

CCEC-25-003

10 CFR 50.82(a)(8)(i)(A)
10 CFR 50.75(h)(1)(iv)

July 31, 2025

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

Christopher M. Crane Clean Energy Center
Renewed Facility License No. DPR-50
NRC Docket No. 50-289

Subject: Request for Rescission of Exemptions for Use of the Nuclear Decommissioning Trust Fund (NDTF) for Spent Fuel Management and Site Restoration Activities

In Reference 1, Constellation Energy Generation (CEG) stated that CEG would request rescission of NRC-approved decommissioning-related exemptions as part of the Christopher M. Crane Clean Energy Center (CCEC) transition out of decommissioning. This letter provides CEG's request for NRC to rescind the exemptions regarding use of the Nuclear Decommissioning Trust Fund (NDTF) and reporting of NDTF withdrawals previously issued in References 2 and 3. CEG requests rescission of these exemptions on the date that CCEC transitions from a decommissioning licensing basis to an Operating Reactor Licensing Basis (ORLB), coincident with the exemption request from 10 CFR 50.82(a)(2) submitted in Reference 4, if approved by NRC.

By letters dated April 12, 2019 (Reference 5) and May 20, 2021 (Reference 6), Exelon Generation Company, LLC¹ (Exelon), submitted to NRC exemption requests from 10 CFR 50.82(a)(8)(i)(A) to allow use of a portion of the funds from the CCEC NDTF for the management of spent fuel and site restoration activities, respectively, based on the CCEC Decommissioning Cost Estimate (DCE). Exelon also requested exemptions from 10 CFR 50.75(h)(1)(iv) to allow NDTF disbursements for spent fuel management and site restoration activities to be made without prior notice to NRC, similar to withdrawals in accordance with 10 CFR 50.82(a)(8).

CEG continues to manage the CCEC NDTF in a manner that ensures CEG's ability to meet the requirements of 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning." CEG does not anticipate radiological decommissioning² or site restoration expenses based on the current plan to resume power operations at CCEC. As communicated in Reference 7, since there is no significant change to the current Post-Shutdown Decommissioning Activities Report (PSDAR) schedule or DCE at this time, there is no anticipated impact on CEG's ability to provide reasonable assurance that adequate funds will be available for decommissioning.

CEG will continue to report remaining costs against the value of the CCEC NDTF in accordance with 10 CFR 50.82(a)(8)(v) until NRC approval of Reference 4. The annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report as of December 31, 2024, was submitted to NRC in Reference 8. Commensurate with NRC approval of Reference 4, future decommissioning funding assurance would continue to be reported in accordance with 10 CFR 50.75(f).

There are no new or revised regulatory commitments contained in this submittal.

¹ At that time, CEG was named "Exelon Generation Company, LLC." See Reference 4, Page 2, Footnote 1.

² Consistent with the 10 CFR 50.2 definition of "decommission."

For questions regarding this submittal, please contact Hannah Pell, Regulatory Specialist, CCEC, at hannah.pell@constellation.com.

Respectfully,

Moore,
Dennis M

 Digitally signed by Moore, Dennis M
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Dennis M. Moore
Senior Manager, Licensing
Constellation Energy Generation, LLC

cc: NRC Regional Administrator – Region I
NRC Director, NRR – DORL
NRC Deputy Director, NRR – DORL
NRC Project Manager, NRR-DORL – Crane Clean Energy Center
Director, Bureau of Radiation Protection – Pennsylvania Dept of Environmental Protection
Chairman, Board of County Commissioners of Dauphin County
Chairman, Board of Supervisors of Londonderry Township

References:

1. Letter RS-24-121 from Constellation Energy Generation, LLC, to U.S. Nuclear Regulatory Commission, “Regulatory Path to Reauthorize Power Operations,” dated November 4, 2024 (ML24310A104)
2. Letter from U.S. Nuclear Regulatory Commission to Exelon Generation Company, LLC, “Three Mile Island Nuclear Station, Unit 1 – Exemptions from the Requirements of 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) (EPID L-2019-LLE-0009),” dated October 16, 2019 (ML19259A175)
3. Letter from U.S. Nuclear Regulatory Commission to Constellation Energy Generation, LLC, “Three Mile Island Station, Unit 1 – Request for Exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) for Constellation Energy Generation, LLC (EPID: L-2021-LLE-0030),” dated June 8, 2022 (ML22126A139)
4. Letter RS-24-124 from Constellation Energy Generation, LLC, to U.S. Nuclear Regulatory Commission, “Request for Exemption from Certain Termination of License Requirements of 10 CFR 50.82,” dated November 19, 2024 (ML24324A048)
5. Letter TM-19-039 from Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, “Request for Exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv),” dated April 12, 2019 (ML19102A085)
6. Letter TM-21-022 from Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, “Request for Exemption from 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv),” dated May 20, 2021 (ML21140A311)
7. Letter RS-25-031 from Constellation Energy Generation, LLC, to U.S. Nuclear Regulatory Commission, “Proposed PSDAR and IFMP Revisions in Support of Potential Reauthorization of

Power Operations for Three Mile Island, Unit 1,” dated March 31, 2025 (ML25090A037)

8. Letter RS-25-046 from Constellation Energy Generation, LLC, to U.S. Nuclear Regulatory Commission, “Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations; Attachment 28: Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Three Mile Island Nuclear Station, Unit 1,” dated March 26, 2025 (ML25085A363)