



June 23, 2021

Attn: Document Control Desk U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Re:

Master Worker Policy

To Whom It May Concern:

Enclosed are certified copies of endorsements numbered 34 to 37 to the Nuclear Energy Liability Policy (Facility Worker Form) which is a Master Worker Policy in the custody of Nuclear Energy Liability Insurance Association, otherwise known as American Nuclear Insurers (ANI).

Sincerely,

Jim Palaia

MODI NRR



UNDERWRITING DEPARTMENT

Jim Palaia, Vice President

June 10, 2021

MEMORANDUM TO OPERATING POWER REACTOR RISK MANAGERS AND THEIR BROKERS

Notification of Change in the Number of Power Reactors in the Secondary Financial Protection (SFP) Program

Further to our memorandum dated March 30, 2021, we have been advised that the Nuclear Regulatory Commission has granted NextEra Energy Duane Arnold, LLC, Central lowa Power Cooperative and Corn Belt Power Cooperative an exemption on June 10, 2021, to remove the Duane Arnold Energy Center from the Secondary Financial Protection (SFP) program. Per the request of NextEra Energy Duane Arnold, LLC, Central lowa Power Cooperative and Corn Belt Power Cooperative, American Nuclear Insurers (ANI) has cancelled the Duane Arnold Energy Center's certificate under the SFP Master Policy effective the same date. As a result of this, the total number of participants in the SFP program has been reduced from 96 to 95.

The total amount of financial protection available for a nuclear incident is now \$13,522,836,000* which is determined as follows:

Primary Limit:

\$450,000,000

plus

Total Amount available

under the SFP Program:

\$13,072,836,000**

- * Does not include any additional funds from foreign Convention on Supplementary Compensation for Nuclear Damage (CSC) Contracting States.
- **Maximum retrospective premium is \$137,608,800 per reactor which includes the 5% additional assessment pursuant to 42 U.S.C.A. § 2210(o)(1)(E). \$137,608,800 x 95 reactors = \$13,072,836,000.

If you have any questions, please don't hesitate to contact me or your account underwriter.

Regards,

Jim Palaia

Vice President, Underwriting

c: Nuclear Regulatory Commission – Document Control

SUBSCRIBING COMPANIES AND THEIR PROPORTIONATE LIABILITY ENDORSEMENT - TO NUCLEAR ENERGY LIABILITY INSURANCE (FACILITY WORKER FORM) **CALENDAR YEAR 2021**

- 1. It is agreed that with respect to bodily injury caused during the effective period of this endorsement by the nuclear energy hazard:
 - The word "companies" wherever used in this certificate means the subscribing companies listed below.
 - b. The certificate shall be binding on such companies only.
 - c. Each such company shall be liable for its proportion, as designated below, of any obligation assumed or expense incurred under the certificate because of such bodily injury.
- 2. It is agreed that the effective period of this endorsement is from the beginning of the effective date of this endorsement stated below to the close of December 31, 2021 or to the effective date and time of the cancellation or other termination of this policy, whichever first occurs, Eastern Standard Time.

ACE American Insurance Company	11.649968 %
American Commerce Insurance Company	8.321406 %
AXIS Reinsurance Company	27.738020 %
Continental Casualty Company	8.927204 %
Liberty Mutual Insurance Company	16.642812 %
Starr Indemnity & Liability Company	8.927204 %
State Farm Mutual Automobile Insurance Company	9.085866 %
Zurich American Insurance Company	<u>8.707520 %</u>

Total 100,000000 NE-2021
This is to certify that this is a true copy of the original endorsement having the endorsement number and being made part of the Certificate of Insurance bearing the number designated hereon for insurance coverage under the Nuclear Energy Liability Policy (Facility Worker Form). No insurance is afforded hereunder.

Jim Palaia, Vice President - Underwriting, American Nuclear Insurers

Effective Date of this Endorsement:

January 1, 2021 (12:01 A.M. Standard Time) To form a part of Nuclear Energy Liability Policy (Facility Worker Form) which is a Master Worker Policy in the custody of **Nuclear Energy Liability Insurance**

Association

Date of Issue:

December 5, 2020

Endorsement No.:

37

President

Kary L. Unichio

DISCLOSURE NOTICE ENDORSEMENT FOR ACTS OF TERRORISM AS DEFINED IN THE TERRORISM RISK INSURANCE ACT OF 2002. AS AMENDED IN 2007, 2015, AND 2019

In accordance with the federal Terrorism Risk Insurance Act (TRIA) of 2002, as amended in 2007, 2015, and 2019, we are providing Named Insureds with this notice disclosing (1) the portion of your premium attributable to coverage for terrorist acts certified under that Act (2) the U.S. Government's participation in payment of terrorism losses under the Act and (3) the \$100 billion cap on liability.

The portion of premium paid under all Certificates and allocated for terrorism losses as defined in TRIA, as amended in 2007, 2015, and 2019, is 8% under this policy and does not include any charges for the portion of losses covered by the U.S. Government under the Act.

The U.S. Government will reimburse American Nuclear Insurers for 80% of losses caused by certified acts of terrorism above a statutorily established deductible paid by American Nuclear Insurers.

TRIA, as amended in 2007, 2015, and 2019, contains a \$100 billion cap that limits U.S. Government reimbursement as well as insurers' liability for losses resulting from certified acts of terrorism when the amount of such losses exceeds \$100 billion in any one calendar year. If the aggregate insured losses for all insurers exceed \$100 billion, coverage may be reduced.

This is to certify that this is a true copy of the original endorsement having the endorsement number and being made part of the Certificate of Insurance bearing the number designated hereon for insurance coverage under the Nuclear Energy Liability Policy (Facility Worker Form). No insurance is afforded hereunder.

Jim Palaia, Vice President – Underwriting, American Nuclear Insurers

Effective Date of this Endorsement:

January 1, 2021 (12:01 A.M. Standard Time) To form a part of Nuclear Energy Liability Policy (Facility Worker Form) which is a Master Worker Policy in the custody of **Nuclear Energy Liability Insurance** Association

Date of Issue: December 5, 2020

For the subscribing companies

Endorsement No.:

36

Muly Com-President Kary L. Urishio

MWP-2-7 (01/01/21)

AMENDATORY ENDORSEMENT

Endorsement Nos. 26 and 27, "DISCLOSURE NOTICE ENDORSEMENT FOR ACTS OF TERRORISM AS DEFINED IN THE TERRORISM RISK INSURANCE ACT OF 2002, AS AMENDED IN 2007 AND 2015", are deleted.

This is to certify that this is a true copy of the original endorsement having the endorsement number and being made part of the Certificate of Insurance bearing the number designated hereon for insurance coverage under the Nuclear Energy Liability Policy (Facility Worker Form). No insurance is afforded hereunder.

Jim Palaia, Vice President – Underwriting, American Nuclear Insurers

Effective Date of this Endorsement:

January 1, 2021 (12:01 A.M. Standard Time) To form a part of Nuclear Energy Liability Policy (Facility Worker Form) which is a Master Worker Policy in the custody of **Nuclear Energy Liability Insurance Association**

Date of Issue:

December 5, 2020

For the subscribing companies

Endorsement No.:

35

Countersigned by

President

Hary L. Unichio

AMENDATORY ENDORSEMENT

Endorsement No. 16, "DISCLOSURE NOTICE ENDORSEMENT FOR ACTS OF TERRORISM AS DEFINED IN THE TERRORISM RISK INSURANCE ACT OF 2002, AS AMENDED IN 2007", is deleted.

This is to certify that this is a true copy of the original endorsement having the endorsement number and being made part of the Certificate of Insurance bearing the number designated hereon for insurance coverage under the Nuclear Energy Liability Policy (Facility Worker Form). No insurance is afforded hereunder.

Jim Palaia, Vice President - Underwriting, American Nuclear Insurers

Effective Date of this Endorsement:

January 1, 2015 (12:01 A.M. Standard Time) To form a part of Nuclear Energy Liability Policy (Facility Worker Form) which is a Master Worker Policy in the custody of

Nuclear Energy Liability Insurance

Association

Date of Issue: **December 5, 2020** For the subscribing companies

Endorsement No.:

34

President

Yary L. Unichio