

**NUCLEAR DECOMMISSIONING FUNDING ASSURANCE STATUS
REPORTS SUBMITTED PURSUANT TO SECTION 8-508.1(g) OF THE
ILLINOIS PUBLIC UTILITIES ACT**



ILLINOIS COMMERCE COMMISSION

May 16, 2024



STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

527 East Capitol Avenue
Springfield, Illinois 62701

160 North LaSalle
Chicago, Illinois 60601

May 16, 2024

The Honorable Members of the Illinois General Assembly
State Capitol
Springfield, Illinois

Dear Honorable Members of the Illinois General Assembly:

The Illinois Commerce Commission submits the attached report to the General Assembly in accordance with 220 ILCS Section 8-508.1(g) of the Illinois Public Utilities Act. Beginning June 1, 2020, and every 2 years thereafter, the Commission shall provide the General Assembly with a copy of the nuclear decommissioning funding assurance status report for shutdown units as submitted by the owner or operator of a nuclear power plant in this State to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission.

Should you have questions regarding the attached report, please contact Sarah Ryan, Director of Governmental Affairs, at (217) 785-2449, or by email at sarah.ryan@illinois.gov.

Sincerely,

A handwritten signature in black ink that reads "Douglas P. Scott". The signature is written in a cursive style.

Douglas P. Scott
Chairman

The 101st General Assembly passed Public Act (“PA”) 101-44 amending Section 8-508.1 of Public Utilities Act (“PUA”). PA 101-44 became effective January 1, 2020. PA 101-44 adds a new subsection to Section 8-508.1, subsection (g), which states:

(g) Beginning on or before May 1, 2020, and every 2 years thereafter, the owner or operator of each nuclear power plant in this State shall provide the Commission with a copy of the nuclear decommissioning funding assurance status report submitted to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission. Beginning June 1, 2020, and every 2 years thereafter, the Commission shall provide the General Assembly with a copy of the nuclear decommissioning funding assurance status report for shutdown units as submitted by the owner or operator of a nuclear power plant in this State to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission.

220 ILCS 5/8-508.1(g)

In response to the requirement of Section 8-508.1, the Commission received a nuclear decommissioning funding assurance status report for three shut down Illinois units and one Illinois unit to be shut down within five years pending a license renewal.

Constellation Energy Generation, LLC (“Constellation”) submitted a report dated March 22, 2024 providing decommissioning funding information applicable with respect to the Dresden Nuclear Power Station Unit 1, which has been shut down since October 31, 1978, Zion Nuclear Power Station Units 1 and 2, which have been shut down since February 13, 1998, and the Clinton Power Station Unit 1, which is to be to be shut down within five years pending a license renewal. This report is attached herein.

As noted above, and pursuant to Section 8-508.1(g) of the PUA, the nuclear decommissioning funding assurance status reports for shut down units received by the Commission are being transmitted with this report to the General Assembly.



4300 Winfield Road
Warrenville, IL 60555
630 657 2000 Office

GF
#37

RS-24-023

10 CFR 50.75(f)
10 CFR 50.82(a)

March 22, 2024

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

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Unit 1
Facility Operating License No. DPR-2
NRC Docket No. 50-010

Peach Bottom Atomic Power Station, Unit 1
Facility Operating License No. DPR-12
NRC Docket No. 50-171

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket No. 50-289

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

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MAR 27 2024

ILLINOIS COMMERCE COMMISSION
CHIEF CLERK'S OFFICE

Subject: Report on Status of Decommissioning Funding for Shutdown Reactors

In accordance with 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," Paragraph (f), and 10 CFR 50.82, "Termination of license," Paragraphs (a)(8)(v) and (a)(8)(vii), Constellation Energy Generation, LLC (CEG) is submitting a report on the status of decommissioning funding as of December 31, 2023, for the reactors owned by CEG that are shutdown or whose license will expire within five years.

CEG currently maintains five shutdown units, Dresden Nuclear Power Station (Dresden), Unit 1, Peach Bottom Atomic Power Station (Peach Bottom), Unit 1, Three Mile Island Nuclear Station (TMI), Unit 1 and Zion Nuclear Power Station (Zion), Units 1 and 2, and one to be shut down within five years pending a license renewal, Clinton Power Station (Clinton). Attachment 1 contains the Labor, Energy, and Burial factors used in the calculation of the formula cost amounts in this letter.

CEG has prepared site-specific decommissioning cost estimates for Dresden, Unit 1, Peach Bottom, Unit 1, TMI, Unit 1, and Zion, Units 1 and 2, as required, in accordance with 10 CFR 50.75(f) and 10 CFR 50.82, paragraphs (a)(4)(i), (a)(8)(iii), and (a)(8)(v)(B). Accordingly, the amount of decommissioning funds estimated to be required is based on site-specific decommissioning cost estimates for these sites. The annual radiological decommissioning funding status reports for these sites are provided in Attachments 3-6, respectively. Attachments 2, 3, 5, and 6 confirm that adequate decommissioning funding is assured for Clinton, Dresden, TMI, and Zion. Disbursements made through December 31, 2023, from the decommissioning trust funds since the last report, other than those for allowed administrative costs and other incidental expenses of the fund in connection with the operation of the fund per 10 CFR 50.75(h)(1)(iv), were for decommissioning activities as outlined in the corresponding attachment.

The Clinton preliminary site-specific SAFSTOR scenario estimate was provided in a letter dated April 18, 2022 (i.e., ML22108A263). Clinton is currently reporting formula cost amount using the formula in 10 CFR 50.75(c). The annual radiological decommissioning funding status report for Clinton is provided in Attachment 2. This attachment confirms that adequate decommissioning funding is assured.

The total reimbursements from the decommissioning trust fund for Dresden Unit 1 were reported incorrectly in the 2022 and 2023 reports (i.e., ML 22082A227 and ML23082A312). This was captured in the CEG Corrective Action Program under Action Request (AR) 04754225 and is referenced in Attachment 3, Footnote (f).

Unless otherwise noted, the specific cash flow analysis for the site-specific decommissioning cost estimates conservatively assumes all expenses in a year are incurred at the beginning of year (i.e., beginning of year convention) during the decommissioning period. The cash flow analysis for Peach Bottom, Unit 1, assumes that half of the current year contributions to the Peach Bottom, Unit 1, trust fund is included in the current year earnings to estimate the amount of contributions throughout the year (i.e., a mid-year convention). CEG uses a mid-year convention in this instance because contributions to the Peach Bottom, Unit 1, trust fund are made monthly at a constant rate throughout the year. Site-specific cash flows from the site-specific cost estimates for Dresden, Unit 1, Peach Bottom, Unit 1, and TMI, Unit 1, are included in Attachments 3, 4, and 5, respectively.

Due to recent market performance, Peach Bottom, Unit 1, did not meet the minimum funding assurance criteria under 10 CFR 50.75 and 10 CFR 50.82 as of December 31, 2023, based solely on the trust fund balance. Financial assurance for decommissioning this reactor is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii). The source of revenue for the external sinking fund is a "non-bypassable charge" approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for CEG. The amount to be collected will be adjusted, as necessary, in accordance with the applicable tariff in the next submission to the PaPUC of the Nuclear Decommissioning Cost Adjustment (NDCA) to cover any funding shortfall that exists at that time. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The most recent rate adjustment was effective January 1, 2023. CEG's ability to adjust the amount collected for Peach Bottom, Unit 1, is consistent with the guidance in Regulatory Guide 1.159, "Assuring Availability of Funds for

Decommissioning Nuclear Reactors," Revision 2, Page 13, which provides that, "Adjustments to the annual amount of funds being set aside may be made to coincide with rate cases considered by a licensee's public utility commission (PUC)."

CEG has not made a final determination of the decommissioning approach for any of its nuclear units, including the shutdown units. For these shutdown units, CEG uses the site-specific decommissioning cost estimates to demonstrate adequacy of funding to meet regulatory requirements. While the site-specific cost estimates assume a decommissioning option, CEG may select a different decommissioning option in the future for any of its shutdown nuclear units, recognizing that the chosen approach must meet NRC requirements for decommissioning funding.

There are no regulatory commitments contained within this letter. If you have any questions concerning this letter, please contact Danii Gantt at (779) 231-6227.

Respectfully,

Humphrey,
Mark D.

Digitally signed by
Humphrey, Mark D.
Date: 2024.03.22
12:00:06 -05'00'

Mark D. Humphrey
Sr. Manager Licensing
Constellation Energy Generation, LLC

Attachments:

1. Labor, Energy, and Burial Factors Used in Calculations (All Facilities)
2. Annual Radiological Decommissioning Funding Assurance Report for Clinton Power Station, Unit 1
3. Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1
4. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1
5. Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Three Mile Island Nuclear Station, Unit 1
6. Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Zion Nuclear Power Station, Units 1 and 2

cc: Regional Administrator – NRC Region I
Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Clinton Power Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
NRC Senior Resident Inspector – Three Mile Island Nuclear Station
NRC Senior Resident Inspector – Zion Nuclear Power Station

ATTACHMENT 1

Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

ATTACHMENT 1
Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The labor, energy, and burial indexes used are consistent with those described in NUREG-1307, Revision 19, "Report on Waste Burial Charges," issued February 2023.

The current labor cost indexes used are obtained from the Employment Cost Index, published by the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Specifically, Constellation Energy Generation, LLC (CEG) used the Employment Cost Index for total compensation for private industry workers by region. The labor adjustment factors were calculated according to Section 3.2 of NUREG-1307, Revision 19, using fourth quarter 2023 data. Table 1 shows the data used for this calculation.

Table 1: Labor Adjustment Factors

Region	Applicable Sites	Series ID	4Q2023 Index Number	Base L_x	Labor Adjustment Factor (L_x)
Northeast	TMI	CIU2010000000210I	163.0	2.16	3.521
Midwest	Clinton Dresden	CIU2010000000230I	158.5	2.08	3.297

The current energy cost indexes used are obtained from Producer Price Indexes (PPI) – Commodities, published by the U.S. Department of Labor, BLS. Specifically, CEG used the PPI for industrial electric power (WPU0543) and light fuel oils (WPU0573). The energy adjustment factors were calculated according to Section 3.3 of NUREG-1307, Revision 19, using December 2023 data. Table 2 shows the data used for this calculation.

Table 2: Energy Adjustment Factors

WPU0543 – January 1986 (base value)	114.2
WPU0573 – January 1986 (base value)	82.0
WPU0543 – December 2023 (preliminary value)	300.4
WPU0573 – December 2023 (preliminary value)	320.3
Industrial electric power adjustment factor - P_x	2.630
Light fuel oil adjustment factor - F_x	3.906
Energy Adjustment Factor (PWR) – $E_x(\text{PWR})$	3.166
Energy Adjustment Factor (BWR) – $E_x(\text{BWR})$	3.217

ATTACHMENT 1 (Continued)
Labor, Energy, and Burial Factors Used in Calculations (All Facilities)

The waste burial adjustment factors used are taken from Table 2-1 of NUREG-1307, Revision 19, based on 2022 data. The adjustment factors CEG used assume a combination of compact-affiliated and non-compact facilities for sites affiliated with a compact. This is consistent with current waste disposal practices at CEG and consistent with typical waste disposal practices during decommissioning. For sites not affiliated with a compact, the values for generators located in unaffiliated states were used. Table 3 summarizes the data used for the calculation of the waste adjustment factors.

Table 3: Waste Adjustment Factors

LLW Burial Site	Reactor Type	Applicable Site	Combination of Compact-Affiliated and Non-Compact Disposal Facilities Waste Adjustment Factor (B_x)	Generators Located in the Unaffiliated States and those Located in Compact-Affiliated States having no Disposal Facility Waste Adjustment Factor (B_x)
Generic LLW Disposal Site	BWR	Clinton Dresden	N/A	12.296
Generic LLW Disposal Site	PWR	TMI	N/A	13.711

The calculation methodology used for all adjustment factors is consistent with NUREG-1307, Revision 19.

ATTACHMENT 2

Annual Radiological Decommissioning Funding Assurance Report
for Clinton Power Station, Unit 1

ATTACHMENT 2
Annual Radiological Decommissioning Funding Assurance Report for
Clinton Power Station, Unit 1
(December 31, 2023 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$710,949 (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	N/A
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2023	\$693,050 (c)
5	Schedule of the annual amounts remaining to be collected.	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i) and 10 CFR 72.30(e)(1).	
9	No changes to the trust agreements since the last report.	

- (a) The Clinton Power Station (CPS) preliminary site-specific SAFSTOR scenario estimate was provided in a letter dated April 18, 2022 (ML22108A263). CPS is reporting formula cost amount using the formula in 10 CFR 50.75(c).
- (b) Per 10CFR72.30(c) ISFSI decommissioning cost is required to be reported every three years. Clinton Power Station, Unit 1 ISFSI was last reported in 2023 (ML23082A312) and will be included in a future report in compliance with the regulation.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning only. There are no past-due tax payments owed on the decommissioning trust fund activities as of December 31, 2023. Periodic payments of estimated income taxes are made by CEG during the year on a quarterly basis. CEG then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2023.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) For purposes of this report, permanent termination of operations (shutdown) is expected on April 17, 2027.

ATTACHMENT 3

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management
Report for Dresden Nuclear Power Station, Unit 1

ATTACHMENT 3

**Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Dresden Nuclear Power Station, Unit 1**
(December 31, 2023 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$337,902 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2023	\$448,814 (c)
5	Schedule of the annual amounts remaining to be collected	\$0
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v)	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i)	
9	No changes to the trust fund agreements since the last report.	
10	2023 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$4,657 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$138,167 (f)
	Reimbursed from the decommissioning trust fund	\$132,136 (f)
	Not yet reimbursed from the decommissioning trust fund	\$6,031
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2023	\$45,420 (g)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$31,400(a)

ATTACHMENT 3 (Continued)
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Dresden Nuclear Power Station, Unit 1**
(December 31, 2023 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Dresden, Unit 1, has been shutdown since October 31, 1978, and some decommissioning activities have already occurred on this unit. However, the amount to decommission Dresden, Unit 1, was calculated pursuant to 10 CFR 50.75(c) to be \$604.6 million (as of December 31, 2023). Dresden, Unit 1, was a BWR reactor that operated at a maximum power level of 700 MWt (< 1200 MWt as specified in 10 CFR 50.75(c)). This amount assumes Dresden, Unit 1, was a BWR reactor type rated at a power capacity of 1200 MWt as required by the formula in 10 CFR 50.75(c). The calculation of this value assumes the labor, energy, and burial factors described in Attachment 1 and does not account for decommissioning activities that have occurred for Dresden, Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (DECOM-2023-EST-DRE, Revision 0, "Dresden Decommissioning Cost Estimate - 2023"). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Dresden Nuclear Power Station, Unit 1, Post-Shutdown Decommissioning Activities Report (PSDAR), as most recently updated in a letter from Michael P. Gallagher to U.S. Nuclear Regulatory Commission dated March 19, 2018. The costs have been escalated from the January 2023 dollars reflected in the 2023 decommissioning cost estimate to estimated costs as of December 31, 2023.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE estimate for the 2023 annual radiological costs because CEG considers the SSCE estimated costs for 2023 decommissioning activities to be historical expenditures at the time the 2024 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Dresden Nuclear Power Station, Unit 1, will take place no earlier than 2029, coinciding with the decommissioning of Dresden Nuclear Power Station, Unit 2.

- (b) Per 10CFR72.30(c) ISFSI decommissioning cost is required to be reported every three years. Dresden Nuclear Power Station, Unit 1 ISFSI was last reported in 2023 (ML23082A312) and will be included in a future report in compliance with the regulation.

ATTACHMENT 3 (Continued)
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Dresden Nuclear Power Station, Unit 1**
(December 31, 2023 dollars, thousands)

- (c) The trust fund amount is the amount allocated for radiological decommissioning only. The allocation of funds for radiological decommissioning is based on DECON scenario as described in the site-specific cost estimate (SSCE) (DECOM-2023-EST-DRE, Revision 0, "Dresden Decommissioning Cost Estimate - 2023").

There are no past-due tax payments owed on the decommissioning trust fund activities as of December 31, 2023. Periodic payments of estimated income taxes are made by CEG during the year on a quarterly basis. CEG then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2023.

- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2023 is consistent with the projected 2023 expense total of \$3,116 (December 31, 2023 thousands of dollars) from the site-specific cost estimate. The delta of \$1,541 can be attributed to increased amount of maintenance, which had been deferred from prior years due to COVID 19 and site staffing levels. In addition, decommissioning planning costs increased as Dresden Unit 1 begins early planning and execution of activities.

The amount spent on decommissioning in 2023 represents the 2023 charges to the Dresden, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) Not all historical data is available, and therefore, the cumulative amount spent on decommissioning and the amount reimbursed are estimates based on the best information obtainable at this time. The total reimbursements from the decommissioning trust fund for Dresden Unit 1 were reported incorrectly in the 2022 (RS-22-042, ML 22082A227) and 2023 (RS-23-049, ML23082A312) reports. The value reported double counted a portion of the 2020 spend reimbursement. Potentially impacted reports include 2021, and 2022. The 2021 report was not impacted. This was captured in the corrective action program, AR 04754225. The cumulative amount reimbursed from the trust was adjusted in 2023 to correct the double counting of a reimbursement that occurred in the prior year.
- (g) The allocation of funds accumulated for managing irradiated fuel is based on the DECON scenario as described in the site-specific cost estimate (SSCE) (DECOM-2023-EST-DRE, Rev 0, "Dresden Decommissioning Cost Estimate - 2023"). No spent fuel management costs are planned to be incurred until 2028.

ATTACHMENT 3 (Continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Dresden Nuclear Power Station, Unit 1
(December 31, 2023 dollars, thousands)

Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2024	\$3,124	\$448,814	\$445,689	\$8,914	\$454,603
2025	\$3,116	\$454,603	\$451,487	\$9,030	\$460,517
2026	\$3,116	\$460,517	\$457,401	\$9,148	\$466,549
2027	\$3,116	\$466,549	\$463,433	\$9,269	\$472,702
2028	\$3,124	\$472,702	\$469,578	\$9,392	\$478,969
2029	\$40,929	\$478,969	\$438,040	\$8,761	\$446,801
2030	\$55,078	\$446,801	\$391,723	\$7,834	\$399,557
2031	\$52,040	\$399,557	\$347,517	\$6,950	\$354,468
2032	\$49,858	\$354,468	\$304,609	\$6,092	\$310,702
2033	\$46,248	\$310,702	\$264,454	\$5,289	\$269,743
2034	\$46,154	\$269,743	\$223,589	\$4,472	\$228,061
2035	\$21,329	\$228,061	\$206,731	\$4,135	\$210,866
2036	\$852	\$210,866	\$210,014	\$4,200	\$214,214
2037	\$0	\$214,214	\$214,214	\$4,284	\$218,498
2038	\$0	\$218,498	\$218,498	\$4,370	\$222,868
2039	\$0	\$222,868	\$222,868	\$4,457	\$227,326
2040	\$0	\$227,326	\$227,326	\$4,547	\$231,872
2041	\$1,095	\$231,872	\$230,777	\$4,616	\$235,393
2042	\$1,453	\$235,393	\$233,940	\$4,679	\$238,618
2043	\$1,453	\$238,618	\$237,165	\$4,743	\$241,909
2044	\$1,457	\$241,909	\$240,452	\$4,809	\$245,261
2045	\$1,453	\$245,261	\$243,808	\$4,876	\$248,684
2046	\$1,453	\$248,684	\$247,231	\$4,945	\$252,175
2047	\$1,453	\$252,175	\$250,722	\$5,014	\$255,737

Total* \$337,902

*Column may not add due to rounding

ATTACHMENT 3 (Continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Dresden Nuclear Power Station, Unit 1
(December 31, 2023 dollars, thousands)

Year	Irradiated Fuel Cost	BOY Irradiated Fuel Trust Fund Value	BOY Irradiated Fuel Trust Fund Less Cost	Irradiated Fuel Trust Fund Earnings	EOY Irradiated Fuel Trust Fund Value
2024	\$0	\$45,420	\$45,420	\$908	\$46,328
2025	\$0	\$46,328	\$46,328	\$927	\$47,255
2026	\$0	\$47,255	\$47,255	\$945	\$48,200
2027	\$0	\$48,200	\$48,200	\$964	\$49,164
2028	\$973	\$49,164	\$48,191	\$964	\$49,155
2029	\$970	\$49,155	\$48,184	\$964	\$49,148
2030	\$970	\$49,148	\$48,178	\$964	\$49,141
2031	\$970	\$49,141	\$48,171	\$963	\$49,134
2032	\$973	\$49,134	\$48,161	\$963	\$49,124
2033	\$970	\$49,124	\$48,154	\$963	\$49,117
2034	\$970	\$49,117	\$48,146	\$963	\$49,109
2035	\$970	\$49,109	\$48,139	\$963	\$49,102
2036	\$1,640	\$49,102	\$47,462	\$949	\$48,411
2037	\$1,710	\$48,411	\$46,700	\$934	\$47,634
2038	\$1,717	\$47,634	\$45,918	\$918	\$46,836
2039	\$1,726	\$46,836	\$45,110	\$902	\$46,012
2040	\$1,731	\$46,012	\$44,281	\$886	\$45,167
2041	\$2,063	\$45,167	\$43,104	\$862	\$43,966
2042	\$2,173	\$43,966	\$41,793	\$836	\$42,629
2043	\$2,173	\$42,629	\$40,456	\$809	\$41,265
2044	\$2,179	\$41,265	\$39,086	\$782	\$39,868
2045	\$2,173	\$39,868	\$37,695	\$754	\$38,449
2046	\$2,173	\$38,449	\$36,276	\$726	\$37,001
2047	\$2,173	\$37,001	\$34,828	\$697	\$35,525
Total*	\$31,400				

*Column may not add due to rounding

ATTACHMENT 4

**Annual Radiological Decommissioning Funding Assurance Report
for Peach Bottom Atomic Power Station, Unit 1**

ATTACHMENT 4
Annual Radiological Decommissioning Funding Assurance Report for
Peach Bottom Atomic Power Station, Unit 1
(December 31, 2023 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$249,652 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (g)
4	The amount of decommissioning trust funds accumulated as of December 31, 2023	\$162,289 (b)
5	Schedule of the annual amounts remaining to be collected.	\$4,213 (c)
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	3% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii).	
9	No changes to the trust fund agreements since the last report.	
10	2023 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$1,395 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$17,729 (f)
	Reimbursed from the decommissioning trust fund	\$13,590 (f)
	Not yet reimbursed from the decommissioning trust fund	\$4,139
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2023.	N/A (g)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B).	N/A (g)

ATTACHMENT 4 (Continued)
Annual Radiological Decommissioning Funding Assurance Report for
Peach Bottom Atomic Power Station, Unit 1
(December 31, 2023 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Peach Bottom, Unit 1, has been shutdown since October 31, 1974, and some decommissioning activities have already occurred on this unit. Furthermore, Peach Bottom, Unit 1, was a High Temperature Gas Cooled Reactor (HTGR), which does not translate to a BWR or PWR as specified in the formula for calculating the formula cost amount, and hence a formula cost amount per 10 CFR 50.75(c) cannot be calculated for Peach Bottom, Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a SAFSTOR scenario as described in the site-specific cost estimate (SSCE) (DECOM-2023-EST-PEA-1, Revision 0, "2023 Decommissioning Cost Estimate Peach Bottom 1 2034 License Termination"). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Peach Bottom, Unit 1, Decommissioning Plan. The costs have been escalated from the January 2023 dollars reflected in the SSCE to estimated costs as of December 31, 2023.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE for the annual radiological decommissioning costs for 2023. CEG considers the SSCE estimated costs for 2023 decommissioning activities to be historical expenditures at the time the 2024 decommissioning funding assurance report is generated.

The SSCE assumes that decontamination and dismantlement of Peach Bottom, Unit 1, will conclude by 10/31/2034 in compliance with 10CFR50.82(a)(3).

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. There are no past-due tax payments related to decommissioning trust fund activities as of December 31, 2023. Periodic payments of estimated income taxes are made by CEG during the year on a quarterly basis. CEG then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2023.
- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for CEG. Adjustments to the amount collected was made in the March 31, 2022 filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2023, and allows for the collection of annual payments from ratepayers of \$4,213K through 2032.

ATTACHMENT 4 (Continued)
Annual Radiological Decommissioning Funding Assurance Report for
Peach Bottom Atomic Power Station, Unit 1
(December 31, 2023 dollars, thousands)

- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, CEG uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) The amount spent on decommissioning in 2023 is consistent with the projected 2023 expense of \$1,223k (December 31, 2023 thousands of dollars) from the site-specific cost estimate. The delta of \$172 (thousands of dollars) is immaterial to the overall funding assurance analysis.

The amount spent on decommissioning in 2023 represents the 2023 charges to the Peach Bottom, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) Not all historical data is available, and therefore, the cumulative amount spent on decommissioning and the amount reimbursed are estimates based on the best information obtainable at this time.
- (g) Peach Bottom, Unit 1, was shut down in October of 1974, with defueling of the core completed by the following June. Starting in 1975, the spent fuel was shipped by truck to Idaho. The final of 44 shipments was completed in February of 1977. Consequently, no irradiated fuel for Peach Bottom, Unit 1, remains on-site; therefore, 10 CFR 50.82(a)(8)(vii) and 10 CFR 72.30(b) do not apply.

ATTACHMENT 4 (Continued)
Annual Radiological Decommissioning Funding Assurance Report for
Peach Bottom Atomic Power Station, Unit 1
(December 31, 2023 dollars, thousands)

Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost**	First Half Contributions	Trust Fund Earnings	Second Half Contributions	EOY Trust Fund Value
2024	\$1,226	\$162,289	\$161,063	\$2,107	\$4,895	\$2,107	\$170,171
2025	\$1,223	\$170,171	\$168,948	\$2,107	\$5,132	\$2,107	\$178,292
2026	\$1,223	\$178,292	\$177,069	\$2,107	\$5,375	\$2,107	\$186,658
2027	\$1,223	\$186,658	\$185,435	\$2,107	\$5,626	\$2,107	\$195,274
2028	\$4,752	\$195,274	\$190,522	\$2,107	\$5,779	\$2,107	\$200,514
2029	\$22,478	\$200,514	\$178,036	\$2,107	\$5,404	\$2,107	\$187,653
2030	\$45,017	\$187,653	\$142,636	\$2,107	\$4,342	\$2,107	\$151,192
2031	\$45,017	\$151,192	\$106,175	\$2,107	\$3,248	\$2,107	\$113,636
2032	\$53,490	\$113,636	\$60,147	\$2,107	\$1,868	\$2,107	\$66,227
2033	\$64,673	\$66,227	\$1,554	\$0	\$47	\$0	\$1,601
2034	\$9,330	\$1,601	-\$7,729	\$0	\$0	\$0	-\$7,729
Total*	\$249,652						

* Columns may not add due to rounding

** Annual contributions added to individual years - Earnings of half of contributions are included in current year to estimate payment of contributions throughout the year

ATTACHMENT 5

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management
Report for Three Mile Island Nuclear Station, Unit 1

ATTACHMENT 5
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Three Mile Island Nuclear Station, Unit 1
(December 31, 2023 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$863,124 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2023	\$616,690 (c)
5	Schedule of the annual amounts remaining to be collected	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v)	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i)	
9	No changes to the trust fund agreements since the last report.	
10	2023 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$25,228 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$187,442
	Reimbursed from the decommissioning trust fund	\$165,837
	Not yet reimbursed from the decommissioning trust fund	\$21,605
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2023	(c)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$93,910 (a)
14	2023 annual amount spent on irradiated fuel management	\$3,900 (e)
15	Cumulative amount spent on irradiated fuel management	\$114,027
	Reimbursed	\$106,147 (f)
	Not yet reimbursed	\$7,880
16	Projected cost of Site restoration based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$110,652 (a)
17	2023 annual amount spent on site restoration	\$100 (e)
18	Cumulative amount spent on site restoration	\$100
	Reimbursed	\$0
	Not yet reimbursed	\$100

ATTACHMENT 5 (continued)
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Three Mile Island Nuclear Station, Unit 1**
(December 31, 2023 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Three Mile Island, Unit 1, has been shutdown since September 2019, and some decommissioning activities have already occurred on this unit. However, the amount to decommission Three Mile Island, Unit 1, was calculated pursuant to 10 CFR 50.75(c) to be \$557.9 million (as of December 31, 2023). The calculation of this value assumes the labor, energy, and burial factors described in Attachment 1 and does not account for decommissioning activities that have occurred for Three Mile Island, Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a SAFSTOR scenario as described in the site-specific cost estimate (SSCE) ("Updated Site-Specific Decommissioning Cost Estimate for Three Mile Island Nuclear Station, Unit 1," March 21, 2023 (ML23080A210)). The costs have been escalated from the June 2022 dollars reflected in the decommissioning cost estimate to estimated costs as of December 31, 2023.

The amount reported does not include cash flows from the SSCE estimate for the 2022 - 2023 annual radiological, spent fuel, and site restoration costs because CEG considers the SSCE estimated cost for 2022 - 2023 decommissioning activities to be historical expenditures at the time the 2024 decommissioning funding assurance report is generated.

- (b) Per 10CFR72.30(c) ISFSI decommissioning cost is required to be reported every three years. Three Mile Island Nuclear Station, Unit 1 ISFSI was last reported in 2023 (ML23082A312) and will be included in a future report in compliance with the regulation.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning, Spent Fuel Management, and Site Restoration. The exemption allowing use of the trust fund for Spent Fuel Management was approved on October 16, 2019 (letter from U.S. Nuclear Regulatory Commission (J. Poole) to Exelon Generation Company, LLC (B. Hanson), "Three Mile Island Nuclear Station, Unit 1 – Exemption from the Requirements of 10 CFR 50.82(a)(8)(i)(A) and 10 CFR 50.75(h)(1)(iv) (EPID L-2019-LLE-0009), ML192549A179). The exemption allowing use of the trust fund for Site restoration was approved on June 8, 2022 (letter from U.S. Nuclear Regulatory Commission (Amy M. Snyder) to Constellation Energy Generation, LLC (David P. Rhoades), "Three Mile Island Nuclear Station, Unit 1 – Exemption from the Requirements of 10 CFR 50.82(a)(8)(i)(A) AND 10 CFR 50.75(h)(1)(iv) (EPID: L-2021-LLE-0030), ML21140A311").

There are no past-due tax payments related to decommissioning trust fund activities as of December 31, 2023. Periodic payments of estimated income taxes are made by CEG during the year on a quarterly basis. CEG then obtains reimbursements from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2023.

ATTACHMENT 5 (continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Three Mile Island Nuclear Station, Unit 1
(December 31, 2023 dollars, thousands)

- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2023 is consistent with the projected 2023 expense of \$24,007 (December 31, 2023 thousands of dollars) from the site-specific cost estimate. The increase of \$1,221 can be attributed to the actual cost that was higher than the projected cost due to inflation and increase in labor cost due to delays in water processing and abandonment prior to SAFSTOR.

The amount spent on irradiated fuel management in 2023 is consistent with the projected 2023 expense total of \$5,104 (December 31, 2023 thousands of dollars) from the site-specific cost estimate (SSCE). The decrease of \$1,204 can be attributed to the cask loading campaign and demobilization work that was completed sooner than the original plan.

The amount spent on site restoration in 2023 is consistent with the projected 2023 expense total of \$187 (December 31, 2023 thousands of dollars) from the site-specific cost estimate (SSCE). The delta of \$87 (thousands of dollars) is immaterial to the overall funding assurance analysis.

The amount spent on radiological decommissioning, irradiated fuel management, and site restoration in 2023 represents the 2023 charges to the TMI, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) The amount of irradiated fuel management reimbursed is the total amount reimbursed by the decommissioning trust fund and the Department of Energy.

ATTACHMENT 5 (continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Three Mile Island Nuclear Station, Unit 1
(December 31, 2023 dollars, thousands)

Year	Radiological Decommissioning Spent Fuel, & Site Restoration Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2024	\$10,701	\$616,690	\$605,990	\$12,120	\$618,109
2025	\$10,559	\$618,109	\$607,551	\$12,151	\$619,702
2026	\$10,561	\$619,702	\$609,141	\$12,183	\$621,324
2027	\$10,564	\$621,324	\$610,760	\$12,215	\$622,975
2028	\$11,314	\$622,975	\$611,661	\$12,233	\$623,895
2029	\$11,283	\$623,895	\$612,612	\$12,252	\$624,864
2030	\$11,283	\$624,864	\$613,581	\$12,272	\$625,852
2031	\$11,283	\$625,852	\$614,569	\$12,291	\$626,861
2032	\$11,314	\$626,861	\$615,547	\$12,311	\$627,858
2033	\$11,283	\$627,858	\$616,575	\$12,331	\$628,906
2034	\$11,283	\$628,906	\$617,623	\$12,352	\$629,976
2035	\$11,283	\$629,976	\$618,693	\$12,374	\$631,066
2036	\$11,314	\$631,066	\$619,753	\$12,395	\$632,148
2037	\$11,283	\$632,148	\$620,865	\$12,417	\$633,282
2038	\$11,283	\$633,282	\$621,999	\$12,440	\$634,439
2039	\$11,283	\$634,439	\$623,156	\$12,463	\$635,619
2040	\$14,955	\$635,619	\$620,664	\$12,413	\$633,077
2041	\$22,172	\$633,077	\$610,905	\$12,218	\$623,123
2042	\$7,061	\$623,123	\$616,062	\$12,321	\$628,383
2043	\$7,061	\$628,383	\$621,322	\$12,426	\$633,749
2044	\$7,080	\$633,749	\$626,668	\$12,533	\$639,202
2045	\$7,061	\$639,202	\$632,141	\$12,643	\$644,784
2046	\$7,061	\$644,784	\$637,723	\$12,754	\$650,477
2047	\$7,061	\$650,477	\$643,416	\$12,868	\$656,285
2048	\$7,080	\$656,285	\$649,204	\$12,984	\$662,188
2049	\$7,061	\$662,188	\$655,127	\$13,103	\$668,230
2050	\$7,061	\$668,230	\$661,169	\$13,223	\$674,392
2051	\$7,061	\$674,392	\$667,331	\$13,347	\$680,678
2052	\$7,080	\$680,678	\$673,598	\$13,472	\$687,070
2053	\$7,061	\$687,070	\$680,009	\$13,600	\$693,609
2054	\$7,061	\$693,609	\$686,548	\$13,731	\$700,279
2055	\$7,061	\$700,279	\$693,218	\$13,864	\$707,083
2056	\$7,080	\$707,083	\$700,002	\$14,000	\$714,002
2057	\$7,061	\$714,002	\$706,941	\$14,139	\$721,080
2058	\$7,061	\$721,080	\$714,019	\$14,280	\$728,300
2059	\$7,061	\$728,300	\$721,239	\$14,425	\$735,664
2060	\$7,080	\$735,664	\$728,583	\$14,572	\$743,155
2061	\$7,061	\$743,155	\$736,094	\$14,722	\$750,816
2062	\$7,061	\$750,816	\$743,755	\$14,875	\$758,630

ATTACHMENT 5 (continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Three Mile Island Nuclear Station, Unit 1
(December 31, 2023 dollars, thousands)

Year	Radiological Decommissioning Spent Fuel, & Site Restoration Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2063	\$7,061	\$758,630	\$751,569	\$15,031	\$766,601
2064	\$7,080	\$766,601	\$759,520	\$15,190	\$774,711
2065	\$7,061	\$774,711	\$767,650	\$15,353	\$783,003
2066	\$7,061	\$783,003	\$775,942	\$15,519	\$791,461
2067	\$7,061	\$791,461	\$784,400	\$15,688	\$800,088
2068	\$7,080	\$800,088	\$793,007	\$15,860	\$808,868
2069	\$7,061	\$808,868	\$801,807	\$16,036	\$817,843
2070	\$7,061	\$817,843	\$810,782	\$16,216	\$826,997
2071	\$7,061	\$826,997	\$819,937	\$16,399	\$836,335
2072	\$7,080	\$836,335	\$829,255	\$16,585	\$845,840
2073	\$28,138	\$845,840	\$817,702	\$16,354	\$834,056
2074	\$78,615	\$834,056	\$755,441	\$15,109	\$770,550
2075	\$103,746	\$770,550	\$666,804	\$13,336	\$680,140
2076	\$104,030	\$680,140	\$576,110	\$11,522	\$587,632
2077	\$99,061	\$587,632	\$488,571	\$9,771	\$498,342
2078	\$91,377	\$498,342	\$406,965	\$8,139	\$415,104
2079	\$37,705	\$415,104	\$377,399	\$7,548	\$384,947
2080	\$51,543	\$384,947	\$333,405	\$6,668	\$340,073
2081	\$39,427	\$340,073	\$300,645	\$6,013	\$306,658

Total* \$1,067,686

*Column may not add due to rounding

ATTACHMENT 6

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management
Report for Zion Nuclear Power Station, Units 1 and 2

ATTACHMENT 6

Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Zion Nuclear Power Station, Units 1 and 2 (December 31, 2023 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$11,671 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2023	\$13,116 (c)
5	Schedule of the annual amounts remaining to be collected	\$0
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v)	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i)	
9	No changes to the trust fund agreements since the last report.	
10	2023 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$0 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$0 (e)
	Reimbursed from the decommissioning trust fund	\$0 (e)
	Not yet reimbursed from the decommissioning trust fund	\$0 (e)
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2023	\$48,404 (f)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$169,683 (g)

ATTACHMENT 6 (continued)
Annual Radiological Decommissioning Funding Assurance and Spent Fuel
Management Report for Zion Nuclear Power Station, Units 1 and 2
(December 31, 2023 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because the Zion Units, have been shutdown since February 13, 1998, and the Zion licenses have been amended, releasing most of the formerly licensed land for unrestricted use, shrinking the licensed land to that utilized to support the Independent Spent Fuel Storage Installation (ISFSI). Thus, the only decommissioning activities and decommissioning funding requirements that remain are those associated with the decommissioning of the Zion ISFSI, which is currently scheduled to occur after the Department of Energy (DOE) removes the irradiated fuel and Greater than Class C (GTCC) waste. In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a Spent Fuel scenario as described in the site-specific cost estimate (SSCE).
- (b) Per 10CFR72.30(c) ISFSI decommissioning cost is required to be reported every three years. Zion Nuclear Power Station ISFSI was last reported in 2022 (ML22299A153) and will be included in a future report in compliance with the regulation.
- (c) The trust fund amount is the amount allocated for radiological decommissioning only. The allocation of funds for radiological decommissioning is based on Spent Fuel scenario as described in the site-specific cost estimate (SSCE).

There are no past-due tax payments owed on the decommissioning trust fund activities as of December 31, 2023. Periodic payments of estimated income taxes are made by CEG during the year on a quarterly basis. CEG then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2023.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The only decommissioning activities that remain are those associated with the decommissioning of the Zion ISFSI, which is currently scheduled to occur after the DOE removes the irradiated fuel and GTCC waste. The cumulative cost spent on decommissioning the Zion ISFSI is \$0, and the amount spent in calendar year 2023 is \$0.
- (f) The allocation of funds accumulated for managing irradiated fuel is based on the Spent Fuel scenario as described in the site-specific cost estimate (SSCE).
- (g) Current projected cost estimate for management of irradiated fuel. Zion is anticipating that some of the cost will be recovered from DOE.