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December 15, 2006

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

Palisades Nuclear Plant
Docket Number 50-255
License DPR-20

Subject: Application for Order and Conforming License Amendment for License
Transfer for Palisades Nuclear Plant

- References: 1) Letter from Entergy Nuclear Operations, Inc., et al. to Document Control Desk, "Application for Order and Conforming License Amendment for License Transfer", dated August 31, 2006
- 2) Letter from M. Chawla (Nuclear Regulatory Commission), to E. J. Weinkam (Nuclear Management Company), "Palisades Plant - Request for additional information related to order and conforming license amendment for license transfer (TAC NO. MD2954)", dated December 14, 2006

In Reference 1, Entergy Nuclear Operations, Inc. (ENO), Entergy Nuclear Palisades, LLC, Consumers Energy Company (Consumers), and Nuclear Management Company, LLC (NMC), requested the transfer of the Palisades Nuclear Plant Facility Operating License DPR-20 from Consumers and NMC, to Entergy Nuclear Palisades to possess and own, and ENO to possess, use, and operate Palisades. In Reference 2, the Nuclear Regulatory Commission requested additional information to support their review. The requested information is provided in the enclosures to this letter.

Attachment 1 provides five-year projected income and financial statements for Entergy Nuclear Palisades, LLC with a ten-percent reduction in the price of a megawatt-hour of

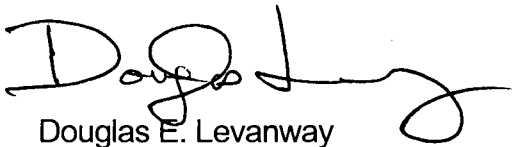
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electricity from the prices assumed in the income and financial statements previously provided in support of the application.

Attachment 2 provides five-year projected income and financial statements for Entergy Nuclear Palisades, LLC that reflect a reduction in the projected capacity factor to 88.6 percent. The years that are forecast to be lower than historical average stay the same. Only years 2008 and 2012 were affected by this reduction.

The financial projections in Attachments 1 and 2 include the cost of operating the Big Rock Point independent spent fuel storage installation and reflect the ownership of Big Rock Point.

Attachments 1 and 2 contain confidential proprietary and financial information that is requested to be held from public disclosure pursuant to 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4). Affidavits in support of this request are attached. Redacted and unredacted versions of Attachments 1 and 2 are attached. It is requested that the unredacted versions not be publicly released.

A handwritten signature in black ink, appearing to read 'Douglas E. Levanway', with a stylized, flowing script.

Douglas E. Levanway
Counsel for Entergy Nuclear Palisades, LLC
Entergy Nuclear Operations, Inc.

DEL:rlm
Enclosures

cc: See next page (w/o enclosures)

Document Control Desk
Page 3

cc:

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Attn: Jon Robinson
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AFFIDAVIT

I, Terence A. Burke, Vice President and Secretary of Entergy Nuclear Palisades, LLC (Entergy Nuclear Palisades), do hereby affirm and state:

1. Entergy Nuclear Palisades, LLC (Entergy Nuclear Palisades) and Entergy Nuclear Operations, Inc. (ENO) are providing information in support of the proposed license transfer and conforming amendments of Facility Operating License DPR-20 (Palisades Nuclear Plant (Palisades), Docket No. 50-255). The supplemental information being provided in Attachments 1 and 2 by Entergy Nuclear Palisades and ENO by separate letter contain Entergy Nuclear Palisades and ENO's confidential financial and corporate projections related to the operation of Palisades and Big Rock Point ISFSI (Docket Nos. 50-155, 72-043). These documents constitute proprietary commercial and financial information that should be held in confidence by the NRC pursuant to 10 CFR 2.390(a)(4), because:
 - i. This information is and has been held in confidence by Entergy Nuclear Palisades and ENO.
 - ii. This information is of a type that is held in confidence by Entergy Nuclear Palisades and ENO and there is a rational basis for doing so because the information contains sensitive financial, corporate, and commercial information concerning Entergy Nuclear Palisades and ENO's projected revenues and operating expenses.
 - 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 Entergy Nuclear Palisades and ENO by disclosing Entergy Nuclear Palisades and ENO's internal financial projections and confidential financial information to other parties whose commercial interests may be adverse to those of Entergy Nuclear Palisades and ENO.
2. Accordingly, Entergy Nuclear Palisades and ENO request that the designated documents be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4).


Terence A. Burke

State of Mississippi)
Hinds County)

Then personally appeared before me, Terence A. Burke, who being duly sworn, did state he is Vice President and Secretary of Entergy Nuclear Palisades, LLC, that he is duly authorized to execute and file this affidavit in the name and on behalf of Entergy Nuclear Palisades, LLC, and that the statements are true to the best of his knowledge and belief.

My Commission expires:

June 17, 2009

Amy A. Blaylock
NOTARY PUBLIC

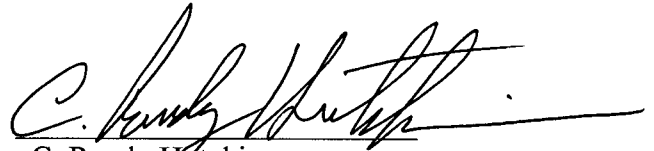
Notary Public State of Mississippi At Large
My Commission Expires: June 17, 2009
Bonded Thru Helden, Brooks & Garland, Inc.

f:/users/del/eni/palisades/affidavit of Terrence Burke

AFFIDAVIT

I, C. Randy Hutchinson, Senior Vice President of Entergy Nuclear Operations, Inc., do hereby affirm and state:

1. Entergy Nuclear Palisades, LLC (Entergy Nuclear Palisades) and Entergy Nuclear Operations, Inc. (ENO) are providing information in support of the proposed license transfer and conforming amendments of Facility Operating License DPR-20 (Palisades Nuclear Plant (Palisades), Docket No. 50-255). The supplemental information being provided in Attachments 1 and 2 by Entergy Nuclear Palisades and ENO by separate letter contain Entergy Nuclear Palisades and ENO's confidential financial and corporate projections related to the operation of Palisades and Big Rock Point ISFSI (Docket Nos. 50-155, 72-043). These documents constitute proprietary commercial and financial information that should be held in confidence by the NRC pursuant to 10 CFR 2.390(a)(4), because:
 - i. This information is and has been held in confidence by Energy Nuclear Palisades and ENO.
 - ii. This information is of a type that is held in confidence by Entergy Nuclear Palisades and ENO and there is a rational basis for doing so because the information contains sensitive financial, corporate, and commercial information concerning Energy Nuclear Palisades and ENO's projected revenues and operating expenses.
 - 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 Entergy Nuclear Palisades and ENO by disclosing Entergy Nuclear Palisades and ENO's internal financial projections and confidential financial information to other parties whose commercial interests may be adverse to those of Entergy Nuclear Palisades and ENO.
2. Accordingly, Entergy Nuclear Palisades and ENO request that the designated documents be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4).


C. Randy Hutchinson

State of Mississippi)
Hinds County)

Then personally appeared before me, C. Randy Hutchinson, who being duly sworn, did state he Senior Vice President of Entergy Nuclear Operations, Inc. that he is duly authorized to execute and file this affidavit in the name and on behalf of Entergy Nuclear Operations, Inc. and that the statements are true to the best of his knowledge and belief.

My Commission expires:

June 17, 2009

Arny A. Blaylock
NOTARY PUBLIC

Notary Public State of Mississippi At Large
My Commission Expires: June 17, 2009
Bonded Thru Heiden, Brooks & Garland, Inc.

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Attachment 1
REDACTED

Projected Financial Statement
For
Entergy Nuclear Palisades, LLC

Palisades NRC Filing
Dollars in Thousands

10% Reduction in MP and PPA

	2007	2008	2009	2010	2011	2012
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Consumers Energy Company
Entergy Nuclear Palisades, LLC
Entergy Nuclear Operations, Inc.
Nuclear Management Company, LLC

Docket NO. 50-255
License No. DPR-20

Attachment 1
REDACTED

Projected Financial Statement
For
Entergy Nuclear Palisades, LLC

Palisades NRC Filing
Dollars in Thousands

10% Reduction in MP and PPA
Projected Balance as of December 31

	2007	2008	2009	2010	2011	2012
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Consumers Energy Company
Entergy Nuclear Palisades, LLC
Entergy Nuclear Operations, Inc.
Nuclear Management Company, LLC

Docket NO. 50-255
License No. DPR-20

Attachment 2
REDACTED

Projected Financial Statement
For
Entergy Nuclear Palisades, LLC

Palisades NRC Filing
Dollars in Thousands

85.2% CF in 2007 and 88.6% CF 2008-2012

	2007	2008	2009	2010	2011	2012
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Attachment 2
REDACTED

Projected Financial Statement
For
Entergy Nuclear Palisades, LLC

Palisades NRC Filing
Dollars in Thousands

85.2% CF in 2007 and 88.6% CF 2008-2012
Projected Balance as of December 31

2007	2008	2009	2010	2011	2012
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