

10 CFR 50.4(b)(1)

May 4, 2015

ZS-2015-0064

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

Zion Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-39 and DPR-48
NRC Docket Nos. 50-295 and 50-304

Subject: License Termination Plan Request for Additional Information

References:

- 1) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Amendment Request for the License Termination Plan", dated December 19, 2014
- 2) Gerard van Noordennen, *ZionSolutions*, Letter to U.S. Nuclear Regulatory Commission, "License Termination Plan Update of the Site-Specific Decommissioning Costs", dated February 26, 2015

The Zion Station License Termination Plan (LTP) was submitted to the U.S Nuclear Regulatory Commission (NRC) for review on December 19, 2014 (Reference 1). On February 26, 2015, a LTP site-specific decommissioning cost update was submitted (Reference 2). In support of the ongoing NRC review process, an e-mail Request for Additional Information (RAI) was received on April 9, 2015 requesting the following information:

- Zion decommissioning project annual expense projection through license termination with a breakdown of expenses in the following areas: 1) radiological decontamination, 2) fuel management, and 3) site restoration.

This submittal provides the Nuclear Regulatory Commission (NRC) with financial information owned by *ZionSolutions*, LLC (ZS) to aid in the review of the Zion Nuclear Power Station (ZNPS) License Termination Plan (LTP). ZS considers this proprietary financial information to be confidential and requests NRC to withhold it from public disclosure under 10 CFR 2.390(a)(4).

Attachment 1 of this submittal consists of *ZionSolutions* Proprietary Financial Information Affidavit pursuant to 10 CFR 2.390. The Affidavit sets forth the basis for which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). All documents within the scope of this affidavit are marked as "withhold from public disclosure under 10 CFR 2.390."

The requested information is included in Attachment 2, which contains proprietary information ZS is providing to the NRC and seeks to have withheld from public disclosure in its entirety.

ZionSolutions, LLC
ZS-2015-0064
Page 2 of 2

The requested information is included in Attachment 2, which contains proprietary information ZS is providing to the NRC and seeks to have withheld from public disclosure in its entirety.

There are no regulatory commitments made in this submittal. If you should have any questions regarding this submittal, please contact Richard Tooze at (224) 789-4056.

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

Executed on May 4, 2015.

Respectfully,



Gerard van Noordennen
Vice President Regulatory Affairs

Attachments:

- 1) Attachment 1: ZionSolutions, LLC Proprietary Financial Information Affidavit
- 2) Attachment 2: Zion Decommissioning Project Annual Expense Projection (Proprietary)

cc: John Hickman, U.S. NRC Senior Project Manager
Service List (No Attachments)

ATTACHMENT 1

ZIONSOLUTIONS, LLC PROPRIETARY FINANCIAL INFORMATION AFFIDAVIT

Affidavit of Gerard van Noordennen, Vice President Regulatory Affairs, ZionSolutions, LLC.

Attachment 2 of this submittal consists of proprietary financial information that ZionSolutions, LLC considers confidential. Release of this information would cause irreparable harm to the competitive position of ZionSolutions, LLC. The basis for this declaration is:

- i. This information is owned and maintained as proprietary by ZionSolutions, LLC,
- ii. This information is routinely held in confidence by ZionSolutions, LLC and not disclosed to the public,
- iii. This information is being requested to be held in confidence by the NRC by this petition,
- iv. This information is not available in public sources,
- v. This information would cause substantial harm to ZionSolutions, LLC if it were released publicly, and
- vi. The information to be withheld is being transmitted to NRC in confidence.

I, Gerard van Noordennen, being duly sworn, state that I am the person who subscribes my name the foregoing statement, I am authorized to execute the Affidavit on behalf of ZionSolutions, LLC, and that the matters and facts set forth in the statement are true to the best of my knowledge, information, and belief.

Gerard van Noordennen

Name: Gerard van Noordennen
Title: Vice President Regulatory Affairs
Company: ZionSolutions, LLC

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4th DAY of MAY, 2015

Linda Chou
LINDA CHOU

