



10 CFR 50.4

September 11, 2007

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

UN#07-014

Subject: UniStar Nuclear, NRC Project No. 746
Partial Combined License Application
Additional Request for Withholding Information from Public Disclosure

- References:
- 1) Letter UN#07-008, from R. M. Krich to U.S. Nuclear Regulatory Commission, "UniStar Nuclear, NRC Project No. 746, Submittal of a Partial Combined License Application for the Calvert Cliffs Nuclear Power Plant, Unit 3, Application for Withholding of Documents, and Request for Exemption," dated July 13, 2007
 - 2) Letter UN#07-010, from R. M. Krich to U.S. Nuclear Regulatory Commission, "UniStar Nuclear, NRC Project No. 746, Partial Combined License Application, Request for Withholding Information from Public Disclosure," dated August 2, 2007

By letter dated July 13, 2007 (Reference 1), UniStar Nuclear submitted a partial Combined License (i.e., COL) application. In addition to the proprietary information that was inadvertently included in the unredacted version of our partial COL application as described in our letter of dated August 2, 2007 (Reference 2), other proprietary information has been identified in the unredacted COL application.

Accordingly, UniStar Nuclear requests that this proprietary information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (a)(4). The affidavit providing the basis for this request for withholding was provided with Reference 1. The page containing the information to be withheld, along with removal and insertion instructions are provided in Enclosure 1. The redacted page, along with removal and insertion instructions, are provided in Enclosure 2.

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HRO

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If you have any questions or need additional information, contact me at (410) 470-5518.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2007



R. M. Krich
UniStar Nuclear Development, LLC

Enclosures:

- 1) Partial COL Application Page Containing Proprietary Information
- 2) Partial COL Application Redacted Page

cc: U.S. NRC Region I (2 copies)
U.S. NRC Resident Inspector, Calvert Cliffs Nuclear Power Plant, Units 1 and 2
NRC Project Manager, U.S. EPR Combined License Application
NRC Project Manager, U.S. EPR Design Certification Application (w/o enclosures)

ENCLOSURE 2

Partial COL Application Redacted Page

**CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT 3
LICENSE APPLICATION GENERAL INFORMATION
PAGE REMOVAL AND INSERTION INSTRUCTIONS**

REMOVE

**LICENSE APPLICATION GENERAL
INFORMATION VOLUME**
(Non-Proprietary Version)

Table 1.0-10, Page 1.0-30

INSERT

**LICENSE APPLICATION GENERAL
INFORMATION VOLUME**
(Non-Proprietary Version)

Table 1.0-10, Page 1.0-30

Information withheld in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (d)(1).

Table 1.0-10
{Calvert Cliffs Nuclear Power Plant Unit 3
6-Month Non-Regulatory Delay
(Non-Proprietary Version)

A specific sensitivity was not calculated for the 6-month non-regulatory delay scenario as it is believed that the 10% Higher Capital Cost Sensitivity (Table 1.0-9) conservatively bounds the 6-month non-regulatory delay scenario.

A 6-month delay is a scenario whereby the start of operations would be postponed for 6 months due to non-regulatory reasons.

A 6-month non-regulatory delay would increase the Interest During Construction (IDC) and would incur additional operating costs (primarily labor). Operating costs incurred prior to Commercial Operation Date (COD) are capitalized and financed along with other construction costs.

The incremental capitalized interest and capitalized Operating and Maintenance (O&M) costs are estimated as follows.

(\$Millions)

Total Base Case Capital Cost (from Table 1.0-3)

Additional Interest on debt (from Table 1.0-3)
([] debt*5.5% interest rate* ½ year)

Additional Capitalized Operating Costs
(fixed O&M Cost, includes labor, overhead, property taxes and insurance)

Total 6-Month Non-Regulatory Delay Capital Cost

The total capital cost would increase from [] million to approximately [] million (an increase of 3%), which is significantly less than the [] []*110%) projected for the 10% Higher Capital Cost Sensitivity.}