

From: [HJ James](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 11:57:05 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.

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Despite billions in recent bailouts, and its bribery scandal in Illinois, the company now seeks another billion dollar bailout. This is not a company to be trusted.

Sincerely,
HJ James
Chicago, IL

From: [Paul O'Byrne](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 11:01:23 PM

Dear NRC Nuclear Regulatory Commission,

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

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Please do the right thing and deny this petition. It is dangerous and obvious ploy to dump the costs of these aging plants onto tax payers instead of the responsible party that has profited

from them for years.

Sincerely,
Paul O'Byrne
12406 Kelly Place
Thonotosassa, FL 33592

From: [Phyllis Miller](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 9:33:08 PM

Dear NRC Nuclear Regulatory Commission,

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All over the World old nuclear power plants are needing to be decommissioned because of safety, economic reasons, and waste storage worries.

Sincerely,
Phyllis Miller
2394 Leafgate Rd
Decatur, GA 30033

From: [Barbara Nicely](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 9:03:29 PM

Dear NRC Nuclear Regulatory Commission,

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

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Exelon is just trying to dump its responsibilities off on a company that doesn't even exist, much less have any knowledge of the nuclear industry. This spin off is complete

irresponsibility which will create more problems and danger to the public.

Sincerely,
Barbara Nicely
3951 Rosemond Rd
Cleveland, OH 44121

From: [STEPHEN NICHOLS](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 7:24:35 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.

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As an ex-Navy nuclear plant operator, I am well aware of the inherent dangers of even well-maintained reactor plants. Old, decrepit plants are an unacceptable risk that no one should

have to endure. Expert, competent decommissioning is a must.

Sincerely,
STEPHEN NICHOLS
13107 ZELLER RD SE
YELM, WA 98597

From: [pete smyke](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 6:07:16 PM

Dear NRC Nuclear Regulatory Commission,

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

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Really? Exelon can just walk away from it's deadly radioactive mess? Reject this application and make Exelon take responsibility for what it has done over the years. Make Exelon

responsible for the reactors that they've profited from for years!!!!

Sincerely,
pete smyke
303 N 1st St
Alpine, TX 79830

From: [Victoria Swanson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 5:21:30 PM

Dear NRC Nuclear Regulatory Commission,

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

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This issue is so important and needs dedicated attention.

Sincerely,
Victoria Swanson
847 Concha Loma Drive
Carpinteria, CA, CA 93013

From: [William Walton](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 3:08:53 PM

Dear NRC Nuclear Regulatory Commission,

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Please don't approve this heinous request.

Sincerely,
William Walton
340 Royal Poinciana Way Suite 317
Palm Beach, FL 33480

From: [Carolyn Treadway](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 1:59:39 PM

Dear NRC Nuclear Regulatory Commission,

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

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Nuclear is LETHAL. Phase it out entirely asap!!

Sincerely,
Carolyn Treadway
1951 Circle Lane SE
Lacey, WA 98503

From: [Carole Plourde](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 1:47:33 PM

Dear NRC Nuclear Regulatory Commission,

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Living near a nuclear power plant for the last 30 years does not make me a fan of Exelon's efforts to ditch its responsibility to local communities to safely shutdown reactors and safely

handle nuclear waste. No to this deal.

Sincerely,
Carole Plourde
70 Cedar Street
Amesbury, MA 01913

From: [Don Kelley](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 1:45:32 PM

Dear NRC Nuclear Regulatory Commission,

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

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This move seems likely to result in public risk from under-capitalized operation of obsolescent nuclear facilities. Exelon should be required to fully meet its obligations in its present form.

Sincerely,
Don Kelley
12637 Merritt Estes Rd
Deadwood, SD 57732

From: [Adam Casey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 1:23:06 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.

Please do not fall victim to this delusional idea. Exelon is responsible for decommissioning these inherently dangerous and unnecessary "ticking time-bombs" and no shell game can

sweep that responsibility under the table or to some other entity.

Sincerely,
Adam Casey
659 Old County Rd
Washington, ME 04574

From: [Steven Melchi](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:27:45 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.

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Just went through this with our local dam that broke and demolished our entire town, the owners and operators are filing for bankruptcy to avoid responsibility. I say "No Way" Keep

them accountable and up to date on federal mandates.

Sincerely,
Steven Melchi
4131 North Maplecrest Drive
Sanford, MI 48657

From: [Wilbur Ince](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 11:42:57 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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This is no time to interfere with the real market pressures on the Nuclear industry. STOP wasting MY TAX money on a dead industry. The time has come for them to take the losses

they have expected for many years.

Sincerely,
Wilbur Ince
4206 3rd Ave S
Minneapolis, MN 55409

From: [Aloysius Wald](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 11:32:03 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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This is another one of those suspicious "bait and switch" games.
NO ONE should fall for this shell game.

Sincerely,
Aloysius Wald
523 E Lincoln Ave
Columbus, OH 43214

From: [Sharon Tompkins](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 10:52:16 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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As we still have no safe way of disposing of nuclear waste there is no reason to even consider this proposal. Public health is already at risk from so many pollutants, adding a nuclear

component is unconscionable.

Sincerely,
Sharon Tompkins
11 W Rolling Acres
Weaverville, NC 28787

From: [Robert Kolkebeck](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 10:12:50 AM

Dear NRC Nuclear Regulatory Commission,

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

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An awareness of past operational failures at nuclear reactors throughout the world means recognizing that there is no justification for funding their deadly operations in the future. Even

without catastrophes, the radioactive trash remains.

Sincerely,
Robert Kolkebeck
131 Hay Street
Park Forest, IL 60466

From: [Jarda Hutar](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 10:05:58 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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This maneuver is like an elopement of Three Mile Island and Chernobyl to get the worst possible combo!

We all know that the way forward is cutting the losses now, start decommissioning of the remaining mastodon reactors and no more subsidies!

Sincerely,
Jarda Hutar
24 Meadow Road
Durham, NH 03824

From: [MICHAEL LETENDRE](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 9:54:04 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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No free ride. Hold them to their obligations.

Sincerely,
MICHAEL LETENDRE
140 Cass St Unit B
Portsmouth, NH 03801

From: [Katherine Crumpacker](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 9:42:08 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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Please do not allow this. My children and grandchildren are depending on you.
Sincerely

Katherine Crumpacker

Sincerely,
Katherine Crumpacker
1633 Waterston ave
Austin, TX 78703

From: [William Harrell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 9:37:32 AM

Dear NRC Nuclear Regulatory Commission,

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

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Nuclear contamination is one of the most destructive of all environmental poisons mankind has created and spread throughout the world...Science well backs up this statement.

Supporting blind capitalism at the cost of the environment is not acceptable

Sincerely,
William Harrell
42 Adams Rd Unit 53
Greenfield, MA 01301

From: [Orrin Merritt](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 8:14:13 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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Time to move on to safer, sustainable, and people friendly technology.

Sincerely,
Orrin Merritt
17618 State Route 72
Genoa, IL 60135

From: [Laurence Kirby](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 7:43:27 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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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 urge the NRC to act responsibly and reject Exelon's application to avoid increased danger of dreadful nuclear contamination and to avoid Exelon's passing on to the public the costs of

decommissioning.

Sincerely,
Laurence Kirby
36 Purdy Hollow Rd
Woodstock, NY 12498

From: [Dane Bowen](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 7:09:14 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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This ploy seems pretty transparent to me. It even calls the new Company Spinco. What a laugh.

Sincerely,
Dane Bowen
8740 Blair Rd
Mint Hill, NC 28227

From: [Dante Renzoni](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 6:54:01 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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Old fashioned nuclear plants are a hazard to America. We must fade them out.

Sincerely,
Dante Renzoni
N5991 Settlement dr
Medford, WI 54451

From: [Greg Wingard](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 4:29:51 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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The state of Washington has personal, painful experience with the schemes of the nuclear industry. In our case it was done through WPPSS net billing plans, and bond fraud. Stop the

steal.

Sincerely,
Greg Wingard
PO Box 7021
Covington, WA 98042

From: [Suzanne M.](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 4:11:19 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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Thank you for reading this.

Sincerely,
Suzanne M.
803 E. 1259 Rd.
Lawrence, KS 66047

From: [Judy Lukasiewicz](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 3:25:07 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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It is clear that nuclear power generation has been a dangerous and costly mistake. Attempts to get rid of responsibility for decommissioned and highly radioactive reactors and/or radioactive

waste is a serious issue. Protect the public. No to SpinCo.

Sincerely,
Judy Lukasiewicz
Santa Cruz, CA 95065

From: [Elise Villemaire](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 3:15:46 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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Stop trying to spin the American People. No Nukes means No Nukes!

Sincerely,
Elise Villemaire
271 Bailhache Ave
Healdsburg, CA 95448

From: [Karen Spiegel](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 3:04:23 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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This plan is the equivalent of sweeping dirt under the rug - only this dirt is potentially lethal to millions. I urge you to make sure that these aging reactors are decommissioned safely by

qualified organizations.

Sincerely,
Karen Spiegel
1074 E Tujunga Ave
Burbank, CA 91501

From: [Joan Lobell](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:51:41 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.

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Nuclear power was a grave error in judgement when it was first proposed. Nobody should have to pay to keep it afloat, especially consumers.

Sincerely,
Joan Lobell
5107 Whiteford Ave
Baltimore, MD 21212

From: [Barbara Larcom](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:33:09 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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The Exelon attempt at transfer of its nuclear reactor licenses is extremely dangerous to the public. Please reject it.

Sincerely,
Barbara Larcom
715 Greenwood Blvd
Wooster, OH 44691

From: [Kelly Larson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:30:23 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 has never been a technology that has economically made energy. It risks the most harmful disasters possible. Stop the nuclear industry. Shut down the reactors, and invest that

money in renewables and energy storage. That is the future!

Sincerely,
Kelly Larson
Box 18094
Reno, NV 89511

From: [Richard Jones](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:14:42 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.

It is essential to the well being of the United States that corporations be held accountable for their history and their decisions. They must be held responsible for what they have developed

and the consequences of that development.

Sincerely,
Richard Jones
17044 Westside Hwy SW
Vashon, WA 98070

From: [Ronald Gulla](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:00:16 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.

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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.

It is time to fight for our environment and future!

Sincerely,
Ronald Gulla
1544 Scenic Valley Rd
Waukon, IA 52172

From: [Doug Yamamoto](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Thursday, June 17, 2021 12:00:13 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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Please act to reject this scam to evade the law and create an even more unstable, unsafe nuclear world.

Sincerely,
Doug Yamamoto
916 Peralta Ave
Albany, CA 94706