



FPL Group, Inc., P. O. Box 14000, Juno Beach, Florida 33408-0420 (561) 694-4000
J. A. Stall
Senior Vice President, Nuclear
Chief Nuclear Officer

August 1, 2005

Docket Nos. 50-331
72-32

10 CFR 50.80
10 CFR 50.90
10 CFR 72.210

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Duane Arnold Energy Center
Application for Order and Conforming Amendments for License Transfer

On August 1, 2005, Nuclear Management Company, LLC, Interstate Power & Light Company, and FPL Duane Arnold, LLC, submitted an Application for Order and Conforming License Amendments for License Transfer of Facility Operating License DPR-49. The application included redacted, non-proprietary versions of Enclosures 6 and 8, and stated that the proprietary versions would be submitted under separate cover. This letter provides the proprietary versions of these Enclosures and requests that they be withheld from public disclosure pursuant to 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4). An affidavit supporting this request is attached.

Sincerely,

J.A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Operator
FPL Energy Duane Arnold, LLC

Enclosure: Affidavit of J. Hartzog
Proprietary Enclosure 6P
Proprietary Enclosure 8P

cc: James L. Caldwell, NRC Region III Administrator
Deirdre W. Spaulding, NRC Project Manager, Duane Arnold Energy Center
Ronald A. Langstaff, NRC Senior Resident Inspector, Duane Arnold Energy Center
Director, Spent Fuel Project Office

**CONTAINS CONFIDENTIAL INFORMATION TO BE WITHHELD
FROM PUBLIC DISCLOSURE PURSUANT TO 10 C.F.R. §§ 2.390 AND
9.17(a)(4)**

AP01
UmSS01

State of Florida)
)
County of Palm Beach) ss.

10 C.F.R. § 2.390
AFFIDAVIT OF JOHN HARTZOG

I, John Hartzog, Manager, Special Financial Projects of FPL Energy, LLC (“FPLE”), being duly sworn according to law, depose and state the following:

1. I am authorized to execute this affidavit on behalf of FPLE and its subsidiary, FPL Energy Duane Arnold, LLC (“FPLE Duane Arnold”).

2. FPLE Duane Arnold is providing information in support of the Application for Order and Conforming License Amendments for License Transfer of Facility Operating License DPR-49, which FPLE Duane Arnold, Nuclear Management Company, LLC, and Interstate Power and Light Company filed on August 1, 2005. The documents provided as Enclosures 6P and 8P to that application contain the financial projections of FPLE and FPLE Duane Arnold related to the operation of the Duane Arnold Energy Center. These documents constitute proprietary commercial information that should be held in confidence by the NRC pursuant to 10 C.F.R. §§ 9.17(a)(4) and 2.390(a)(4), because:

a) The information is and has been held in confidence by FPLE and its subsidiary, FPLE Duane Arnold.

b) This information is of a type that is held in confidence by FPLE and FPLE Duane Arnold, and there is a rational basis for doing so because the information contains sensitive financial information concerning projected revenues, operating expenses, and finances of FPLE Duane Arnold.

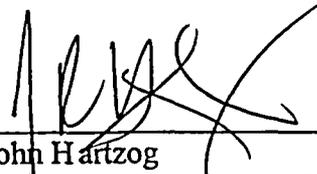
c) This information is being transmitted to the NRC in confidence.

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 FPLE and FPLE Duane Arnold by disclosing their internal financial projections to other persons whose commercial interests may be adverse to FPLE and FPLE Duane Arnold.

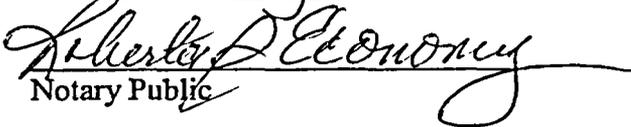
3. Accordingly, FPLE and FPLE Duane Arnold request that the designated documents be withheld from public disclosure pursuant to 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4).

Further, affiant sayeth naught.



John Hartzog
Manager, Special Financial Projects
Florida Power & Light Company

Subscribed and sworn to before me
this 21 day of July, 2005.



Notary Public

My commission expires _____.



Roberta S. Economy
Commission # DD415603
Expires June 1, 2009
Bonded Tray Pahn - Insurance, Inc. 800-385-7019