

From: Purnell, Blake
Sent: Monday, May 24, 2021 1:46 PM
To: Bradley.Fewell@exeloncorp.com
Cc: Salgado, Nancy; david.helker@exeloncorp.com
Subject: Exelon Generation Company, LLC - Request for Additional Information Regarding License Transfer Application (EPID L-2021-LLM-0000)
Attachments: RAI Exelon License Transfer Application.pdf

Dear Mr. Fewell:

By application dated February 25, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21057A273), as supplemented by letter dated March 25, 2021 (ADAMS Accession No. ML21084A165), Exelon Generation Company, LLC, on behalf of itself and Exelon Corporation; Exelon FitzPatrick, LLC; Nine Mile Point Nuclear Station, LLC; R. E. Ginna Nuclear Power Plant, LLC; and Calvert Cliffs Nuclear Power Plant, LLC requested, pursuant to Section 184 of the Atomic Energy Act of 1954, as amended, and Title 10 of the *Code of Federal Regulations* Sections 50.80, "Transfer of licenses," and 72.50, "Transfer of license," that the U.S. Nuclear Regulatory Commission (NRC) consent to the indirect transfer of control of the following licenses:

- Renewed Facility Operating License Nos. NPF-72 and NPF-77 for Braidwood Station, Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. NPF-37 and NPF-66 for Byron Station, Unit Nos. 1 and 2, respectively;
- Renewed Facility Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Nuclear Power Plant, Units 1 and 2, respectively;
- Facility Operating License No. NPF-62 for Clinton Power Station, Unit No. 1;
- Facility Operating License No. DPR-2 and Renewed Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station, Units 1, 2, and 3, respectively;
- Renewed Facility Operating License No. DPR-59 for James A. FitzPatrick Nuclear Power Plant;
- Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station, Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. DPR-63 and NPF-69 for Nine Mile Point Nuclear Station, Units 1 and 2, respectively;
- Facility Operating License No. DPR-12 and Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station, Units 1, 2, and 3, respectively;
- Renewed Facility Operating License Nos. DPR-29 and DPR-30 for Quad Cities Nuclear Power Station, Units 1 and 2, respectively;
- Renewed Facility Operating License No. DPR-18 for R. E. Ginna Nuclear Power Plant;
- Renewed Facility Operating License Nos. DPR-70 and DPR-75 for Salem Nuclear Generating Station, Unit Nos. 1 and 2, respectively;
- Renewed Facility License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1;
- Facility Operating License Nos. DPR-39 and DPR-48 for Zion Nuclear Power Station, Units 1 and 2, respectively;

- Renewed Materials License No. SNM-2505 for the independent spent fuel storage installation (ISFSI) at Calvert Cliffs; and
- the general licenses for the ISFSIs at the other sites.

The NRC staff has reviewed the application, as supplemented, and determined that additional information is needed to complete the review. A response to the attached request for additional information is requested to be provided within 30 days from the date of this email. If you have any questions, please contact me by email or phone at (301) 415-1380.

Sincerely,

Blake Purnell, Project Manager
 Plant Licensing Branch III
 Division of Operating Reactor Licensing
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission

Docket Nos. STN 50-456, STN 50-457, 72-73, STN 50-454, STN 50-455, 72-68, 50-317, 50-318, 72-8, 50-461, 72-1046, 50-010, 50-237, 50-249, 72-37, 50-333, 72-12, 50-373, 50-374, 72-70, 50-352, 50-353, 72-65, 50-220, 50-410, 72-1036, 50-171, 50-277, 50-278, 72-29, 50-254, 50-265, 72-53, 50-244, 72-67, 50-272, 50-311, 72-48, 50-289, 72-77, 50-295, 50-304, and 72-1037

OFFICE	NRR/DORL/LPL3/PM	NMSS/REFS/FAB/BC(A)	OGC - NLO	NRR/DORL/LPL3/BC
NAME	BPurnell	RTurtil	JWachutka	NSalgado
DATE	5/24/21	5/6/21	5/20/21	5/21/21

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REQUEST FOR ADDITIONAL INFORMATION

EXELON GENERATION COMPANY, LLC

REQUEST FOR APPROVAL OF

TRANSFER OF LICENSES AND CONFORMING AMENDMENTS

DOCKET NOS. STN 50-456, STN 50-457, 72-73, STN 50-454, STN 50-455, 72-68,
50-317, 50-318, 72-8, 50-461, 72-1046, 50-10, 50-237, 50-249, 72-37, 50-333, 72-12,
50-373, 50-374, 72-70, 50-352, 50-353, 72-65, 50-220, 50-410, 72-1036, 50-171,
50-277, 50-278, 72-29, 50-254, 50-265, 72-53, 50-244, 72-67, 50-272, 50-311, 72-48,
50-289, 72-77, 50-295, 50-304, and 72-1037

By application dated February 25, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21057A273), as supplemented by letter dated March 25, 2021 (ADAMS Accession No. ML21084A165), Exelon Generation Company, LLC (EGC), on behalf of itself and Exelon Corporation; Exelon FitzPatrick, LLC; Nine Mile Point Nuclear Station, LLC; R. E. Ginna Nuclear Power Plant, LLC (Ginna LLC); and Calvert Cliffs Nuclear Power Plant, LLC (collectively, the Applicants) requested, pursuant to Section 184 of the Atomic Energy Act of 1954, as amended, and Title 10 of the *Code of Federal Regulations* (10 CFR) Sections 50.80, "Transfer of licenses," and 72.50, "Transfer of license," that the U.S. Nuclear Regulatory Commission (NRC) consent to the indirect transfer of control of the following licenses (collectively, the licenses):

- Renewed Facility Operating License Nos. NPF-72 and NPF-77 for Braidwood Station (Braidwood), Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. NPF-37 and NPF-66 for Byron Station (Byron), Unit Nos. 1 and 2, respectively;
- Renewed Facility Operating License Nos. DPR-53 and DPR-69 for Calvert Cliffs Nuclear Power Plant (Calvert Cliffs), Units 1 and 2, respectively;
- Facility Operating License No. NPF-62 for Clinton Power Station (Clinton), Unit No. 1;
- Facility Operating License No. DPR-2 and Renewed Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (Dresden), Units 1, 2, and 3, respectively;
- Renewed Facility Operating License No. DPR-59 for James A. FitzPatrick Nuclear Power Plant (FitzPatrick);
- Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LaSalle), Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (Limerick), Units 1 and 2, respectively;
- Renewed Facility Operating License Nos. DPR-63 and NPF-69 for Nine Mile Point Nuclear Station (NMP), Units 1 and 2, respectively;

- Facility Operating License No. DPR-12 and Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56 for Peach Bottom Atomic Power Station (Peach Bottom), Units 1, 2, and 3, respectively;
- Renewed Facility Operating License Nos. DPR-29 and DPR-30 for Quad Cities Nuclear Power Station (Quad Cities), Units 1 and 2, respectively;
- Renewed Facility Operating License No. DPR-18 for R. E. Ginna Nuclear Power Plant (Ginna);
- Renewed Facility Operating License Nos. DPR-70 and DPR-75 for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2, respectively;
- Renewed Facility License No. DPR-50 for Three Mile Island Nuclear Station (TMI), Unit 1;
- Facility Operating License Nos. DPR-39 and DPR-48 for Zion Nuclear Power Station (Zion), Units 1 and 2, respectively;
- Renewed Materials License No. SNM-2505 for the independent spent fuel storage installation (ISFSI) at Calvert Cliffs; and
- the general licenses for the ISFSIs at the other sites.

Specifically, the application, as supplemented, requests that the 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 EGC to a newly-created subsidiary (referred to as HoldCo in the application) that will then be spun off to Exelon Corporation shareholders, becoming EGC's new ultimate parent company. Once the spin transaction is completed, the new ultimate parent company, EGC, and its subsidiaries will no longer be affiliated with Exelon Corporation. EGC will remain the same Pennsylvania limited liability company as before the proposed transaction and will continue to own and/or operate the aforementioned reactor units and associated ISFSIs (collectively, the facilities), as applicable, and hold the licenses, but it will be renamed (referred to as SpinCo in the application) and reorganized. The application also requests that the NRC consent to the indirect transfer of control of the licenses for the FitzPatrick, NMP, and Ginna facilities to support the reorganization of EGC. Pursuant to 10 CFR 50.90 "Application for amendment of license, construction permit, or early site permit," and 72.56, "Application for amendment of license," the application, as supplemented, requests conforming amendments to the licenses to reflect the proposed transfer.

The application, as supplemented, also requests NRC approval to replace existing nuclear operating services agreements and financial support agreements associated with the ownership and operation of the Calvert Cliffs, NMP, Ginna, and FitzPatrick facilities. The application requests NRC approval to transfer the qualified and non-qualified trusts for FitzPatrick from Exelon Generation Consolidation, LLC (a subsidiary of EGC) to New FitzPatrick, LLC. Pursuant to 10 CFR 50.90, the application, as supplemented, requests amendments to the Calvert Cliffs, Units 1 and 2; NMP, Units 1 and 2; and Ginna licenses to delete conditions referencing the Constellation Energy Nuclear Group, LLC (a subsidiary of EGC at the time of the proposed transaction) Board and its operating agreement to reflect the internal reorganization of EGC described in the application.

The NRC staff has reviewed the application, as supplemented, and determined that the information below is needed to complete its review.

Regulatory Requirements

According to 10 CFR 50.80(b)(1)(i), an application for the transfer of an operating license under 10 CFR Part 50 shall include as much of the information described in 10 CFR 50.33 and 50.34 with respect to the identity and technical and financial qualifications of the proposed transferee as would be required by those sections if the application were for an initial license. The regulations in 10 CFR 50.33(a) and (b) require the application to state the name and address of the applicant. If the applicant is a corporation or an unincorporated association, 10 CFR 50.33(d)(3)(i) and (ii) require the application to state: (i) the state where it is incorporated and the principal location where it does business and (ii) the names, addresses, and citizenship of its directors and principal officers. In accordance with 10 CFR 72.50(b)(1) and 72.22, an application for the transfer of an ISFSI license must also provide this information.

In accordance with 10 CFR 50.38, any person who is a citizen, national, or agent of a foreign country, or any corporation, or other entity which the Commission knows or has reason to believe is owned, controlled, or dominated by an alien, a foreign corporation, or a foreign government, shall be ineligible to apply for and obtain a license under 10 CFR Part 50.

Paragraph 2.1315(a) of 10 CFR states:

Unless otherwise determined by the Commission with regard to a specific application, the Commission has determined that any amendment to the license of a utilization facility or the license of an Independent Spent Fuel Storage Installation which does no more than conform the license to reflect the transfer action, involves respectively, "no significant hazards consideration," or "no genuine issue as to whether the health and safety of the public will be significantly affected."

Request for Additional Information (RAI) 1

The application, as supplemented, does not provide some of the information required by 10 CFR 50.33 and 72.22. The application states that HoldCo, SpinCo, New York HoldCo, and New FitzPatrick, LLC are used in the application as generic names because the final legal names have not yet been determined. The application states that HoldCo will be incorporated in either Delaware or Pennsylvania. The application does not provide the business addresses and information regarding the directors and principal officers for HoldCo and New York HoldCo.

Pursuant to 10 CFR 50.33 and 72.22, provide the following information:

- (a) The final legal entity names of HoldCo, SpinCo, New York HoldCo, and New FitzPatrick, LLC.
- (b) The state of incorporation and address for HoldCo.
- (c) The address for New York HoldCo.
- (d) The names, addresses, and citizenship of the directors and principal officers of HoldCo and New York HoldCo.

Alternatively, confirm acceptance of a condition to provide this information prior to the closing of the transfer transaction for inclusion in any license transfer order.

RAI 2 (Calvert Cliffs, Units 1 and 2)

The supplemental letter dated March 25, 2021, proposes to add the following statement to the footnote on page 1 of the licenses for Calvert Cliffs, Units 1 and 2: “Unless otherwise noted, references to “licensee” are to [SPINCO] as the operating licensee.” The licenses, which include Appendices A, B, and C, refer to “the licensee” in multiple places.

Page 1 of Appendix C to the licenses for Calvert Cliffs, Units 1 and 2, states, in part:

Exelon Generation Company, LLC (the licensee or Company) shall comply with the following conditions....

For Unit 1, the supplemental letter dated March 25, 2021, proposes to revise this statement to read:

[SPINCO] (the operating licensee) and Calvert Cliffs Nuclear Power plant, LLC (CCNPP, LLC or Company) shall comply with the following conditions....

For Unit 2, the March 25, 2021, supplement proposes to revise this statement to read:

Exelon Generation Company, LLC (the operating licensee) and Calvert Cliffs Nuclear Power Plant, LLC (CCNPP, LLC or Company) shall comply with the following conditions....

The proposed changes on page 1 of Appendix C to the licenses for Calvert Cliffs, Units 1 and 2, appear to shift requirements that currently apply to just EGC/SpinCo to EGC/SpinCo and Calvert Cliffs Nuclear Power Plant, LLC. The application, as supplemented, does not explain why the additional conditions in Appendix C are proposed to be divided between EGC/SpinCo and Calvert Cliffs Nuclear Power Plant, LLC instead of being assigned just to EGC/SpinCo. Also, the proposed newly defined term “operating licensee” is not used in Appendix C and the application, as supplemented, does not propose to add this term elsewhere in Appendix C. However, the term “licensee” is used repeatedly in Appendix C. In addition, the application, as supplemented, does not explain why “Company” is being redefined as CCNPP, LLC rather than SpinCo. Finally, the proposed changes to page 1 of Appendix C to the license for Unit 1 are inconsistent with the proposed changes to page 1 of Appendix C to the license for Unit 2—the first defines SpinCo as the operating licensee and the second defines Exelon Generation Company, LLC as the operating licensee.

A. Provide revised markup of Appendix C to the licenses for Calvert Cliffs, Units 1 and 2, to clearly identify which entity is “the licensee” referred to in Appendix C. The revised markup should also include the following corrections to the text quoted above from page 1 of Appendix C:

- For the Unit 1 license, the first letter in “plant” in “Calvert Cliffs Nuclear Power plant, LLC” should be capitalized.
- For the Unit 2 license, “Exelon Generation Company, LLC” should be replaced by “[SPINCO].”

B. Explain why “Company” is being redefined as CCNPP, LLC rather than SpinCo, and explain why this change is needed to support the proposed spin transaction.

- C. Identify all the requirements that are being shifted from EGC to an entity other than SpinCo. Explain why each of these changes is needed to support the proposed spin transaction.

RAI 3 (Limerick, Unit 1; Quad Cities, Unit 1; Ginna)

The supplemental letter dated March 25, 2021, proposes, in part, to delete the following text:

- “hereby” in paragraph 2 of the Limerick, Unit 1, license.
- “Until that update is complete,” in Condition 3.W of the Quad Cities, Unit 1, license.
- “the” in paragraphs 2.B.(2)(a) and (b) of the Ginna license.

The application, as supplemented, does not explain why these changes are needed to reflect the proposed spin transaction. Therefore, the NRC staff plans to retain the current text instead of making these deletions when issuing the conforming amendments.

Confirm that the NRC staff plans regarding the conforming amendments are consistent with the proposed spin transaction and are acceptable. Otherwise, explain why EGC’s proposed license changes are needed to reflect the proposed spin transaction.

RAI 4 (Zion, Units 1 and 2)

The supplemental letter dated March 25, 2021, provides a markup of the draft licenses for Zion, Units 1 and 2, based on the draft conforming amendments issued on November 26, 2019 (ADAMS Package Accession No. ML19228A126). The application, as supplemented, proposes to entirely replace the footnote on page 1 of each of these draft licenses with the following:

The Nuclear Regulatory Commission approved the transfer of the possession, maintenance, and decommissioning authorities under the license from Zion Solutions, LLC to Exelon Generation Company, LLC on November 26, 2019. Thereafter, on October 21, 2020, the Nuclear Regulatory Commission extended the effective date of the transfer order through May 26, 2021. On [Month/Day/Year], the Nuclear Regulatory Commission approved a transaction that resulted in Exelon Generation Company, LLC being renamed [“SPINCO”].

The application, as supplemented, does not explain why these changes are needed to reflect the proposed spin transaction. Therefore, rather than replace the footnote, the NRC staff plans to add the following sentence to the end of the footnote as it is written at the time of the spin transaction:

On [Month/Day/Year], the Nuclear Regulatory Commission approved a transaction that resulted in Exelon Generation Company, LLC being renamed [“SPINCO”].

Confirm that the NRC staff plans regarding the conforming amendments are consistent with the proposed spin transaction and are acceptable. Otherwise, explain why EGC’s proposed license changes are needed to reflect the proposed spin transaction.

RAI 5 (FitzPatrick)

The supplemental letter dated March 25, 2021, proposes to revise paragraph 2 of the FitzPatrick license as follows:

Accordingly, Facility Operating License No. DPR-59 (previously issued to the Power Authority of the State of New York and Niagara Mohawk Power Corporation pursuant to the Atomic Safety and Licensing Board's Initial Decision and Supplemental Initial Decision dated November 12, 1973, and January 10, 1974, respectively; and the Atomic Safety and Licensing Appeal Board's Decision dated January 29, 1974) as previously amended and transferred to Entergy Nuclear FitzPatrick, LLC (ENF) and Entergy Nuclear Operations, Inc. (ENO) dated November 21, 2000, is superseded by Renewed Facility Operating License No. DPR-59, ~~hereby~~ issued to Exelon FitzPatrick and Exelon Generation Company on March 1, 2017, and subsequently Exelon FitzPatrick was renamed [New FitzPatrick, LLC] and Exelon Generation Company was renamed [SPINCO] (the licensee) as the result of a transaction approved by the U.S. Nuclear Regulatory Commission on [Month/Day/Year]. to read as follows:

With the proposed changes, it is not clear that Renewed Facility Operating License No. DPR-59 is issued to New FitzPatrick, LLC and SpinCo. In addition, the March 1, 2017, date is incorrect. The license was transferred from ENF and ENO to EGC by conforming amendment issued on March 31, 2017 (ADAMS Accession No. ML17082A283). Paragraph 2 of the license does not currently include historical information regarding the March 31, 2017, license transfer. On November 30, 2017 (ADAMS Accession No. ML17313A077), the license was revised by conforming amendment associated with the transfer of ownership of FitzPatrick from EGC to Exelon FitzPatrick.

Instead of making EGC's proposed changes, the NRC staff plans to make the following changes to paragraph 2 of the FitzPatrick license when the conforming amendment is issued. Confirm that the following changes are consistent with the proposed spin transaction and are acceptable:

Accordingly, Facility Operating License No. DPR-59 (previously issued to the Power Authority of the State of New York and Niagara Mohawk Power Corporation pursuant to the Atomic Safety and Licensing Board's Initial Decision and Supplemental Initial Decision dated November 12, 1973, and January 10, 1974, respectively; and the Atomic Safety and Licensing Appeal Board's Decision dated January 29, 1974) as previously amended and transferred to Entergy Nuclear FitzPatrick, LLC (ENF) and Entergy Nuclear Operations, Inc. (ENO) dated November 21, 2000, is superseded by Renewed Facility Operating License No. DPR-59, hereby issued to [NEW FitzPatrick, LLC] and [SPINCO] (the licensee) to read as follows:

Otherwise, provide revised markup for paragraph 2 of the FitzPatrick license that clearly indicates that Renewed Facility Operating License No. DPR-59 is issued to New FitzPatrick, LLC and SpinCo. If the revised markup adds historical information regarding previous license transfers, explain why such information is needed to reflect the proposed spin transaction.

RAI 6 (Ginna)

The supplemental letter dated March 25, 2021, proposes to revise paragraph 2 of the Ginna license as follows:

On the basis of the foregoing findings regarding this facility, Facility Operating License No. DPR-18, is superseded by Renewed Facility Operating License No. DPR-18, ~~hereby~~ issued to RG&E and ~~subsequently later~~ transferred to Ginna LLC and Exelon Generation ~~on [Month/Day/Year], and subsequently transferred from Exelon Generation Company to [SPINCO] (the licensee) as approved by the U.S. Nuclear Regulatory Commission on [Month/Day/Year],~~ to read as follows:

With the proposed changes, it is not clear that Renewed Facility Operating License No. DPR-18 is issued to Ginna LLC and SpinCo. In addition, the transfer of the license from RG&E to Ginna LLC and EGC was not a single transaction. Paragraph 2 of the license does not currently include the dates of these license transfers.

Instead of making EGC's proposed changes, the NRC staff plans to make the following changes to paragraph 2 of the Ginna license when the conforming amendment is issued. Confirm that the following changes are consistent with the proposed spin transaction and are acceptable:

On the basis of the foregoing findings regarding this facility, Facility Operating License No. DPR-18, is superseded by Renewed Facility Operating License No. DPR-18, hereby issued to ~~RG&E and subsequently transferred to~~ Ginna LLC and ~~Exelon Generation~~ [SPINCO] to read as follows:

Otherwise, provide revised markup for paragraph 2 of the Ginna license that clearly indicates that Renewed Facility Operating License No. DPR-18 is issued to Ginna LLC and SpinCo. If the revised markup adds additional information regarding the previous license transfers, explain why such information is needed to reflect the proposed spin transaction.

RAI 7 (multiple licenses)

The supplemental letter dated March 25, 2021, appears to be missing some changes that are needed to conform the licenses to reflect the proposed spin transaction. For each of the following, confirm that the NRC staff plans regarding the conforming amendments are consistent with the proposed spin transaction and are acceptable:

- (a) For both Calvert Cliffs, Units 1 and 2, EGC proposes to change this first sentence on page 9 of Appendix C to the license to state: "[SPINCO] shall, no later than the date the closing of the transaction approved on [MONTH/DAY/YEAR] occurs, enter into a Support Agreement of approximately \$126 million with the licensee." For both licenses, the NRC staff plans to replace "the licensee" in this sentence with "Calvert Cliffs Nuclear Power Plant, LLC."
- (b) For the Calvert Cliffs ISFSI, the NRC staff plans to replace "Exelon Generation Company, LLC, staff" with "[SPINCO] staff" in Technical Specification (TS) 6.1, "GENERAL."
- (c) For Clinton, Unit No. 1, the NRC staff plans to replace "Exelon Generation Company, LLC (EGC)" with "[SPINCO]" in paragraph 2.C.(26) of the license.
- (d) For Dresden, Unit 1, the NRC staff plans to replace "Exelon Generation Company, LLC" with "[SPINCO]" on the cover page of Appendix A to the license.

- (e) For Dresden, Unit 3, the NRC staff plans to replace "Exelon Generation Company, LLC" with "[SPINCO]" in paragraph 2 of the license (page 2).
- (f) For FitzPatrick, the NRC staff plans to replace "an Exelon-controlled document" with "a licensee-controlled document" in the additional condition for Amendment No. 250 listed in Appendix C to the license.
- (g) For LaSalle, Units 1 and 2, the NRC staff plans to replace "Exelon Generation Company, LLC" with "[SPINCO]" on the cover page of Appendix B to the licenses.
- (h) For Limerick, Unit 2, EGC's proposed markup for license paragraph 2.C.(2) appears to strike through the wrong text. For this paragraph, the NRC staff plans to replace "Exelon Generation Company" with "[SPINCO]."
- (i) For NMP, Unit 1, the NRC staff plans to replace "Exelon Generation" with "[SPINCO]" in license Condition 2.D.(6)c.
- (j) For NMP, the NRC staff plans to replace "Exelon Corporation Support Agreement" with "[SPINCO] Support Agreement" where it states "materially modify the Exelon Corporation Support Agreement" in license Conditions 2.D.(17) and 2.C.(23) for NMP, Units 1 and 2, respectively.
- (k) For NMP, Unit 2, the NRC staff plans to replace "Exelon" with "[SPINCO]" where it states "Exelon is approved" and "Exelon will complete" in license Conditions 2.C.(29) and (30).
- (l) For Peach Bottom, Unit 1, the NRC staff plans to replace "Exelon Generation Company" with "[SPINCO]" in TS 1.0, "LOCATION AND SITE."
- (m) For Peach Bottom, the NRC staff plans to replace "Exelon" with "[SPINCO]" where it states "Exelon is approved" and "Exelon will complete" in license Condition 2.C.(20) for Peach Bottom, Units 2 and 3.