

CONFIDENTIAL COMMERCIAL MATERIAL TO BE WITHHELD FROM PUBLIC
DISCLOSURE PURSUANT TO 10 CFR 2.390 AND 10 CFR 9.17



341 White Pond Drive
Akron, Ohio 44320

March 4, 2020
L-20-067

10 CFR 140.21

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

SUBJECT:

Beaver Valley Power Station, Unit Nos. 1 and 2
Docket No. 50-334, License No. DPR-66
Docket No. 50-412, License No. NPF-73

Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3

Perry Nuclear Power Plant, Unit No. 1
Docket No. 50-440, License No. NPF-58
Retrospective Premium Guarantee

In accordance with 10 CFR 140.21, Energy Harbor Nuclear Corp. hereby submits to the Nuclear Regulatory Commission (NRC) an internal cash flow projection for Energy Harbor Nuclear Generation LLC. Energy Harbor Nuclear Generation LLC is the licensed owner of the Beaver Valley Power Station, Unit Nos. 1 and 2; the Davis-Besse Nuclear Power Station, Unit No. 1; and the Perry Nuclear Power Plant, Unit No. 1, reactors. The cash flow projection provides evidence of the guarantee of payment of deferred premiums in the amount of \$20.496 million per reactor, as specified in 10 CFR 140.11(a)(4).

This financial projection is confidential commercial information, and Energy Harbor Nuclear Corp. requests that information be withheld from public disclosure pursuant to 10 CFR 2.390 and 10 CFR 9.17(a)(4). A redacted version of the financial projection

Enclosure C to this letter contains confidential commercial material.
Withhold from public disclosure under 10 CFR 2.390 and 10 CFR 9.17.
Upon removal of Enclosure C, this letter is uncontrolled.

CONFIDENTIAL COMMERCIAL MATERIAL TO BE WITHHELD FROM PUBLIC DISCLOSURE
PURSUANT TO 10 CFR 2.390 AND 10 CFR 9.17

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station, Unit No. 1
Perry Nuclear Power Plant, Unit No. 1
L-20-067
Page 2

suitable for public disclosure is provided in the non-proprietary version contained in Enclosure A. A confidential version of the financial projection is provided in Enclosure C. An affidavit supporting the request for withholding Enclosure C from public disclosure is provided in Enclosure B.

This information is required to be submitted annually on the anniversary date on which the indemnity agreement is effective for each reactor. Because the indemnity agreement effective dates vary for each reactor, the enclosure contains the information for the aforementioned reactors to be submitted by March 7, the earliest indemnity agreement anniversary date of the reactors.

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Phil H. Lashley, Acting Manager – Nuclear Licensing and Regulatory Affairs, at (330) 315-6808.

Sincerely,



Darin M. Benyak
Vice President, Nuclear Support and Regulatory Affairs

Enclosures:

- A. Energy Harbor Nuclear Generation LLC 2020 Internal Cash Flow Projection for Beaver Valley Power Station, Unit Nos. 1 and 2; Davis-Besse Nuclear Power Station, Unit No. 1; and Perry Nuclear Power Plant, Unit No. 1 (Non-Proprietary)
- B. Affidavit
- C. Energy Harbor Nuclear Generation LLC 2020 Internal Cash Flow Projection for Beaver Valley Power Station, Unit Nos. 1 and 2; Davis-Besse Nuclear Power Station, Unit No. 1; and Perry Nuclear Power Plant, Unit No. 1 (Proprietary)

Enclosure C to this letter contains confidential commercial material.
Withhold from public disclosure under 10 CFR 2.390 and 10 CFR 9.17.
Upon removal of Enclosure C, this letter is uncontrolled.

CONFIDENTIAL COMMERCIAL MATERIAL TO BE WITHHELD FROM PUBLIC DISCLOSURE
PURSUANT TO 10 CFR 2.390 AND 10 CFR 9.17

Beaver Valley Power Station, Unit Nos. 1 and 2
Davis-Besse Nuclear Power Station, Unit No. 1
Perry Nuclear Power Plant, Unit No. 1
L-20-067
Page 3

cc: NRC Region I Administrator (without Enclosure C)
NRC Region III Administrator (without Enclosure C)
NRC Resident Inspector (Beaver Valley) (without Enclosure C)
NRC Resident Inspector (Davis-Besse) (without Enclosure C)
NRC Resident Inspector (Perry) (without Enclosure C)
NRC Energy Harbor Nuclear Corp. Fleet Project Manager (without Enclosure C)
Director, Bureau of Radiation Protection/Department of Environmental Protection
(BRP/DEP) (without Enclosure C)
PA Department of Environmental Protection, Bureau of Water Protection (without
Enclosure C)
Site BRP/DEP Representative (without Enclosure C)
Utility Radiological Safety Board (without Enclosure C)

Enclosure C to this letter contains confidential commercial material.
Withhold from public disclosure under 10 CFR 2.390 and 10 CFR 9.17.
Upon removal of Enclosure C, this letter is uncontrolled.

Enclosure A
L-20-067

Energy Harbor Nuclear Generation LLC 2020 Internal Cash Flow Projection for
Beaver Valley Power Station, Unit Nos. 1 and 2;
Davis-Besse Nuclear Power Station, Unit No. 1;
and Perry Nuclear Power Plant, Unit No. 1
(Non-Proprietary)

(One Page Follows)

Energy Harbor Nuclear Generation LLC 2020 Internal Cash Flow Projection
(Non-Proprietary)

(Dollars in Millions)

	<u>2020 Projected⁽¹⁾⁽²⁾</u>
Internal Cash Flows:	
Revenues	[]
Cost of Revenues	[]
Operations and Maintenance	[]
Other Operating Costs	[]
Capital Expenditures	[]
Deferred Cash Flow	[]
	<hr/>
Net Internal Cash Flow	[] ⁽³⁾
Percentage Ownership in Units:	
Davis-Besse Unit No. 1	100.00%
Perry Unit No. 1	100.00%
Beaver Valley Unit No. 2	100.00%
Beaver Valley Unit No. 1	100.00%
Maximum Total Contingent Liability	<u>\$81.984⁽³⁾</u>

Notes:

(1) Information contained within the brackets [] is considered proprietary.

(2) Rounding has been used to calculate the values.

(3) Energy Harbor Nuclear Generation LLC has coverage of all cash costs per the terms of a power supply agreement with an affiliate. Therefore, Energy Harbor Nuclear Generation LLC will be able to satisfy any deferred premiums through the funding from their affiliate.

CERTIFICATION

I, David D. Faranetta, Chief Financial Officer of Energy Harbor Nuclear Generation LLC, hereby certify that the foregoing Internal Cash Flow Projection for the calendar year 2020 is derived from reasonable assumptions and is a reasonable estimate.

3/3/2020
Date



David D. Faranetta

Enclosure B
L-20-067

Affidavit

(Two Pages Follow)

10 CFR 2.390

AFFIDAVIT OF DARIN M. BENYAK

I, Darin M. Benyak, Vice President, Nuclear Support and Regulatory Affairs state that:

1. I am authorized to execute this affidavit on behalf of Energy Harbor Nuclear Corp. and its affiliates.

2. Energy Harbor Nuclear Corp. is providing information in support of its "Retrospective Premium Guarantee" submittal. The proprietary version of Enclosure C being provided in the submittal contains a 2020 cash flow projection for Energy Harbor Nuclear Generation LLC and the projected revenue is based on an intercompany Power Supply Agreement dated February 27, 2020. This document constitutes proprietary commercial and financial information that should be held in confidence by the Nuclear Regulatory Commission (NRC) pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4), because:

a. This information is and has been held in confidence by Energy Harbor Nuclear Corp. and its affiliates.

b. This information is of a type that is held in confidence by Energy Harbor Nuclear Corp. and its affiliates, and there is a rational basis for doing so because the information contains sensitive financial competitive information concerning Energy Harbor Nuclear Generation LLC's anticipated cash flow.

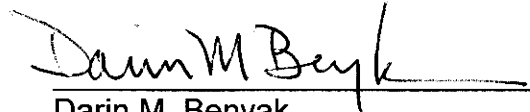
c. This information is being transmitted to the NRC in confidence.

d. This information is not available in public sources and could not be gathered readily from other publicly available information.

e. Public disclosure of this information would create substantial harm to the competitive position of Energy Harbor Nuclear Generation LLC by disclosing its internal cash flow.

3. Accordingly, Energy Harbor Nuclear Corp. requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4).

Energy Harbor Nuclear Corp.



Darin M. Benyak
Vice President, Nuclear Support and
Regulatory Affairs

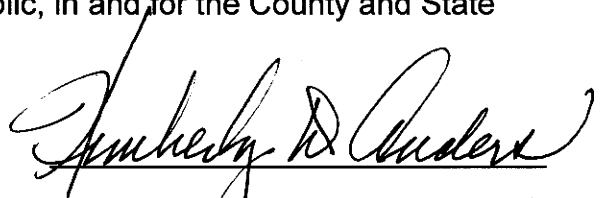
STATE OF Ohio

COUNTY OF Summit

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 3rd day of March, 2020.



KIMBERLY D. ANDERS
Notary Public, State of Ohio
My Commission Expires
December 27, 2022



My Commission Expires: 12-27-2020