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Nuclear  
Exelon Generation  
4300 Winfield Road  
Warrenville, IL 60555

2130-05-20053

February 25, 2005

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

Limerick Generating Station, Units 1 and 2  
Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Oyster Creek Generating Station  
Facility Operating License No. DPR-16  
NRC Docket No. 50-219

**Subject:** Limerick Generating Station and Oyster Creek Generating Station -  
Response to Information Request Regarding Significance Determination  
Process Risk-Informed Inspection Notebook

**Reference:** Letter from U.S. NRC to Michael P. Gallagher (Exelon Generation  
Company, LLC), "Transmittal of Revision 1 Significance Determination  
Process Risk-Informed Inspection Notebook and Information Request for  
Next Revision," dated September 10, 2004

In the referenced letter, the NRC requested plant-specific information to support revision of the risk-informed notebooks used to support the NRC's significance determination process. In a telephone conversation with Mr. Robert Perch of the NRC, it was agreed that Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen) would provide this information for Limerick Generating Station and Oyster Creek Generating Station by February 25, 2005. The CDs enclosed with this letter provide the requested information.

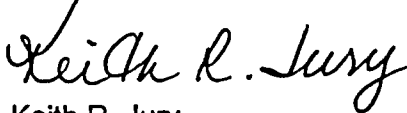
The referenced letter identified that the information in the attached CDs is considered proprietary in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." As such, Exelon and AmerGen request that this information response contained in the attached CDs be withheld from public disclosure. In accordance with 10 CFR 2.390, attached is an affidavit providing the basis for withholding the information from public disclosure.

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Please contact Mr. David J. Distel at 610-765-5517 regarding any questions about this letter.

Respectfully,



Keith R. Jury  
Director, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC  
AmerGen Energy Company, LLC

Enclosures:

1. Limerick Generating Station Information for SDP Notebooks
2. Oyster Creek Generating Station Information for SDP Notebooks
3. Exelon/AmerGen Affidavit

cc: S. J. Collins, Administrator, Region I, USNRC (w/o Encl 1 & 2)  
R. J. Summers, USNRC Senior Resident Inspector, Oyster Creek (w/o Encl 1 & 2)  
S. Hansell, USNRC Senior Resident Inspector, Limerick (w/o Encl 1 & 2)  
P. S. Tam, USNRC Senior Project Manager, Oyster Creek (w/o Encl 1 & 2)  
T. Tate, USNRC Senior Project Manager, Limerick (w/o Encl 1 & 2)  
M. Tschiltz, USNRC, Chief, Probabilistic Safety Assessment Branch (with  
Enclosures)

**ENCLOSURE 3**

**Exelon/AmerGen Affidavit**

**Affidavit of Keith R. Jury**

I, Keith R. Jury, Director, Licensing and Regulatory Affairs, do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of Exelon Generation Company, LLC (Exelon) and AmerGen Energy Company, LLC (AmerGen).
2. Exelon/AmerGen is providing the information contained in the enclosed CDs in response to an NRC request for information regarding the Significance Determination Process Risk-Informed Inspection Notebooks for the Limerick Generating Station and the Oyster Creek Generating Station. This information constitutes proprietary information following the events of September 11, 2001, and is being controlled as trade secrets and commercial or financial information, considered privileged or confidential, that should be held in confidence by the NRC under 10 CFR 2.390 because:
  - i. This information is and has been held in confidence by Exelon/AmerGen.
  - ii. This information is being transmitted voluntarily to the NRC in confidence.
  - iii. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - iv. Public disclosure of this information would create substantial harm to the competitive position of Exelon/AmerGen by disclosing information to parties whose commercial interests may be adverse to those of Exelon/AmerGen.
3. Accordingly, Exelon/AmerGen requests that the enclosed CDs and the information contained therein be withheld from public disclosure under 10 CFR 2.390.

*Keith R. Jury*

Keith R. Jury  
Director, Licensing and Regulatory Affairs

Commonwealth of State of Illinois

County of DuPage

Subscribed and sworn to before me, a Notary Public, in and for the County and State above named, this 25<sup>th</sup> day of February, 2005.

*Timothy A. Byam*  
Notary Public

My Commission Expires:

12/04/05

