

CONFIDENTIAL FINANCIAL INFORMATION TO BE WITHHELD FROM PUBLIC  
DISCLOSURE PURSUANT TO 10 CFR 2.390 AND 10 CFR 9.17



341 White Pond Dr.  
Akron, Ohio 44320

April 22, 2016  
L-16-147

10 CFR 140.21

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

**SUBJECT:**

Beaver Valley Power Station, Unit Nos. 1 and 2  
Docket No. 50-334, License No. DPR-66  
Docket No. 50-412, License No. NPF-73

Davis-Besse Nuclear Power Station, Unit No. 1  
Docket No. 50-346, License No. NPF-3

Perry Nuclear Power Plant, Unit No. 1  
Docket No. 50-440, License No. NPF-58  
Supplemental Information Regarding the Retrospective Premium Guarantee

By letter dated March 2, 2016, FirstEnergy Nuclear Operating Company (FENOC) submitted an internal cash flow projection to the Nuclear Regulatory Commission (NRC) for FirstEnergy Corp. (FE). The cash flow projection provided evidence of the guarantee of payment of deferred premiums in the amount of \$18.963 million per reactor, for the operating FE owned reactors, as specified in 10 CFR 140.11(a)(4). FENOC is providing the enclosed information to supplement the March 2, 2016 letter.

This financial projection is confidential financial information, and FENOC requests that information be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4). A redacted version of the financial projection suitable for public disclosure is provided in the non-proprietary version contained in Enclosure A. A confidential version of the financial projection is provided in Enclosure C. An affidavit supporting the request for withholding Enclosure C from public disclosure is provided in Enclosure B.

Enclosure C to this letter contains confidential financial information.  
Withhold from public disclosure under 10 CFR 2.390 and 10 CFR 9.17.  
Upon removal of Enclosure C, this letter is uncontrolled.

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Beaver Valley Power Station, Unit Nos. 1 and 2  
Davis-Besse Nuclear Power Station, Unit No. 1  
Perry Nuclear Power Plant, Unit No. 1  
L-16-147  
Page 2

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 315-6810.

Sincerely,



Gregory H. Halnon  
Vice President, Regulatory Affairs and Laboratory Services

Enclosure:

- A. FIRSTENERGY CORP. 2016 INTERNAL CASH FLOW PROJECTION FOR DAVIS-BESSE UNIT NO. 1, PERRY UNIT NO. 1, AND BEAVER VALLEY UNIT NOS. 1 AND 2 NUCLEAR POWER PLANTS (Non-Proprietary)
- B. Affidavit
- C. FIRSTENERGY CORP. 2016 INTERNAL CASH FLOW PROJECTION FOR DAVIS-BESSE UNIT NO. 1, PERRY UNIT NO. 1, AND BEAVER VALLEY UNIT NOS. 1 AND 2 NUCLEAR POWER PLANTS (Proprietary)

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Beaver Valley Power Station, Unit Nos. 1 and 2  
Davis-Besse Nuclear Power Station, Unit No. 1  
Perry Nuclear Power Plant, Unit No. 1  
L-16-147  
Page 3

cc: NRC Region I Administrator (without Enclosure C)  
NRC Region III Administrator (without Enclosure C)  
NRC Resident Inspector (Beaver Valley) (without Enclosure C)  
NRC Resident Inspector (Davis-Besse) (without Enclosure C)  
NRC Resident Inspector (Perry) (without Enclosure C)  
NRC Project Manager (Beaver Valley) (without Enclosure C)  
NRC Project Manager (Davis-Besse) (without Enclosure C)  
NRC Project Manager (Perry) (without Enclosure C)  
Director, Bureau of Radiation Protection/Department of Environmental Protection  
(BRP/DEP) (without Enclosure C)  
PA Department of Environmental Protection, Bureau of Water Protection (without  
Enclosure C)  
Site BRP/DEP Representative (without Enclosure C)  
Utility Radiological Safety Board (without Enclosure C)

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Enclosure A  
L-16-147

FIRSTENERGY CORP. 2016 INTERNAL CASH FLOW PROJECTION  
FOR DAVIS-BESSE UNIT NO. 1, PERRY UNIT NO. 1, AND  
BEAVER VALLEY UNIT NOS. 1 AND 2 NUCLEAR POWER PLANTS  
(Non-Proprietary)

(One Page Follows)

FIRSTENERGY CORP.

2016 INTERNAL CASH FLOW PROJECTION  
FOR DAVIS-BESSE UNIT NO. 1, PERRY UNIT NO. 1,  
AND BEAVER VALLEY UNIT NOS. 1 AND 2 NUCLEAR POWER PLANTS

(Dollars in Thousands)

	2016 <u>Projected</u> <sup>(1)</sup>
Cash Flows:	
Retained Earnings, Depreciation and Amortization	[       ]
Deferred Income Taxes and Investment Tax Credits	[       ]
Allowance for Funds Used During Construction and Carrying Charges	[       ]
Deferred Operating Expenses	[       ]
Net Cash Flows	[       ]
Internal Cash Flow	[       ]
Average Quarterly Cash Flow	[       ]
Percentage Ownership in Units:	
Davis-Besse Unit No. 1	100.00%
Perry Unit No. 1	100.00%
Beaver Valley Unit No. 2	100.00%
Beaver Valley Unit No. 1	100.00%
Maximum Total Contingent Liability	<u>\$75,852</u>

Note:

(1) Information contained within the brackets [ ] is considered proprietary.

CERTIFICATION

I, Steven R. Staub, Vice President & Treasurer of FirstEnergy Corp., hereby certify that the foregoing Internal Cash Flow Projection for calendar year 2016 is derived from reasonable assumptions and is a reasonable estimate.

4/14/16

Date



Steven R. Staub

Enclosure B  
L-16-147

Affidavit

(Two Pages Follow)

**10 CFR 2.390**

**10 CFR 9.17**

**AFFIDAVIT OF GREGORY H. HALNON**

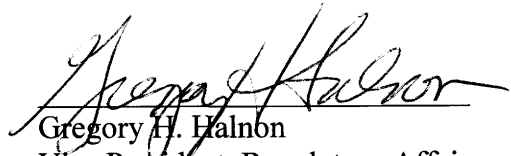
I, Gregory H. Halnon, Vice President, Regulatory Affairs and Laboratory Services state that:

1. I am authorized to execute this affidavit on behalf of FirstEnergy Nuclear Operating Company (FENOC) and its affiliates.
2. FENOC is providing information in support of its "Retrospective Premium Guarantee" submittal. Enclosure C, being provided in the submittal, contains a 2016 cash flow projection for FirstEnergy Corp. Unlike previous "Retrospective Premium Guarantee" submittals, the financial information contained in Enclosure C is proprietary since FirstEnergy Corp. has not released its earnings forecast for 2016.
3. The information sought to be withheld in Enclosure C is identified by being enclosed inside square brackets [ ].
4. This document constitutes proprietary financial information that should be held in confidence by the Nuclear Regulatory Commission (NRC) pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4), because:
  - a. This information is and has been held in confidence by FENOC and its affiliates.
  - b. This information is of a type that is held in confidence by FENOC and its affiliates, and there is a rational basis for doing so because the information contains sensitive financial information concerning FirstEnergy Corp.'s anticipated cash flow.
  - 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 material non-public internal financial information would create substantial harm to FirstEnergy Corp. and its shareholders as this disclosure would not be accompanied by the typical disclaimers provided with projected financial information along with the necessary analysis and commentary to contextualize such projected financial information thus risking market abuse with respect to FirstEnergy Corp.'s common stock.

5. Accordingly, FENOC requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4).

FirstEnergy Nuclear Operating Company

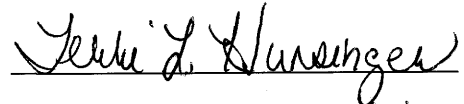


Gregory H. Halnon  
Vice President, Regulatory Affairs and  
Laboratory Services

STATE OF OHIO

CITY OF AKRON - SUMMIT COUNTY

Subscribed and sworn to me, a Notary Public, in and for the County and State above named, this 22<sup>nd</sup> day of April, 2016.



My Commission Expires: 5/5/16

Terri L. Hunsinger  
Notary Public - State of Ohio  
My Commission Expires 5/5/16