted in arriving at this amount.

The portion of the above trust fund balance considered to be related to radiological decommissioning requirements addressed in the NRC's financial assurance formula was \$211,151,841 after tax on December 31, 2020. This balance includes cash and the cash surrender values of life insurance policies. Advances of \$48,681,941 from DESC to fund premium payments that are considered to be applicable to this portion of the fund have not been deducted in arriving at the balance. These amounts reflect 88.69% of total balances, as described above.

The portion of the trust fund balance considered to be related to other decommissioning costs was \$26,926,681 after tax on December 31, 2020. This balance includes cash and the cash surrender values of life insurance policies. Advances of \$6,208,059 from DESC to fund premium payments that are considered to be applicable to this portion of the fund have not been deducted in arriving at this balance. These amounts reflect 11.31% of total balances, as described above.

DESC's use of decommissioning funds does not require prior approval from the SCPSC. Moreover, DESC is unaware of any SCPSC requirement prohibiting the

Company from using any portion of its decommissioning funds for radiological decommissioning costs. DESC will continue to assess the adequacy of annual collections and request rate relief as appropriate based upon results of models incorporating site-specific decommissioning cost study estimates.

A schedule of the annual amounts remaining to be collected;

Please see Attachment 3.

The after-tax annual collection amount is currently \$2,420,302, which was based on a 1991 site-specific decommissioning cost study. Annual amounts collected through rates have not changed since 1993. The after-tax collection amounts shown in the Financial Assurance Model in Attachment 3 represent 88.69% of the \$2,420,302, or \$2,146,566.

The assumptions used regarding escalation in decommissioning cost, rates of earnings on decommissioning funds, and rates of other factors used in funding projections;

Please see Attachment 3.

Any contracts upon which the licensee is relying pursuant to paragraph (e)(1)(v) of this section;

None

Any modifications occurring to a licensee's current method of providing financial assurance since the last submitted report;

None

Any material changes to trust agreements;

None

Site specific cost estimates for license termination, spent fuel management and site restoration;

The most recent site-specific decommissioning cost study for VCSNS was completed in 2020. The cost estimates taken from that study (in 2019 dollars) were \$470,330,000 for license termination, \$216,426,670 for spent fuel management and \$44,759,330 for site restoration. These estimates represent DESC's two-thirds ownership share of costs estimated for the DECON decommissioning alternative.

Certificates of Insurance

Current certificates of insurance evidencing DESC's coverage for premature decontamination and decommissioning liabilities are included in Attachment 4.

Attachment 2

**CALCULATION OF AMOUNT OF DECOMMISSIONING
FUNDS ESTIMATED TO BE REQUIRED
PURSUANT TO 10 CFR 50.75 (b) AND (c)**

**Virgil C. Summer Nuclear Station Unit 1
Dominion Energy South Carolina, Inc.**

**CALCULATION OF AMOUNT OF DECOMMISSIONING
FUNDS ESTIMATED TO BE REQUIRED
PURSUANT TO 10 CFR 50.75 (b) AND (c)**

Base Amount for PWR between 1,200 MWt and 3,400 MWt

$$\begin{aligned} \text{1986 Base Cost} &= \$ (75 + 0.0088p) \text{ million} \\ &= \$ (75 + 0.0088 \times 2900) \text{ million} \\ &= \$100,520,000 \end{aligned}$$

$$\begin{aligned} \text{Estimated Cost (Year X)} &= (\text{1986 \$ Base Cost}) (A L_x + B E_x + C B_x) \\ \text{Estimated Cost 2019} &= (\$100,520,000)((.65 \times 2.758) + (.13 \times 2.257) + (.22 \times 11.679)) \\ &= (\$100,520,000) (1.793 + 0.293 + 2.569) \\ &= \$467,920,600 \end{aligned}$$

DESC's two-thirds ownership share of 2020 Estimated Cost = **\$311,947,067**

Where:

$$\begin{aligned} p &= 2,900 \text{ MWt} \\ A &= .65 && (\text{NUREG 1307, Rev. 18}) \\ B &= .13 && (\text{NUREG 1307, Rev. 18}) \\ C &= .22 && (\text{NUREG 1307, Rev. 18}) \\ L_x &= 2.758 && (\text{Computed Below}) \\ E_x &= 2.257 && (\text{Computed Below}) \\ P_x &= 2.038 && (\text{Computed Below}) \\ F_x &= 2.559 && (\text{Computed Below}) \\ B_x &= 11.679 && (\text{NUREG 1307, Rev. 18}) \end{aligned}$$

$$\begin{aligned} L_x &= \text{Base (Dec 2005 Value)} \times \text{ECI (Qtr 4 2020)} / 100 \\ &= (1.98 \times 139.3) / 100 \\ &= 2.758 \end{aligned}$$

$$\begin{aligned} P_x &= \text{December 2020 Value} / \text{January 1986 Value} \\ &= 232.7 / 114.2 \\ &= 2.038 \end{aligned}$$

$$\begin{aligned} F_x &= \text{December 2020 Value} / \text{January 1986 Value} \\ &= 209.8 / 82.0 \\ &= 2.559 \end{aligned}$$

$$\begin{aligned} E_x &= ((.58P_x) + (.42F_x)) \\ &= ((.58 \times 2.038) + (.42 \times 2.559)) \\ &= (1.182 + 1.075) \\ &= 2.257 \end{aligned}$$

The values for the labor adjustment factor (South Region), the energy adjustment factor, and the waste burial adjustment factor (Combination of Compact-Affiliated and Non-Compact Disposal Facilities) were taken from NUREG 1307, Revision 18.

Attachment 3

EXPLANATION OF FINANCIAL ASSURANCE
MECHANISM AND AMOUNTS
REMAINING TO BE COLLECTED

Virgil C. Summer Nuclear Station Unit 1
Dominion Energy South Carolina, Inc.

Financial Assurance Mechanism

DESC and Santee Cooper are joint owners of undivided interests in VCSNS. Under the joint ownership arrangement, DESC is the operator of VCSNS and shares the ownership, operating costs and energy output of the plant with Santee Cooper in the proportions of two-thirds and one-third, respectively. Under the plan used by DESC to fund its share of the costs of decommissioning VCSNS, funds collected through rates are invested in life insurance policies on key company personnel who, in return for participating in the plan, may receive a two-year salary continuation benefit from DESC. DESC has established a decommissioning trust fund (trust fund) with U.S. Bank, N.A. as Trustee. DESC and the trust fund are beneficiaries of the life insurance policies. Lynch & Associates is the servicing agent for the life insurance policies. Through the purchase of life insurance contracts, DESC and the trust fund are able to take advantage of income tax provisions that allow DESC to accrue earnings on the life insurance contracts on a tax deferred basis. In a letter dated July 13, 1989, the NRC had no objection to the program as a funding vehicle for satisfying the investment criteria of its financial assurance regulations. Further, this funding methodology has been approved by the SCPSC.

Gains and losses related to policy cash surrender values are tax-deferred. Upon the death of the insured, the policy proceeds are remitted tax-free. With regard to general account policies, the trust fund receives the cash surrender value (CSV) and DESC receives the death benefit component (minus any CSV paid; plus any interest due from the date of death) in order to recover its term premium and salary continuation payments, if applicable. With regard to separate account policies, DESC is currently reinvesting death benefits back into those policies. Designated amounts collected through electric rates, insurance proceeds, and interest on proceeds, less after-tax expenses of the program, are transferred by DESC to the trust fund.

As noted earlier in this report, DESC does not maintain separate trusts for radiological and non-radiological segments of the decommissioning process. However, based upon rate treatment received in our 1993 electric rate order, 88.69% of after-tax collections (and also 88.69% of the trust fund balances) are considered to relate to items included in the NRC's definition of radiological decommissioning.

In DESC's June 1993 electric rate case, the SCPSC approved gross annual collections for decommissioning in the amount of \$3,224,920, based upon cost estimates contained in a 1991 site-specific study. In subsequent rate orders, including a rate order issued in December 2012, the PSC has not changed this amount. DESC reassesses the adequacy of annual collections on a periodic basis as site-specific decommissioning cost studies are completed. As noted earlier, \$2,860,181 (88.69% of \$3,224,920) or \$2,146,566 after-tax, is considered to relate to items included in the NRC's definition of radiological decommissioning.

The Financial Assurance Model on the following page incorporates the 2021 beginning trust fund balance (gross of advances) and projections of annual amounts (after tax) collected through electric rates, program costs (after tax), investment earnings, and payments of amounts of decommissioning funds estimated to be required pursuant to 10 CFR 50.75 (b) and (c). Relevant assumptions used in the Financial Assurance Model are discussed on page 4 of 4.

Financial Assurance Model

<i>Year</i>	<i>External Trust, Beginning Balance</i>	<i>Schedule of Annual Collection Amounts, Net of Tax</i>	<i>Program Costs, After Tax</i>	<i>Decom-missioning Payments</i>	<i>Investment Earnings</i>	<i>External Trust, Ending Balance</i>
—						
2020						211,151,841
2021	211,151,841	2,146,566	190,669		4,262,155	217,369,893
2022	217,369,893	2,146,566	190,669		4,386,516	223,712,306
2023	223,712,306	2,146,566	207,309		4,513,031	230,164,594
2024	230,164,594	2,146,566	249,732		4,641,229	236,702,657
2025	236,702,657	2,146,566	223,950		4,772,505	243,397,778
2026	243,397,778	2,146,566	190,669		4,907,074	250,260,749
2027	250,260,749	2,146,566	190,669		5,044,333	257,260,979
2028	257,260,979	2,146,566	190,669		5,184,338	264,401,214
2029	264,401,214	2,146,566	249,732		5,325,961	271,624,009
2030	271,624,009	2,146,566	223,950		5,470,933	279,017,558
2031	279,017,558	2,146,566	190,669		5,619,469	286,592,924
2032	286,592,924	2,146,566	190,669		5,770,976	294,319,797
2033	294,319,797	2,146,566	207,309		5,925,181	302,184,235
2034	302,184,235	2,146,566	249,732		6,081,621	310,162,690
2035	310,162,690	2,146,566	223,950		6,241,706	318,327,012
2036	318,327,012	2,146,566	190,669		6,405,658	326,688,567
2037	326,688,567	2,146,566	190,669		6,572,889	335,217,353
2038	335,217,353	2,146,566	190,669		6,743,465	343,916,715
2039	343,916,715	2,146,566	249,732		6,916,271	352,729,820
2040	352,729,820	2,146,566	190,669		7,093,714	361,779,431
2041	361,779,431	2,146,566	190,669		7,274,707	371,010,035
2042	371,010,035	2,146,566	190,669	14,854,622	7,162,226	365,273,536
2043	365,273,536		190,669	44,563,867	6,410,380	326,929,380
2044	326,929,380		190,669	44,563,867	5,643,497	287,818,341
2045	287,818,341		190,669	44,563,867	4,861,276	247,925,081
2046	247,925,081		190,669	44,563,867	4,063,411	207,233,956
2047	207,233,956		190,669	44,563,867	3,249,588	165,729,008
2048	165,729,008		190,669	44,563,867	2,419,489	123,393,961
2049	123,393,961		190,669	29,709,243	1,869,881	95,363,930
Total	211,151,841	47,224,452	5,898,776	311,947,067	154,833,480	95,363,930

Relevant assumptions used in the model to project decommissioning funds through 2049 are as follows:

- Estimated program costs (after tax) that are paid by DESC or the trust include salary continuation payments to beneficiaries of the insured and administrative costs. These costs are shown in the model at 88.69% of total estimated program costs.
- Repayment of advances of \$54,890,000 from DESC to fund premium payments have not been reflected in the model. Advances of \$48,681,941, or 88.69%, are considered to be applicable to the fund balance shown in the model.
- The assumed real rate of return on invested funds is 2% based on the provisions of 10 CFR 50.75(e)(1)(ii) which allows "up to a 2 percent annual real rate of return" for licensees that provide decommissioning cost estimates according to the NRC formulas under 10 CFR 50.75(c).
- This 2% earnings credit is taken through the presumed dismantlement period, as allowed for licensees that use the NRC formula under 10 CFR 50.75(c) to derive decommissioning cost estimates.
- Amounts totaling \$311,947,067 in 2020 dollars estimated to be required pursuant to 10 CFR 50.75 (b) and (c) based upon the DECON method are expended evenly over the dismantlement period 2042-2049.

It should be noted that the above does not consider the effects of presumed income tax deductibility of decommissioning payments in the years in which such payments are made. Additionally, the above Financial Assurance Model incorporates the NRC formula-based cost estimates and the DECON (immediate decommissioning) methodology. In contrast, DESC currently intends to utilize a deferred decommissioning (SAFSTOR) methodology. Under the SAFSTOR methodology, the site will be placed and maintained for an extended period in a condition that allows for subsequent decontamination to levels that permit release for unrestricted use in 2104.

As noted earlier, DESC will continue to assess the adequacy of annual collections and request rate relief as appropriate, based upon results of models incorporating site-specific decommissioning cost study estimates and a SAFSTOR method of decommissioning.

ATTACHMENT 4

NEIL CERTIFICATE OF INSURANCE

POLICY NO. X21-052: Decontamination Liability, Decommissioning Liability, and Excess Property Insurance

POLICY NO. P21-082: Primary Property and Decontamination Liability Insurance

**Virgil C. Summer Nuclear Station Unit 1
Dominion Energy South Carolina, Inc.**

CERTIFICATE OF INSURANCE

ISSUED TO: United States NRC
ADDRESS: Washington, DC 20555
Attn: William Dean
Director of Nuclear Reactor Regulation

THIS IS TO CERTIFY that insurance has been effected with NUCLEAR ELECTRIC INSURANCE LIMITED, 1201 N. Market Street, Suite 1100, Wilmington, Delaware 19801, under Policy No. X21-052 as follows:

MEMBER INSURED: DOMINION ENERGY SOUTH CAROLINA, INC.
ADDRESS: P.O. Box 764
Columbia, SC 29218
PROPERTY INSURED: Summer Nuclear Station
COVERAGE: Excess Property, Decontamination Liability and Decommissioning Liability Insurance
AMOUNT OF INSURANCE: A. Except as provided in Item 6.B, the Insurer's maximum Limit of Liability resulting from any one Accident will not exceed \$0.
B. The Insurer's maximum Limit of Liability caused by any one Accident that involves coverage under paragraph I.A.1, Section I.B or Section II will not exceed \$1,250,000,000; provided, however, that not more than \$0 of such Limit of Liability may be used for losses that are covered under Policy provisions other than paragraph I.A.1, Section I.B or Section II.
INSUREDS: South Carolina Electric & Gas Company and South Carolina Public Service Authority.
POLICY TERM: 12:01 a.m. on April 1, 2021 to 12:01 a.m. on April 1, 2022
Standard time in Hamilton, Bermuda.

LOSS PAYEE CLAUSE:

- A. Expenses covered under the Nuclear Liability Coverage (subsection I.A.1) shall be adjusted with the Member Insured and payable to:

South Carolina Electric & Gas Company

The Member Insured may, by written notice to the Insurer, designate other payees.

- B. The expenses covered under the Debris Removal and Decontamination Coverage (paragraph I.A.2), the losses covered under the Property Damage Coverage (subsection I.A.3), and the losses covered under the Functional Total Loss Coverage (Section I.B) shall be adjusted with the Member Insured and payable to:

South Carolina Electric & Gas Company

The Member Insured may, by written notice to the Insurer, designate other payees.

- C. Expenses covered under the Decommissioning Liability Coverage (Section II) shall be adjusted with the Member Insured and payable to:

South Carolina Electric & Gas Nuclear Decommissioning Trust and South Carolina Public Service Authority Nuclear Decommissioning Internal Fund.

The Member Insured may, by written notice to the Insurer, designate other payees.

This Certificate is not transferable and may be canceled by NUCLEAR ELECTRIC INSURANCE COMPANY by giving 60 days written notice to the party to whom this Certificate is issued prior to cancellation of the insurance described herein, unless specifically provided for otherwise under the Terms, Conditions and Exceptions of the Policy.

THIS CERTIFICATE is for information only; it is not a contract of insurance but attests that a policy as numbered herein, and as it stands at the date of this Certificate, has been issued by the Company. Said policy is subject to change by endorsement and cancellation in accordance with its terms.

EFFECTIVE DATE OF THIS CERTIFICATE: April 1, 2021

CERTIFICATE EXPIRES: April 1, 2022, unless canceled sooner.

Signed by:
NUCLEAR ELECTRIC INSURANCE LIMITED

Jon Levis

Jon Levis, CPCU, AU
Senior Underwriter

CERTIFICATE OF INSURANCE

ISSUED TO: United States NRC
ADDRESS: Washington, DC 20555
Attention: William Dean
Director of Nuclear Reactor Regulation

THIS IS TO CERTIFY that insurance has been effected with NUCLEAR ELECTRIC INSURANCE LIMITED, 1201 N Market Street, Suite 1100, Wilmington, Delaware 19801, under Policy No. P21-082 as follows:

MEMBER INSURED: DOMINION ENERGY SOUTH CAROLINA, INC.
ADDRESS: P.O. Box 764
Columbia, South Carolina 29218
PROPERTY INSURED: Summer Nuclear Station
COVERAGE: Primary Property and Decontamination Liability Insurance
AMOUNT OF INSURANCE: A. Except as provided in Item 6.B and 6.C, the Insurer's maximum Limit of Liability resulting from any one Accident will not exceed \$1,500,000,000.
B. The Insurer's maximum Limit of Liability resulting from any one Accident that involves coverage under paragraph I.A.1, Section I.F or Section I.G will not exceed \$1,500,000,000; provided, however, that not more than \$1,500,000,000 of such Limit of Liability may be used for losses that are covered under Policy provisions other than paragraph I.A.1, Section I.F or Section I.G.
INSUREDS: South Carolina Electric and Gas Company and South Carolina Public Service Authority
POLICY TERM: 12:01 a.m. on April 1, 2021 to 12:01 a.m. on April 1, 2022,
Standard time in Hamilton, Bermuda
LOSS PAYEE CLAUSE:
A. Expenses covered under Section I.A.1 (Nuclear Liability Coverage) shall be adjusted with the Member Insured and payable to:
South Carolina Electric and Gas Company

- B. All other covered Losses, except for expenses covered under Section I.G. shall be adjusted with the Member Insured and payable to:

Loss, if any under this policy, except losses to Nuclear Fuel, and except as to materials and supplies and except as otherwise provided shall be adjusted with South Carolina Electric & Gas Company except as to any particular loss less than the greater of Ten Million Dollars (\$10,000,000) and three per centum (3%) of the sum of (x) the principal amount of Securities Outstanding on the date of such particular loss and (y) the principal amount of the Class A Bonds Outstanding on the date of such particular loss, other than Class A Bonds delivered to and held by the Trustee hereunder, to be made payable to The Bank of New York Mellon Trust Company, N.A., successor to Nations Bank of Georgia, National Association, as trustee as the interest of the Trustee may appear.

Payments, if any, under this policy with respect to loss or damage to the Nuclear Fuel covered under the Amended and Restated Nuclear Fuel Agreement dated October 25, 2012, between South Carolina Fuel Company, Inc. and Wells Fargo Bank, National Association, as Collateral Agent, shall be made to such Collateral Agent as its interest may appear.

- C. Expenses covered under Section I.G. (Decommissioning Liability Coverage) shall be adjusted with the Member Insured and payable to:

South Carolina Electric & Gas Nuclear Decommissioning Trust and South Carolina Public Service Authority Nuclear Decommissioning Internal Fund.

The Member Insured may, by written notice to the Insurer, designate other payees under Items 10 A, B or C.

This Certificate is not transferable and may be canceled by NUCLEAR ELECTRIC INSURANCE LIMITED by giving 60 days written notice to the party to whom this Certificate is issued prior to cancellation of the insurance described herein, unless specifically provided for otherwise under the Terms, Conditions and Exceptions of the Policy.

THIS CERTIFICATE is for information only; it is not a contract of insurance but attests that a policy as numbered herein, and as it stands at the date of this Certificate, has been issued by the Company. Said policy is subject to change by endorsement and cancellation in accordance with its terms.

EFFECTIVE DATE OF THIS CERTIFICATE: April 1, 2021

CERTIFICATE EXPIRES: April 1, 2022, unless canceled sooner.

Signed by:
NUCLEAR ELECTRIC INSURANCE LIMITED

Jon Lewis

Jon Lewis, CPCU, AU
Senior Underwriter