

October 31, 2023

ZS-2023-024

10 CFR 50.80

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 Constellation Energy Generation, LLC

References:

1. Letter from Ken Robuck (*EnergySolutions*) and J. Bradley Fewell (Exelon Generation Company, LLC), to the U.S. NRC, "Application for License Transfers and Conforming Administrative License Amendments," dated July 24, 2018 (ML18211A303)
2. Letter from Gerard van Noordennen (*ZionSolutions*, LLC), to the U.S. NRC, "Supplemental Information Regarding Application for License Transfers and Conforming Administrative License Amendments," dated January 21, 2019 (ML19028A175)
3. Letter from Patrick Simpson (Exelon Generation Company, LLC) to the U.S. NRC, "Response to Request for Additional Information Related to the Application for License Transfers and Conforming Administrative Amendments," dated February 8, 2019 (ML19043A673)
4. "Zion License Transfer Letter, Enclosures, Order, and FRN," dated November 26, 2019 (ML19228A126)
5. Letter from John Sauger (*ZionSolutions*, LLC) to the U.S. NRC, "Request for Extension of Order Approving Transfer of the License for Zion Nuclear Power Station, Units 1 and 2, from *ZionSolutions*, LLC to Constellation Energy Company, LLC," dated October 19, 2022 (ML22294A162)
6. "Zion License Transfer Order Fourth Extension Approval", dated November 17, 2022 (ML22308A175)
7. Letter from Gerard van Noordennen (*ZionSolutions*, LLC), to the U.S. NRC, "Zion Nuclear Power Station Request for Partial Site Release," dated June 5, 2020 (ML20164A096)

8. Letter from Amy Hazelhoff (*ZionSolutions*, LLC), to the U.S. NRC, “Confirmatory Survey Extent of Condition Review for the Zion Nuclear Power Station, dated September 8, 2023 (ML23251A071)

By letter dated July 24, 2018 (Reference 1), as supplemented by letters dated January 21, 2019 (Reference 2) and February 8, 2019 (Reference 3), *ZionSolutions*, LLC (ZS) requested, on behalf of itself and Exelon Generation Company, LLC (EGC) [now Constellation Energy Generation, LLC (CEG)], that the U.S. Nuclear Regulatory Commission (NRC) consent to the transfer to CEG of Facility Operating License Nos. DPR-39 and DPR-48 for Zion Nuclear Power Station, Units 1 and 2 (ZNPS), respectively, and the generally licensed Independent Spent Fuel Storage Installation. Specifically, ZS intended to transfer its NRC-licensed possession, maintenance, and decommissioning authorities back to CEG, upon the completion of the decommissioning activities at the ZNPS.

By Order dated November 26, 2019 (Transfer Order), the NRC consented to the direct transfer of the ZNPS licenses and approved the draft conforming administrative license amendments (Reference 4). By its terms, the Transfer Order would become null and void if the transfer was not completed within one year (i.e., November 26, 2020); provided, however, that upon written application and for good cause shown, such date may be extended by order. Due to delays with license termination activities, the effectiveness of the Transfer Order has been extended numerous times, most recently following ZS’ request dated October 19, 2022 (Reference 5). In response to that request, the NRC extended the effectiveness of the Transfer Order by 12 months, to November 26, 2023 (Reference 6).

The purpose of this letter is to request that the effectiveness of the Transfer Order be extended an additional two months. An extension would be necessary if all conditions of the Transfer Order are not satisfied prior to November 26, 2023. For example, regulatory approval of ZS’ request for partial site release (Reference 7) is required to allow the transfer of ZS’ authorities to CEG.

ZS has promptly responded to all NRC requests that were associated with final license termination activities, such as the extent of condition evaluations that followed the NRC’s confirmatory surveys (Reference 8). The activities related to partial site release and license transfer remain a high priority for ZS. Nonetheless, the time remaining to complete the partial site release may exceed the time remaining until the expiration of the Transfer Order, which provides good cause for the extension.

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

This letter contains no regulatory commitments. If you should have any questions regarding this submittal, please email me at jtwheat@energysolutions.com.

U.S. Nuclear Regulatory Commission

ZS-2023-024

Page 3 of 3

Respectfully,

Justin T. Wheat

Director, Regulatory Affairs

cc: NRC Inspector and Health Physicist – Zion Nuclear Power Station, Units 1 and 2
NRC Senior Project Manager – Zion Nuclear Power Station, Units 1 and 2
NRC Chief, Reactor Decommissioning Branch
Manager, Nuclear Facility Inspection – Illinois Emergency Management Agency
Senior Health Physicist – Illinois Emergency Management Agency
Manager – Lake County Emergency Management Agency