

RS-23-115

October 31, 2023

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: Supplemental Information in Response to Order Consenting to License Transfers and Approval of Conforming License Amendments

- References:
1. Letter from Ken Robuck (EnergySolutions) and J. Bradley Fewell (Exelon Generation Company, LLC) to U.S. NRC, "Application for License Transfers and Conforming Administrative License Amendments," dated July 24, 2018
  2. Letter from John B. Hickman (U.S. NRC) to John Sauger (EnergySolutions, LLC), "Zion Nuclear Power Station, Units 1 and 2 – 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

By letter dated July 24, 2018 (Reference 1), ZionSolutions, LLC (ZS) and Exelon Generation Company, LLC (EGC) [now Constellation Energy Generation, LLC (CEG)] submitted an application, in accordance with Section 184 of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.80, "Transfer of licenses," requesting that the NRC consent to the direct transfer of Facility Operating License Nos. DPR-39 and DPR-48 for the Zion Nuclear Power Station, Units 1 and 2 (ZNPS), respectively, and the associated general license to the ZNPS Independent Spent Fuel Storage Installation.

On November 26, 2019, the NRC issued an Order consenting to the license transfers, subject to the condition described therein, along with approving supporting conforming license amendments (Reference 2). Section III of the Order requires that:

Prior to the consummation of the license transfer from ZS to EGC, EGC shall provide satisfactory documentary evidence to the Director of the Office of Nuclear Material Safety and Safeguards at the NRC that it has obtained or continues to possess the appropriate amount of insurance required of a licensee under 10 CFR Part 140 and

10 CFR 50.54(w), consistent with the exemptions issued to ZNPS on December 21, 1999.

The attachments to this letter provide information addressing this specific condition.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Kenneth M. Nicely at (779) 231-6119.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of October 2023.

Respectfully,

Kevin Lueshen  
Director, Licensing  
Constellation Energy Generation, LLC

Attachments:

1. Documentation Satisfying 10 CFR Part 140 Insurance Requirements
2. Documentation Satisfying 10 CFR 50.54(w) Insurance Requirements

cc: NRC Regional Administrator, Region III  
Director, Office of Nuclear Material Safety and Safeguards  
NRC Senior Resident Inspector – Zion Nuclear Power Station  
Illinois Emergency Management Agency – Division of Nuclear Safety

**ATTACHMENT 1**

**Documentation Satisfying 10 CFR Part 140 Insurance Requirements**



Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

October 13, 2023

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

**Re: Constellation Energy Generation, LLC  
NRC Operating License Transfer for Zion Station**

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for Constellation Energy Generation, LLC for the Zion Station.

As of the date of the license transfer, which is expected to occur prior to November 26, 2023, we will amend the policy and certificate for the Zion Station as follows:

- a. **Facility Form Policy No. NF -0201:** ANI will amend the named insured to "Constellation Energy Generation, LLC" in lieu of "Zion Solutions, LLC and Constellation Energy Generation, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC.
- b. **Master Worker Certificate No. NW -0584:** ANI will amend the named insureds to "Constellation Energy Generation, LLC" in lieu of "Zion Solutions, LLC and Constellation Energy Generation, LLC". The operator of the facility will also change to Constellation Energy Generation, LLC.

The commitment to write insurance for Constellation Energy Generation, LLC for the above captioned nuclear power station remains valid through December 31, 2023. In the event the license transfers occur after this date, ANI will review the existing circumstances prior to reinstating our commitment to provide insurance.

Please feel free to contact me with any questions or concerns.

Yours sincerely,

A handwritten signature in black ink, appearing to read "JM", is written over a light blue horizontal line.

Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

C: Constellation – Tomala, Bob; Sayette, Richard  
Marsh – Fowler, Kate; Evans, Dan

**ATTACHMENT 2**

**Documentation Satisfying 10 CFR 50.54(w) Insurance Requirements**



NEIL Services, Inc.  
1 Righter Parkway, Suite 210  
Wilmington, DE 19803  
USA

*office* + 302 888 3000

October 23, 2023

ATTN: Document Control  
Desk  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re.: Zion License - Constellation Energy Generation, LLC

To whom it may concern:

This letter confirms that Nuclear Electric Insurance Limited has a Primary Property and Decontamination Liability Policy (P23-012) currently in place effective 4/1/2023 to 4/1/2024 for the interest of Constellation Energy Generation, LLC in the Zion Nuclear Generating Station.

The limits on the above referenced policy will satisfy the NRC required minimum insurance limit of \$50 million for this site.

Sincerely,

A handwritten signature in black ink that reads "Scott Lauchlan".

Scott Lauchlan  
Director – Underwriting (Nuclear)

cc: Kate Fowler (Marsh USA)  
Steve Nusspickel (NEIL)  
Stephen Woods (NEIL)  
Ken Manne (NEIL)  
Peter Cavanaugh (NEIL)