



TMI-Alert's Opposition of the Sale of TMI-2 from First Energy to TMI-2 Solutions

- “Energy Solutions lacks the requisite resources to ensure sufficient funding will be available for decommissioning. GPU’s decommissioning fund is under \$1 billion, and it will take up to \$5 billion to achieve any semblance of a partial cleanup.”*
- “TMI’s nuclear decommissioning trust fund has experienced an erosion in fund balance worse than any scenario forecast in the license transfer request. The funds may no longer satisfy the prepayment requirements established.”
- “In TMI-Alert’s view, examining the impact of market volatility on the Nuclear Trust Fund balance is paramount. It is likely that First Energy and Energy Solutions may find themselves in the position of having to procure supplemental financial assurance to address and offset shortfalls in clean up funds.”
- “Private companies should not be allowed to access public trust funds without authorization and oversight from the Public Utility Commission.”
- “The transfer of decommissioning assets from First Energy to TMI-Solutions is an illegal taking of public property, and would constitute one of the largest privatization's of public property in Pennsylvania history.”
- “The Trust Fund is owned by rate payers, and neither GPU or FirstEnergy have contributed a dime to the fund despite the fact that they were responsible for the core meltdown.”
- “There is still the matter of the damaged fuel from TMI which resides in Idaho. Idaho wants all commercial waste out by 2035, and the melted reactor at TMI-2 is not an ideal site to store a melted core.”

- “TMI Solutions is a fictional company that exists on paper only. TMI Solutions is not a solution. It is a smoke and mirror limited liability Utah-shell company that lacks the experience and financial resources to decommission one of the most radioactive sites in America.”

* By contrast, the NRC staff performed an independent cash flow analysis on Diablo Canyon using information provided in PG&E's cash flow statement. The balance in the NDT as of December 31, 2018, was \$1.31 billion for Unit 1 and \$1.71 billion for Unit 2, or three times more than is available in the TMI-2 fund. The site-specific cost estimate states that PG&E plans to deposit \$226.7 million per year into the Unit 1 NDT in 2020-2024, and \$151.1 million per year into the Unit 2 NDT in 2020-2025. Neither First Energy or TMI-2 Solutions plan to make any additional contributions.