

From: [Harold Watson](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 10:55:06 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.

Sincerely,
Harold Watson

1930 E Cairo St
Springfield, MO 65802

From: [Bob Jordan](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 7:56:27 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Bob Jordan

5370 Pershing Ave Apt 300
Saint Louis, MO 63112

From: [Edith Griffin](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 6:30:12 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Edith Griffin

PO Box 383
Groton, MA 01450

From: [cynthia molinero](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 4:57:26 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
cynthia molinero

PO Box 16835
Rocky River, OH 44116

From: [Elizabeth Dodd](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 4:11:05 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Elizabeth Dodd

18678 Cape Sable Dr
Boca Raton, FL 33498

From: [Tod Alan Spoerl](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 3:47:36 PM

Dear NRC Nuclear Regulatory Commission,

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

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Sincerely,
Tod Alan Spoerl

N448 Highview Rd
Ixonia, WI 53036

From: [Anita Scheunemann](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 3:27:48 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Anita Scheunemann

6316 199th Loop SW
Rochester, WA 98579

From: [Carolyn Croom](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 2:17:10 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Carolyn Croom

2502 Albata Ave
Austin, TX 78757

From: [Chris McCarty](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 12:35:57 PM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Chris McCarty

1500 Strathene Ct
Mt Pleasant, SC 29466

From: [Carl Tyndall](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 9:42:45 AM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Carl Tyndall

251 E 28th St
Brooklyn, NY 11226

From: [Jane Van Praag](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 6:46:43 AM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Jane Van Praag

PO Box 354
Bartlett, TX 76511

From: [John Zamos](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 6:46:43 AM

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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.

Sincerely,
John Zamos

8224 Keating Ave
Skokie, IL 60076

From: [Thomas Talbot](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 5:47:44 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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Sincerely,
Thomas Talbot

Anthony, NM 88021

From: [Carmen Joseph Dello Buono](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 3:12:43 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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Sincerely,
Carmen Joseph Dello Buono

5770 Winfield Blvd Spc 166
San Jose, CA 95123

From: [Kathy Shores](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 1:38:55 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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Sincerely,
Kathy Shores

1021 S Ash Ave
Tempe, AZ 85281

From: [Susan Carey](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 1:38:33 AM

Dear NRC Nuclear Regulatory Commission,

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Sincerely,
Susan Carey

15033 20th Rd
Whitestone, NY 11357

From: [Louise Perini](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 12:20:12 AM

Dear NRC Nuclear Regulatory Commission,

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

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Sincerely,
Louise Perini

87 Maywood Drive
Santa Rosa, CA 95409

From: [DR SUSAN CASWELL](#)
To: [Docket, Hearing](#)
Subject: [External_Sender] Docket ID NRC-2021-0099: Exelon license transfer application
Date: Sunday, June 20, 2021 12:03:08 AM

Dear NRC Nuclear Regulatory Commission,

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

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Sincerely,
DR SUSAN CASWELL

PO Box 347
Paauilo, HI 96776