



PO Box 1551  
411 Fayetteville Street Mall  
Raleigh NC 27602

10 CFR 140.21(e)

**Confidential Financial Information  
Submitted Under 10 CFR 2.390**

Serial: RA-09-004  
April 23, 2009

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, DC 20555-0001

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 AND 50-324 / LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT  
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-400 / LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261 / LICENSE NO. DPR-23

**EVIDENCE OF GUARANTEE OF PAYMENT OF DEFERRED PREMIUMS**

Ladies and Gentlemen:

Pursuant to 10 CFR 140.21(e), enclosed are 2008 actual and 2009 projected cash flow statements as evidence of guarantee of payment of deferred premiums for the above listed plants belonging to Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc., and Florida Power Corporation, now doing business as Progress Energy Florida, Inc.

Enclosure 1 provides evidence of guarantee of payment of deferred premiums for the principal owner-licensee and other owners-licensees of the Brunswick Steam Electric Plant, Unit Nos. 1 and 2; Shearon Harris Nuclear Power Plant, Unit No. 1; H. B. Robinson Steam Electric Plant, Unit No. 2; and Crystal River Unit 3 Nuclear Generating Plant.

Enclosure 1 contains information confidential to Progress Energy. Progress Energy requests that the content of Enclosure 1 be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). An affidavit supporting the 10 CFR 2.390(a)(4) request is contained in Enclosure 2. A non-confidential version of the projected internal cash flows is contained in Enclosure 3.

This document contains no new regulatory commitment.

If you have additional questions, please call me at (919) 546-4579.

Sincerely,

Brian McCabe  
Manager – Nuclear Regulatory Affairs

M001  
NRR

DBM  
Enclosures (3)

- c: Eric Leeds, Director – Office of Nuclear Reactor Regulation
- Luis Reyes, USNRC Regional Administrator – Region II
- USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
- USNRC Resident Inspector – CR3
- USNRC Resident Inspector – SHNPP, Unit No. 1
- USNRC Resident Inspector – HBRSEP, Unit No. 2
- F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
- M. Vaaler, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2

ENCLOSURE 2

AFFIDAVIT

REQUEST TO WITHHOLD PROPRIETARY INFORMATION FROM PUBLIC  
DISCLOSURE

**REQUEST TO WITHHOLD PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE**

**UNITED STATES NUCLEAR REGULATORY COMMISSION**

**PROGRESS ENERGY**

**BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2**

**DOCKET NOS. 50-325  
50-324**

**CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT**

**DOCKET NO. 50-302**

**SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1**

**DOCKET NO. 50-400**

**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2**

**DOCKET NO. 50-261**

Progress Energy hereby requests that Enclosure 1 to letter RA-09-004 entitled "Evidence of Guarantee of Payment of Deferred Premiums" be withheld from public disclosure due to its proprietary nature. The details of this request are provided in the following affidavit:

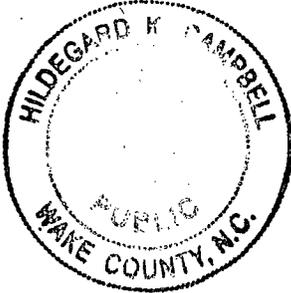
**AFFIDAVIT**

I, Thomas R. Sullivan, Treasurer of Progress Energy, do hereby affirm and state as follows:

1. I am an officer of Progress Energy, authorized to execute this affidavit on its behalf. I am further authorized to review information submitted to the Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure.
2. The information sought to be withheld consists of portions of the 2009 Internal Cash Flow Projection that is included in Enclosure 1 to Progress Energy's letter RA-09-004 to the NRC entitled "Evidence of Guarantee of Payment of Deferred Premiums". Enclosure 1, a two page document, has the words "Proprietary Information" on the top and bottom of the pages.
3. Progress Energy is providing information pursuant to 10 CFR 140.21(e), which constitutes proprietary financial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4), because:
  - i. This information has been held in confidence by Progress Energy.
  - ii. This information is of a type that is held in confidence by Progress Energy and there is rational basis for doing so because the information contains sensitive financial information concerning Progress Energy net income and internal cash flow.
  - iii. This information is being transmitted to the NRC in confidence.
  - iv. This information is not available in public sources and could not be gathered readily from other publicly available information.
  - v. Public disclosure of this information would create substantial harm to the competitive position of Progress Energy by disclosing Progress Energy's internal financial projections to other parties whose commercial interests may be adverse to those of Progress Energy.
4. Accordingly, Progress Energy requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4).

This letter contains no restricted or other defense information.

PROGRESS ENERGY



Thomas R. Sullivan  
Treasurer

Hildegard K. Campbell - NOTARY PUBLIC  
March 23, 2009 - DATE

My commission expires May 17, 2009

**Non-Confidential Financial Information**

ENCLOSURE 3

Evidence of Guarantee of Payment of Deferred Premiums  
Brunswick Steam Electric Plant, Unit Nos. 1 and 2; Shearon Harris Nuclear Power Plant, Unit  
No. 1; H. B. Robinson Steam Electric Plant, Unit No. 2; and Crystal River Unit 3 Nuclear  
Generating Plant

**Non-Confidential Financial Information**

**NON-PROPRIETARY INFORMATION**

Carolina Power & Light  
 2009 Internal Cash Flow Projection for  
 H. B. Robinson, Unit 2; Brunswick Units 1 and 2; Shearon Harris, Unit 1  
 (Dollars in Millions)

	Year Ended December 31, 2008 Actual	Year Ended December 31, 2009 Projected
Net Income After Taxes	\$ 534	Withheld from public disclosure per Affidavit
Less Dividend Paid	<u>0</u>	
Retained Earnings	<u>534</u>	
Adjustments:		
Depreciation and Amortization	616	
Deferred Income Taxes and Investment Tax Credits	204	
AFUDC	(27)	
Total Adjustments	<u>793</u>	
Internal Cash Flow	<u>\$ 1,327</u>	
Average Quarterly Cash Flow	<u>\$ 332</u>	
Percentage Ownership in Robinson, Brunswick 1 & 2, and Harris plants	100% *	
Maximum Total Contingent Liability	<u>\$ 60</u>	

\* Carolina Power & Light is the principal licensee as owner of 100%, 83.83% and 81.67% of the Robinson, Harris, and Brunswick nuclear units, respectively.

This certified cash flow statement is made as of March 23, 2009, and covers all of the owners of these units.

I do certify the above to be correct and accurate.

  
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 Thomas R. Sullivan  
 Treasurer

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**NON-PROPRIETARY INFORMATION**

Florida Power Corporation  
 2009 Internal Cash Flow Projection for  
 Crystal River Unit 3  
 (Dollars in Millions)

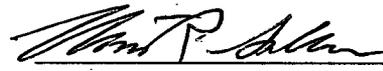
	Year Ended December 31, 2008 Actual	Year Ended December 31, 2009 Projected
Net Income After Taxes	\$ 385	
Plus Contribution Received	0	
Retained Earnings	<u>385</u>	
Adjustments:		
Depreciation and Amortization	320	
Deferred Income Taxes and Investment Tax Credits	130	
AFUDC	(95)	
Total Adjustments	<u>355</u>	
Internal Cash Flow	<u>\$ 740</u>	
Average Quarterly Cash Flow	<u>\$ 185</u>	
Percentage Ownership in Crystal River Unit No. 3	100% *	
Maximum Total Contingent Liability	<u>\$ 15</u>	

Withheld from  
 public disclosure  
 per Affidavit

\* Florida Power Corporation is the principal licensee as owner of 91.8% of the unit.

This certified cash flow statement is made as of March 23, 2009, and covers all of the owners of this unit.

I do certify the above to be correct and accurate.

  
 \_\_\_\_\_  
 Thomas R. Sullivan  
 Treasurer

SD