



Exelon Generation®

January 8, 2018

**Confidential Information  
Submitted Under 10 CFR 2.390**

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

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

Nine Mile Point Nuclear Station, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-63 and NPF-69  
NRC Docket Nos. 50-220 and 50-410

R. E. Ginna Nuclear Power Plant, Unit 1  
Renewed Facility Operating License No. DPR-18  
NRC Docket No. 50-244

Subject: Submittal of Annual Report of the Nuclear Advisory Committee

Reference: Letter from D. V. Pickett (NRC) to C. M. Crane (Exelon), "Orders Approving Corporate Merger Between Exelon Corporation and Constellation Energy Group, Inc., and Resultant Indirect Transfer of Renewed Facility Operating Licenses – Calvert Cliffs Nuclear Power Plant, Unit Nos. 1 and 2, and Independent Spent Fuel Storage Installation, Nine Mile Point Nuclear Station, Unit Nos. 1 and 2, and R.E. Ginna Nuclear Power Plant (TAC Nos. ME6234, ME6235, ME6236, ME6237, and ME 6238)," (ML113560381) dated February 15, 2012.

The purpose of this letter is to provide the annual report of the Constellation Energy Nuclear Group, LLC (CENG) Nuclear Advisory Committee, as required by the above Reference. This Reference requires that the report be submitted within 30 days of the report completion or January 31, whichever comes first. The report was distributed to the CENG Board of Directors and declared final on December 11, 2017.

Attachment 1 is a proprietary version of the annual report of the Nuclear Advisory Committee to the CENG Board of Directors. Attachment 1 contains information confidential to Exelon Generation Company, LLC. Exelon Generation Company, LLC requests that the contents of Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4).

A non-proprietary version of the annual report is contained in Attachment 2. An affidavit supporting the 2.390(a)(4) request is contained in Attachment 3.

This correspondence does not contain any regulatory commitments.

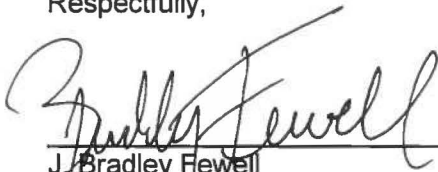
Submittal of Annual Report of the Nuclear Advisory Committee

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Should you have any questions concerning this letter, please contact Jessie Hodge, at (610) 765-5532.

I declare under penalty of perjury that the foregoing is true and correct. This statement was executed on the 8<sup>th</sup> Day of January 2018.

Respectfully,



J. Bradley Fewell  
Senior Vice President, Regulatory Affairs & General Counsel  
Exelon Generation Company, LLC

- Attachments:
1. The 2017 Annual Report of the CENG Independent Nuclear Advisory Committee to the CENG Board of Directors (Proprietary)
  2. The 2017 Annual Report of the CENG Independent Nuclear Advisory Committee to the CENG Board of Directors (Non-Proprietary)
  3. 10 CFR 2.390 Affidavit of J. Bradley Fewell

cc: **With Attachment 1**  
NRC Project Manager, Calvert Cliffs  
NRC Project Manager, Nine Mile Point  
NRC Project Manager, R.E. Ginna  
NRC Regional Administrator, Region I  
NRC Resident Inspector, Calvert Cliffs  
NRC Resident Inspector, Nine Mile Point  
NRC Resident Inspector, R.E. Ginna

**Without Attachment 1**  
S. Gray, Maryland DNR

**Attachment 3**

**10 CFR 2.390 Affidavit of J. Bradley Fewell**

ATTACHMENT 3

10 CFR 2.390 AFFIDAVIT OF J. BRADLEY FEWELL

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
Exelon Generation Company, LLC )

AFFIDAVIT

I, J. Bradley Fewell, Senior Vice President, Regulatory Affairs & General Counsel of Exelon Generation, LLC (Exelon), do hereby affirm and state:


1. I am authorized to execute this affidavit on behalf of Exelon and its affiliates.
2. Exelon is providing information in support of the Order approving the corporate merger between Exelon and Constellation Energy Group, Inc., and the resultant indirect transfer of the Renewed Facility Operating Licenses, approved February 15, 2012 (ML113560381). The document being provided in Attachment 1 contains confidential and proprietary information related to a report generated by the Nuclear Advisory Committee (NAC) for the Constellation Energy Nuclear Group, LLC (CENG) Board of Directors, information on proprietary decommissioning cost estimates, and confidential information provided to the Committee on Foreign Investment in the United States. This information constitutes proprietary information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 9.17(a)(4), because:
  - i. This information is and had been held in confidence by Exelon.
  - ii. This information is of a type that is customarily held in confidence by CENG, and there is a rational basis for doing so because the information contains sensitive business information. In particular, the NAC report discusses proprietary internal discussions and activities by and between Exelon and CENG management and the NAC, as well as legal and regulatory analysis prepared by internal and external legal counsel for the benefit of CENG and the NAC.
  - iii. This information is being transmitted to the NRC voluntarily and in confidence.
  - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - v. Public disclosure of this information would create substantial harm to the competitive position of Exelon and CENG by disclosing confidential commercial information, including internal business discussions and activities as well as the legal and regulatory advice prepared by counsel at the request and for the benefit of CENG management or the NAC that is intended solely for internal use.

ATTACHMENT 3

10 CFR 2.390 AFFIDAVIT OF J. BRADLEY FEWELL

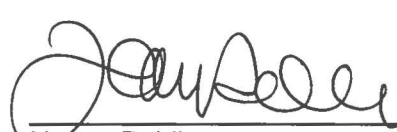
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3. Accordingly, we request that Attachment 1 be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 9.17(a)(4).

  
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J. Bradley Fewell

Subscribed and sworn before me, a Notary Public, in and for Washington, DC, this 8th day of January 2018.

WITNESS my hand and Notarial Seal:

  
\_\_\_\_\_  
Notary Public

My Commission Expires ~~NOTARY PUBLIC DISTRICT OF COLUMBIA~~ **JEAN R. KABRE**  
**NOTARY PUBLIC DISTRICT OF COLUMBIA**  
My Commission Expires June 30, 2018

01/08/2018  
Date

