

From: [stephen nickels](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 9:21:58 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

In order to possess a reactor operating license, a company must demonstrate that it is financially qualified and can provide assurance of sufficient funds to fully decommission the reactor. Exelon's proposed "SpinCo" meets neither criteria, and its license transfer application provides no evidence to the contrary.

Exelon states publicly and in its application that many of its reactors are not able to generate enough revenue to pay their operating and maintenance costs. Several others are financially dependent on temporary consumer subsidies from state governments. SpinCo will have no other sources of revenue except for electricity sales and subsidies, and cannot guarantee it will have sufficient funds to operate and maintain all of its reactors safely.

Neither can SpinCo provide assurance of decommissioning funding. In 2019, Callan Institute concluded that Exelon's decommissioning funds were between \$1.5 billion and \$7.4 billion short of the amounts needed for decommissioning. The company will have no other sources of decommissioning funding than the decommissioning trust funds. Because the reactors themselves are unprofitable and dependent on temporary, out-of-market subsidies, SpinCo will not be able to make up for decommissioning fund shortfalls and cost overruns.

What is more, the application does not provide the state in which SpinCo will be incorporated, nor the names of its executives and officers, as it has not even been incorporated. In effect, Exelon is asking NRC to violate its own statutory and regulatory requirements (per 10 CFR 50.80 and 50.33), and allow 28 reactor licenses and billions of dollars in decommissioning funds to be transferred to an unknown company.

Exelon is proposing this spin-off because it no longer sees a future in nuclear power, which is increasingly risky and uneconomical. So Exelon has decided to get rid of its nuclear power plants because no other company sees a future in them either. But the Atomic Energy Act and NRC's licensing requirements are intended to prevent exactly what Exelon is proposing. Putting nuclear reactors in the hands of financially unqualified companies that could put the public's health and safety at risk. NRC must dismiss Exelon's application: it is incomplete, SpinCo is not financially qualified, and cannot provide decommissioning funding assurance.

There is nothing clean or green about nuclear power.

Sincerely,
stephen nickels
2880 Trigg Tower
Simpson, IL 62985

From: [Joni Bosh](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 7:25:19 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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It is inconceivable to me that we would prop up this terribly expensive and dangerous form of power, when so many safe, efficient and much less expensive options abound. Shut these

plants down.

Sincerely,
Joni Bosh
376 Wills Lane NW
Bainbridge Island, WA 98110

From: [Carol Book](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 5:10:05 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Energy corporations have been permitted to play their games with our health and safety for decades. Please take a stand and bring it to an end.

Sincerely,
Carol Book
27 Mill St
York, PA 17406

From: [David Greene](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 1:52:15 PM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Exelon is trying to get rid of costly nuclear and declare a major boost in corporate profits. Stop this irresponsible action and force companies to account for their nuclear mistakes.

Sincerely,
David Greene
806 Francis Av
Bexley, OH 43209

From: [fred.schoell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 12:04:17 PM

Dear NRC Nuclear Regulatory Commission,

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If capitalism is working for the corporations, this may lead to an even worse Exelon proposal for avoiding their responsibilities. That's OK, we'll make the decision on that when we know

what it is.

Sincerely,
fred schoell
4215 w104th terrace
overland park, KS 66207

From: [Kate Kenner](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 11:31:24 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Usually when people/companies want to "get rid of" something they have no concern for what will happen to it and in this case the effects could be catastrophic. Please do not allow this

transfer to go through for the mere convenience of Exelon.

Sincerely,
Kate Kenner
3539 Weatherhead Hollow Rd
Guilford, VT 05301

From: [James Newberry](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:58:36 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Therefore, approval of this scam would only increase the anti-American agenda of globalized fossil and fissile corporate fascism, and is a direct threat to public health, safety and security.

Sincerely,
James Newberry
243 State Route 203
Spencertown, NY 12165

From: [Kim Rapholz](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:57:00 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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Please protect the people. The company has enjoyed the profits from the nuclear reactor for years - make them clean it up! What is their plan?

Do not approve this!!

Thank you for executing the will of the people.

Sincerely,

Kim

Sincerely,
Kim Rapholz
1055 MORENO DR
Ojai, CA 93023

From: [Peter Ayres](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:53:50 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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I agree with this statement. I would only add that I don't think anything new should be done with Nuclear energy sources until they can "solve" the nuclear waste created. We can't agree

where to put the waste we have already. Fix that first please

Sincerely,
Peter Ayres
25W640 Indian Hill Woods
Naperville, IL 60563

From: [Ralph Penunuri](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:42:15 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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The invested interests of an indentured nuclear advocacy – a propped up insular institution which has never even been a sustainable enterprise – is a crime against humanity and an attack

against sustainable life on the planet.

Sincerely,
Ralph Penunuri
5065 SW Beals Ave
Corvallis, OR 97333

From: [John Leddy](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:41:12 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

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Nuclear energy is too dangerous for shell games!

JL

Sincerely,
John Leddy
1179 Nelrose Ave
Venice, CA 90291

From: [Kathleen Reiley](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 10:18:41 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

In order to possess a reactor operating license, a company must demonstrate that it is financially qualified and can provide assurance of sufficient funds to fully decommission the reactor. Exelon's proposed "SpinCo" meets neither criteria, and its license transfer application provides no evidence to the contrary.

Exelon states publicly and in its application that many of its reactors are not able to generate enough revenue to pay their operating and maintenance costs. Several others are financially dependent on temporary consumer subsidies from state governments. SpinCo will have no other sources of revenue except for electricity sales and subsidies, and cannot guarantee it will have sufficient funds to operate and maintain all of its reactors safely.

Neither can SpinCo provide assurance of decommissioning funding. In 2019, Callan Institute concluded that Exelon's decommissioning funds were between \$1.5 billion and \$7.4 billion short of the amounts needed for decommissioning. The company will have no other sources of decommissioning funding than the decommissioning trust funds. Because the reactors themselves are unprofitable and dependent on temporary, out-of-market subsidies, SpinCo will not be able to make up for decommissioning fund shortfalls and cost overruns.

What is more, the application does not provide the state in which SpinCo will be incorporated, nor the names of its executives and officers, as it has not even been incorporated. In effect, Exelon is asking NRC to violate its own statutory and regulatory requirements (per 10 CFR 50.80 and 50.33), and allow 28 reactor licenses and billions of dollars in decommissioning funds to be transferred to an unknown company.

Exelon is proposing this spin-off because it no longer sees a future in nuclear power, which is increasingly risky and uneconomical. So Exelon has decided to get rid of its nuclear power plants because no other company sees a future in them either. But the Atomic Energy Act and NRC's licensing requirements are intended to prevent exactly what Exelon is proposing. Putting nuclear reactors in the hands of financially unqualified companies that could put the public's health and safety at risk. NRC must dismiss Exelon's application: it is incomplete, SpinCo is not financially qualified, and cannot provide decommissioning funding assurance.

I have been going to MINAMI Soma in Japan where the nuclear disaster happened 10 years ago. I know first hand the suffering of the people and the environment.

The whole world has to decommission all nuclear reactors NOW.
AND THE NUCLEAR WASTE???

Sincerely,
Kathleen Reiley
10 Pinesbridge Rd
MARYKNOLL, NY 10545

From: [DIANA WULF](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 7:53:27 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

I urge you to reject Exelon's petition to transfer all of its nuclear reactor licenses to a new, completely separate corporation (currently called SpinCo). The Commission must reject this corporate spin-off scheme, which is unprecedented in size, scope, and complexity. It places worker and public health and safety at immense risk from the transfer of aging, uneconomical reactors, thousands of tons of radioactive waste, and over \$14 billion in consumer-funded decommissioning funds to a company that does not even exist yet.

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Enough is ENOUGH! I do not consent!

Sincerely,
DIANA WULF
PO BOX 232
STAPLEHURST, NE 68439

From: [Joseph Bridy](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 1:45:33 AM

Dear NRC Nuclear Regulatory Commission,

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Nuclear power Generation X? Too cheap to be responsible for? Exelon is hoping to dump the long term costs on the public, while keeping the short and long term profits for itself and it's

majority owners.

Sincerely,
Joseph Bridy
709 Morris St.
Phila., PA 19148

From: [Hartson Doak](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 1:40:16 AM

Dear NRC Nuclear Regulatory Commission,

Dear Chairman Hanson and Commissioners Baron, Caputo, and Wright,

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As a former nuclear quality control inspector, THIS is why I moved my family to Hawaii decades ago.

Sincerely,
Hartson Doak
1603 Makiki St
Honolulu, HI 96822

From: [joanne.groshardt](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Monday, June 07, 2021 12:27:45 AM

Dear NRC Nuclear Regulatory Commission,

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don't allow Exelon license transfer application

Sincerely,
joanne groshardt
302 trailridge dr
richardson, TX 75081