

RS-26-039

10 CFR 50.12  
10 CFR 50.82(a)(8)(i) and (ii)  
10 CFR 50.75(h)(1)(iv)

April 1, 2026

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

Subject: Request for Exemption from 10 CFR 50.82(a)(8) and 10 CFR 50.75(h)(1)

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-53 and DPR-69  
NRC Docket Nos. 50-317 and 50-318

Calvert Cliffs Nuclear Power Plant, Units 1 and 2  
Independent Spent Fuel Storage Installation  
Renewed Materials License No. SNM-2505  
NRC Docket No. 72-08

Clinton Power Station, Unit 1  
Renewed Facility Operating License No. NPF-62  
NRC Docket Nos. 50-461 and 72-1046

Limerick Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352, 50-353, and 72-65

Peach Bottom Atomic Power Station, Units 2 and 3  
Subsequent Renewed Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277, 50-278, and 72-29

Salem Generating Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-70 and DPR-75  
NRC Docket Nos. 50-272, 50-311, and 72-48

In accordance with 10 CFR 50.12, Constellation Energy Generation, LLC (CEG) is requesting the U.S. Nuclear Regulatory Commission (NRC) approval of an exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv) for Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs), Clinton Power Station, Unit 1 (Clinton), Limerick Generating Station, Units 1 and 2 (Limerick), Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom), and Salem Generating Station, Units 1 and 2 (Salem) to establish and fund subaccounts within the respective nuclear decommissioning trusts (NDTs) that would not be part of the funds necessary to provide funding assurance per 10 CFR 50.75. CEG also requests an exemption from 10 CFR 50.75(h)(1)(iv) to allow the periodic transfers to the subaccounts to be made without prior notification to the NRC. Exemption from 10 CFR 50.75(h)(1)(iv) is requested because CEG is not an "electric utility," as defined in 10 CFR 50.2. CEG is not an

"electric utility" since CEG does not recover the cost of electricity generated through rates established by itself or by a separate regulatory authority.

The requested exemptions would allow CEG to periodically transfer earnings from funds dedicated for activities consistent with the definition of "decommission" in 10 CFR 50.2 (radiological decommissioning) into separately maintained subaccounts still within the NDT. Funds accumulated in the subaccounts could be used to pay for activities that are part of the larger decommissioning process and not exclusively dedicated for radiological decommissioning, as strictly defined by the NRC. Transfers are limited to earnings from funds dedicated to radiological decommissioning in excess of that allowed to be credited by the NRC (2 percent) per 10 CFR 50.75. These newly established sub-accounts would not receive funds transferred from existing accounts dedicated to radiological decommissioning.

Funds in non-50.75 subaccounts would not be dedicated to radiological decommissioning and could be used to pay for "decommissioning costs" as defined in 26 CFR 1.468A-1(b)(6) in the Treasury Department regulations for Section 468A of the Internal Revenue Code. This definition includes costs for radiological and non-radiological activities and certain spent fuel management activities whether the plant is operating or has permanently ceased operations. Thus, the funds could be used to pay for activities that are part of the larger decommissioning process that include transferring and safely storing spent fuel at the Independent Spent Fuel Storage Installations (ISFSIs) and decontamination, removal, and disposal of retired radioactive components, which are under the regulatory authority of the NRC. Future Decommissioning Funding Assurance Reports required by 10 CFR 50.75(f)(1) will include the amount of funds transferred to the subaccounts since the last report.

The requested exemptions, if granted, would rely on earnings during operations. Therefore, the exemptions would only be needed during the operating lives of the reactors. The exemptions allowing movement of funds to the subaccounts would expire effective on an individual reactor basis at the time the certifications of permanent cessation of operations and permanent removal of fuel from the reactor vessel required under 10 CFR 50.82(a)(1)(i) and (ii) are docketed. During decommissioning, funds already held in the subaccounts would be available, but not exclusively dedicated, to radiological decommissioning.

If approved, these exemptions will facilitate activities that are part of the larger decommissioning process at Calvert Cliffs, Clinton, Limerick, Peach Bottom, and Salem during operations, spent fuel management and site restoration, reduce overall decommissioning costs, and reduce an unnecessary regulatory burden on CEG.

As described more fully in the attachments, the NDTs at Calvert Cliffs, Clinton, Limerick, Peach Bottom, and Salem were originally established through ratepayer collections for the defined purpose of decommissioning the sites. Because these trusts currently contain funds substantially in excess of those required for radiological decommissioning, the transfer would have no adverse impact on those future decommissioning activities.

CEG requests that the NRC grant the requested exemptions because:

- (1) These exemptions, "will not present an undue risk to the public health and safety, and [is] consistent with the common defense and security," in accordance with 10 CFR 50.12(a)(1), and
- (2) Special circumstances are present that satisfy 10 CFR 50.12(a)(2).

CEG demonstrates in the attachments that the request satisfies these provisions. Granting these exemptions is consistent with the NRC decommissioning regulations (see 10 CFR 50.82(a)(6)) as it would not:

- (1) eliminate the potential for unrestricted site release;
- (2) have a significant environmental impact not previously considered in environmental impact statements (EISs); or
- (3) decrease reasonable assurance that adequate funds will be available for decommissioning.

These exemptions would support efforts to ultimately achieve unrestricted release of Calvert Cliffs, Clinton, Limerick, Peach Bottom, and Salem, thus improving environmental conditions. In addition, prompt disposal when cost effective disposal alternatives are available eliminates future price uncertainty and potential risks associated with the future availability of disposal capacity.

Granting this request would facilitate the overall decommissioning process through radiological and non-radiological activities and certain spent fuel management activities. The funds could be used to pay for activities that are part of the larger decommissioning process that can include transferring and safely storing spent fuel at the ISFSIs and decontamination, removal, and disposal of radioactive components. The adequacy of the available funds for Calvert Cliffs, Clinton, Limerick, Peach Bottom, and Salem decommissioning is supported by the site-specific decommissioning cost estimate and the associated funding program.

The NRC has issued an interim staff guidance (ISG) that addresses using the exemption process to allow the use of the NDTs to dispose of Major Radioactive Components (MRCs). This exemption request under 10 CFR 50.12 to fund the subaccounts using earnings from NDT funds dedicated for radiological decommissioning is similar in nature to the MRC exemption request. Hence, CEG will follow the ISG to the best of its ability to support this exemption request.

CEG is submitting this exemption request to provide timely resolution of this issue and support planning activities. Accordingly, CEG requests approval of this request by July 31, 2026, to avoid the resource allocation and other expenses associated with activities that are part of the larger decommissioning process, which would be avoided if NDT subaccount funds can be used for activities not exclusively dedicated for radiological decommissioning.

This letter and attachment contain no new regulatory commitments.

Should you have any questions concerning this request, please contact Mr. Jeff Dunlap at (779) 231-5216.

Respectfully,

Steinman, Rebecca  
Lee

Digitally signed by Steinman,  
Rebecca Lee  
Date: 2026.04.01 15:51:06 -05'00'

Rebecca L. Steinman  
Sr. Manager – Licensing  
Constellation Energy Generation, LLC

Attachments:

1. Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)
2. Table 9 Decommissioning Cash Flow Analysis for Clinton, Unit 1 SAFSTOR Radiological
3. Table 10 Decommissioning Cash Flow Analysis for Clinton, Unit 1 SAFSTOR Total
4. Table 11 Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 SAFSTOR Radiological
5. Table 12 Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 SAFSTOR Radiological
6. Table 13 Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 SAFSTOR Total
7. Table 14 Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 SAFSTOR Total
8. Table 15 Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 SAFSTOR Radiological
9. Table 16 Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 SAFSTOR Radiological
10. Table 17 Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 SAFSTOR Total
11. Table 18 Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 SAFSTOR Total
12. Table 19 Decommissioning Cash Flow Analysis for Limerick, Unit 1 SAFSTOR Radiological
13. Table 20 Decommissioning Cash Flow Analysis for Limerick, Unit 2 SAFSTOR Radiological
14. Table 21 Decommissioning Cash Flow Analysis for Limerick, Unit 1 SAFSTOR Total
15. Table 22 Decommissioning Cash Flow Analysis for Limerick, Unit 2 SAFSTOR Total
16. Table 23 Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 SAFSTOR Radiological
17. Table 24 Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 SAFSTOR Radiological
18. Table 25 Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 SAFSTOR Total
19. Table 26 Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 SAFSTOR Total
20. Table 27 CEG Parent Guarantee Qualification

**Attachment 1**

Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

#### I. Exemption Request

In accordance with the provisions of 10 CFR 50.12, "Specific Exemptions," Constellation Energy Generation, LLC (CEG) requests that the U.S. Nuclear Regulatory Commission (NRC) grant an exemption from provisions of 10 CFR 50.82, "Termination of license" and 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning." Specifically, CEG requests an exemption from the requirements in 10 CFR 50.82(a)(8)(i) and (ii) in order to establish and fund subaccounts within the nuclear decommissioning trust funds (NDTs) to pay for activities that are part of the larger decommissioning process and not exclusively dedicated to radiological decommissioning. CEG also requests an exemption from 10 CFR 50.75(h)(1)(iv) to allow the periodic transfers to the subaccounts to be made without prior notification to the NRC. This request follows the Interim Staff Guidance (ISG) issued by NRC staff that defines the information that would assist the NRC in evaluating a similar exemption request.<sup>1</sup>

The purpose of this exemption request is to establish and fund subaccounts with earnings in excess of that allowed to be credited by the NRC (2 percent) within the Clinton Power Station, Unit 1 (Clinton), Calvert Cliffs Nuclear Power Plant, Units 1 and 2 (Calvert Cliffs), Salem Generating Station, Units 1 and 2 (Salem), Limerick Generating Station, Units 1 and 2 (Limerick), and Peach Bottom Atomic Power Station, Units 2 and 3 (Peach Bottom) NDTs. The subaccounts will be used for activities that are part of the larger decommissioning process which will result in several benefits, as follows:

- 1) the inventory of radioactive waste and associated source term at each site will be reduced;
- 2) the costs associated with maintaining any retired major components and irradiated hardware on site and providing protection to workers from these can be avoided;
- 3) the overall cost to decommission the site will be reduced;
- 4) any uncertainty regarding future disposal cost and capacity is eliminated; and
- 5) assurance adequate funds will be available to decommission the reactor at the time the reactor ceases operation will be maintained.

Finally, the adequacy of the availability of funds for Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom decommissioning is supported by the site-specific decommissioning cost estimate (DCE) and the associated funding program.

Authorization of the use of NDT funds for activities that are part of the larger decommissioning process is in the public interest because it would immediately reduce on-site waste inventories, eliminate risks associated with future disposal, and reduce the eventual cost and complexity of decommissioning Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom. Consequently, authorization to fund subaccounts within the NDT would further the purpose of 10 CFR 50.82(a)(8), which is to provide reasonable assurance that the decommissioning trust funds will be adequate to accomplish their intended purpose.

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<sup>1</sup> "Interim Staff Guidance on the Use of the Decommissioning Trust Fund During Operations for Major Radioactive Component Disposal," August 5, 2024.

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Funds that will be deposited into the newly established subaccounts will not be taken from the existing funds dedicated to radiological decommissioning. Those funds will remain untouched and continue to meet NRC minimum funding and other decommissioning obligations. Rather, the subaccounts will be funded exclusively from investment earnings above and beyond the 2 percent assumed real rate of return allowed by the NRC at 10 CFR 50.75(e).

#### II. Requirements

The NRC regulations in 10 CFR 50.82(a)(8)(i) provide that decommissioning trust funds may be used by CEG if:

- (A) The withdrawals are for expenses for legitimate decommissioning activities consistent with the definition of decommissioning in 10 CFR 50.2;
- (B) The expenditure would not reduce the value of the NDT below an amount necessary to place and maintain the reactor in a safe storage condition if unforeseen conditions or expenses arise;
- (C) The expenditure would not inhibit the ability of CEG to complete funding of any shortfalls in the NDT needed to ensure the availability of funds to ultimately release the site and terminate the license.

10 CFR 50.82(a)(8)(i)(A) refers to the definition of "decommissioning" in 10 CFR 50.2, which defines the term "decommission" rather than "decommissioning." By that definition, the term "decommission" means:

to **remove a facility or site safely from service** (emphasis added) and reduce residual radioactivity to a level that permits—

- (1) release of the property for unrestricted use and termination of the license; or
- (2) release of the property under restricted conditions and termination of the license.

The NRC has further conditioned the withdrawal of decommissioning trust funds by limiting the withdrawal rate from the trust. 10 CFR 50.82(a)(8)(ii) provides:

Initially, 3 percent of the generic amount specified in 10 CFR 50.75 may be used for decommissioning planning. For licensees that have submitted the certifications required under 10 CFR 50.82(a)(1) and commencing 90 days after the NRC has received the post-shutdown decommissioning activities report (PSDAR), an additional 20 percent may be used. A site-specific decommissioning cost estimate must be submitted to the NRC prior to the licensee using any funding in excess of these amounts.

10 CFR 50.75(h)(1)(iv) further requires that, except for withdrawals being made under 10 CFR 50.82(a)(8) or for payments of ordinary administrative costs and other incidental expenses of the fund in connection with the operation of the fund, no disbursement or payment may be made from the NDT without written notice to the NRC at least 30 working days before the date of the intended disbursement or payment. Pursuant to 10 CFR 50.12, CEG requests an

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exemption from 10 CFR 50.75(h)(1)(iv) to allow periodic transfers to be made in accordance with the exemption request without prior NRC notification in the same manner as withdrawals made under 10 CFR 50.82(a)(8). Exemption from 10 CFR 50.75(h)(1)(iv) is requested because CEG is not an "electric utility," as defined in 10 CFR 50.2. CEG is not an "electric utility" since CEG does not recover the cost of electricity generated through rates established by itself or by a separate regulatory authority.

In the absence of an exemption by the NRC, these provisions would restrict the ability of CEG to use the NDT for activities that are part of the larger decommissioning process prior to permanent cessation of operations at Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom, even though activities that are part of the larger decommissioning process would reduce the level of radioactivity at these sites and would not adversely impact the ability to fund future decommissioning.

A request for an exemption from these requirements must satisfy the requirements of 10 CFR 50.12. As demonstrated below, this exemption request satisfies the provisions of 10 CFR 50.12. In addition to providing the information requested by the NRC in the ISG, CEG addresses the concerns expressed by the staff in its 2020 proposal to deny the EnergySolutions' petition for rulemaking to allow for the use of decommissioning trust funds for the disposal of major radioactive components.<sup>2</sup> Specifically, in recommending denial, the staff stated:

the staff envisions certain circumstances, which could be stated in an exemption request (a large projected excess in decommissioning trust funds compared to a site-specific cost estimate ...) that may lead to the approval of the particular request, based on the totality of the facts.

While the staff's statement was specific to proposed exemptions for disposal of major radioactive component, the condition that there be "a large projected excess in decommissioning trust funds compared to a site-specific cost estimate" would seem to also apply to CEG's proposal for the funding of subaccounts. In the instance of this exemption request, CEG can affirm that there will be a large projected excess in each of the NDTs after establishing and funding subaccounts with earnings in excess of that credited by the NRC (2 percent) within Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom's respective NDTs.

### III. Background

In the context of NRC's decommissioning funding requirements, CEG understands that it is NRC's position that depositing excess earnings from an NDT into a subaccount not dedicated to radiological decommissioning is a withdrawal not authorized under the rule. Therefore, NRC would not permit such withdrawals absent an exemption. Specifically, in 2023 PSEG provided notice to the NRC by letter that it intended to make changes to the PSEG Master

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<sup>2</sup> SECY-20-0095, "Denial of Petition for Rulemaking to Access the Decommissioning Trust Fund for the Disposal of Large Components," U.S. Nuclear Regulatory Commission, p. 2, October 19, 2020. The Commission approved the staff's recommendation in Staff Requirements Memorandum (SRM) SECY-20-0095 (Dec. 23, 2021).

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Decommissioning Trust Agreement to create subaccounts into which excess decommissioning trust funds would be deposited.<sup>3</sup> In its response to PSEG's notice, NRC stated that:

the earnings from funds originally dedicated for radiological decommissioning in a decommissioning trust fund, whether established under the prepayment method or otherwise, are restricted by the NRC's regulations at 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) to being withdrawn only for radiological decommissioning expenses, even when such earnings are claimed to be in excess of what is required for radiological decommissioning and are directed to subaccounts purporting to allow for other types of withdrawals.

NRC concluded by stating that "PSEG would need to request and have approved an exemption, under 10 CFR 50.12, from the NRC's regulations at 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) in addition to amending the Trust Agreement."<sup>4</sup>

Accordingly, CEG is submitting this exemption consistent with the NRC's statements.

In the Statements of Consideration for the 1996 amendments to its decommissioning regulations, the NRC received a comment requesting that "The NRC should develop a ... policy for operating plants and should allow licensees to withdraw decommissioning trust funds to dispose of structures and equipment no longer being used for operating plants." In response, the NRC stated as follows:

The NRC has concluded that allowing decommissioning trust funds withdrawals for disposals by nuclear power plants that continue to operate is not warranted. These activities are more appropriately considered operating activities and should be financed that way<sup>5</sup>

This position is reflected in the NRC's regulations quoted above. Consequently, licensees have been precluded from using decommissioning trust funds for activities that are part of the larger decommissioning process.

The accumulating amounts of spent nuclear fuel and the ongoing lack of a federal repository for that fuel have resulted in the need for plant owners to store spent fuel in Independent Spent Fuel Storage Installations (ISFSIs) that was not anticipated when previous Treasury Department regulations were issued. Allowing funds to be used for activities that are part of the larger decommissioning process at any time during operations or decommissioning, such as transferring and safely storing spent fuel at the ISFSIs and decontamination, removal, and disposal of radioactive components, would more accurately reflect the current environment in which a permanent federal repository for spent fuel does not exist and CEG is required to provide long-term storage for spent fuel in the ISFSIs.

If the exemption is granted, funds deposited into the subaccounts from excess earnings could be allocated to pay for activities that are part of the larger decommissioning process and not restricted to radiological decommissioning. The subaccounts could be used to pay for

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<sup>3</sup> Letter from PSEG to NRC, "Notice of Proposed Amendment to Decommissioning Trust Agreement" (Nov. 29, 2023) (ML23252A001).

<sup>4</sup> NRC Letter to PSEG Nuclear LLC (Nov. 29, 2023) (ML23270C007).

<sup>5</sup> Final Rule, Decommissioning of Nuclear Power Reactors, 61 FR 39278, 39293; July 29, 1996.

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“decommissioning costs” as defined by the Treasury Department regulations implementing Section 468A of the Internal Revenue Code. Specifically, 26 CFR 1.468A-1, “Nuclear decommissioning costs; general rules,” paragraph (b)(6) defines “decommissioning costs” to include costs for radiological and non-radiological activities and certain spent fuel management activities whether the plant is operating or has permanently ceased operations. The practice of commingling funds in the NDT is generally permitted under NRC guidance as long as the licensee is able to identify and account for the funds dedicated to radiological decommissioning separately from funds set aside for other purposes. Only earnings above 2 percent from NDT funds would be used as a source of funds for the subaccounts.

#### IV. Basis

The NRC definition of “decommission” states that the entire reactor facility must be removed from service before related activities fall within NRC-sanctioned decommissioning (10 CFR 50.2). Further, when the NRC promulgated the decommissioning rule in 1988, it noted in the Statements of Consideration to the final rule that “[d]ecommissioning activities are initiated when a licensee decides to terminate licensed activities.”<sup>6</sup> If this exemption were granted, CEG will perform activities that are part of the larger decommissioning process at any time during operations or decommissioning rather than waiting until the entire site is decommissioned. This is proposed to be accomplished using funds from the NDTs that were placed there for the purpose of removing such components. Absent this exemption, retired major components and irradiated hardware, would remain on site at each respective location until all units cease operation.

The regulatory history of the NRC’s decommissioning regulations clearly contemplates the scenario proposed by CEG in this exemption request. The NRC’s regulations and guidance have emphasized compliance with the minimum funding requirements of 10 CFR 50.75(c) by taking credit for future earnings from investments of NDT assets. However, to the extent that a licensee does not need to take credit for future earnings in order to meet the minimum compliance requirements, there is a sound regulatory basis for diverting future NDT earnings into an “Excess Earnings Subaccount” within a qualified fund.

The most significant regulatory basis for doing this is the rulemaking history relating to NRC’s 1988 rule. In the proposed rule, the NRC staff proposed including language that required “accumulated earnings” to be included in either the “prepayment” or “external sinking fund” method. For the “prepayment” method in the proposed 10 CFR 50.33(k)(2)(i), the proposed rule provided that the prepayment method involved a segregated account “in an amount such that the principal plus accumulated earnings would be sufficient to pay decommissioning costs.”<sup>7</sup> For the “external sinking fund” method in the proposed 10 CFR 50.33(k)(2)(ii), the proposed rule provided establishment of a fund “in which the total amount of the periodic deposits plus accumulated earnings would be sufficient to pay decommissioning costs at the time termination of operations is expected.” The words “plus accumulated earnings” were

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<sup>6</sup> Final Rule, Decommissioning Criteria for Nuclear Facilities, 53 FR 24,018, 24,019; June 27, 1988.

<sup>7</sup> Proposed Rule, “Decommissioning Criteria for Nuclear Facilities,” 50 FR 5600, 5618 (Feb. 11, 1985) (emphasis added).

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deleted in the language ultimately adopted by the 1988 Final Rule in 10 CFR 50.75(e)(1)(i) and 50.75(e)(1)(ii).

In connection with the 1988 rulemaking, the NRC staff published its disposition of various comments to the proposed rule in NUREG-1221.<sup>8</sup> Comment “D 3.3.4 Prepayment” was reported as follows:

#### Comment Summary

One commenter stated that if a licensee uses the prepayment method the accumulated earnings in the decommissioning fund will reach a level larger than required to reflect the annual adjustment for inflation because the proposed rule does not recognize that the accumulated earnings will consist of an inflation adjustment component, a pure interest rate component, and a premium-associated-with-risk component. *The commenter recommended that the proposed rule be modified to permit a licensee to withdraw the pure interest rate component and the premium-associated-with-risk component periodically from the prepayment fund.* (133). (emphasis added)

#### Comment Analysis and Response

The amendments indicate that in prepayment, at the time of decommissioning, the funds are in such amount that the principal plus accumulated earnings would be sufficient to pay decommissioning costs. *There is nothing in these requirements which is intended to prevent a licensee from making sure that the fund does not reach a level higher than required.* Measures which licensees may take to prevent that occurrence are outside the scope of this rule. The rule has been modified to clarify this. (emphasis added)

Thus, the NRC staff specifically acknowledged that there could be “excess” earnings from assets in an NDT that would not necessarily have to be dedicated to 10 CFR 50.75 purposes. If a unit’s existing NDT balance meets or exceeds the minimum funding requirement, there is no need to take credit for any earnings. Therefore, all earnings beyond the 2 percent assumed rate of return for the next year could be considered “excess.”

#### **A. Clinton, Calvert Cliffs, Salem, Limerick, And Peach Bottom Decommissioning Trust Funds**

##### **1. There Are Large Projected Surpluses In The Decommissioning Trust Funds**

The license renewal to 60 years for Clinton, Calvert Cliffs, Salem, and Limerick and the license renewal to 80 years for Peach Bottom resulted in a robust funding level for these sites.

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<sup>8</sup> NUREG-1221, “Summary, Analysis and Response to Public Comments on Proposed Amendments to 10 CFR Part 30,” (ML18073A149).

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**Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)**

**Table 1  
Summary Of Annual SAFSTOR Decommissioning Cash Flow Analyses  
(2025 dollars)**

	Clinton Unit 1	Calvert Cliffs Unit 1	Calvert Cliffs Unit 2	Salem Unit 1 (42.59 percent ownership)	Salem Unit 2 (42.59 percent ownership)	Limerick Unit 1	Limerick Unit 2	Peach Bottom Unit 2 (50 percent ownership)	Peach Bottom Unit 3 (50 percent ownership)
12/31/2024 fund value (\$M)	\$748	\$561	\$728	\$362	\$300	\$644	\$688	\$391	\$424
Permanent cessation of operations	April 17, 2047	July 31, 2034	August 13, 2036	August 13, 2036	April 18, 2040	October 26, 2044	June 22, 2049	August 8, 2053	July 2, 2054
Projected funds at start of analysis using a 2% annual RROR (\$M)	\$1,112	\$645	\$871	\$432	\$404	\$902	\$1,064	\$655	\$724
Radiological decommissioning cost (SSDCE) (\$M)	\$1,366	\$906	\$919	\$389	\$372	\$1,128	\$1,059	\$449	\$456
Decommissioning period earnings using a 2% annual RROR (\$M)	\$1,635	\$873	\$1,430	\$844	\$659	\$1,400	\$1,761	\$1,394	\$1,538
Projected surplus of funds at completion of decommissioning (\$M)	\$1,381	\$612	\$1,382	\$887	\$691	\$1,174	\$1,766	\$1,600	\$1,806

**2. Time Period Before Commencement Of Major Radiological Decommissioning Activities**

**Table 2  
Years Remaining Before Shutdown**

	Clinton Unit 1	Calvert Cliffs Unit 1	Calvert Cliffs Unit 2	Salem Unit 1 (42.59 percent ownership)	Salem Unit 2 (42.59 percent ownership)	Limerick Unit 1	Limerick Unit 2	Peach Bottom Unit 2 (50 percent ownership)	Peach Bottom Unit 3 (50 percent ownership)
Permanent cessation of operations	April 17, 2047	July 31, 2034	August 13, 2036	August 13, 2036	April 18, 2040	October 26, 2044	June 22, 2049	August 8, 2053	July 2, 2054
Years remaining to accumulate earnings before shutdown	21	8	10	10	14	18	23	27	28

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As described above, the time period prior to commencement of decommissioning activities is sufficient to provide for the accumulation of funds to support license termination.

#### 3. Status And Structure Of The Decommissioning Trust Fund

CEG has not collected from ratepayers for Clinton and Calvert Cliffs since purchase. Additionally, no ratepayer collections are currently being made for Salem, Limerick, or Peach Bottom although CEG has the ability to do so if needed.

#### 4. Decommissioning Funding Assurance History

As noted previously, the additional time for funds to grow has resulted in a robust funding level for Clinton Unit 1, Calvert Cliffs Units 1 and 2, Salem Units 1 and 2, Limerick Units 1 and 2, and Peach Bottom Units 2 and 3. Calvert, Salem, Limerick, and Peach Bottom show in all cases that the respective projected fund value exceeds the minimum formula amount. With license renewal approval, Clinton's projected fund value on shutdown greatly exceeds the minimum formula amount as shown in Table 3 for 12/31/2024. Subaccount funding is limited to earnings from funds dedicated for radiological decommissioning in excess of that allowed to be credited by the NRC (2 percent), thus maintaining a 2 percent margin.

**Table 3**  
**Summary Of Clinton and Calvert Cliffs Funding Assurance History**  
 (2025 dollars)

Date	Clinton Unit 1			Calvert Cliffs Unit 1			Calvert Cliffs Unit 2		
	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)
12/31/2024	\$748	\$1,162	\$697	\$561	\$677	\$519	\$728	\$916	\$519
12/31/2022	\$634	\$690	\$706	\$479	\$602	\$538	\$620	\$811	\$538
12/31/2020	\$651	\$737	\$675	\$492	\$643	\$486	\$637	\$867	\$486
12/31/2018	\$543	\$632	\$682	\$386	\$524	\$480	\$498	\$706	\$480
12/31/2016	\$513	\$622	\$652	\$359	\$507	\$457	\$460	\$677	\$457

**Attachment 1**

**Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)**

**Table 4  
Summary Of Salem Funding Assurance History  
(2025 dollars)**

Date	Salem Unit 1 (42.59 percent ownership)			Salem Unit 2 (42.59 percent ownership)		
	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)
12/31/2024	\$362	\$455	\$249	\$300	\$406	\$249
12/31/2022	\$312	\$409	\$257	\$259	\$365	\$257
12/31/2020	\$316	\$430	\$218	\$262	\$384	\$218
12/31/2018	\$253	\$358	\$214	\$210	\$320	\$214
12/31/2016	\$235	\$346	\$200	\$195	\$310	\$200

**Table 5  
Summary Of Limerick Funding Assurance History  
(2025 dollars)**

Date	Limerick Unit 1			Limerick Unit 2		
	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)
12/31/2024	\$644	\$953	\$717	\$688	\$1,117	\$717
12/31/2022	\$555	\$855	\$725	\$592	\$999	\$725
12/31/2020	\$563	\$901	\$694	\$601	\$1,055	\$694
12/31/2018	\$448	\$745	\$699	\$477	\$871	\$699
12/31/2016	\$409	\$722	\$667	\$430	\$842	\$667

**Table 6  
Summary Of Peach Bottom Funding Assurance History  
(2025 dollars)**

Date	Peach Bottom Unit 2 (50 percent ownership)			Peach Bottom Unit 3 (50 percent ownership)		
	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)	Fund Value (\$M)	Projected Fund Value on Shutdown (\$M)	Minimum Formula Amount (\$M)
12/31/2024	\$391	\$689	\$359	\$424	\$761	\$359
12/31/2022	\$338	\$417	\$362	\$366	\$460	\$362
12/31/2020	\$340	\$650	\$347	\$369	\$717	\$347
12/31/2018	\$273	\$365	\$350	\$296	\$403	\$350
12/31/2016	\$254	\$352	\$333	\$275	\$389	\$333

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

#### 5. Funding Mechanisms To Cover Future Shortfalls In The Decommissioning Trust Fund (For A Merchant Plant Owner)

NRC regulations in 10 CFR 50.75(e) specify funding mechanisms that are acceptable for demonstrating financial assurance. Due to the current funding level of the Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom NDTs and continuing to credit fund growth anticipated under this exemption request, it is unlikely that any additional financial assurance would be required. In the unlikely event of a shortfall for Clinton, Calvert Cliffs, Salem, Limerick, or Peach Bottom, CEG would use one of the authorized methods to make up any shortfall that may occur, including but not limited to a parent company guarantee. CEG meets the financial test in 10 CFR 30 Appendix A for providing a parent company guarantee (see Attachment 20) and could also provide additional assurances using a letter of credit or surety bond if required.

#### 6. Current Financial Health Of CEG

Pursuant to longstanding NRC financial qualification guidance under NUREG-1577, Revision 1, if an applicant "has an 'investment grade' rating or equivalent from at least two of these sources [Moody's Standard and Poors, and Value Line],...the reviewer will find such applicant financially qualified". CEG maintains an investment grade credit rating with the S&P of BBB+ and Moody's of Baa1. It would require a three-notch downgrade from their current levels to BB+ and Ba1 to drop below an investment grade credit rating.

Historical financial information regarding CEG and its parent company is provided in its February 24, 2026 Form 10-K Annual Report filed with the Securities and Exchange Commission and available on the Internet at:

[Form 10-K for Constellation Energy Corp filed 02/24/2026](#)

See pages 87-94.

#### B. The Site-Specific Decommissioning Cost Estimate

##### 1. The Site-Specific Decommissioning Cost Estimate Is Comprehensive

The NRC requires in 10 CFR 50.75(f)(2) that each licensee prepare and submit a DCE at least five years prior to the projected end of operations. CEG already has in place a detailed, site-specific DCE. The most recent DCE is comprehensive; the total estimated costs include license termination, spent fuel management, and site restoration in 2025 dollars based on the SAFSTOR scenario. License termination cost is in 2025 dollars and includes just plant and Independent Spent Fuel Storage Installation (ISFSI) license termination.

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

**Table 7**  
**Summary of Site-Specific Decommissioning Cost Estimate**  
(2025 dollars)

	Total Estimated Cost (\$M)	License Termination Cost (\$M)
Clinton Unit 1	\$1,723	\$1,366
Calvert Cliffs Unit 1	\$1,124	\$906
Calvert Cliffs Unit 2	\$1,168	\$919
Salem Unit 1 (42.59 percent ownership)	\$562	\$389
Salem Unit 2 (42.59 percent ownership)	\$551	\$372
Limerick Unit 1	\$1,469	\$1,128
Limerick Unit 2	\$1,418	\$1,059
Peach Bottom Unit 2 (50 percent ownership)	\$618	\$449
Peach Bottom Unit 3 (50 percent ownership)	\$640	\$456

The site-specific estimate considers the lessons learned and industry experience gained from the decommissioning of several nuclear power plants in recent years. These plants include the completed projects at Maine Yankee, Connecticut Yankee, Yankee Rowe, Trojan, and Big Rock Point. Although some of those projects exceeded projected costs, the experience has led to improvements in the ability to prepare DCEs that address all costs. For example, the Zion Nuclear Power Station, where all physical decommissioning work has been completed, will be decommissioned for significantly less than the DCE that was prepared and submitted to the NRC. In addition, decommissioning projects that are underway at Vermont Yankee, Oyster Creek, and Pilgrim also are projected to be completed for less than estimated.

In particular, contemporary DCEs, including the one for Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom, account for the significant lessons learned in the segmentation and disposal of reactor pressure vessels. The uncertainty with these projects has historically been very high, both in terms of the cost to complete the work and the estimate of the volume and class of low-level radioactive waste (LLW) generated. Significant progress has been made in the ability to reduce the generation of Greater than Class C Waste (GTCC), which must be stored onsite in the ISFSI.

In addition, the DCEs include detailed staffing models based on recent experience and include activity-based contingency based on the complexity and uncertainty of each activity. The DCEs are consistent with industry standards as described in AIF/NESP036, "Guidelines for Producing Commercial Nuclear Power Plant Decommissioning Cost Estimates," and NRC Regulatory Guide 1.202, "Standard Format and Content of Decommissioning Cost Estimates for Nuclear Power Reactors," February 2005.

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

#### 2. The Site-Specific Decommissioning Cost Estimate Is Reliable

The DCE contains a thorough and comprehensive analysis of the anticipated costs of decommissioning. Previous decommissioning projects provide ample evidence that it is reasonable to rely on the DCE. Data for the three large PWRs that have been fully demolished (i.e., Connecticut Yankee, Maine Yankee, and Trojan) show that final decommissioning costs were less than projected in the DCE for two (Maine Yankee and Trojan) and 24 percent higher for Connecticut Yankee. These data indicate that the DCEs are reliable planning tools. Furthermore, the difference in the case of Connecticut Yankee is now well understood. Additional completed reactor decommissioning projects have continued to prove the reasonableness of DCEs.

One key reason that Connecticut Yankee stands out as an exception is that it entered the decommissioning process following an unplanned shutdown. The lack of planning was a key factor in the challenges that the project faced. Decommissioning planning is another area that has proven to show significant benefits in recent years. The Decommissioning Planning costs are also included in the most recent DCE. These lessons are useful even in the event of an unplanned shutdown and have been applied at the current generation of nuclear power plants undergoing decommissioning.

#### C. Withdrawal Of Funds Now From The NDT Will Not Jeopardize CEG's Ability To Fully Decommission Clinton, Calvert Cliffs, Salem, Limerick, And Peach Bottom

##### 1. There Will Be Sufficient Funds Available To Decommission Clinton, Calvert Cliffs, Salem, Limerick, And Peach Bottom

The NDT provides adequate assurance that funds will be available throughout the decommissioning period. As noted above, CEG's NDT balance reported for the end of calendar year 2024 was approximately \$748 million for Clinton Unit 1, approximately \$561 and \$728 million for Calvert Cliffs Units 1 and 2, approximately \$362 and \$300 million for Salem Units 1 and 2 (at 42.59 percent ownership), approximately \$644 and \$688 million for Limerick Units 1 and 2, and approximately \$391 and \$424 million for Peach Bottom Units 2 and 3 (at 50 percent ownership), respectively. These balances will continue to grow because only earnings above 2 percent on the NDT funds would be used as a source of funds for the subaccounts. The first 2 percent of earnings will remain in the NDTs.

**Attachment 1**

**Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)**

**Table 8**  
**Summary Of Most Recent Funding Assurance**  
 (2025 dollars)

	Fund Value as of 12/31/2024 (\$M)	Projected Fund Value on Shutdown w/ 2% annual RROR (\$M)	Minimum Formula Amount at Ownership as of 12/31/2024 (\$M)
Clinton Unit 1	\$748	\$1,112	\$697
Calvert Cliffs Unit 1	\$561	\$645	\$519
Calvert Cliffs Unit 2	\$728	\$871	\$519
Salem Unit 1 (42.59 percent ownership)	\$362	\$432	\$249
Salem Unit 2 (42.59 percent ownership)	\$300	\$404	\$249
Limerick Unit 1	\$644	\$902	\$717
Limerick Unit 2	\$688	\$1,064	\$717
Peach Bottom Unit 2 (50 percent ownership)	\$391	\$655	\$359
Peach Bottom Unit 3 (50 percent ownership)	\$424	\$724	\$359

**2. The Withdrawal Will Not Reduce The Value Of The Decommissioning Trust Below An Amount Necessary To Place And Maintain The Reactor In A Safe Storage Condition If Unforeseen Conditions Or Expenses Arise (10 CFR 50.82(a)(8)(i)(B))**

The use of NDT for the requested purpose will not reduce its value below an amount necessary to place and maintain the reactor in a safe storage condition. The NDT balances will continue to exceed the NRC minimum requirements for financial assurance for decommissioning and be considered fully funded for purposes of compliance with NRC’s rules. Even with the requested action, CEG not only has sufficient funds to place and maintain the reactor in a safe storage condition, but also expects to have more than sufficient funds to complete the NRC-required radiological decommissioning based on the site-specific DCE as shown in Attachments 2 through 20. Subaccount funding is limited to earnings from funds dedicated for radiological decommissioning in excess of that allowed to be credited by the NRC (2 percent).

**3. The Withdrawal Will Not Inhibit The Ability Of CEG To Complete Funding Of Any Shortfalls In The Decommissioning Trust Needed To Ensure The Availability Of Funds To Ultimately Release The Site And Terminate The License (10 CFR 50.82(a)(8)(i)(C))**

The expenditure of NDT funds would not inhibit the ability of CEG to complete funding of any shortfalls in the NDTs needed to ensure the availability of funds to ultimately release the site and terminate the license. CEG proposes funding subaccounts only with trust earnings in excess of 2 percent, the remaining funds in the trusts exceed the NRC’s minimum funding requirements in accordance with 10 CFR 50.75.

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

#### V. Justification Of Exemption And Special Circumstances

10 CFR 50.12, "Specific Exemptions," states that the NRC may grant exemptions from the requirements of the regulations in 10 CFR Part 50 if three conditions are met. The three conditions are: 1) the exemption is authorized by law, 2) the exemption will not present an undue risk to the public health and safety, and 3) the exemption is consistent with the common defense and security. In addition, section 50.12 provides that the NRC will not consider granting an exemption unless special circumstances are present.

##### A. The Requested Exemptions Are Authorized By Law

The requested exemptions are authorized by law in accordance with 10 CFR 50.12(a)(1). No law exists that precludes the activities covered by this exemption request. The provisions of 10 CFR 50.82 and 10 CFR 50.75 as well as the definition of "decommission" at 10 CFR 50.2 were adopted at the discretion of the NRC consistent with its statutory authority. No statute required the NRC to adopt the specific regulations from which CEG now seeks an exemption. Rather, it is entirely within the NRC's discretion to determine that alternative means are adequate to provide reasonable assurance of adequate protection of safety.

##### B. The Requested Exemptions Do Not Present An Undue Risk To The Public Health And Safety

The requested exemptions will not present an undue risk to the public health and safety. To the contrary, granting these exemptions will result in increasing the protection to the public health and safety as a significant source term will be removed from the site and properly disposed of decades in advance of the time of these activities that are part of the larger decommissioning process if CEG waited until the reactors cease operation. This will reduce the potential for exposures from this source.

##### C. The Requested Exemptions Will Not Endanger The Common Defense And Security

The requested exemptions are consistent with the common defense and security because it removes a source term from the site sooner than would otherwise be the case without the exemption. Additionally, periodic transfers under the requested exemptions have no relation to security issues.

##### D. Special Circumstances

NRC regulations require that special circumstances be present in order to grant an exemption. This exemption is justified based on three of the six special circumstances cited in the regulations. The following special circumstances from 10 CFR 50.12(a)(2) are present that warrant the granting of this exemption request:

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

#### 1. The Regulation In The Particular Circumstances Conflicts With Other Rules Or Requirements Of The Commission (10 CFR 50.12(a)(2)(i))

In this particular circumstance, application of the regulations in 10 CFR 50.82(a) and 10 CFR 50.75(h) is in conflict with the philosophy underlying the approach the Commission has taken for expeditiously removing contamination. It is inconsistent with the timeliness requirements set up for materials licensees as it may provide an unnecessary economic barrier for the removal of source terms from reactor sites. Material licensees of the NRC are subject to the 1994 Decommissioning Timeliness Rule, 10 CFR 30.36, 40.42, 70.38, and 72.54, which requires licensees to decontaminate and decommission certain unused portions of operating nuclear materials facilities.

Allowing contaminated land, buildings, or equipment to remain on site was seen as a possible public and environmental liability and the Commission looked for ways to achieve early decommissioning of unused portions of materials facilities, absent any other operational or safety concerns that would increase the risk to the site. For valid and sound reasons, reactor licensees are not subject to this rule and, in fact, are allowed the SAFSTOR option under 10 CFR 50.82. Nevertheless, in this case, absent the requested exemption, the requirement creates an economic barrier for the Licensee, who seeks to make a prudent decision to remove a source term from the site.

In addition, granting an exemption to the regulations in 10 CFR 50.82(a) and 10 CFR 50.75(h) would be consistent with the philosophy underlying the approach the Commission took for the license termination rule.<sup>9</sup> In 1997, for instance, NRC originally added 10 CFR 20.1406(a) which requires that “Applicants for licenses, other than renewals, after August 20, 1997, shall describe in the application how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize to the extent practicable, the generation of radioactive waste.”

More recently, in 2011, NRC further amended the license termination regulations to explicitly include an obligation to licensees during operations.<sup>10</sup> Section 10 CFR 20.1406(c) requires that: “Licensees shall, to the extent practical, conduct operations to minimize the introduction of residual radioactivity into the site, including the subsurface, in accordance with the existing radiation protection requirements in subpart B and radiological criteria for license termination in [subpart E of this part](#).”

The NRC added this provision related to operations because, in its view, “[t]he ALARA requirements in existing regulations do not explicitly address subsurface contamination and do not provide adequate assurance that additional legacy sites will be prevented. Before this final rule, the NRC regulations did not explicitly specify licensees' obligations to survey subsurface contamination, nor did the regulations explicitly specify the requirement of licensees to conduct operations to minimize residual radioactivity at the site, including the subsurface.” Therefore, the overarching intent of 10 CFR 20.1406 is to minimize the occurrence and severity of site contamination by proactively taking measures that will control contamination and facilitate eventual decommissioning. Consistent with this philosophy, these activities that are part of the

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<sup>9</sup> Final Rule, Radiological Criteria for License Termination, 62 Fed. Reg. 39058 (July 21, 1997).

<sup>10</sup> Final Rule, Decommissioning Planning, 76 Fed. Reg. 35512 (June 17, 2011).

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

larger decommissioning process would comply with the Commission's intent under 10 CFR 20.1406.

In contrast, the storage of any retired major components and irradiated hardware at Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom until permanent cessation of operations will increase the complexity of decommissioning and volume of waste to be disposed at the end of plant life. Moreover, this complexity will be exacerbated by the inventory of retired major components and irradiated hardware, stored onsite at other plants. Thus, permitting these activities that are part of the larger decommissioning process will reduce the inventory of waste material and eliminate this future decommissioning activity, consistent with the philosophy underlying 10 CFR 20.1406.

Nuclear reactor licensees, though not required to do so, should be permitted to utilize NDTs that are intended to cover the removal expense in advance of cessation of operations when such components no longer have a useful purpose. Early removal also could take advantage of the current favorable disposal pricing. However, without an exemption such items could remain on site for additional decades, particularly given current trends towards license renewal.

#### **2. Application Of The Regulation In The Particular Circumstances Would Not Serve The Underlying Purpose Of The Rule Or Is Not Necessary To Achieve The Underlying Purpose Of The Rule (10 CFR 50.12(a)(2)(ii))**

The underlying purpose of the rule is to provide adequate funds for ultimate decommissioning of the site. The application of the regulation restricts the expenditure of NDTs in this circumstance, which is unnecessary to achieve the underlying purpose of the rule. The purpose of the restrictions on fund withdrawal is to protect the health and safety of the public by assuring that there will be adequate funds available to complete NRC-required decommissioning activities following termination of the operating license. The above analysis of the site-specific DCE and the NDT demonstrates that funding will be adequate to complete decommissioning even if funds are withdrawn for activities that are part of the larger decommissioning process during operations. It is noteworthy that a licensee can exceed the three (3) and 20 percent limitations of 10 CFR 50.82(a)(8)(ii) if a site-specific DCE is submitted to the NRC. Once this cost estimate is provided to the NRC, the licensee, according to the 1996 Statements of Consideration, may withdraw funds without obtaining additional approvals from the NRC.<sup>11</sup> Since the cash flow analysis from CEG's site-specific DCE is being submitted with this exemption request, NRC has the information that is needed to assess the requirements of 10 CFR 50.82(a)(8)(ii) before CEG exceeds the limitations.

As noted above, it is prudent from both the safety and economic sense to use funds from the NDT for activities that are part of the larger decommissioning process. Permitting this will reduce the inventory of waste material and eliminate this from the decommissioning activities at the end of plant life. The underlying purpose is also to protect the environment; delaying removal would be counterproductive for this underlying purpose.

Furthermore, it is clear from the regulatory history of the NRC's decommissioning funding rules that the proposed exemptions would be consistent with the original intent of the rule. As

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<sup>11</sup> 61 FR 39278, 39285; July 29, 1996.

## Attachment 1

### Request for Exemption from 10 CFR 50.82(a)(8)(i) and (ii) and 10 CFR 50.75(h)(1)(iv)

explained above, when NRC originally issued the decommissioning funding requirements in 1988, it made clear that "There is nothing in these requirements which is intended to prevent a licensee from making sure that the fund does not reach a level higher than required."<sup>12</sup>

#### **3. The Exemption Would Result In Benefit To The Public Health And Safety That Compensates For Any Decrease In Safety That May Result From The Grant Of The Exemption (10 CFR 50.12(a)(2)(iv))**

The exemptions would result in benefit to the public health and safety because these activities that are part of the larger decommissioning process support efforts to ultimately achieve unrestricted release of Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom, thus improving environmental conditions. Furthermore, there is no associated decrease in safety. Allowing the exemptions will result in a net benefit to the public health and safety. Disposing of waste prior to the permanent cessation of operations is consistent with NRC policy to minimize the costs and complexity of decommissioning, which can only improve safety at the site.

#### **VI. Conclusion**

Granting these exemptions will be consistent with the NRC decommissioning regulations as it: (1) would not eliminate the potential for unrestricted site release; (2) would not have a significant environmental impact not previously considered in Environmental Impact Statements, and (3) would not decrease reasonable assurance that adequate funds will be available for decommissioning. Conversely, the exemption would support efforts to achieve unrestricted release, improve environmental conditions as a result, and increase the effectiveness of the decommissioning fund for unrestricted release of the site.

In sum, it will facilitate the larger decommissioning process from the sites so that: (1) the inventory of radioactive waste and the associated source term at Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom will be reduced; (2) the costs associated with maintaining any retired major components and irradiated hardware on site and providing protection to workers can be avoided; (3) the overall cost to decommission the site will be reduced; (4) any uncertainty regarding future disposal cost and capacity is eliminated; and (5) adequate funds will be available to decommission Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom at the time the reactor ceases operation. Finally, the adequacy of the availability of funds for Clinton, Calvert Cliffs, Salem, Limerick, and Peach Bottom decommissioning is supported by a site-specific Decommissioning Cost Estimate and the associated funding program.

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<sup>12</sup> 53 FR 24,018, 24,019; June 27, 1988.

**Attachment 2**  
Decommissioning Cash Flow Analysis for Clinton, Unit 1  
SAFSTOR Radiological

**Table 9**  
**Decommissioning Cash Flow Analysis for Clinton, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2045	4,562	-	4,562	1,111,728	1,107,166	22,143	1,129,309
2046	6,404	-	6,404	1,129,309	1,122,906	22,458	1,145,364
2047	68,104	-	68,104	1,145,364	1,077,260	21,545	1,098,805
2048	70,000	-	70,000	1,098,805	1,028,805	20,576	1,049,381
2049	60,351	-	60,351	1,049,381	989,030	19,781	1,008,810
2050	55,935	-	55,935	1,008,810	952,876	19,058	971,933
2051	50,358	-	50,358	971,933	921,575	18,432	940,007
2052	27,930	-	27,930	940,007	912,077	18,242	930,318
2053	8,481	-	8,481	930,318	921,837	18,437	940,273
2054	7,648	-	7,648	940,273	932,626	18,653	951,278
2055	7,648	-	7,648	951,278	943,630	18,873	962,503
2056	7,669	-	7,669	962,503	954,834	19,097	973,931
2057	7,648	-	7,648	973,931	966,283	19,326	985,609
2058	7,648	-	7,648	985,609	977,961	19,559	997,520
2059	7,648	-	7,648	997,520	989,872	19,797	1,009,670
2060	7,669	-	7,669	1,009,670	1,002,001	20,040	1,022,041
2061	7,648	-	7,648	1,022,041	1,014,393	20,288	1,034,681
2062	7,648	-	7,648	1,034,681	1,027,033	20,541	1,047,574
2063	7,098	-	7,098	1,047,574	1,040,476	20,810	1,061,285
2064	6,938	-	6,938	1,061,285	1,054,347	21,087	1,075,434
2065	8,281	-	8,281	1,075,434	1,067,153	21,343	1,088,496
2066	8,281	-	8,281	1,088,496	1,080,215	21,604	1,101,820
2067	8,281	-	8,281	1,101,820	1,093,539	21,871	1,115,410
2068	8,304	-	8,304	1,115,410	1,107,106	22,142	1,129,248
2069	8,281	-	8,281	1,129,248	1,120,967	22,419	1,143,386
2070	8,281	-	8,281	1,143,386	1,135,105	22,702	1,157,808
2071	8,281	-	8,281	1,157,808	1,149,527	22,991	1,172,517
2072	8,304	-	8,304	1,172,517	1,164,213	23,284	1,187,498
2073	8,281	-	8,281	1,187,498	1,179,217	23,584	1,202,801
2074	8,281	-	8,281	1,202,801	1,194,520	23,890	1,218,411
2075	8,281	-	8,281	1,218,411	1,210,130	24,203	1,234,332
2076	8,304	-	8,304	1,234,332	1,226,029	24,521	1,250,549
2077	8,281	-	8,281	1,250,549	1,242,268	24,845	1,267,114
2078	8,281	-	8,281	1,267,114	1,258,833	25,177	1,284,009
2079	8,281	-	8,281	1,284,009	1,275,728	25,515	1,301,243
2080	8,304	-	8,304	1,301,243	1,292,939	25,859	1,318,798
2081	8,281	-	8,281	1,318,798	1,310,517	26,210	1,336,727

**Table 9**  
**Decommissioning Cash Flow Analysis for Clinton, Unit 1 – SAFSTOR Radiological**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2082	8,281	-	8,281	1,336,727	1,328,446	26,569	1,355,015
2083	8,281	-	8,281	1,355,015	1,346,734	26,935	1,373,669
2084	8,304	-	8,304	1,373,669	1,365,365	27,307	1,392,673
2085	8,281	-	8,281	1,392,673	1,384,392	27,688	1,412,080
2086	8,281	-	8,281	1,412,080	1,403,799	28,076	1,431,875
2087	8,281	-	8,281	1,431,875	1,423,594	28,472	1,452,065
2088	8,304	-	8,304	1,452,065	1,443,762	28,875	1,472,637
2089	8,281	-	8,281	1,472,637	1,464,356	29,287	1,493,643
2090	8,281	-	8,281	1,493,643	1,485,362	29,707	1,515,069
2091	8,281	-	8,281	1,515,069	1,506,789	30,136	1,536,924
2092	8,304	-	8,304	1,536,924	1,528,621	30,572	1,559,193
2093	8,281	-	8,281	1,559,193	1,550,912	31,018	1,581,930
2094	8,281	-	8,281	1,581,930	1,573,649	31,473	1,605,122
2095	8,281	-	8,281	1,605,122	1,596,841	31,937	1,628,778
2096	8,304	-	8,304	1,628,778	1,620,475	32,409	1,652,884
2097	8,281	-	8,281	1,652,884	1,644,603	32,892	1,677,495
2098	8,281	-	8,281	1,677,495	1,669,214	33,384	1,702,598
2099	8,281	-	8,281	1,702,598	1,694,318	33,886	1,728,204
2100	8,304	-	8,304	1,728,204	1,719,900	34,398	1,754,298
2101	43,791	-	43,791	1,754,298	1,710,507	34,210	1,744,717
2102	109,787	-	109,787	1,744,717	1,634,930	32,699	1,667,628
2103	123,682	-	123,682	1,667,628	1,543,947	30,879	1,574,826
2104	124,021	-	124,021	1,574,826	1,450,805	29,016	1,479,821
2105	128,148	3,134	131,282	1,479,821	1,348,539	26,971	1,375,509
2106	82,450	8,338	90,788	1,375,509	1,284,722	25,694	1,310,416
2107	9,585	-	9,585	1,310,416	1,300,831	26,017	1,326,848
2108	-	-	-	1,326,848	1,326,848	26,537	1,353,385
2109	-	-	-	1,353,385	1,353,385	27,068	1,380,453
Totals(a)	1,354,816	11,472	1,366,289				

<sup>(a)</sup> Cash flows may not add due to rounding

<sup>(b)</sup> A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 3**  
Decommissioning Cash Flow Analysis for Clinton, Unit 1  
SAFSTOR Total

**Table 10**  
**Decommissioning Cash Flow Analysis for Clinton, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost (a)	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings (b)	EOY Trust Fund Value (a)
2045	4,562	-	-	-	4,562	1,111,728	1,107,166	22,143	1,129,309
2046	6,404	-	-	-	6,404	1,129,309	1,122,906	22,458	1,145,364
2047	68,104	-	87,084	74	155,262	1,145,364	990,102	19,802	1,009,904
2048	70,000	-	25,470	37	95,507	1,009,904	914,397	18,288	932,685
2049	60,351	-	4,537	22	64,910	932,685	867,775	17,355	885,130
2050	55,935	-	17,772	22	73,729	885,130	811,402	16,228	827,630
2051	50,358	-	24,251	22	74,631	827,630	752,998	15,060	768,058
2052	27,930	-	11,083	90	39,102	768,058	728,956	14,579	743,535
2053	8,481	-	4,537	10	13,029	743,535	730,506	14,610	745,116
2054	7,648	-	4,537	-	12,185	745,116	732,931	14,659	747,590
2055	7,648	-	4,537	-	12,185	747,590	735,405	14,708	750,113
2056	7,669	-	4,550	-	12,218	750,113	737,894	14,758	752,652
2057	7,648	-	4,537	-	12,185	752,652	740,467	14,809	755,277
2058	7,648	-	4,537	-	12,185	755,277	743,092	14,862	757,954
2059	7,648	-	4,537	-	12,185	757,954	745,769	14,915	760,684
2060	7,669	-	4,550	-	12,218	760,684	748,465	14,969	763,435
2061	7,648	-	4,537	-	12,185	763,435	751,250	15,025	766,275
2062	7,648	-	4,537	-	12,185	766,275	754,090	15,082	769,172
2063	7,098	-	12,269	-	19,368	769,172	749,804	14,996	764,800
2064	6,938	-	14,839	-	21,776	764,800	743,024	14,860	757,884
2065	8,281	-	-	-	8,281	757,884	749,603	14,992	764,595
2066	8,281	-	-	-	8,281	764,595	756,314	15,126	771,440
2067	8,281	-	-	-	8,281	771,440	763,160	15,263	778,423
2068	8,304	-	-	-	8,304	778,423	770,119	15,402	785,521
2069	8,281	-	-	-	8,281	785,521	777,240	15,545	792,785
2070	8,281	-	-	-	8,281	792,785	784,504	15,690	800,194
2071	8,281	-	-	-	8,281	800,194	791,913	15,838	807,752
2072	8,304	-	-	-	8,304	807,752	799,448	15,989	815,437
2073	8,281	-	-	-	8,281	815,437	807,156	16,143	823,299
2074	8,281	-	-	-	8,281	823,299	815,018	16,300	831,319
2075	8,281	-	-	-	8,281	831,319	823,038	16,461	839,498
2076	8,304	-	-	-	8,304	839,498	831,195	16,624	847,819
2077	8,281	-	-	-	8,281	847,819	839,538	16,791	856,328
2078	8,281	-	-	-	8,281	856,328	848,047	16,961	865,008
2079	8,281	-	-	-	8,281	865,008	856,727	17,135	873,862
2080	8,304	-	-	-	8,304	873,862	865,558	17,311	882,870
2081	8,281	-	-	-	8,281	882,870	874,589	17,492	892,080

**Table 10**  
**Decommissioning Cash Flow Analysis for Clinton, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost (a)	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings (b)	EOY Trust Fund Value (a)
2082	8,281	-	-	-	8,281	892,080	883,799	17,676	901,475
2083	8,281	-	-	-	8,281	901,475	893,194	17,864	911,058
2084	8,304	-	-	-	8,304	911,058	902,755	18,055	920,810
2085	8,281	-	-	-	8,281	920,810	912,529	18,251	930,779
2086	8,281	-	-	-	8,281	930,779	922,498	18,450	940,948
2087	8,281	-	-	-	8,281	940,948	932,667	18,653	951,321
2088	8,304	-	-	-	8,304	951,321	943,017	18,860	961,877
2089	8,281	-	-	-	8,281	961,877	953,596	19,072	972,668
2090	8,281	-	-	-	8,281	972,668	964,387	19,288	983,675
2091	8,281	-	-	-	8,281	983,675	975,394	19,508	994,902
2092	8,304	-	-	-	8,304	994,902	986,598	19,732	1,006,330
2093	8,281	-	-	-	8,281	1,006,330	998,049	19,961	1,018,010
2094	8,281	-	-	-	8,281	1,018,010	1,009,729	20,195	1,029,924
2095	8,281	-	-	-	8,281	1,029,924	1,021,643	20,433	1,042,076
2096	8,304	-	-	-	8,304	1,042,076	1,033,772	20,675	1,054,448
2097	8,281	-	-	-	8,281	1,054,448	1,046,167	20,923	1,067,090
2098	8,281	-	-	-	8,281	1,067,090	1,058,809	21,176	1,079,985
2099	8,281	-	-	-	8,281	1,079,985	1,071,704	21,434	1,093,139
2100	8,304	-	-	-	8,304	1,093,139	1,084,835	21,697	1,106,532
2101	43,791	-	-	75	43,866	1,106,532	1,062,666	21,253	1,083,919
2102	109,787	-	-	584	110,371	1,083,919	973,548	19,471	993,019
2103	123,682	-	-	703	124,384	993,019	868,634	17,373	886,007
2104	124,021	-	-	705	124,725	886,007	761,282	15,226	776,507
2105	128,148	3,134	-	3,448	134,731	776,507	641,777	12,836	654,612
2106	82,450	8,338	-	1,924	92,712	654,612	561,900	11,238	573,138
2107	9,585	-	-	36,739	46,324	573,138	526,814	10,536	537,351
2108	-	-	-	52,110	52,110	537,351	485,241	9,705	494,946
2109	-	-	-	17,478	17,478	494,946	477,468	9,549	487,017
Totals(a)	1,354,816	11,472	242,701	114,042	1,723,032				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 4**  
Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1  
SAFSTOR Radiological

**Table 11**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2032	1,275	-	1,275	644,635	643,360	12,867	656,227
2033	3,010	-	3,010	656,227	653,217	13,064	666,281
2034	16,828	-	16,828	666,281	649,453	12,989	662,442
2035	34,733	-	34,733	662,442	627,709	12,554	640,263
2036	30,406	-	30,406	640,263	609,858	12,197	622,055
2037	39,258	-	39,258	622,055	582,796	11,656	594,452
2038	37,620	-	37,620	594,452	556,832	11,137	567,969
2039	33,547	-	33,547	567,969	534,422	10,688	545,110
2040	29,625	-	29,625	545,110	515,486	10,310	525,795
2041	22,514	-	22,514	525,795	503,282	10,066	513,347
2042	11,786	-	11,786	513,347	501,561	10,031	511,592
2043	4,101	-	4,101	511,592	507,492	10,150	517,641
2044	4,101	-	4,101	517,641	513,541	10,271	523,811
2045	4,112	-	4,112	523,811	519,699	10,394	530,093
2046	4,101	-	4,101	530,093	525,992	10,520	536,512
2047	4,101	-	4,101	536,512	532,411	10,648	543,060
2048	4,101	-	4,101	543,060	538,959	10,779	549,738
2049	4,112	-	4,112	549,738	545,626	10,913	556,538
2050	4,101	-	4,101	556,538	552,437	11,049	563,486
2051	4,101	-	4,101	563,486	559,385	11,188	570,573
2052	4,101	-	4,101	570,573	566,472	11,329	577,802
2053	4,112	-	4,112	577,802	573,690	11,474	585,163
2054	4,101	-	4,101	585,163	581,063	11,621	592,684
2055	3,971	-	3,971	592,684	588,712	11,774	600,487
2056	3,971	-	3,971	600,487	596,515	11,930	608,445
2057	3,982	-	3,982	608,445	604,463	12,089	616,552
2058	3,971	-	3,971	616,552	612,581	12,252	624,833
2059	3,971	-	3,971	624,833	620,861	12,417	633,278
2060	4,423	-	4,423	633,278	628,856	12,577	641,433
2061	4,435	-	4,435	641,433	636,998	12,740	649,738
2062	4,423	-	4,423	649,738	645,316	12,906	658,222
2063	4,423	-	4,423	658,222	653,799	13,076	666,875
2064	4,423	-	4,423	666,875	662,453	13,249	675,702
2065	4,435	-	4,435	675,702	671,267	13,425	684,693
2066	4,423	-	4,423	684,693	680,270	13,605	693,875
2067	4,423	-	4,423	693,875	689,453	13,789	703,242
2068	4,423	-	4,423	703,242	698,819	13,976	712,796

**Table 11**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 – SAFSTOR Radiological**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2069	4,435	-	4,435	712,796	708,361	14,167	722,528
2070	4,423	-	4,423	722,528	718,106	14,362	732,468
2071	4,423	-	4,423	732,468	728,045	14,561	742,606
2072	4,423	-	4,423	742,606	738,184	14,764	752,947
2073	4,435	-	4,435	752,947	748,513	14,970	763,483
2074	4,423	-	4,423	763,483	759,060	15,181	774,242
2075	4,423	-	4,423	774,242	769,819	15,396	785,215
2076	4,423	-	4,423	785,215	780,793	15,616	796,409
2077	4,435	-	4,435	796,409	791,974	15,839	807,814
2078	4,423	-	4,423	807,814	803,391	16,068	819,459
2079	4,423	-	4,423	819,459	815,036	16,301	831,337
2080	4,423	-	4,423	831,337	826,914	16,538	843,453
2081	4,435	-	4,435	843,453	839,018	16,780	855,798
2082	4,423	-	4,423	855,798	851,376	17,028	868,403
2083	4,423	-	4,423	868,403	863,981	17,280	881,260
2084	4,423	-	4,423	881,260	876,838	17,537	894,375
2085	4,435	-	4,435	894,375	889,940	17,799	907,739
2086	4,423	-	4,423	907,739	903,316	18,066	921,383
2087	39,618	-	39,618	921,383	881,765	17,635	899,400
2088	70,292	-	70,292	899,400	829,108	16,582	845,690
2089	76,278	-	76,278	845,690	769,412	15,388	784,800
2090	76,070	-	76,070	784,800	708,730	14,175	722,905
2091	72,537	-	72,537	722,905	650,368	13,007	663,376
2092	55,614	-	55,614	663,376	607,762	12,155	619,917
2093	48,004	6,825	54,829	619,917	565,088	11,302	576,389
2094	11,689	-	11,689	576,389	564,700	11,294	575,994
2095	-	-	-	575,994	575,994	11,520	587,514
2096	-	-	-	587,514	587,514	11,750	599,264
2097	-	-	-	599,264	599,264	11,985	611,249
Totals(a)	899,310	6,825	906,135				

<sup>(a)</sup> Cash flows may not add due to rounding

<sup>(b)</sup> A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 5**  
Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2  
SAFSTOR Radiological

**Table 12**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2034	1,154	-	1,154	870,525	869,370	17,387	886,758
2035	2,966	-	2,966	886,758	883,792	17,676	901,468
2036	22,687	-	22,687	901,468	878,780	17,576	896,356
2037	61,906	-	61,906	896,356	834,449	16,689	851,138
2038	38,920	-	38,920	851,138	812,218	16,244	828,463
2039	34,847	-	34,847	828,463	793,616	15,872	809,488
2040	30,924	-	30,924	809,488	778,563	15,571	794,135
2041	23,603	-	23,603	794,135	770,532	15,411	785,943
2042	12,267	-	12,267	785,943	773,675	15,474	789,149
2043	4,224	-	4,224	789,149	784,925	15,698	800,623
2044	4,224	-	4,224	800,623	796,399	15,928	812,327
2045	4,236	-	4,236	812,327	808,092	16,162	824,253
2046	4,224	-	4,224	824,253	820,029	16,401	836,430
2047	4,224	-	4,224	836,430	832,206	16,644	848,850
2048	4,224	-	4,224	848,850	844,626	16,893	861,519
2049	4,236	-	4,236	861,519	857,283	17,146	874,429
2050	4,224	-	4,224	874,429	870,205	17,404	887,609
2051	4,224	-	4,224	887,609	883,385	17,668	901,052
2052	4,224	-	4,224	901,052	896,828	17,937	914,765
2053	4,236	-	4,236	914,765	910,529	18,211	928,740
2054	4,224	-	4,224	928,740	924,516	18,490	943,006
2055	4,095	-	4,095	943,006	938,912	18,778	957,690
2056	4,095	-	4,095	957,690	953,595	19,072	972,667
2057	4,106	-	4,106	972,667	968,561	19,371	987,933
2058	4,095	-	4,095	987,933	983,838	19,677	1,003,515
2059	4,095	-	4,095	1,003,515	999,420	19,988	1,019,408
2060	4,546	-	4,546	1,019,408	1,014,863	20,297	1,035,160
2061	4,558	-	4,558	1,035,160	1,030,602	20,612	1,051,214
2062	4,546	-	4,546	1,051,214	1,046,668	20,933	1,067,602
2063	4,546	-	4,546	1,067,602	1,063,056	21,261	1,084,317
2064	4,546	-	4,546	1,084,317	1,079,771	21,595	1,101,367
2065	4,558	-	4,558	1,101,367	1,096,809	21,936	1,118,745
2066	4,546	-	4,546	1,118,745	1,114,199	22,284	1,136,483
2067	4,546	-	4,546	1,136,483	1,131,937	22,639	1,154,576
2068	4,546	-	4,546	1,154,576	1,150,030	23,001	1,173,031
2069	4,558	-	4,558	1,173,031	1,168,473	23,369	1,191,842
2070	4,546	-	4,546	1,191,842	1,187,296	23,746	1,211,042

**Table 12**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2071	4,546	-	4,546	1,211,042	1,206,497	24,130	1,230,627
2072	4,546	-	4,546	1,230,627	1,226,081	24,522	1,250,603
2073	4,558	-	4,558	1,250,603	1,246,044	24,921	1,270,965
2074	4,546	-	4,546	1,270,965	1,266,420	25,328	1,291,748
2075	4,546	-	4,546	1,291,748	1,287,202	25,744	1,312,946
2076	4,546	-	4,546	1,312,946	1,308,401	26,168	1,334,569
2077	4,558	-	4,558	1,334,569	1,330,010	26,600	1,356,611
2078	4,546	-	4,546	1,356,611	1,352,065	27,041	1,379,106
2079	4,546	-	4,546	1,379,106	1,374,560	27,491	1,402,052
2080	4,546	-	4,546	1,402,052	1,397,506	27,950	1,425,456
2081	4,558	-	4,558	1,425,456	1,420,898	28,418	1,449,316
2082	4,546	-	4,546	1,449,316	1,444,770	28,895	1,473,666
2083	4,546	-	4,546	1,473,666	1,469,120	29,382	1,498,502
2084	4,546	-	4,546	1,498,502	1,493,957	29,879	1,523,836
2085	4,558	-	4,558	1,523,836	1,519,278	30,386	1,549,663
2086	4,546	-	4,546	1,549,663	1,545,117	30,902	1,576,020
2087	39,741	-	39,741	1,576,020	1,536,279	30,726	1,567,005
2088	70,562	-	70,562	1,567,005	1,496,443	29,929	1,526,372
2089	76,588	-	76,588	1,526,372	1,449,784	28,996	1,478,779
2090	76,379	-	76,379	1,478,779	1,402,401	28,048	1,430,449
2091	76,032	-	76,032	1,430,449	1,354,416	27,088	1,381,505
2092	74,374	-	74,374	1,381,505	1,307,131	26,143	1,333,274
2093	63,644	6,825	70,469	1,333,274	1,262,805	25,256	1,288,061
2094	11,750	-	11,750	1,288,061	1,276,311	25,526	1,301,837
2095	-	-	-	1,301,837	1,301,837	26,037	1,327,874
2096	-	-	-	1,327,874	1,327,874	26,557	1,354,432
2097	-	-	-	1,354,432	1,354,432	27,089	1,381,520
Totals(a)	912,373	6,825	919,198				

<sup>(a)</sup> Cash flows may not add due to rounding

<sup>(b)</sup> A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 6**  
Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1  
SAFSTOR Total

**Table 13**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost (a)	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings (b)	EOY Trust Fund Value (a)
2032	1,275	-	-	-	1,275	644,635	643,360	12,867	656,227
2033	3,010	-	-	-	3,010	656,227	653,217	13,064	666,281
2034	16,828	-	19,380	34	36,242	666,281	630,039	12,601	642,639
2035	34,733	-	42,592	76	77,400	642,639	565,239	11,305	576,544
2036	30,406	-	2,060	19	32,484	576,544	544,059	10,881	554,940
2037	39,258	-	2,065	19	41,343	554,940	513,598	10,272	523,870
2038	37,620	-	2,060	19	39,699	523,870	484,171	9,683	493,854
2039	33,547	-	5,860	19	39,426	493,854	454,429	9,089	463,517
2040	29,625	-	13,332	19	42,975	463,517	420,542	8,411	428,953
2041	22,514	-	9,599	49	32,162	428,953	396,792	7,936	404,727
2042	11,786	-	2,060	72	13,918	404,727	390,809	7,816	398,625
2043	4,101	-	2,060	-	6,161	398,625	392,465	7,849	400,314
2044	4,101	-	2,060	-	6,161	400,314	394,153	7,883	402,036
2045	4,112	-	2,065	-	6,178	402,036	395,859	7,917	403,776
2046	4,101	-	2,060	-	6,161	403,776	397,615	7,952	405,568
2047	4,101	-	2,060	-	6,161	405,568	399,407	7,988	407,395
2048	4,101	-	2,060	-	6,161	407,395	401,234	8,025	409,259
2049	4,112	-	2,065	-	6,178	409,259	403,082	8,062	411,143
2050	4,101	-	2,060	-	6,161	411,143	404,982	8,100	413,082
2051	4,101	-	2,060	-	6,161	413,082	406,921	8,138	415,060
2052	4,101	-	2,060	-	6,161	415,060	408,899	8,178	417,077
2053	4,112	-	2,065	-	6,178	417,077	410,900	8,218	419,118
2054	4,101	-	2,060	-	6,161	419,118	412,957	8,259	421,216
2055	3,971	-	5,201	-	9,173	421,216	412,043	8,241	420,284
2056	3,971	-	5,201	-	9,173	420,284	411,111	8,222	419,333
2057	3,982	-	5,216	-	9,198	419,333	410,135	8,203	418,338
2058	3,971	-	5,201	-	9,173	418,338	409,165	8,183	417,349
2059	3,971	-	5,201	-	9,173	417,349	408,176	8,164	416,339
2060	4,423	-	-	-	4,423	416,339	411,917	8,238	420,155
2061	4,435	-	-	-	4,435	420,155	415,720	8,314	424,035
2062	4,423	-	-	-	4,423	424,035	419,612	8,392	428,004
2063	4,423	-	-	-	4,423	428,004	423,582	8,472	432,053
2064	4,423	-	-	-	4,423	432,053	427,631	8,553	436,184
2065	4,435	-	-	-	4,435	436,184	431,749	8,635	440,384
2066	4,423	-	-	-	4,423	440,384	435,961	8,719	444,681
2067	4,423	-	-	-	4,423	444,681	440,258	8,805	449,063
2068	4,423	-	-	-	4,423	449,063	444,641	8,893	453,533

**Table 13**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost (a)	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings (b)	EOY Trust Fund Value (a)
2069	4,435	-	-	-	4,435	453,533	449,099	8,982	458,081
2070	4,423	-	-	-	4,423	458,081	453,658	9,073	462,731
2071	4,423	-	-	-	4,423	462,731	458,309	9,166	467,475
2072	4,423	-	-	-	4,423	467,475	463,052	9,261	472,313
2073	4,435	-	-	-	4,435	472,313	467,879	9,358	477,236
2074	4,423	-	-	-	4,423	477,236	472,814	9,456	482,270
2075	4,423	-	-	-	4,423	482,270	477,848	9,557	487,404
2076	4,423	-	-	-	4,423	487,404	482,982	9,660	492,642
2077	4,435	-	-	-	4,435	492,642	488,207	9,764	497,971
2078	4,423	-	-	-	4,423	497,971	493,548	9,871	503,419
2079	4,423	-	-	-	4,423	503,419	498,997	9,980	508,977
2080	4,423	-	-	-	4,423	508,977	504,554	10,091	514,645
2081	4,435	-	-	-	4,435	514,645	510,211	10,204	520,415
2082	4,423	-	-	-	4,423	520,415	515,992	10,320	526,312
2083	4,423	-	-	-	4,423	526,312	521,890	10,438	532,327
2084	4,423	-	-	-	4,423	532,327	527,905	10,558	538,463
2085	4,435	-	-	-	4,435	538,463	534,028	10,681	544,709
2086	4,423	-	-	-	4,423	544,709	540,286	10,806	551,092
2087	39,618	-	-	85	39,703	551,092	511,389	10,228	521,617
2088	70,292	-	-	676	70,969	521,617	450,648	9,013	459,661
2089	76,278	-	-	833	77,111	459,661	382,550	7,651	390,201
2090	76,070	-	-	831	76,900	390,201	313,301	6,266	319,567
2091	72,537	-	-	1,097	73,634	319,567	245,933	4,919	250,851
2092	55,614	-	-	2,375	57,989	250,851	192,862	3,857	196,720
2093	48,004	6,825	-	1,977	56,807	196,720	139,913	2,798	142,711
2094	11,689	-	-	9,555	21,245	142,711	121,467	2,429	123,896
2095	-	-	-	22,789	22,789	123,896	101,107	2,022	103,129
2096	-	-	-	24,037	24,037	103,129	79,092	1,582	80,674
2097	-	-	-	3,375	3,375	80,674	77,299	1,546	78,845
Totals(a)	899,310	6,825	149,763	67,957	1,123,855				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 7**  
Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2  
SAFSTOR Total

**Table 14**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2034	1,154	-	-	-	1,154	870,525	869,370	17,387	886,758
2035	2,966	-	-	-	2,966	886,758	883,792	17,676	901,468
2036	22,687	-	15,455	27	38,169	901,468	863,298	17,266	880,564
2037	61,906	-	46,348	81	108,336	880,564	772,229	15,445	787,673
2038	38,920	-	2,060	30	41,009	787,673	746,664	14,933	761,597
2039	34,847	-	5,834	30	40,710	761,597	720,887	14,418	735,304
2040	30,924	-	13,347	30	44,301	735,304	691,003	13,820	704,823
2041	23,603	-	9,610	56	33,268	704,823	671,555	13,431	684,986
2042	12,267	-	2,060	72	14,400	684,986	670,587	13,412	683,998
2043	4,224	-	2,060	-	6,284	683,998	677,715	13,554	691,269
2044	4,224	-	2,060	-	6,284	691,269	684,985	13,700	698,685
2045	4,236	-	2,065	-	6,301	698,685	692,384	13,848	706,231
2046	4,224	-	2,060	-	6,284	706,231	699,947	13,999	713,946
2047	4,224	-	2,060	-	6,284	713,946	707,663	14,153	721,816
2048	4,224	-	2,060	-	6,284	721,816	715,532	14,311	729,843
2049	4,236	-	2,065	-	6,301	729,843	723,542	14,471	738,012
2050	4,224	-	2,060	-	6,284	738,012	731,729	14,635	746,363
2051	4,224	-	2,060	-	6,284	746,363	740,079	14,802	754,881
2052	4,224	-	2,060	-	6,284	754,881	748,597	14,972	763,569
2053	4,236	-	2,065	-	6,301	763,569	757,268	15,145	772,413
2054	4,224	-	2,060	-	6,284	772,413	766,130	15,323	781,452
2055	4,095	-	5,201	-	9,296	781,452	772,156	15,443	787,599
2056	4,095	-	5,201	-	9,296	787,599	778,303	15,566	793,869
2057	4,106	-	5,216	-	9,322	793,869	784,548	15,691	800,239
2058	4,095	-	5,201	-	9,296	800,239	790,943	15,819	806,761
2059	4,095	-	5,201	-	9,296	806,761	797,465	15,949	813,415
2060	4,546	-	-	-	4,546	813,415	808,869	16,177	825,046
2061	4,558	-	-	-	4,558	825,046	820,488	16,410	836,898
2062	4,546	-	-	-	4,546	836,898	832,352	16,647	848,999
2063	4,546	-	-	-	4,546	848,999	844,454	16,889	861,343
2064	4,546	-	-	-	4,546	861,343	856,797	17,136	873,933
2065	4,558	-	-	-	4,558	873,933	869,375	17,387	886,762
2066	4,546	-	-	-	4,546	886,762	882,217	17,644	899,861
2067	4,546	-	-	-	4,546	899,861	895,315	17,906	913,221
2068	4,546	-	-	-	4,546	913,221	908,676	18,174	926,849
2069	4,558	-	-	-	4,558	926,849	922,291	18,446	940,737
2070	4,546	-	-	-	4,546	940,737	936,191	18,724	954,915

**Table 14**  
**Decommissioning Cash Flow Analysis for Calvert Cliffs, Unit 2 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2071	4,546	-	-	-	4,546	954,915	950,369	19,007	969,377
2072	4,546	-	-	-	4,546	969,377	964,831	19,297	984,128
2073	4,558	-	-	-	4,558	984,128	979,569	19,591	999,161
2074	4,546	-	-	-	4,546	999,161	994,615	19,892	1,014,507
2075	4,546	-	-	-	4,546	1,014,507	1,009,962	20,199	1,030,161
2076	4,546	-	-	-	4,546	1,030,161	1,025,615	20,512	1,046,128
2077	4,558	-	-	-	4,558	1,046,128	1,041,569	20,831	1,062,401
2078	4,546	-	-	-	4,546	1,062,401	1,057,855	21,157	1,079,012
2079	4,546	-	-	-	4,546	1,079,012	1,074,466	21,489	1,095,956
2080	4,546	-	-	-	4,546	1,095,956	1,091,410	21,828	1,113,238
2081	4,558	-	-	-	4,558	1,113,238	1,108,680	22,174	1,130,854
2082	4,546	-	-	-	4,546	1,130,854	1,126,308	22,526	1,148,834
2083	4,546	-	-	-	4,546	1,148,834	1,144,289	22,886	1,167,174
2084	4,546	-	-	-	4,546	1,167,174	1,162,629	23,253	1,185,881
2085	4,558	-	-	-	4,558	1,185,881	1,181,323	23,626	1,204,949
2086	4,546	-	-	-	4,546	1,204,949	1,200,404	24,008	1,224,412
2087	39,741	-	-	85	39,826	1,224,412	1,184,586	23,692	1,208,277
2088	70,562	-	-	694	71,256	1,208,277	1,137,021	22,740	1,159,762
2089	76,588	-	-	856	77,444	1,159,762	1,082,318	21,646	1,103,964
2090	76,379	-	-	854	77,232	1,103,964	1,026,732	20,535	1,047,267
2091	76,032	-	-	1,314	77,346	1,047,267	969,921	19,398	989,319
2092	74,374	-	-	3,519	77,893	989,319	911,426	18,229	929,655
2093	63,644	6,825	-	2,930	73,399	929,655	856,255	17,125	873,381
2094	11,750	-	-	15,154	26,903	873,381	846,477	16,930	863,407
2095	-	-	-	36,141	36,141	863,407	827,266	16,545	843,811
2096	-	-	-	37,389	37,389	843,811	806,422	16,128	822,551
2097	-	-	-	4,546	4,546	822,551	818,005	16,360	834,365
Totals(a)	912,373	6,825	145,469	103,807	1,168,474				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 8**

Decommissioning Cash Flow Analysis for CEG Salem, Unit 1  
SAFSTOR Radiological

**Table 15**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2034	984	-	984	432,250	431,266	8,625	439,891
2035	2,566	-	2,566	439,891	437,325	8,746	446,071
2036	12,916	-	12,916	446,071	433,155	8,663	441,818
2037	31,715	-	31,715	441,818	410,103	8,202	418,305
2038	11,351	-	11,351	418,305	406,955	8,139	415,094
2039	8,646	-	8,646	415,094	406,448	8,129	414,577
2040	3,480	-	3,480	414,577	411,096	8,222	419,318
2041	2,750	-	2,750	419,318	416,568	8,331	424,900
2042	1,498	-	1,498	424,900	423,402	8,468	431,870
2043	1,498	-	1,498	431,870	430,372	8,607	438,979
2044	1,502	-	1,502	438,979	437,477	8,750	446,226
2045	1,498	-	1,498	446,226	444,728	8,895	453,623
2046	1,498	-	1,498	453,623	452,125	9,042	461,167
2047	1,498	-	1,498	461,167	459,669	9,193	468,863
2048	1,502	-	1,502	468,863	467,361	9,347	476,708
2049	1,498	-	1,498	476,708	475,210	9,504	484,714
2050	1,498	-	1,498	484,714	483,216	9,664	492,880
2051	1,498	-	1,498	492,880	491,382	9,828	501,210
2052	1,502	-	1,502	501,210	499,708	9,994	509,702
2053	1,498	-	1,498	509,702	508,204	10,164	518,368
2054	1,498	-	1,498	518,368	516,870	10,337	527,207
2055	1,498	-	1,498	527,207	525,709	10,514	536,224
2056	1,502	-	1,502	536,224	534,721	10,694	545,416
2057	1,498	-	1,498	545,416	543,918	10,878	554,796
2058	1,498	-	1,498	554,796	553,298	11,066	564,364
2059	1,498	-	1,498	564,364	562,866	11,257	574,123
2060	1,502	-	1,502	574,123	572,621	11,452	584,074
2061	1,498	-	1,498	584,074	582,576	11,652	594,227
2062	1,498	-	1,498	594,227	592,729	11,855	604,584
2063	1,498	-	1,498	604,584	603,086	12,062	615,148
2064	1,502	-	1,502	615,148	613,645	12,273	625,918
2065	1,498	-	1,498	625,918	624,420	12,488	636,909
2066	1,498	-	1,498	636,909	635,411	12,708	648,119
2067	1,498	-	1,498	648,119	646,621	12,932	659,553
2068	1,502	-	1,502	659,553	658,051	13,161	671,212
2069	1,498	-	1,498	671,212	669,714	13,394	683,108
2070	1,498	-	1,498	683,108	681,610	13,632	695,243

**Table 15**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2071	1,498	-	1,498	695,243	693,745	13,875	707,620
2072	1,502	-	1,502	707,620	706,117	14,122	720,240
2073	1,498	-	1,498	720,240	718,742	14,375	733,117
2074	1,498	-	1,498	733,117	731,619	14,632	746,251
2075	1,498	-	1,498	746,251	744,753	14,895	759,648
2076	1,502	-	1,502	759,648	758,146	15,163	773,309
2077	1,498	-	1,498	773,309	771,811	15,436	787,247
2078	1,498	-	1,498	787,247	785,749	15,715	801,464
2079	1,498	-	1,498	801,464	799,966	15,999	815,965
2080	1,502	-	1,502	815,965	814,463	16,289	830,752
2081	1,498	-	1,498	830,752	829,254	16,585	845,839
2082	1,498	-	1,498	845,839	844,341	16,887	861,228
2083	1,498	-	1,498	861,228	859,730	17,195	876,925
2084	1,502	-	1,502	876,925	875,423	17,508	892,931
2085	1,498	-	1,498	892,931	891,433	17,829	909,262
2086	1,498	-	1,498	909,262	907,764	18,155	925,919
2087	1,498	-	1,498	925,919	924,421	18,488	942,909
2088	1,773	-	1,773	942,909	941,137	18,823	959,960
2089	26,203	-	26,203	959,960	933,757	18,675	952,432
2090	50,227	-	50,227	952,432	902,205	18,044	920,249
2091	67,173	-	67,173	920,249	853,076	17,062	870,137
2092	33,558	-	33,558	870,137	836,579	16,732	853,311
2093	33,467	-	33,467	853,311	819,844	16,397	836,241
2094	16,163	-	16,163	836,241	820,078	16,402	836,480
2095	5,459	-	5,459	836,480	831,021	16,620	847,641
2096	11,427	-	11,427	847,641	836,214	16,724	852,939
2097	76	-	76	852,939	852,863	17,057	869,920
2098	47	-	47	869,920	869,873	17,397	887,271
Totals(a)	388,934	-	388,934				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

(c) Salem ISFSI Decommissioning Cost is combined within the Radiological Decommissioning Cost

**Attachment 9**  
Decommissioning Cash Flow Analysis for CEG Salem, Unit 2  
SAFSTOR Radiological

**Table 16**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2040	19,529	-	19,529	403,746	384,217	7,684	391,901
2041	26,162	-	26,162	391,901	365,739	7,315	373,054
2042	7,961	-	7,961	373,054	365,092	7,302	372,394
2043	6,892	-	6,892	372,394	365,502	7,310	372,812
2044	2,762	-	2,762	372,812	370,050	7,401	377,450
2045	2,758	-	2,758	377,450	374,692	7,494	382,186
2046	1,506	-	1,506	382,186	380,680	7,614	388,293
2047	1,506	-	1,506	388,293	386,787	7,736	394,523
2048	1,511	-	1,511	394,523	393,012	7,860	400,872
2049	1,506	-	1,506	400,872	399,366	7,987	407,353
2050	1,506	-	1,506	407,353	405,847	8,117	413,964
2051	1,506	-	1,506	413,964	412,457	8,249	420,707
2052	1,511	-	1,511	420,707	419,196	8,384	427,580
2053	1,506	-	1,506	427,580	426,074	8,521	434,595
2054	1,506	-	1,506	434,595	433,089	8,662	441,750
2055	1,506	-	1,506	441,750	440,244	8,805	449,049
2056	1,511	-	1,511	449,049	447,538	8,951	456,489
2057	1,506	-	1,506	456,489	454,983	9,100	464,083
2058	1,506	-	1,506	464,083	462,576	9,252	471,828
2059	1,506	-	1,506	471,828	470,321	9,406	479,728
2060	1,511	-	1,511	479,728	478,217	9,564	487,782
2061	1,506	-	1,506	487,782	486,275	9,726	496,001
2062	1,506	-	1,506	496,001	494,494	9,890	504,384
2063	1,506	-	1,506	504,384	502,878	10,058	512,935
2064	1,511	-	1,511	512,935	511,425	10,228	521,653
2065	1,506	-	1,506	521,653	520,147	10,403	530,550
2066	1,506	-	1,506	530,550	529,044	10,581	539,624
2067	1,506	-	1,506	539,624	538,118	10,762	548,880
2068	1,511	-	1,511	548,880	547,370	10,947	558,317
2069	1,506	-	1,506	558,317	556,811	11,136	567,947
2070	1,506	-	1,506	567,947	566,441	11,329	577,770
2071	1,506	-	1,506	577,770	576,263	11,525	587,788
2072	1,511	-	1,511	587,788	586,278	11,726	598,004
2073	1,506	-	1,506	598,004	596,497	11,930	608,427
2074	1,506	-	1,506	608,427	606,921	12,138	619,059
2075	1,506	-	1,506	619,059	617,553	12,351	629,904
2076	1,511	-	1,511	629,904	628,393	12,568	640,961

**Table 16**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2077	1,506	-	1,506	640,961	639,455	12,789	652,244
2078	1,506	-	1,506	652,244	650,737	13,015	663,752
2079	1,506	-	1,506	663,752	662,246	13,245	675,491
2080	1,511	-	1,511	675,491	673,980	13,480	687,460
2081	1,506	-	1,506	687,460	685,953	13,719	699,673
2082	1,506	-	1,506	699,673	698,166	13,963	712,130
2083	1,506	-	1,506	712,130	710,623	14,212	724,836
2084	1,511	-	1,511	724,836	723,325	14,467	737,792
2085	1,506	-	1,506	737,792	736,285	14,726	751,011
2086	1,506	-	1,506	751,011	749,505	14,990	764,495
2087	1,506	-	1,506	764,495	762,988	15,260	778,248
2088	1,511	-	1,511	778,248	776,737	15,535	792,272
2089	6,011	-	6,011	792,272	786,262	15,725	801,987
2090	21,759	-	21,759	801,987	780,227	15,605	795,832
2091	55,114	-	55,114	795,832	740,718	14,814	755,532
2092	61,898	-	61,898	755,532	693,634	13,873	707,507
2093	32,997	-	32,997	707,507	674,510	13,490	688,000
2094	32,997	-	32,997	688,000	655,003	13,100	668,103
2095	19,118	-	19,118	668,103	648,985	12,980	661,965
2096	11,567	-	11,567	661,965	650,398	13,008	663,406
2097	33	-	33	663,406	663,373	13,267	676,641
2098	20	-	20	676,641	676,621	13,532	690,153
Totals(a)	372,399	-	372,399				

<sup>(a)</sup> Cash flows may not add due to rounding

<sup>(b)</sup> A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

<sup>(c)</sup> Salem ISFSI Decommissioning Cost is combined within the Radiological Decommissioning Cost

**Attachment 10**

Decommissioning Cash Flow Analysis for CEG Salem, Unit 1  
SAFSTOR Total

**Table 17**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2034	984	-	142	-	1,127	432,250	431,123	8,622	439,746
2035	2,566	-	371	-	2,937	439,746	436,808	8,736	445,545
2036	12,916	-	1,063	-	13,979	445,545	431,566	8,631	440,197
2037	31,715	-	32,816	-	64,532	440,197	375,666	7,513	383,179
2038	11,351	-	26,894	-	38,244	383,179	344,935	6,899	351,833
2039	8,646	-	28,699	-	37,345	351,833	314,488	6,290	320,778
2040	3,480	-	848	297	4,626	320,778	316,152	6,323	322,475
2041	2,750	-	856	297	3,903	322,475	318,573	6,371	324,944
2042	1,498	-	770	297	2,565	324,944	322,379	6,448	328,827
2043	1,498	-	1,432	247	3,177	328,827	325,650	6,513	332,163
2044	1,502	-	883	247	2,633	332,163	329,530	6,591	336,120
2045	1,498	-	956	-	2,454	336,120	333,667	6,673	340,340
2046	1,498	-	1,021	-	2,520	340,340	337,821	6,756	344,577
2047	1,498	-	1,010	-	2,508	344,577	342,069	6,841	348,911
2048	1,502	-	975	-	2,477	348,911	346,434	6,929	353,363
2049	1,498	-	935	-	2,433	353,363	350,929	7,019	357,948
2050	1,498	-	973	-	2,471	357,948	355,477	7,110	362,587
2051	1,498	-	984	-	2,482	362,587	360,104	7,202	367,306
2052	1,502	-	975	-	2,477	367,306	364,830	7,297	372,126
2053	1,498	-	787	-	2,285	372,126	369,841	7,397	377,238
2054	1,498	-	787	-	2,285	377,238	374,953	7,499	382,452
2055	1,498	-	1,010	-	2,508	382,452	379,945	7,599	387,543
2056	1,502	-	986	-	2,489	387,543	385,055	7,701	392,756
2057	1,498	-	973	-	2,471	392,756	390,285	7,806	398,091
2058	1,498	-	861	-	2,359	398,091	395,732	7,915	403,646
2059	1,498	-	935	-	2,433	403,646	401,213	8,024	409,237
2060	1,502	-	938	-	2,440	409,237	406,798	8,136	414,934
2061	1,498	-	1,021	-	2,520	414,934	412,414	8,248	420,662
2062	1,498	-	973	-	2,471	420,662	418,192	8,364	426,556
2063	1,498	-	935	-	2,433	426,556	424,122	8,482	432,605
2064	1,502	-	938	-	2,440	432,605	430,165	8,603	438,768
2065	1,498	-	935	-	2,433	438,768	436,335	8,727	445,061
2066	1,498	-	1,021	-	2,520	445,061	442,542	8,851	451,393
2067	1,498	-	935	-	2,433	451,393	448,959	8,979	457,938
2068	1,502	-	938	-	2,440	457,938	455,499	9,110	464,609
2069	1,498	-	973	-	2,471	464,609	462,138	9,243	471,381
2070	1,498	-	935	-	2,433	471,381	468,948	9,379	478,326

**Table 17**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2071	1,498	-	1,021	-	2,520	478,326	475,807	9,516	485,323
2072	1,502	-	938	-	2,440	485,323	482,883	9,658	492,541
2073	1,498	-	935	-	2,433	492,541	490,108	9,802	499,910
2074	1,498	-	935	-	2,433	499,910	497,476	9,950	507,426
2075	1,498	-	973	-	2,471	507,426	504,955	10,099	515,054
2076	1,502	-	1,024	-	2,526	515,054	512,529	10,251	522,779
2077	1,498	-	935	-	2,433	522,779	520,346	10,407	530,753
2078	1,498	-	935	-	2,433	530,753	528,319	10,566	538,886
2079	1,498	-	935	-	2,433	538,886	536,452	10,729	547,181
2080	1,502	-	938	-	2,440	547,181	544,742	10,895	555,636
2081	1,498	-	1,021	-	2,520	555,636	553,117	11,062	564,179
2082	1,498	-	973	-	2,471	564,179	561,709	11,234	572,943
2083	1,498	-	935	-	2,433	572,943	570,509	11,410	581,920
2084	1,502	-	938	-	2,440	581,920	579,480	11,590	591,070
2085	1,498	-	935	-	2,433	591,070	588,636	11,773	600,409
2086	1,498	-	1,021	-	2,520	600,409	597,889	11,958	609,847
2087	1,498	-	935	-	2,433	609,847	607,414	12,148	619,562
2088	1,773	-	1,003	5	2,781	619,562	616,781	12,336	629,116
2089	26,203	-	-	472	26,675	629,116	602,441	12,049	614,490
2090	50,227	-	-	1,095	51,322	614,490	563,168	11,263	574,431
2091	67,173	-	179	1,048	68,400	574,431	506,031	10,121	516,151
2092	33,558	-	1,640	1,520	36,718	516,151	479,433	9,589	489,022
2093	33,467	-	1,636	1,516	36,618	489,022	452,404	9,048	461,452
2094	16,163	-	695	644	17,501	461,452	443,951	8,879	452,830
2095	5,459	-	-	-	5,459	452,830	447,371	8,947	456,318
2096	11,427	-	596	4,149	16,172	456,318	440,146	8,803	448,949
2097	76	-	1,543	10,741	12,360	448,949	436,589	8,732	445,321
2098	47	-	947	6,592	7,585	445,321	437,735	8,755	446,490
Totals(a)	388,934	-	144,052	29,169	562,155				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

(c) Salem ISFSI Decommissioning Cost is combined within the Radiological Decommissioning Cost

**Attachment 11**

Decommissioning Cash Flow Analysis for CEG Salem, Unit 2  
SAFSTOR Total

**Table 18**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2040	19,529	-	1,430	297	21,256	403,746	382,490	7,650	390,140
2041	26,162	-	32,713	297	59,172	390,140	330,967	6,619	337,587
2042	7,961	-	26,994	297	35,253	337,587	302,334	6,047	308,381
2043	6,892	-	29,228	247	36,367	308,381	272,013	5,440	277,454
2044	2,762	-	883	247	3,893	277,454	273,560	5,471	279,032
2045	2,758	-	955	0	3,714	279,032	275,318	5,506	280,824
2046	1,506	-	1,021	0	2,528	280,824	278,296	5,566	283,862
2047	1,506	-	1,010	0	2,516	283,862	281,346	5,627	286,973
2048	1,511	-	975	0	2,485	286,973	284,488	5,690	290,178
2049	1,506	-	935	0	2,442	290,178	287,736	5,755	293,491
2050	1,506	-	972	0	2,479	293,491	291,012	5,820	296,833
2051	1,506	-	984	0	2,491	296,833	294,342	5,887	300,229
2052	1,511	-	975	0	2,485	300,229	297,744	5,955	303,699
2053	1,506	-	787	0	2,293	303,699	301,405	6,028	307,434
2054	1,506	-	787	0	2,293	307,434	305,140	6,103	311,243
2055	1,506	-	1,010	0	2,516	311,243	308,727	6,175	314,902
2056	1,511	-	986	0	2,497	314,902	312,405	6,248	318,653
2057	1,506	-	972	0	2,479	318,653	316,174	6,323	322,498
2058	1,506	-	861	0	2,367	322,498	320,130	6,403	326,533
2059	1,506	-	935	0	2,442	326,533	324,091	6,482	330,573
2060	1,511	-	937	0	2,448	330,573	328,125	6,562	334,687
2061	1,506	-	1,021	0	2,528	334,687	332,160	6,643	338,803
2062	1,506	-	972	0	2,479	338,803	336,324	6,726	343,051
2063	1,506	-	935	0	2,442	343,051	340,609	6,812	347,421
2064	1,511	-	937	0	2,448	347,421	344,973	6,899	351,873
2065	1,506	-	935	0	2,442	351,873	349,431	6,989	356,419
2066	1,506	-	1,021	0	2,528	356,419	353,892	7,078	360,970
2067	1,506	-	935	0	2,442	360,970	358,528	7,171	365,698
2068	1,511	-	937	0	2,448	365,698	363,250	7,265	370,515
2069	1,506	-	972	0	2,479	370,515	368,037	7,361	375,397
2070	1,506	-	935	0	2,442	375,397	372,956	7,459	380,415
2071	1,506	-	1,021	0	2,528	380,415	377,887	7,558	385,445
2072	1,511	-	937	0	2,448	385,445	382,997	7,660	390,657
2073	1,506	-	935	0	2,442	390,657	388,215	7,764	395,979
2074	1,506	-	935	0	2,442	395,979	393,538	7,871	401,408
2075	1,506	-	972	0	2,479	401,408	398,930	7,979	406,908
2076	1,511	-	1,023	0	2,534	406,908	404,374	8,087	412,462

**Table 18**  
**Decommissioning Cash Flow Analysis for CEG Salem, Unit 2 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost <sup>(c)</sup>	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2077	1,506	-	935	0	2,442	412,462	410,020	8,200	418,220
2078	1,506	-	935	0	2,442	418,220	415,779	8,316	424,094
2079	1,506	-	935	0	2,442	424,094	421,653	8,433	430,086
2080	1,511	-	937	0	2,448	430,086	427,638	8,553	436,190
2081	1,506	-	1,021	0	2,528	436,190	433,663	8,673	442,336
2082	1,506	-	972	0	2,479	442,336	439,857	8,797	448,654
2083	1,506	-	935	0	2,442	448,654	446,213	8,924	455,137
2084	1,511	-	937	0	2,448	455,137	452,689	9,054	461,743
2085	1,506	-	935	0	2,442	461,743	459,301	9,186	468,487
2086	1,506	-	1,021	0	2,528	468,487	465,959	9,319	475,278
2087	1,506	-	935	0	2,442	475,278	472,837	9,457	482,293
2088	1,511	-	1,012	0	2,522	482,293	479,771	9,595	489,367
2089	6,011	-	-	30	6,041	489,367	483,326	9,667	492,992
2090	21,759	-	-	247	22,007	492,992	470,985	9,420	480,405
2091	55,114	-	-	850	55,964	480,405	424,441	8,489	432,930
2092	61,898	-	378	1,356	63,632	432,930	369,298	7,386	376,684
2093	32,997	-	1,533	2,329	36,859	376,684	339,825	6,796	346,621
2094	32,997	-	1,533	2,329	36,859	346,621	309,762	6,195	315,957
2095	19,118	-	706	1,072	20,896	315,957	295,062	5,901	300,963
2096	11,567	-	596	5,497	17,660	300,963	283,303	5,666	288,969
2097	33	-	1,543	14,230	15,806	288,969	273,164	5,463	278,627
2098	20	-	947	8,733	9,700	278,627	268,927	5,379	274,306
Totals(a)	372,399	-	140,529	38,060	550,989				

(a) Cash flows may not add due to rounding

(b) A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

(c) Salem ISFSI Decommissioning Cost is combined within the Radiological Decommissioning Cost

**Attachment 12**  
Decommissioning Cash Flow Analysis for Limerick, Unit 1  
SAFSTOR Radiological

**Table 19**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2042	714	-	714	902,135	901,421	18,028	919,449
2043	3,832	-	3,832	919,449	915,617	18,312	933,930
2044	11,385	-	11,385	933,930	922,544	18,451	940,995
2045	42,248	-	42,248	940,995	898,747	17,975	916,722
2046	31,336	-	31,336	916,722	885,386	17,708	903,094
2047	31,336	-	31,336	903,094	871,758	17,435	889,193
2048	31,422	-	31,422	889,193	857,772	17,155	874,927
2049	31,781	-	31,781	874,927	843,146	16,863	860,009
2050	32,219	-	32,219	860,009	827,789	16,556	844,345
2051	31,908	-	31,908	844,345	812,437	16,249	828,685
2052	31,481	-	31,481	828,685	797,205	15,944	813,149
2053	30,810	-	30,810	813,149	782,338	15,647	797,985
2054	24,186	-	24,186	797,985	773,799	15,476	789,275
2055	11,154	-	11,154	789,275	778,121	15,562	793,683
2056	4,322	-	4,322	793,683	789,361	15,787	805,148
2057	4,310	-	4,310	805,148	800,838	16,017	816,855
2058	4,310	-	4,310	816,855	812,545	16,251	828,796
2059	4,310	-	4,310	828,796	824,485	16,490	840,975
2060	4,322	-	4,322	840,975	836,653	16,733	853,386
2061	4,310	-	4,310	853,386	849,076	16,982	866,057
2062	4,310	-	4,310	866,057	861,747	17,235	878,982
2063	4,310	-	4,310	878,982	874,672	17,493	892,166
2064	4,322	-	4,322	892,166	887,844	17,757	905,600
2065	4,310	-	4,310	905,600	901,290	18,026	919,316
2066	4,310	-	4,310	919,316	915,006	18,300	933,306
2067	4,310	-	4,310	933,306	928,996	18,580	947,576
2068	4,322	-	4,322	947,576	943,254	18,865	962,119
2069	4,310	-	4,310	962,119	957,809	19,156	976,965
2070	4,310	-	4,310	976,965	972,655	19,453	992,108
2071	4,310	-	4,310	992,108	987,798	19,756	1,007,554
2072	4,322	-	4,322	1,007,554	1,003,232	20,065	1,023,296
2073	4,310	-	4,310	1,023,296	1,018,986	20,380	1,039,366
2074	4,310	-	4,310	1,039,366	1,035,056	20,701	1,055,757
2075	4,310	-	4,310	1,055,757	1,051,447	21,029	1,072,476
2076	4,311	-	4,311	1,072,476	1,068,165	21,363	1,089,528
2077	4,179	-	4,179	1,089,528	1,085,349	21,707	1,107,055
2078	4,179	-	4,179	1,107,055	1,102,876	22,058	1,124,934

**Table 19**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 1 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2079	4,179	-	4,179	1,124,934	1,120,754	22,415	1,143,169
2080	4,191	-	4,191	1,143,169	1,138,978	22,780	1,161,758
2081	4,179	-	4,179	1,161,758	1,157,579	23,152	1,180,730
2082	4,787	-	4,787	1,180,730	1,175,943	23,519	1,199,462
2083	4,787	-	4,787	1,199,462	1,194,675	23,894	1,218,569
2084	4,800	-	4,800	1,218,569	1,213,769	24,275	1,238,044
2085	4,787	-	4,787	1,238,044	1,233,257	24,665	1,257,922
2086	4,787	-	4,787	1,257,922	1,253,135	25,063	1,278,198
2087	4,787	-	4,787	1,278,198	1,273,411	25,468	1,298,879
2088	4,800	-	4,800	1,298,879	1,294,079	25,882	1,319,961
2089	4,787	-	4,787	1,319,961	1,315,174	26,303	1,341,477
2090	4,787	-	4,787	1,341,477	1,336,690	26,734	1,363,424
2091	4,787	-	4,787	1,363,424	1,358,637	27,173	1,385,810
2092	4,800	-	4,800	1,385,810	1,381,010	27,620	1,408,630
2093	4,787	-	4,787	1,408,630	1,403,843	28,077	1,431,920
2094	4,787	-	4,787	1,431,920	1,427,133	28,543	1,455,676
2095	4,787	-	4,787	1,455,676	1,450,889	29,018	1,479,906
2096	4,800	-	4,800	1,479,906	1,475,106	29,502	1,504,608
2097	29,908	-	29,908	1,504,608	1,474,701	29,494	1,504,195
2098	78,066	-	78,066	1,504,195	1,426,129	28,523	1,454,652
2099	100,816	-	100,816	1,454,652	1,353,835	27,077	1,380,912
2100	100,816	-	100,816	1,380,912	1,280,096	25,602	1,305,698
2101	100,816	-	100,816	1,305,698	1,204,882	24,098	1,228,979
2102	79,309	-	79,309	1,228,979	1,149,670	22,993	1,172,663
2103	76,394	7,634	84,028	1,172,663	1,088,635	21,773	1,110,408
2104	24,200	776	24,975	1,110,408	1,085,432	21,709	1,107,141
2105	-	-	-	1,107,141	1,107,141	22,143	1,129,284
2106	-	-	-	1,129,284	1,129,284	22,586	1,151,870
2107	-	-	-	1,151,870	1,151,870	23,037	1,174,907
Totals(a)	1,119,477	8,410	1,127,887				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 13**  
Decommissioning Cash Flow Analysis for Limerick, Unit 2  
SAFSTOR Radiological

**Table 20**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 2 – SAFSTOR Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2047	2,017	-	2,017	1,064,288	1,062,271	21,245	1,083,516
2048	3,805	-	3,805	1,083,516	1,079,711	21,594	1,101,305
2049	35,559	-	35,559	1,101,305	1,065,746	21,315	1,087,061
2050	44,605	-	44,605	1,087,061	1,042,456	20,849	1,063,305
2051	33,523	-	33,523	1,063,305	1,029,782	20,596	1,050,378
2052	33,099	-	33,099	1,050,378	1,017,279	20,346	1,037,624
2053	32,425	-	32,425	1,037,624	1,005,199	20,104	1,025,303
2054	25,325	-	25,325	1,025,303	999,978	20,000	1,019,978
2055	11,551	-	11,551	1,019,978	1,008,426	20,169	1,028,595
2056	4,446	-	4,446	1,028,595	1,024,148	20,483	1,044,631
2057	4,434	-	4,434	1,044,631	1,040,197	20,804	1,061,001
2058	4,434	-	4,434	1,061,001	1,056,567	21,131	1,077,698
2059	4,434	-	4,434	1,077,698	1,073,264	21,465	1,094,730
2060	4,446	-	4,446	1,094,730	1,090,283	21,806	1,112,089
2061	4,434	-	4,434	1,112,089	1,107,655	22,153	1,129,808
2062	4,434	-	4,434	1,129,808	1,125,374	22,507	1,147,881
2063	4,434	-	4,434	1,147,881	1,143,447	22,869	1,166,316
2064	4,446	-	4,446	1,166,316	1,161,870	23,237	1,185,107
2065	4,434	-	4,434	1,185,107	1,180,673	23,613	1,204,287
2066	4,434	-	4,434	1,204,287	1,199,853	23,997	1,223,850
2067	4,434	-	4,434	1,223,850	1,219,415	24,388	1,243,804
2068	4,446	-	4,446	1,243,804	1,239,357	24,787	1,264,145
2069	4,434	-	4,434	1,264,145	1,259,711	25,194	1,284,905
2070	4,434	-	4,434	1,284,905	1,280,471	25,609	1,306,080
2071	4,434	-	4,434	1,306,080	1,301,646	26,033	1,327,679
2072	4,446	-	4,446	1,327,679	1,323,233	26,465	1,349,697
2073	4,434	-	4,434	1,349,697	1,345,263	26,905	1,372,168
2074	4,434	-	4,434	1,372,168	1,367,734	27,355	1,395,089
2075	4,434	-	4,434	1,395,089	1,390,655	27,813	1,418,468
2076	4,435	-	4,435	1,418,468	1,414,033	28,281	1,442,313
2077	4,303	-	4,303	1,442,313	1,438,010	28,760	1,466,770
2078	4,303	-	4,303	1,466,770	1,462,467	29,249	1,491,716
2079	4,303	-	4,303	1,491,716	1,487,413	29,748	1,517,161
2080	4,315	-	4,315	1,517,161	1,512,846	30,257	1,543,103
2081	4,303	-	4,303	1,543,103	1,538,799	30,776	1,569,575
2082	4,911	-	4,911	1,569,575	1,564,664	31,293	1,595,958
2083	4,911	-	4,911	1,595,958	1,591,047	31,821	1,622,868

**Table 20**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 2 – SAFSTOR Radiological**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2084	4,924	-	4,924	1,622,868	1,617,943	32,359	1,650,302
2085	4,911	-	4,911	1,650,302	1,645,391	32,908	1,678,299
2086	4,911	-	4,911	1,678,299	1,673,388	33,468	1,706,856
2087	4,911	-	4,911	1,706,856	1,701,945	34,039	1,735,984
2088	4,924	-	4,924	1,735,984	1,731,060	34,621	1,765,681
2089	4,911	-	4,911	1,765,681	1,760,770	35,215	1,795,985
2090	4,911	-	4,911	1,795,985	1,791,074	35,821	1,826,896
2091	4,911	-	4,911	1,826,896	1,821,985	36,440	1,858,425
2092	4,924	-	4,924	1,858,425	1,853,500	37,070	1,890,570
2093	4,911	-	4,911	1,890,570	1,885,659	37,713	1,923,373
2094	4,911	-	4,911	1,923,373	1,918,462	38,369	1,956,831
2095	4,911	-	4,911	1,956,831	1,951,920	39,038	1,990,958
2096	4,924	-	4,924	1,990,958	1,986,034	39,721	2,025,755
2097	30,032	-	30,032	2,025,755	1,995,723	39,914	2,035,637
2098	80,694	-	80,694	2,035,637	1,954,944	39,099	1,994,043
2099	105,486	-	105,486	1,994,043	1,888,556	37,771	1,926,327
2100	105,486	-	105,486	1,926,327	1,820,841	36,417	1,857,257
2101	105,486	-	105,486	1,857,257	1,751,771	35,035	1,786,806
2102	94,966	-	94,966	1,786,806	1,691,840	33,837	1,725,677
2103	92,825	7,634	100,459	1,725,677	1,625,218	32,504	1,657,723
2104	25,426	776	26,202	1,657,723	1,631,521	32,630	1,664,151
2105	-	-	-	1,664,151	1,664,151	33,283	1,697,434
2106	-	-	-	1,697,434	1,697,434	33,949	1,731,383
2107	-	-	-	1,731,383	1,731,383	34,628	1,766,010
Totals(a)	1,050,737	8,410	1,059,147				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 14**  
Decommissioning Cash Flow Analysis for Limerick, Unit 1  
SAFSTOR Total

**Table 21**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 1 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2042	714	-	-	-	714	902,135	901,421	18,028	919,449
2043	3,832	-	-	-	3,832	919,449	915,617	18,312	933,930
2044	11,385	-	19,403	20	30,808	933,930	903,122	18,062	921,184
2045	42,248	-	78,166	84	120,498	921,184	800,686	16,014	816,700
2046	31,336	-	2,809	11	34,156	816,700	782,543	15,651	798,194
2047	31,336	-	2,809	11	34,156	798,194	764,038	15,281	779,319
2048	31,422	-	2,817	11	34,250	779,319	745,069	14,901	759,970
2049	31,781	-	2,809	11	34,602	759,970	725,368	14,507	739,876
2050	32,219	-	2,809	11	35,040	739,876	704,836	14,097	718,933
2051	31,908	-	2,809	11	34,729	718,933	684,204	13,684	697,888
2052	31,481	-	14,446	11	45,938	697,888	651,950	13,039	664,989
2053	30,810	-	25,749	11	56,571	664,989	608,418	12,168	620,586
2054	24,186	-	14,182	56	38,425	620,586	582,162	11,643	593,805
2055	11,154	-	2,809	50	14,013	593,805	579,792	11,596	591,387
2056	4,322	-	2,817	-	7,139	591,387	584,249	11,685	595,934
2057	4,310	-	2,809	-	7,119	595,934	588,814	11,776	600,591
2058	4,310	-	2,809	-	7,119	600,591	593,472	11,869	605,341
2059	4,310	-	2,809	-	7,119	605,341	598,222	11,964	610,186
2060	4,322	-	2,817	-	7,139	610,186	603,047	12,061	615,108
2061	4,310	-	2,809	-	7,119	615,108	607,989	12,160	620,149
2062	4,310	-	2,809	-	7,119	620,149	613,030	12,261	625,290
2063	4,310	-	2,809	-	7,119	625,290	618,171	12,363	630,534
2064	4,322	-	2,817	-	7,139	630,534	623,396	12,468	635,864
2065	4,310	-	2,809	-	7,119	635,864	628,744	12,575	641,319
2066	4,310	-	2,809	-	7,119	641,319	634,200	12,684	646,884
2067	4,310	-	2,809	-	7,119	646,884	639,765	12,795	652,560
2068	4,322	-	2,817	-	7,139	652,560	645,421	12,908	658,330
2069	4,310	-	2,809	-	7,119	658,330	651,211	13,024	664,235
2070	4,310	-	2,809	-	7,119	664,235	657,116	13,142	670,258
2071	4,310	-	2,809	-	7,119	670,258	663,139	13,263	676,401
2072	4,322	-	2,817	-	7,139	676,401	669,263	13,385	682,648
2073	4,310	-	2,809	-	7,119	682,648	675,529	13,511	689,039
2074	4,310	-	2,809	-	7,119	689,039	681,920	13,638	695,558
2075	4,310	-	2,809	-	7,119	695,558	688,439	13,769	702,208
2076	4,311	-	3,086	-	7,397	702,208	694,811	13,896	708,707
2077	4,179	-	5,982	-	10,161	708,707	698,546	13,971	712,516
2078	4,179	-	5,982	-	10,161	712,516	702,355	14,047	716,402

**Table 21**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 1 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2079	4,179	-	5,982	-	10,161	716,402	706,241	14,125	720,365
2080	4,191	-	5,998	-	10,189	720,365	710,176	14,204	724,380
2081	4,179	-	5,982	-	10,161	724,380	714,218	14,284	728,502
2082	4,787	-	-	-	4,787	728,502	723,716	14,474	738,190
2083	4,787	-	-	-	4,787	738,190	733,403	14,668	748,071
2084	4,800	-	-	-	4,800	748,071	743,271	14,865	758,136
2085	4,787	-	-	-	4,787	758,136	753,349	15,067	768,416
2086	4,787	-	-	-	4,787	768,416	763,629	15,273	778,902
2087	4,787	-	-	-	4,787	778,902	774,115	15,482	789,597
2088	4,800	-	-	-	4,800	789,597	784,797	15,696	800,493
2089	4,787	-	-	-	4,787	800,493	795,706	15,914	811,620
2090	4,787	-	-	-	4,787	811,620	806,833	16,137	822,970
2091	4,787	-	-	-	4,787	822,970	818,183	16,364	834,547
2092	4,800	-	-	-	4,800	834,547	829,747	16,595	846,342
2093	4,787	-	-	-	4,787	846,342	841,555	16,831	858,386
2094	4,787	-	-	-	4,787	858,386	853,599	17,072	870,671
2095	4,787	-	-	-	4,787	870,671	865,884	17,318	883,202
2096	4,800	-	-	-	4,800	883,202	878,402	17,568	895,970
2097	29,908	-	-	56	29,963	895,970	866,006	17,320	883,326
2098	78,066	-	-	161	78,227	883,326	805,100	16,102	821,202
2099	100,816	-	-	210	101,027	821,202	720,175	14,404	734,579
2100	100,816	-	-	210	101,027	734,579	633,552	12,671	646,223
2101	100,816	-	-	210	101,027	646,223	545,197	10,904	556,100
2102	79,309	-	-	1,963	81,272	556,100	474,829	9,497	484,325
2103	76,394	7,634	-	2,086	86,114	484,325	398,211	7,964	406,175
2104	24,200	776	-	5,281	30,257	406,175	375,918	7,518	383,437
2105	-	-	-	28,400	28,400	383,437	355,037	7,101	362,138
2106	-	-	-	28,400	28,400	362,138	333,738	6,675	340,413
2107	-	-	-	12,588	12,588	340,413	327,824	6,556	334,381
Totals(a)	1,119,477	8,410	260,849	79,867	1,468,604				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 15**  
Decommissioning Cash Flow Analysis for Limerick, Unit 2  
SAFSTOR Total

**Table 22**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 2 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2047	2,017	-	-	-	2,017	1,064,288	1,062,271	21,245	1,083,516
2048	3,805	-	-	-	3,805	1,083,516	1,079,711	21,594	1,101,305
2049	35,559	-	58,499	61	94,119	1,101,305	1,007,186	20,144	1,027,330
2050	44,605	-	40,016	56	84,677	1,027,330	942,653	18,853	961,506
2051	33,523	-	2,809	24	36,356	961,506	925,150	18,503	943,653
2052	33,099	-	14,399	24	47,523	943,653	896,130	17,923	914,053
2053	32,425	-	25,780	24	58,229	914,053	855,824	17,116	872,940
2054	25,325	-	14,198	63	39,586	872,940	833,355	16,667	850,022
2055	11,551	-	2,809	50	14,410	850,022	835,611	16,712	852,324
2056	4,446	-	2,817	-	7,263	852,324	845,061	16,901	861,962
2057	4,434	-	2,809	-	7,243	861,962	854,719	17,094	871,813
2058	4,434	-	2,809	-	7,243	871,813	864,570	17,291	881,861
2059	4,434	-	2,809	-	7,243	881,861	874,618	17,492	892,110
2060	4,446	-	2,817	-	7,263	892,110	884,847	17,697	902,544
2061	4,434	-	2,809	-	7,243	902,544	895,301	17,906	913,207
2062	4,434	-	2,809	-	7,243	913,207	905,964	18,119	924,083
2063	4,434	-	2,809	-	7,243	924,083	916,840	18,337	935,177
2064	4,446	-	2,817	-	7,263	935,177	927,914	18,558	946,472
2065	4,434	-	2,809	-	7,243	946,472	939,229	18,785	958,014
2066	4,434	-	2,809	-	7,243	958,014	950,770	19,015	969,786
2067	4,434	-	2,809	-	7,243	969,786	962,543	19,251	981,793
2068	4,446	-	2,817	-	7,263	981,793	974,530	19,491	994,021
2069	4,434	-	2,809	-	7,243	994,021	986,778	19,736	1,006,513
2070	4,434	-	2,809	-	7,243	1,006,513	999,270	19,985	1,019,256
2071	4,434	-	2,809	-	7,243	1,019,256	1,012,012	20,240	1,032,253
2072	4,446	-	2,817	-	7,263	1,032,253	1,024,990	20,500	1,045,489
2073	4,434	-	2,809	-	7,243	1,045,489	1,038,246	20,765	1,059,011
2074	4,434	-	2,809	-	7,243	1,059,011	1,051,768	21,035	1,072,803
2075	4,434	-	2,809	-	7,243	1,072,803	1,065,560	21,311	1,086,871
2076	4,435	-	3,086	-	7,521	1,086,871	1,079,350	21,587	1,100,937
2077	4,303	-	5,982	-	10,285	1,100,937	1,090,651	21,813	1,112,464
2078	4,303	-	5,982	-	10,285	1,112,464	1,102,179	22,044	1,124,223
2079	4,303	-	5,982	-	10,285	1,124,223	1,113,937	22,279	1,136,216
2080	4,315	-	5,998	-	10,314	1,136,216	1,125,902	22,518	1,148,420
2081	4,303	-	5,982	-	10,285	1,148,420	1,138,135	22,763	1,160,898
2082	4,911	-	-	-	4,911	1,160,898	1,155,987	23,120	1,179,106
2083	4,911	-	-	-	4,911	1,179,106	1,174,195	23,484	1,197,679

**Table 22**  
**Decommissioning Cash Flow Analysis for Limerick, Unit 2 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2084	4,924	-	-	-	4,924	1,197,679	1,192,755	23,855	1,216,610
2085	4,911	-	-	-	4,911	1,216,610	1,211,699	24,234	1,235,933
2086	4,911	-	-	-	4,911	1,235,933	1,231,022	24,620	1,255,643
2087	4,911	-	-	-	4,911	1,255,643	1,250,732	25,015	1,275,746
2088	4,924	-	-	-	4,924	1,275,746	1,270,822	25,416	1,296,238
2089	4,911	-	-	-	4,911	1,296,238	1,291,328	25,827	1,317,154
2090	4,911	-	-	-	4,911	1,317,154	1,312,243	26,245	1,338,488
2091	4,911	-	-	-	4,911	1,338,488	1,333,577	26,672	1,360,249
2092	4,924	-	-	-	4,924	1,360,249	1,355,324	27,106	1,382,431
2093	4,911	-	-	-	4,911	1,382,431	1,377,520	27,550	1,405,070
2094	4,911	-	-	-	4,911	1,405,070	1,400,159	28,003	1,428,163
2095	4,911	-	-	-	4,911	1,428,163	1,423,252	28,465	1,451,717
2096	4,924	-	-	-	4,924	1,451,717	1,446,792	28,936	1,475,728
2097	30,032	-	-	56	30,087	1,475,728	1,445,641	28,913	1,474,554
2098	80,694	-	-	412	81,105	1,474,554	1,393,448	27,869	1,421,317
2099	105,486	-	-	665	106,152	1,421,317	1,315,165	26,303	1,341,469
2100	105,486	-	-	665	106,152	1,341,469	1,235,317	24,706	1,260,023
2101	105,486	-	-	665	106,152	1,260,023	1,153,871	23,077	1,176,949
2102	94,966	-	-	6,221	101,188	1,176,949	1,075,761	21,515	1,097,276
2103	92,825	7,634	-	6,612	107,071	1,097,276	990,205	19,804	1,010,009
2104	25,426	776	-	7,065	33,267	1,010,009	976,742	19,535	996,277
2105	-	-	-	36,544	36,544	996,277	959,733	19,195	978,927
2106	-	-	-	36,544	36,544	978,927	942,383	18,848	961,231
2107	-	-	-	15,198	15,198	961,231	946,033	18,921	964,953
Totals(a)	1,050,737	8,410	247,743	110,951	1,417,840				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 16**

Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2  
SAFSTOR Radiological

**Table 23**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 – SAFSTOR**  
**Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2051	711	-	711	654,721	654,011	13,080	667,091
2052	1,764	-	1,764	667,091	665,327	13,307	678,633
2053	8,777	-	8,777	678,633	669,857	13,397	683,254
2054	18,613	-	18,613	683,254	664,641	13,293	677,934
2055	14,742	-	14,742	677,934	663,192	13,264	676,455
2056	14,713	-	14,713	676,455	661,742	13,235	674,977
2057	14,694	-	14,694	674,977	660,283	13,206	673,489
2058	14,599	-	14,599	673,489	658,890	13,178	672,067
2059	11,539	-	11,539	672,067	660,528	13,211	673,739
2060	5,007	-	5,007	673,739	668,732	13,375	682,106
2061	1,725	-	1,725	682,106	680,381	13,608	693,989
2062	1,721	-	1,721	693,989	692,268	13,845	706,113
2063	1,721	-	1,721	706,113	704,393	14,088	718,481
2064	1,721	-	1,721	718,481	716,760	14,335	731,095
2065	1,725	-	1,725	731,095	729,370	14,587	743,957
2066	1,721	-	1,721	743,957	742,237	14,845	757,082
2067	1,721	-	1,721	757,082	755,361	15,107	770,468
2068	1,721	-	1,721	770,468	768,748	15,375	784,123
2069	1,725	-	1,725	784,123	782,397	15,648	798,045
2070	1,721	-	1,721	798,045	796,325	15,926	812,251
2071	1,721	-	1,721	812,251	810,531	16,211	826,741
2072	1,721	-	1,721	826,741	825,021	16,500	841,521
2073	1,725	-	1,725	841,521	839,796	16,796	856,592
2074	1,721	-	1,721	856,592	854,871	17,097	871,969
2075	1,721	-	1,721	871,969	870,248	17,405	887,653
2076	1,721	-	1,721	887,653	885,932	17,719	903,651
2077	1,725	-	1,725	903,651	901,926	18,039	919,964
2078	1,721	-	1,721	919,964	918,244	18,365	936,609
2079	1,721	-	1,721	936,609	934,888	18,698	953,586
2080	1,721	-	1,721	953,586	951,865	19,037	970,903
2081	1,725	-	1,725	970,903	969,177	19,384	988,561
2082	1,721	-	1,721	988,561	986,840	19,737	1,006,577
2083	1,721	-	1,721	1,006,577	1,004,856	20,097	1,024,954
2084	1,721	-	1,721	1,024,954	1,023,233	20,465	1,043,698
2085	1,725	-	1,725	1,043,698	1,041,972	20,839	1,062,812
2086	1,721	-	1,721	1,062,812	1,061,091	21,222	1,082,313

**Table 23**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 – SAFSTOR**  
**Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2087	1,721	-	1,721	1,082,313	1,080,592	21,612	1,102,204
2088	1,721	-	1,721	1,102,204	1,100,484	22,010	1,122,493
2089	1,725	-	1,725	1,122,493	1,120,768	22,415	1,143,184
2090	1,721	-	1,721	1,143,184	1,141,463	22,829	1,164,292
2091	1,721	-	1,721	1,164,292	1,162,572	23,251	1,185,823
2092	1,721	-	1,721	1,185,823	1,184,102	23,682	1,207,785
2093	1,725	-	1,725	1,207,785	1,206,059	24,121	1,230,180
2094	1,691	-	1,691	1,230,180	1,228,489	24,570	1,253,059
2095	1,670	-	1,670	1,253,059	1,251,389	25,028	1,276,417
2096	1,670	-	1,670	1,276,417	1,274,747	25,495	1,300,242
2097	1,675	-	1,675	1,300,242	1,298,567	25,971	1,324,538
2098	1,670	-	1,670	1,324,538	1,322,868	26,457	1,349,326
2099	1,670	-	1,670	1,349,326	1,347,656	26,953	1,374,609
2100	1,670	-	1,670	1,374,609	1,372,939	27,459	1,400,397
2101	2,040	-	2,040	1,400,397	1,398,358	27,967	1,426,325
2102	2,034	-	2,034	1,426,325	1,424,290	28,486	1,452,776
2103	2,034	-	2,034	1,452,776	1,450,742	29,015	1,479,757
2104	2,034	-	2,034	1,479,757	1,477,723	29,554	1,507,277
2105	2,034	-	2,034	1,507,277	1,505,243	30,105	1,535,348
2106	19,852	-	19,852	1,535,348	1,515,496	30,310	1,545,806
2107	39,742	-	39,742	1,545,806	1,506,064	30,121	1,536,185
2108	44,204	-	44,204	1,536,185	1,491,981	29,840	1,521,820
2109	44,325	-	44,325	1,521,820	1,477,495	29,550	1,507,045
2110	42,687	-	42,687	1,507,045	1,464,357	29,287	1,493,644
2111	34,138	-	34,138	1,493,644	1,459,506	29,190	1,488,697
2112	30,029	3,540	33,568	1,488,697	1,455,128	29,103	1,484,231
2113	6,593	-	6,593	1,484,231	1,477,638	29,553	1,507,191
2114	-	-	-	1,507,191	1,507,191	30,144	1,537,335
2115	-	-	-	1,537,335	1,537,335	30,747	1,568,082
2116	-	-	-	1,568,082	1,568,082	31,362	1,599,443
Totals(a)	445,443	3,540	448,983				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 17**

Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3  
SAFSTOR Radiological

**Table 24**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 – SAFSTOR**  
**Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2052	880	-	880	723,895	723,015	14,460	737,476
2053	1,750	-	1,750	737,476	735,725	14,715	750,440
2054	13,772	-	13,772	750,440	736,668	14,733	751,402
2055	21,422	-	21,422	751,402	729,980	14,600	744,579
2056	15,090	-	15,090	744,579	729,490	14,590	744,079
2057	15,071	-	15,071	744,079	729,008	14,580	743,588
2058	14,976	-	14,976	743,588	728,612	14,572	743,185
2059	11,899	-	11,899	743,185	731,286	14,626	745,911
2060	5,229	-	5,229	745,911	740,683	14,814	755,496
2061	1,787	-	1,787	755,496	753,709	15,074	768,783
2062	1,783	-	1,783	768,783	767,000	15,340	782,341
2063	1,783	-	1,783	782,341	780,558	15,611	796,169
2064	1,783	-	1,783	796,169	794,387	15,888	810,274
2065	1,787	-	1,787	810,274	808,487	16,170	824,657
2066	1,783	-	1,783	824,657	822,874	16,457	839,332
2067	1,783	-	1,783	839,332	837,549	16,751	854,300
2068	1,783	-	1,783	854,300	852,517	17,050	869,568
2069	1,787	-	1,787	869,568	867,780	17,356	885,136
2070	1,783	-	1,783	885,136	883,353	17,667	901,020
2071	1,783	-	1,783	901,020	899,238	17,985	917,223
2072	1,783	-	1,783	917,223	915,440	18,309	933,749
2073	1,787	-	1,787	933,749	931,961	18,639	950,601
2074	1,783	-	1,783	950,601	948,818	18,976	967,794
2075	1,783	-	1,783	967,794	966,012	19,320	985,332
2076	1,783	-	1,783	985,332	983,550	19,671	1,003,221
2077	1,787	-	1,787	1,003,221	1,001,433	20,029	1,021,462
2078	1,783	-	1,783	1,021,462	1,019,679	20,394	1,040,073
2079	1,783	-	1,783	1,040,073	1,038,290	20,766	1,059,056
2080	1,783	-	1,783	1,059,056	1,057,274	21,145	1,078,419
2081	1,787	-	1,787	1,078,419	1,076,632	21,533	1,098,164
2082	1,783	-	1,783	1,098,164	1,096,382	21,928	1,118,309
2083	1,783	-	1,783	1,118,309	1,116,527	22,331	1,138,857
2084	1,783	-	1,783	1,138,857	1,137,075	22,741	1,159,816
2085	1,787	-	1,787	1,159,816	1,158,029	23,161	1,181,189
2086	1,783	-	1,783	1,181,189	1,179,407	23,588	1,202,995
2087	1,783	-	1,783	1,202,995	1,201,212	24,024	1,225,237

**Table 24**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 – SAFSTOR**  
**Radiological**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2088	1,783	-	1,783	1,225,237	1,223,454	24,469	1,247,923
2089	1,787	-	1,787	1,247,923	1,246,136	24,923	1,271,059
2090	1,783	-	1,783	1,271,059	1,269,276	25,386	1,294,661
2091	1,783	-	1,783	1,294,661	1,292,879	25,858	1,318,736
2092	1,783	-	1,783	1,318,736	1,316,954	26,339	1,343,293
2093	1,787	-	1,787	1,343,293	1,341,506	26,830	1,368,336
2094	1,753	-	1,753	1,368,336	1,366,583	27,332	1,393,914
2095	1,732	-	1,732	1,393,914	1,392,182	27,844	1,420,026
2096	1,732	-	1,732	1,420,026	1,418,294	28,366	1,446,660
2097	1,737	-	1,737	1,446,660	1,444,923	28,898	1,473,821
2098	1,732	-	1,732	1,473,821	1,472,089	29,442	1,501,531
2099	1,732	-	1,732	1,501,531	1,499,799	29,996	1,529,795
2100	1,732	-	1,732	1,529,795	1,528,063	30,561	1,558,624
2101	2,102	-	2,102	1,558,624	1,556,522	31,130	1,587,653
2102	2,096	-	2,096	1,587,653	1,585,556	31,711	1,617,267
2103	2,096	-	2,096	1,617,267	1,615,171	32,303	1,647,475
2104	2,096	-	2,096	1,647,475	1,645,378	32,908	1,678,286
2105	2,096	-	2,096	1,678,286	1,676,190	33,524	1,709,713
2106	19,914	-	19,914	1,709,713	1,689,800	33,796	1,723,596
2107	40,125	-	40,125	1,723,596	1,683,471	33,669	1,717,140
2108	44,686	-	44,686	1,717,140	1,672,455	33,449	1,705,904
2109	44,808	-	44,808	1,705,904	1,661,096	33,222	1,694,317
2110	43,638	-	43,638	1,694,317	1,650,680	33,014	1,683,693
2111	37,732	-	37,732	1,683,693	1,645,961	32,919	1,678,880
2112	33,101	3,540	36,641	1,678,880	1,642,239	32,845	1,675,084
2113	6,633	-	6,633	1,675,084	1,668,450	33,369	1,701,819
2114	-	-	-	1,701,819	1,701,819	34,036	1,735,856
2115	-	-	-	1,735,856	1,735,856	34,717	1,770,573
2116	-	-	-	1,770,573	1,770,573	35,411	1,805,984
Totals(a)	452,231	3,540	455,771				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 18**

Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2  
SAFSTOR Total

**Table 25**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2051	711	-	-	-	711	654,721	654,011	13,080	667,091
2052	1,764	-	-	-	1,764	667,091	665,327	13,307	678,633
2053	8,777	-	19,483	19	28,278	678,633	650,355	13,007	663,362
2054	18,613	-	29,679	32	48,324	663,362	615,038	12,301	627,339
2055	14,742	-	1,259	9	16,010	627,339	611,329	12,227	623,555
2056	14,713	-	1,259	9	15,981	623,555	607,574	12,151	619,725
2057	14,694	-	6,159	9	20,862	619,725	598,864	11,977	610,841
2058	14,599	-	12,861	9	27,470	610,841	583,371	11,667	595,039
2059	11,539	-	7,996	25	19,561	595,039	575,478	11,510	586,988
2060	5,007	-	1,259	27	6,293	586,988	580,695	11,614	592,309
2061	1,725	-	1,262	-	2,988	592,309	589,321	11,786	601,107
2062	1,721	-	1,259	-	2,979	601,107	598,128	11,963	610,091
2063	1,721	-	1,259	-	2,979	610,091	607,111	12,142	619,254
2064	1,721	-	1,259	-	2,979	619,254	616,274	12,325	628,600
2065	1,725	-	1,262	-	2,988	628,600	625,612	12,512	638,124
2066	1,721	-	1,259	-	2,979	638,124	635,145	12,703	647,848
2067	1,721	-	1,259	-	2,979	647,848	644,868	12,897	657,766
2068	1,721	-	1,259	-	2,979	657,766	654,786	13,096	667,882
2069	1,725	-	1,262	-	2,988	667,882	664,895	13,298	678,192
2070	1,721	-	1,259	-	2,979	678,192	675,213	13,504	688,717
2071	1,721	-	1,259	-	2,979	688,717	685,738	13,715	699,453
2072	1,721	-	1,259	-	2,979	699,453	696,473	13,929	710,403
2073	1,725	-	1,262	-	2,988	710,403	707,415	14,148	721,564
2074	1,721	-	1,259	-	2,979	721,564	718,584	14,372	732,956
2075	1,721	-	1,259	-	2,979	732,956	729,976	14,600	744,576
2076	1,721	-	1,259	-	2,979	744,576	741,597	14,832	756,429
2077	1,725	-	1,262	-	2,988	756,429	753,441	15,069	768,510
2078	1,721	-	1,259	-	2,979	768,510	765,530	15,311	780,841
2079	1,721	-	1,259	-	2,979	780,841	777,862	15,557	793,419
2080	1,721	-	1,259	-	2,979	793,419	790,440	15,809	806,248
2081	1,725	-	1,262	-	2,988	806,248	803,261	16,065	819,326
2082	1,721	-	1,259	-	2,979	819,326	816,347	16,327	832,674
2083	1,721	-	1,259	-	2,979	832,674	829,694	16,594	846,288
2084	1,721	-	1,259	-	2,979	846,288	843,309	16,866	860,175
2085	1,725	-	1,262	-	2,988	860,175	857,187	17,144	874,331
2086	1,721	-	1,259	-	2,979	874,331	871,352	17,427	888,779
2087	1,721	-	1,259	-	2,979	888,779	885,799	17,716	903,515

**Table 25**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 2 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2088	1,721	-	1,259	-	2,979	903,515	900,536	18,011	918,547
2089	1,725	-	1,262	-	2,988	918,547	915,559	18,311	933,870
2090	1,721	-	1,259	-	2,979	933,870	930,891	18,618	949,509
2091	1,721	-	1,259	-	2,979	949,509	946,529	18,931	965,460
2092	1,721	-	1,259	-	2,979	965,460	962,480	19,250	981,730
2093	1,725	-	1,262	-	2,988	981,730	978,743	19,575	998,317
2094	1,691	-	2,119	-	3,810	998,317	994,507	19,890	1,014,397
2095	1,670	-	2,726	-	4,396	1,014,397	1,010,001	20,200	1,030,201
2096	1,670	-	2,726	-	4,396	1,030,201	1,025,804	20,516	1,046,321
2097	1,675	-	2,734	-	4,408	1,046,321	1,041,912	20,838	1,062,750
2098	1,670	-	2,726	-	4,396	1,062,750	1,058,354	21,167	1,079,521
2099	1,670	-	2,726	-	4,396	1,079,521	1,075,125	21,502	1,096,627
2100	1,670	-	2,726	-	4,396	1,096,627	1,092,231	21,845	1,114,075
2101	2,040	-	-	-	2,040	1,114,075	1,112,035	22,241	1,134,276
2102	2,034	-	-	-	2,034	1,134,276	1,132,242	22,645	1,154,887
2103	2,034	-	-	-	2,034	1,154,887	1,152,852	23,057	1,175,909
2104	2,034	-	-	-	2,034	1,175,909	1,173,875	23,478	1,197,353
2105	2,034	-	-	-	2,034	1,197,353	1,195,318	23,906	1,219,225
2106	19,852	-	-	36	19,887	1,219,225	1,199,337	23,987	1,223,324
2107	39,742	-	-	50	39,792	1,223,324	1,183,532	23,671	1,207,203
2108	44,204	-	-	50	44,255	1,207,203	1,162,948	23,259	1,186,207
2109	44,325	-	-	51	44,376	1,186,207	1,141,831	22,837	1,164,668
2110	42,687	-	-	80	42,767	1,164,668	1,121,901	22,438	1,144,339
2111	34,138	-	-	245	34,383	1,144,339	1,109,956	22,199	1,132,155
2112	30,029	3,540	-	209	33,777	1,132,155	1,098,378	21,968	1,120,345
2113	6,593	-	-	4,327	10,919	1,120,345	1,109,426	22,189	1,131,615
2114	-	-	-	10,888	10,888	1,131,615	1,120,727	22,415	1,143,141
2115	-	-	-	11,295	11,295	1,143,141	1,131,847	22,637	1,154,484
2116	-	-	-	1,967	1,967	1,154,484	1,152,516	23,050	1,175,566
Totals(a)	445,443	3,540	140,011	29,337	618,331				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 19**

Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3  
SAFSTOR Total

**Table 26**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 – SAFSTOR Total**  
**(thousands of 2025 dollars)**

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2052	880	-	-	-	880	723,895	723,015	14,460	737,476
2053	1,750	-	-	-	1,750	737,476	735,725	14,715	750,440
2054	13,772	-	24,271	23	38,066	750,440	712,373	14,247	726,621
2055	21,422	-	24,679	30	46,131	726,621	680,490	13,610	694,100
2056	15,090	-	1,259	11	16,360	694,100	677,740	13,555	691,295
2057	15,071	-	6,134	11	21,216	691,295	670,079	13,402	683,481
2058	14,976	-	12,877	11	27,864	683,481	655,616	13,112	668,729
2059	11,899	-	8,006	26	19,931	668,729	648,798	12,976	661,774
2060	5,229	-	1,259	27	6,515	661,774	655,259	13,105	668,365
2061	1,787	-	1,262	-	3,050	668,365	665,315	13,306	678,621
2062	1,783	-	1,259	-	3,041	678,621	675,580	13,512	689,091
2063	1,783	-	1,259	-	3,041	689,091	686,050	13,721	699,771
2064	1,783	-	1,259	-	3,041	699,771	696,730	13,935	710,664
2065	1,787	-	1,262	-	3,050	710,664	707,615	14,152	721,767
2066	1,783	-	1,259	-	3,041	721,767	718,726	14,375	733,100
2067	1,783	-	1,259	-	3,041	733,100	730,059	14,601	744,660
2068	1,783	-	1,259	-	3,041	744,660	741,619	14,832	756,451
2069	1,787	-	1,262	-	3,050	756,451	753,401	15,068	768,469
2070	1,783	-	1,259	-	3,041	768,469	765,428	15,309	780,736
2071	1,783	-	1,259	-	3,041	780,736	777,695	15,554	793,249
2072	1,783	-	1,259	-	3,041	793,249	790,208	15,804	806,012
2073	1,787	-	1,262	-	3,050	806,012	802,962	16,059	819,021
2074	1,783	-	1,259	-	3,041	819,021	815,980	16,320	832,300
2075	1,783	-	1,259	-	3,041	832,300	829,258	16,585	845,843
2076	1,783	-	1,259	-	3,041	845,843	842,802	16,856	859,658
2077	1,787	-	1,262	-	3,050	859,658	856,608	17,132	873,740
2078	1,783	-	1,259	-	3,041	873,740	870,699	17,414	888,113
2079	1,783	-	1,259	-	3,041	888,113	885,072	17,701	902,773
2080	1,783	-	1,259	-	3,041	902,773	899,732	17,995	917,726
2081	1,787	-	1,262	-	3,050	917,726	914,677	18,294	932,970
2082	1,783	-	1,259	-	3,041	932,970	929,929	18,599	948,527
2083	1,783	-	1,259	-	3,041	948,527	945,486	18,910	964,396
2084	1,783	-	1,259	-	3,041	964,396	961,354	19,227	980,582
2085	1,787	-	1,262	-	3,050	980,582	977,532	19,551	997,083
2086	1,783	-	1,259	-	3,041	997,083	994,041	19,881	1,013,922
2087	1,783	-	1,259	-	3,041	1,013,922	1,010,881	20,218	1,031,098
2088	1,783	-	1,259	-	3,041	1,031,098	1,028,057	20,561	1,048,618

**Table 26**  
**Decommissioning Cash Flow Analysis for CEG Peach Bottom, Unit 3 – SAFSTOR Total**  
(thousands of 2025 dollars)

Year	Radiological Decommissioning Cost	ISFSI Decommissioning Cost	Spent Fuel Management Cost	Site Restoration Cost	Total Cost <sup>(a)</sup>	BOY Trust Fund Value	BOY Trust Fund Less Cost	Trust Fund Earnings <sup>(b)</sup>	EOY Trust Fund Value <sup>(a)</sup>
2089	1,787	-	1,262	-	3,050	1,048,618	1,045,568	20,911	1,066,480
2090	1,783	-	1,259	-	3,041	1,066,480	1,063,438	21,269	1,084,707
2091	1,783	-	1,259	-	3,041	1,084,707	1,081,666	21,633	1,103,299
2092	1,783	-	1,259	-	3,041	1,103,299	1,100,258	22,005	1,122,263
2093	1,787	-	1,262	-	3,050	1,122,263	1,119,213	22,384	1,141,597
2094	1,753	-	2,119	-	3,872	1,141,597	1,137,725	22,755	1,160,480
2095	1,732	-	2,726	-	4,458	1,160,480	1,156,021	23,120	1,179,142
2096	1,732	-	2,726	-	4,458	1,179,142	1,174,683	23,494	1,198,177
2097	1,737	-	2,734	-	4,471	1,198,177	1,193,706	23,874	1,217,580
2098	1,732	-	2,726	-	4,458	1,217,580	1,213,122	24,262	1,237,385
2099	1,732	-	2,726	-	4,458	1,237,385	1,232,926	24,659	1,257,585
2100	1,732	-	2,726	-	4,458	1,257,585	1,253,126	25,063	1,278,189
2101	2,102	-	-	-	2,102	1,278,189	1,276,087	25,522	1,301,609
2102	2,096	-	-	-	2,096	1,301,609	1,299,512	25,990	1,325,503
2103	2,096	-	-	-	2,096	1,325,503	1,323,406	26,468	1,349,874
2104	2,096	-	-	-	2,096	1,349,874	1,347,778	26,956	1,374,734
2105	2,096	-	-	-	2,096	1,374,734	1,372,637	27,453	1,400,090
2106	19,914	-	-	36	19,949	1,400,090	1,380,141	27,603	1,407,744
2107	40,125	-	-	172	40,297	1,407,744	1,367,446	27,349	1,394,795
2108	44,686	-	-	211	44,897	1,394,795	1,349,898	26,998	1,376,896
2109	44,808	-	-	212	45,020	1,376,896	1,331,876	26,638	1,358,514
2110	43,638	-	-	330	43,968	1,358,514	1,314,546	26,291	1,340,837
2111	37,732	-	-	1,000	38,732	1,340,837	1,302,105	26,042	1,328,147
2112	33,101	3,540	-	852	37,493	1,328,147	1,290,654	25,813	1,316,467
2113	6,633	-	-	6,624	13,257	1,316,467	1,303,210	26,064	1,329,274
2114	-	-	-	16,669	16,669	1,329,274	1,312,606	26,252	1,338,858
2115	-	-	-	17,075	17,075	1,338,858	1,321,783	26,436	1,348,218
2116	-	-	-	2,601	2,601	1,348,218	1,345,618	26,912	1,372,530
Totals(a)	452,231	3,540	138,541	45,921	640,233				

<sup>(a)</sup>Cash flows may not add due to rounding

<sup>(b)</sup>A 2 percent real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i)

**Attachment 20**  
CEG Parent Guarantee Qualification

**Table 27**  
**CEG Parent Guarantee Qualification**  
**As of December 31, 2025**

Parameter	Value
All decommissioning amounts covered by an NRC or Agreement State parent company guarantees or self-guarantee.	\$0
All amounts covered by parent guarantees, self-guarantees, or financial tests of other Federal or State agencies (e.g. EPA)	\$0
Creditworthiness criteria provided to NRC?	
Tangible Net Worth	\$14,232 million
Total Net Worth	\$14,853 million
Total Assets in the United States	\$56,421 million

Criteria	Met?
Tangible net worth of at least \$21M?	Yes
Total net worth at least six times the amount of decommissioning funds being assured by a parent guarantee for the total of all nuclear facilities or parts thereof (or prescribed amount, if certification is used)?	Yes
Are at least 90 percent of the firm's assets located in the United States? Or Assets located in the United States amount to at least six times the current decommissioning cost estimates?	Yes  N/A