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Exelon Generation Company, LLC ZEC Application – Salem 2 Docket No.: ER20080558

Response to Application Request: S2-IUD-7 Date: October 1, 2020

<u>Question</u>: Describe the status of decommissioning funds for the Unit as of the date of the application, include decommissioning status reports filed with the Nuclear Regulatory Commission ("NRC"), and identify any shortfall of decommissioning funds resulting from early retirement of the Unit.

Attachments Provided Herewith:

S2-IUD-07_RS-11-044.pdf S2-IUD-07_RS-13-100.pdf S2-IUD-07_RS-15-094.pdf S2-IUD-07_RS-17-045.pdf S2-IUD-07_RS-19-045.pdf

Response:

The decommission funding for the unit is sufficient to meet all regulatory requirements. This is supported by the attached Reports of Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations, which are filed with the NRC every other year. The most recent report to the NRC was filed on April 1, 2019 based on the funds balance December 31, 2018. Note that both PSEG and Exelon maintain decommissioning trust funds for their ownership share of the Unit. Both PSEG and Exelon conduct internal reviews annually to ensure fund adequacy.

Exelon Generation's decommissioning plans include the use of the SAFSTOR process and result in no expected shortfalls in decommissioning funds from early retirement.

In SAFSTOR, a nuclear plant is kept intact and placed in protective storage for an extended period of time. All fuel is removed from the reactor vessel and placed in fuel pools or dry storage on-site. The NRC continues to inspect the site and provides regulatory oversight of maintenance and security appropriate to the low risk profile of the site. The plant is dismantled once radioactivity has decayed to lower levels and the safety risk to workers is substantially reduced. The entire process must be completed within 60 years of the plant ceasing operations. Given the decommissioning activities under the SAFSTOR method, assets have a longer time period over which the NDT investments are expected to appreciate in value to be sufficient to meet the expected decommissioning obligation.

Date	Docket	Description of Document
3/31/2011	RS-11-044	2011 Report on Status of Decommissioning Funding for Reactors
4/01/2013	RS-13-100	2013 Report on Status of Decommissioning Funding for Reactors
3/31/2015	RS-15-094	Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations

The following decommissioning status reports filed the NRC are attached:

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3/30/2017	RS-17-045	Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations
4/01/2019	RS-19-045	Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations