

August 17, 2021

ZS-2021-0031

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

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295, 50-304, and 72-1037

Subject: Request for Extension of Order Approving Transfer of the License for Zion Nuclear Power Station, Units 1 and 2, from *ZionSolutions, LLC* to Exelon Generation Company, LLC

References:

- 1) Letter from Ken Robuck (*EnergySolutions*) and J. Bradley Fewell (Exelon Generation Company, LLC), to U.S. Nuclear Regulatory Commission, "Application for License Transfers and Conforming Administrative License Amendments," dated July 24, 2018
- 2) Letter from Gerard van Noordennen (*ZionSolutions, LLC*), to U.S. Nuclear Regulatory Commission, "Supplemental Information Regarding Application for License Transfers and Conforming Administrative License Amendments," dated January 21, 2019
- 3) Letter from John B. Hickman (U.S. Nuclear Regulatory Commission), to John Sauger, (*EnergySolutions*), "Order Approving Transfer of the Licenses from *ZionSolutions, LLC* to Exelon Generation Company, LLC and Conforming Administrative License Amendments (EPID L-2018-LLA-0217)," dated November 26, 2019
- 4) Letter from Gerard van Noordennen (*ZionSolutions, LLC*), to U.S. Nuclear Regulatory Commission, "Request for Extension of Order Approving Transfer of the License for Zion Nuclear Power Station, Units 1 and 2, from *ZionSolutions, LLC* to Exelon Generation Company, LLC," dated August 27, 2020
- 5) Letter from John B. Hickman (U.S. Nuclear Regulatory Commission), to John Sauger, (*EnergySolutions*), "Order Extending the Effectiveness of the Approval of the Transfer of the Licenses from *ZionSolutions, LLC* to Exelon Generation Company, LLC and Conforming Administrative License Amendments (CAC No. 000079; EPID L-2020-LLO-0007)," dated October 21, 2020
- 6) Letter from Gerard van Noordennen (*ZionSolutions, LLC*), to U.S. Nuclear Regulatory Commission, "Request for Extension of Order Approving Transfer of the License for Zion Nuclear Power Station, Units 1 and 2, from *ZionSolutions, LLC* to Exelon Generation Company, LLC," dated April 15, 2021
- 7) Letter from John B. Hickman (U.S. Nuclear Regulatory Commission), to John Sauger, (*EnergySolutions*), "Order Extending the Effectiveness of the Approval of the Transfer of the Licenses from *ZionSolutions, LLC* to Exelon Generation Company, LLC and Conforming Administrative License Amendments (CAC No. 000079; EPID L-2020-LLO-0007)," dated May 12, 2021

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By letter dated July 24, 2018 (Reference 1), as supplemented by letter dated January 21, 2019 (Reference 2), ZionSolutions, LLC (ZS) and Exelon Generation Company, LLC (EGC) submitted an application requesting U.S. Nuclear Regulatory Commission (NRC) consent for the direct transfer of ZS's Facility Operating License Nos. DPR-39 and DPR-48, for Zion Nuclear Power Station, Units 1 and 2, respectively (Zion), and the associated general license to the Zion Independent Spent Fuel Storage Installation, to EGC. Specifically, ZS and EGC requested that the NRC consent to the direct transfer of ZS's ownership interest in, and management authority of, Zion back to EGC upon the completion of decommissioning activities at the ZNPS site. ZS and EGC also requested approval of conforming amendments to the licenses pursuant to 10 CFR 50.80 and 10 CFR 50.90.

Upon completion of its review, the NRC issued an Order providing consent of the proposed license transfers, subject to the condition described in the order, and approval of the conforming license amendments (Enclosure 1 to Reference 3). The Order states, in part, that should the proposed direct license transfers not be completed within one year of the Order's date of issuance, the Order shall become null and void; provided, however, that upon written application and for good cause shown, such date may be extended by order.

By letter dated August 27, 2020 (Reference 4), ZS submitted a request for an extension of the effectiveness of the NRC Order dated November 26, 2019. The NRC issued an Order approving the extension of the effectiveness of the Order from November 26, 2020, to May 26, 2021 (Enclosure to Reference 5). By letter dated April 15, 2021 (Reference 6), ZS submitted a second request for an extension of the effectiveness of the NRC Order by another six months. The NRC issued an Order approving the extension of the effectiveness of the Order from May 26, 2021, to November 26, 2021 (Enclosure to Reference 7).

The purpose of this letter is to request that the effectiveness of the order approving the transfer of licenses and conforming amendments be extended twelve months. The extension would allow sufficient time to complete decommissioning activities.

There is good cause to extend the existing approval. ZS expects to receive further requests for additional information (RAIs) in the near term. Responses to RAIs regarding Final Status Survey Final Reports (FSSRs) and their associated Release Records will require review by NRC staff. The extension provides the NRC staff with additional time to assess the responses provided by ZS and make a final determination regarding the release of land for unrestricted use.

In accordance with 10 CFR 50.91(b)(1), a copy of this submittal has been sent to the State of Illinois.

There are no regulatory commitments made in this submittal. If you should have any questions regarding this submittal, please contact me at (860) 462-9707.

Respectfully,

Gerard P. Van Noordennen

Gerard P. Van Noordennen Aug 17 2021 8:09 AM

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Gerard van Noordennen
Senior Vice President Regulatory Affairs

ZionSolutions, LLC

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cc: Kimberly Conway, U.S. NRC Senior Project Manager
Regional Administrator, U.S. NRC, Region III
Zion Nuclear Power Station, Units 1 and 2, License Transfer Service List

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