

RS-24-124

10 CFR 50.12
10 CFR 50.82(a)(2)

November 19, 2024

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

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

Subject: Request for Exemption from Certain Termination of License Requirements of
10 CFR 50.82

References:

- 1) Constellation Energy Generation, LLC letter to U.S. Nuclear Regulatory Commission, "Regulatory Path to Reauthorize Power Operations," dated November 4, 2024 (ADAMS Accession No. ML24310A104)
- 2) Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, "Certification of Permanent Cessation of Power Operations for Three Mile Island Nuclear Station, Unit 1," dated June 20, 2017 (ADAMS Accession No. ML17171A151)
- 3) Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, "Certification of Permanent Removal of Fuel from the Reactor Vessel for Three Mile Island Nuclear Station, Unit 1," dated September 26, 2019 (ADAMS Accession No. ML19269E480)

In a meeting with the U.S. Nuclear Regulatory Commission (NRC) in Rockville, MD, on October 25, 2024, Constellation Energy Generation, LLC (CEG) introduced our technical approach and regulatory activities intended to support NRC reauthorization of the Three Mile Island, Unit 1 (TMI-1) Operating License. On November 4, 2024, CEG submitted a letter to the NRC outlining in detail a regulatory path to reauthorize power operations at TMI-1 (Reference 1). The regulatory path described is consistent with NRC Inspection Manual Chapter (IMC) 2562, "Light-Water Reactor Inspection Program for Restart of Reactor Facilities Following Permanent Cessation of Power Operations," effective on July 29, 2024, and supports the ability of the reactor to resume safe operations in conformance with NRC licensing requirements for operating reactors. The approach described in IMC 2562 begins with a request for exemption from the requirements of 10 CFR 50.82 to allow placing fuel in the reactor vessel and authorizing operation of the reactor.

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.12, "Specific exemptions," CEG, hereby requests exemption from 10 CFR 50.82(a)(2), "Termination of license" for TMI-1.

Specifically, CEG is requesting an exemption from 10 CFR 50.82(a)(2) to allow for a one-time rescission of the docketed 10 CFR 50.82(a)(1) certifications submitted on June 20, 2017 (Reference 2) and September 26, 2019 (Reference 3). This proposed exemption, if approved, will result in the removal of the restrictions that prohibit operation of the TMI-1 reactor or emplacement or retention of fuel into the TMI-1 reactor vessel. This exemption will allow CEG to resume power operations at TMI-1 after the NRC approves the license amendments necessary to reinstate the TMI-1 Renewed Facility Operating License (RFOL) operating reactor licensing basis (ORLB). Details of the exemption justification are included in the attachment.

To coordinate implementing this requested exemption, after NRC approval of the supporting licensing submittals, CEG plans to submit an operational readiness letter to the NRC verifying completion of restart actions and readiness to return to the ORLB.

There are no regulatory commitments contained in this letter.

If you have any questions, please contact Dennis Moore at (779) 231-5605.

Respectfully,

Gullott, David M.
M.  Digitally signed by Gullott, David M.
Date: 2024.11.19 07:09:25 -05'00'

David M. Gullott
VP, Licensing & Regulated Programs
Constellation Energy Generation, LLC

Attachment - Request for Exemption from 10 CFR 50.82(a)

cc: NRC Regional Administrator – Region I
NRC Director, NRR – DORL
NRC Deputy Director, NRR – DORL
NRC Project Manager, NRR-DORL – Three Mile Island, Unit 1
NRC Project Manager, NMSS – Three Mile Island, Unit 1
Director, Bureau of Radiation Protection – Pennsylvania Department of Environmental Protection
Chairman, Board of County Commissioners of Dauphin County
Chairman, Board of Supervisors of Londonderry Township

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PROPOSED EXEMPTION

In accordance with the requirements of Title 10 of the Code of Federal Regulations, 10 CFR 50.12, "Specific exemptions," Constellation Energy Generation, LLC (CEG), hereby requests exemption from 10 CFR 50.82(a), "Termination of license," for the Three Mile Island Nuclear Station, Unit 1 (TMI-1).

Specifically, CEG is requesting an exemption from 10 CFR 50.82(a)(2) to allow for a one-time rescission of the docketed 10 CFR 50.82(a)(1) certifications submitted on June 20, 2017 (Reference 1) and September 26, 2019 (Reference 2). This proposed exemption, if approved, will result in the removal of the restrictions that prohibit operation of the TMI-1 reactor or emplacement or retention of fuel into the TMI-1 reactor vessel. This exemption will allow CEG to resume power operations at TMI-1 after the U.S. Nuclear Regulatory Commission (NRC) approves the license amendments necessary to reinstate the TMI-1 Renewed Facility Operating License (RFOL) operating reactor licensing basis (ORLB).

BACKGROUND

TMI-1 is a nuclear plant that operated safely and reliability for over 45 years before CEG retired it in 2019 due to economic conditions.¹ Before it was retired, the plant had a generating capacity of 835 megawatts of clean, reliable, carbon free electricity. In its last year of operation, the plant was operating at a 99 percent capacity factor – well above the industry average. The plant had an annual payroll of about \$60 million and employed more than 600 full-time workers, in addition to the 1,000 highly skilled, mostly union craftspeople that supported the plant's biennial refueling outages. CEG's commitment to restarting the plant will restore to Pennsylvania and the local community many benefits that were lost when the unit was shut down in 2019.

CEG announced its plans to retire TMI-1 on May 30, 2017, and on June 20, 2017, CEG submitted to the NRC its certification that it had decided to permanently cease power operations at TMI-1 on or about September 30, 2019 (Reference 1). On September 20, 2019, CEG shut down TMI-1, intending that shutdown to be permanent. On September 26, 2019, CEG submitted to the NRC its certification that all fuel had been permanently removed from the TMI-1 reactor vessel and placed in the spent fuel pool (Reference 2).

Prior to and after shutdown, CEG submitted a number of licensing actions to transition TMI-1 into decommissioning. On April 5, 2019, CEG submitted to the NRC its TMI-1 Post-Shutdown Decommissioning Activities Report (Reference 3) and Site-Specific Decommissioning Cost Estimate (Reference 4). On August 29, 2019, the NRC issued Amendment No. 297 to the RFOL revising the RFOL and associated technical specifications (TSs) to permanently-defueled TSs, consistent with the permanent cessation of reactor operations and permanent defueling of the reactor (Reference 5). On October 1, 2019, the NRC informed CEG that the reactor

¹ At that time, CEG was named "Exelon Generation Company, LLC." NRC approved the indirect transfer of licenses associated with Exelon Generation Company's spinoff from Exelon Corporation on November 16, 2021 (Reference 7). This included changing the name of Exelon Generation Company, LLC to Constellation Energy Generation, LLC, while remaining the same legal entity and licensed owner and operator of Three Mile Island, Unit 1. While some actions referred to in this document were submitted under the name "Exelon" or "Exelon Generation Company," for clarity, CEG or Constellation will be used as the name of the licensee.

oversight process at TMI-1 had been terminated and that the NRC decommissioning inspection program was now applicable (Reference 6). This is the date when TMI-1 transitioned from a power operations plant to a facility in decommissioning.

For reasons explained below, on September 20, 2024, CEG announced its intent to restore TMI-1 to safe and reliable commercial power operation.

REGULATORY PATH

In a meeting with the NRC in Rockville, MD, on October 25, 2024, CEG introduced its technical approach and regulatory activities intended to support NRC reauthorization of the TMI-1 RFOL. The regulatory path provided during the meeting is consistent with NRC Inspection Manual Chapter (IMC) 2562, "Light-Water Reactor Inspection Program for Restart of Reactor Facilities Following Permanent Cessation of Power Operations," effective on July 29, 2024, and supports the ability of the reactor to resume safe operations in conformance with NRC licensing requirements for operating reactors. On November 4, 2024, CEG submitted a letter to the NRC proposing a regulatory path to reauthorize power operations at TMI-1 (Reference 8) consistent with IMC 2562. The regulatory pathway letter provides a more complete discussion of the specific steps CEG contemplates for obtaining NRC approval for restart.

The approach described in IMC 2562 begins with this request for exemption from the requirements of 10 CFR 50.82 to allow placing fuel in the reactor vessel and authorizing operation of the reactor, beginning the restart phase of the reactor facility inspection program. This exemption request, if approved, will result in the rescission of the docketed 10 CFR 50.82(a)(1) certifications, removing the restriction on placement of fuel into the TMI-1 reactor vessel, and reauthorizing power operations of the TMI-1 reactor. The exemption is needed alongside the requisite licensing submittals that will reinstate the operational licensing basis to allow for restarting of TMI-1.

ENVIRONMENTAL

CEG understands that the NRC will conduct an Environmental Assessment (EA) pursuant to its obligations under the National Environmental Policy Act (NEPA) (Reference 18. Holtec Decommissioning International, LLC, and Holtec Palisades, LLC; Palisades Nuclear Plant; Notice of Intent to Conduct Scoping Process and Prepare an Environmental Assessment, 89 FR 53659 (June 27, 2024). As noted in IMC 2562: "It is anticipated that the NRC's review of licensing actions to restore the operating basis of the facility will occur concurrently with any applicable environmental assessments of the resumption of power operations and with the implementation of the Restart of Reactor Facilities Inspection Process."

To effectuate the NRC's review, CEG will submit an Environmental Report to the NRC that provides the necessary information for the NRC to complete the EA. CEG expects to file this Environmental Report within nine months after initiating the restart process. CEG anticipates pre-submittal engagement with the NRC on the environmental aspects of this review in the 1st Quarter 2025.

In addition to the environmental work associated with the NRC licensing activities, CEG will

work with other state and federal agencies to obtain environmental permits and reviews required to restore the unit to power operations.

JUSTIFICATION

In accordance with 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. Section 50.12 also states that the Commission will not consider granting an exemption unless special circumstances are present.

“The exemption is authorized by law.”

Section 50.12 allows the NRC to grant exemptions from the requirements of Part 50. The requested exemption to Section 50.82(a)(2)—to allow a one-time rescission of the docketed Section 50.82(a)(1) certifications during the decommissioning process after all requisite licensing actions are approved by the NRC to support returning a plant to power operations—does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission’s regulations.

NRC has implicitly acknowledged that such an exemption request is authorized by law in its issuance of guidance in IMC 2562. The restart approach described in IMC 2562 states that “[w]hen a licensee submits a request for exemption from the requirements of 10 CFR 50.82 to allow placing fuel in the reactor vessel and authorizing operation of the reactor, the Restart phase of the reactor facility inspection program can begin.” NRC’s identification of an exemption request under Section 50.82 as a necessary element of the restart process presumes that such a request is authorized by law.

In addition, in denying a petition for rulemaking on the criteria to return retired nuclear power reactors to operations, the Commission recognized that the existing regulatory framework provides adequate flexibility for the resumption of power operations after docketing the Section 50.82(a)(1) certifications (Reference 9).

Therefore, the exemption is authorized by law.

“The exemption will not present an undue risk to public health and safety.”

Closeiy tied to the exemption request, CEG will also need to satisfy regulatory requirements applicable to the ability to restart a shutdown nuclear power plant to restore its ORLB, including the submission of multiple license amendment requests (LARs). These additional licensing actions, subject to NRC review and approval, will demonstrate CEG’s ability to restart and operate TMI-1 in a safe manner, and are expected to allow rescission of the docketed Section 50.82(a)(1) certifications, and removal of the restrictions on placement of fuel into the TMI-1 reactor vessel and operation of the TMI-1 reactor. The requested exemption (to 10 CFR 50.82(a)(2) to allow for a one-time rescission of the Section 50.82(a)(1) certifications after docketing)

supports restoration of the TMI-1 ORLB that complied with NRC regulations.

NRC's licensing review and oversight of the restart process necessarily ensures that the restart will not present an undue risk to public health and safety. Here again, IMC 2562 states: "When the NRC has verified adequate operational readiness to ensure reasonable assurance of adequate protection of public health and safety, and the applicable restart licensing actions have been issued, the NRC will authorize transition of the facility to the ROP."

Therefore, this exemption will not present an undue risk to public health and safety.

"The exemption is consistent with the common defense and security."

Allowing a one-time rescission of the decommissioning certifications does not alter the design, function, or operation of any structures or plant equipment that is necessary to maintain the safe and secure status of the plant and will not adversely affect CEG's ability to physically secure the site or protect special nuclear material. TMI-1's safeguards and security programs will remain in full effect within regulatory requirements commensurate with the reinstated ORLB. A key component of CEG's regulatory submittals will be a LAR that supports the restoration of the site's Physical Security Plan that will be submitted for NRC review and approval.

Therefore, the proposed exemption is consistent with the common defense and security.

Special Circumstances

10 CFR 50.12(a)(2) states that the Commission will not consider granting an exemption unless special circumstances are present and identifies in Section 50.12(a)(2)(i)-(vi) when special circumstances are present. Special circumstances are present here and those applicable to this exemption are discussed below.

10 CFR 50.12(a)(2)(ii). "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;"

Granting CEG's exemption request from Section 50.82(a) would not be in conflict with the underlying purpose of the rule nor would denying the exemption be necessary to achieve the underlying purpose of the rule. While the purpose of Section 50.82(a)(2) is to prohibit the operation of the reactor or emplacement or retention of fuel in the reactor vessel upon docketing the decommissioning certifications required by Section 50.82(a)(1), nothing in the rulemaking record suggests that the purpose was to make these actions irreversible. The rule language is, in fact, silent on this. The Commission added this prohibition and the requirements for written certifications in Section 50.82 as part of the 1996 revisions to the rule (Reference 16). The rulemaking record does not include any statements as to what the Commission's underlying purpose was for these written certifications or the Section 50.82(a)(2) prohibition. As part of the general purpose for the revisions to the decommissioning regulations, however, the Commission

stated that a key consideration was to “increase opportunities for the public to become informed about the licensee's decommissioning activities.” (Reference 16). Additionally, it is logical that the submission of the certifications also demarcates the point in time when a reactor formally enters the decommissioning process, including any applicable restrictions the Commission saw fit to impose such as the prohibition against loading fuel or operating the reactor.

With respect to the Section 50.82(a)(2) operation and fuel loading prohibition, the rulemaking record is equally silent on the underlying purpose.

However, nothing in the rulemaking record states that the written certifications cannot be withdrawn or that the Section 50.82(a)(2) prohibition cannot be reversed after the certifications are withdrawn. In fact, NRC has essentially acknowledged that it is not contrary to the underlying purpose of Section 50.82 for the certifications to be withdrawn and the operation and fuel loading prohibition to be lifted. In its 2021 denial of a petition for rulemaking proposing a restart specific framework, for example, NRC stated “[w]hile current regulations do not specify a particular mechanism for reauthorizing operation of a nuclear power plant after both certifications are submitted, there is no statute or regulation prohibiting such action.” (Reference 9). Furthermore, in a 2016 letter on the same subject, the NRC stated that “[t]he docketing of the two certifications will result in a permanent cessation of operations but will not result in permanent irreversible termination of the operating license.” (Reference 17).

Given the lack of contrary information in the rulemaking record for Section 50.82 and the NRC’s own statements and actions with respect to permitting the restart of reactors that have submitted the Section 50.82(a)(1) certifications, the underlying purpose of the rule would continue to be served were NRC to grant this exemption request and lift the prohibition once CEG satisfies NRC’s requirements necessary to reinstate the ORLB.

Accordingly, this special circumstance is present to justify the requested exemption.

10 CFR 50.12(a)(2)(vi). “There is present any other material circumstance not considered when the regulation was adopted for which it would be in the public interest to grant an exemption.”

CEG’s exemption request presents material circumstances that were not considered when the current decommissioning requirements in Section 50.82(a) were adopted, and it would be in the public interest to grant the exemption. With respect to this specific exemption criterion, the Commission explained when it issued the current exemption rule and the special circumstances that “[a]lthough the Commission believes that the conditions in §§ 50.12(a)(2)(i) through 50.12(a)(2)(v) will cover most requests in which an exemption could reasonably be granted, § 50.12(a)(2)(vi) recognizes that there may be circumstances, which could not have been foreseen in developing the conditions in § 50.12(a)(2)(i) through 50.12(a)(2)(v), in which it would be equitable to provide relief from the regulations.” (Reference 13). The Commission also made clear that “the Commission does not believe that the ‘special circumstances’ criteria of § 50.12(a)(2) would preclude consideration of [novel proposals].” (Reference 13).

Restarting a nuclear power plant that had shutdown and entered into the decommissioning process is undoubtedly a “material circumstance not considered when the regulation was adopted.” Most importantly, nowhere in the Commission’s regulations does the plain language state or imply that the withdrawal of those certifications and the reversal of the prohibition in Section 50.82(a)(2) are prohibited. Further, nothing in the rulemaking records suggests that the Commission had considered the possibility that a plant would exit the decommissioning process after the submission of the Section 50.82(a)(1) certifications when the current requirements were issued in 1996. This is further evidenced by the fact that the NRC has expressly acknowledged that nothing in the rule expressly or implicitly forbids the restart of a nuclear plant that has submitted the Section 50.82(a)(1) certifications (Reference 9). Most recently, this is reflected in the NRC’s issuance of IMC 2562 and other steps taken with respect to the NRC considering the restart of the Palisades nuclear plant.

In any event, the material circumstances that existed at the time TMI-1 was shutdown in 2019 are undeniably different. As previously discussed, the economic environment that existed at the time of the shutdown did not allow further operation of the plant, thus compelling CEG to shut the unit down. However, CEG’s signing of a 20-year Power Purchase Agreement with Microsoft supports the economic viability of restarting TMI-1. These are the types of circumstances that could not have been contemplated when the NRC issued Section 50.82(a)(2).

Finally, it is clearly in the public interest to grant CEG’s exemption request allowing the loading of fuel and operation of TMI-1. Prior to shutdown, TMI-1 was among the safest and most reliable nuclear plants on the grid. Once TMI-1 resumes operation, independent studies have found that it will create 3,400 direct and indirect jobs and add more than 800 megawatts of carbon-free electricity to the grid. Restarting the plant will also add \$16 billion to the state’s GDP and generate more than \$3 billion in state and federal taxes. (Reference 14). Pennsylvania Governor Josh Shapiro also reinforced that restarting the plant was in the public interest because it “will safely utilize existing infrastructure to sustain and expand nuclear power in the Commonwealth while creating thousands of energy jobs and strengthening Pennsylvania’s legacy as a national energy leader.” (Reference 15).

In sum, Criterion vi of Section 50.12(a)(2) is met because material circumstances are present that were not considered when the regulation was adopted, and it is in the public interest to grant this exemption.

Accordingly, this additional special circumstance is also present to justify this exemption request.

PRECEDENT

On September 28, 2023, Holtec Decommissioning International LLC (HDI) submitted a similar Request for Exemption from Certain Termination License Requirements of 10 CFR 50.82 for the Palisades Nuclear Plant (Reference 10). On November 3, 2023, the NRC issued its acceptance of the request for exemption, finding that it provided technical safety information in sufficient detail to enable the NRC staff to complete its detailed technical safety review (Reference 11).

Attachment - Request for Exemption from 10 CFR 50.82(a)

The HDI exemption request is still under review. To provide oversight of the Palisades restart effort, the NRC has established a Palisades Nuclear Restart Panel, which will guide the staff efforts to review, inspect, and confirm that Palisades is ready to be returned to an operating facility.

Other than Palisades, no nuclear power plant licensee to date has requested reauthorization of power operation after docketing the 10 CFR 50.82(a)(1) certifications and before reaching the renewed facility license expiration date. There have been instances in which a licensee submitted to the NRC, and then subsequently withdrew, a certification of an intent to cease operations under Section 50.82(a)(1)(i). In those cases, the licensee had not submitted on the docket the certification of permanent cessation of operation and permanent removal of fuel from the reactor vessel.

Additionally, the NRC has issued IMC 2562, which contemplates submission of an exemption from the requirements of Section 50.82 to allow placing fuel in the reactor and authorizing operation of the reactor, thereby initiating the “Restart phase” of the inspection program. The NRC also has considered the possibility of returning a plant to power operations as mentioned in Regulatory Guide 1.184, Decommissioning of Nuclear Power Reactors (Reference 12), and its denial of a Petition for Rulemaking on Criteria to Return Retired Power Reactors to Operations (Reference 9). Thus, the NRC may address such requests under the existing regulatory framework—including granting exemptions, where needed—on a case-by-case basis.

CONCLUSION

Pursuant to the provisions of 10 CFR 50.12, CEG is requesting an exemption, from 10 CFR 50.82(a) to allow a one-time rescission of the docketed decommissioning certifications. Based on the considerations discussed above, CEG proposes that the requested exemption is authorized by law, will not present an undue risk to the public health and safety, is consistent with the common defense and security, and special circumstances are present as set forth in 10 CFR 50.12.

REFERENCES

1. Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, Certification of Permanent Cessation of Power Operations for Three Mile Island Nuclear Station, Unit 1, dated June 20, 2017 (ADAMS Accession No. ML17171A151).
2. Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, Certification of Permanent Removal of Fuel from the Reactor Vessel for Three Mile Island Nuclear Station, Unit 1, dated September 26, 2019 (ADAMS Accession No. ML19269E480).
3. Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, Three Mile Island Nuclear Station, Unit 1 – Post-Shutdown Decommissioning Activities Report, dated April 5, 2019 (ADAMS Accession No. ML19095A041).

4. Exelon Generation Company, LLC letter to U.S. Nuclear Regulatory Commission, Site-Specific Decommissioning Cost Estimate for Three Mile Island Nuclear Station, Unit 1, dated April 5, 2019 (ADAMS Accession No. ML19095A010).
5. U.S. Nuclear Regulatory Commission letter to Exelon Generation Company, LLC, Three Mile Island Nuclear Station, Unit 1 – Issuance of Amendment No. 297 re: Defueled Technical Specifications and Revised License Conditions (EPID L-2018-LLA-0204), dated August 29, 2019 (ADAMS Accession No. ML 19211D317).
6. U.S. Nuclear Regulatory Commission letter to Exelon Generation Company, LLC, Termination of Reactor Oversight Process for Three Mile Island Nuclear Station Unit 1 and Commencement of Decommissioning Inspection Program, dated October 1, 2019 (ADAMS Accession No. ML19274B163).
7. CEG letter to U.S. Nuclear Regulatory Commission, Notification of Completion of License Transfer and Request to Continue Processing Pending NRC Actions Previously Requested by Exelon Generation Company, LLC, dated February 1, 2022 (ADAMS Accession No. ML22032A333).
8. CEG letter to U.S. Nuclear Regulatory Commission, Regulatory Path to Reauthorize Power Operations, dated November 4, 2024 (ADAMS Accession No. ML24310A104).
9. Petition for Rulemaking; Denial – Criteria to Return Retired Nuclear Power Reactors to Operation (86 Fed. Reg. 24362 (May 6, 2021)).
10. Holtec Decommissioning International, LLC letter to U.S. Nuclear Regulatory Commission, Request for Exemption from Certain Termination of License Requirements of 10 CFR 50.82, dated September 28, 2023 (ADAMS Accession No. ML23271A140).
11. U.S. Nuclear Regulatory Commission letter to Holtec Decommissioning International, LLC, Palisades Nuclear Plant – Acceptance of Requested Licensing Action Re: Request for Exemption from 10 CFR 50.82(a)(2) to Support Reauthorization of Power Operations (EPID L-2023-LLE-0025), dated November 3, 2023 (ADAMS Accession No. ML23291A440).
12. U.S. Nuclear Regulatory Commission Regulatory Guide 1.184, Decommissioning of Nuclear Power Reactors, Revision 1, dated October 4, 2013 (ADAMS Accession No. ML13144A840).
13. Final Rule, Specific Exemptions; Clarification of Standards, 50 Fed. Reg. 50764 (Dec. 12, 1985).
14. Economic Impacts of Establishing the Crane Clean Energy Center (CCEC) (Sept. 20, 2024) (available at <https://www.pabuildingtrades.org/ccec>).
15. Constellation Press Release, Constellation to Launch Crane Clean Energy Center, Restoring Jobs and Carbon-Free Power to The Grid (Sept. 20, 2024) (available at <https://perry.house.gov/news/documentsingle.aspx?DocumentID=402994>)

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16. Final Rule, Decommissioning of Nuclear Power Reactors, 61 Fed. Reg. 39278 (July 29, 1996).

17. Letter to David A. Kraft, Director, Nuclear Energy Information Services, from Christine Lupa (acting for John B. Geissner), Director, Division of Nuclear Materials Safety, U.S. Nuclear Regulatory Commission (Aug. 4, 2016) (ADAMS Accession No. ML16218A266).

18. Holtec Decommissioning International, LLC, and Holtec Palisades, LLC; Palisades Nuclear Plant; Notice of Intent to Conduct Scoping Process and Prepare an Environmental Assessment, 89 FR 53659 (June 27, 2024).