



Continuum Dynamics, Inc.

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31 January 2005

Mr. Thomas G. Roddey
Exelon Generation Company
Licensing and Regulatory Affairs
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: Transmittal of Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," Presentation prepared by Continuum Dynamics, Inc. for Exelon Generation LLC, 25 January 2005; and "Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," C.D.I. Report 04-09P Rev. 5 prepared by Continuum Dynamics, Inc., dated January 2005.

Dear Mr. Roddey:

Enclosed please find one copy of each of the above referenced documents which are being submitted to Exelon Generation Company in accordance with the Proprietary Information Exchange Agreement between Continuum Dynamics, Inc. and Exelon Generation LLC dated June 18, 2003. Should the documents be submitted to the Nuclear Regulatory Commission, we have also enclosed an Affidavit requesting withholding of disclosure, in accordance with 10 CFR 2.390.

Very truly yours,

A handwritten signature in cursive script that reads "Alan Bilanin".

Alan J. Bilanin

President & Senior Associate

AJB/epb
Enclosures – as stated
05012

AFFIDAVIT

Re: "Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," Presentation prepared by Continuum Dynamics, Inc. for Exelon Generation LLC, 25 January 2005; and
"Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," C.D.I. Report No. 04-09P Rev. 5, prepared by Continuum Dynamics, Inc., dated January 2005.

I, Alan J. Bilanin, being duly sworn, depose and state as follows:

1. I hold the position of President and Senior Associate of Continuum Dynamics, Inc. (hereinafter referred to as C.D.I.), and I am authorized to make the request for withholding from Public Record the Information contained in the documents described in Paragraph 2. This Affidavit is submitted to the Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 2.390(a)(4) based on the fact that the attached information consists of trade secret(s) of C.D.I. and that the NRC will receive the information from C.D.I. under privilege and in confidence.
2. The Information sought to be withheld, is contained in the presentation entitled "Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," prepared by Continuum Dynamics, Inc. for Exelon Generation LLC, dated 25 January 2005 and C.D.I. Report No. 04-09P, Rev. 5, entitled "Methodology to Determine Unsteady Pressure Loading on Components in Reactor Steam Domes," prepared by Continuum Dynamics, Inc., dated January 2005 transmitted to Keith Moser, Exelon in email dated January 21, 2005.
3. The Information summarizes:
 - (a) a process or method, including supporting data and analysis, where prevention of its use by C.D.I.'s competitors without license from C.D.I. constitutes a competitive advantage over other companies;
 - (b) Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;
 - (c) Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 3(a), 3(b) and 3(c) above.

4. The Information has been held in confidence by C.D.I., its owner. The Information has consistently been held in confidence by C.D.I. and no public disclosure has been made and it is not available to the public. All disclosures to third parties, which have been limited, have been made pursuant to the terms and conditions contained in C.D.I.'s Proprietary Information Exchange Agreement which must be fully executed prior to disclosure.
5. The Information is a type customarily held in confidence by C.D.I. and there is a rational basis therefore. The Information is a type, which C.D.I. considers trade secret and is held in confidence by C.D.I. because it constitutes a source of competitive advantage in the competition and performance of such work in the industry. Public disclosure of the Information is likely to cause substantial harm to C.D.I.'s competitive position and foreclose or reduce the availability of profit-making opportunities.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to be the best of my knowledge, information and belief.

Executed on this 31st day of January 2005.


Alan J. Bilanin
Continuum Dynamics, Inc.

Subscribed and sworn before me this day:

Jan 31, 2005


Barbara A. Agans, Notary Public

BARBARA A. AGANS
NOTARY PUBLIC OF NEW JERSEY
MY COMM. EXPIRES MAY 6, 2007