

## Confidential Financial Information Submitted Under 10 CFR 2.390

November 7, 2018

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Renewed Facility Operating License Nos. DPR-53 and DPR-69 NRC Docket Nos. 50-317 and 50-318

Clinton Power Station, Unit 1 Facility Operating License No. NPF-62 NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3 Renewed Facility Operating License Nos. DPR-19 and DPR-25 NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant Renewed Facility Operating License No. DPR-59 NRC Docket No. 50-333

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Attachment 1 transmitted herewith contains Confidential Financial Information. When separated from Attachment 1, this transmittal document is decontrolled.

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> Nine Mile Point Nuclear Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-63 and NPF-69 NRC Docket Nos. 50-220 and 50-410

Oyster Creek Nuclear Generating Station Renewed Facility Operating License No. DPR-16 NRC Docket No. 50-219

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-29 and DPR-30 NRC Docket Nos. 50-254 and 50-265

R. E. Ginna Nuclear Power Plant Renewed Facility Operating License No. DPR-18 NRC Docket No. 50-244

Three Mile Island Nuclear Station, Unit 1 Renewed Facility Operating License No. DPR-50 NRC Docket No. 50-289

Subject: 2018 Annual Report - Guarantees of Payment of Deferred Premiums

Pursuant to 10 CFR 140.21, "Licensee guarantees of payment of deferred premiums," Exelon Generation Company, LLC, is providing evidence that it maintains a guarantee of payment of deferred premiums in the amount of \$20.496 million for each reactor it owns (in whole or in part) and is licensed to operate. This information is required to be submitted annually on the anniversary date on which the indemnity agreement is effective for each covered reactor. Because the indemnity agreement effective dates vary for each reactor, Exelon Generation Company, LLC submits information for all of its reactors by November 16 of each year to demonstrate its compliance with 10 CFR 140.21.

The Exelon Generation Company, LLC projected internal cash flow is contained in Attachment 1. The average quarterly cash flow projection could be drawn on to raise \$471.408 million needed to provide for its payment of retrospective premiums.

MidAmerican Energy Company is the owner of 25 percent of the Quad Cities Nuclear Power Station. PSEG Nuclear, LLC is the owner of 50 percent of Peach Bottom Atomic Power Station, Units 2 and 3. Constellation Energy Nuclear Group, LLC ("CENG") owns (through a subsidiary) Calvert Cliffs Nuclear Power Plant, LLC (which owns Calvert Cliffs Nuclear Power Plant, Units 1 and 2), R. E. Ginna Nuclear Power Plant, LLC (which owns the R. E. Ginna Nuclear Power Station), and Nine Mile Point Nuclear Station, LLC (which owns 100% of Nine Mile Point Nuclear Station, Unit 1 and 82% of Nine Mile Point Nuclear Station, Unit 2). Exelon Generation Company, LLC, through its direct subsidiaries, owns a 50.01% interest in

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CENG. EDF Inc., a subsidiary of Électricité de France, S.A., a French société anonyme, owns a 49.99% interest in CENG. In addition, Long Island Power Authority owns an 18% interest in Nine Mile Point Nuclear Power Plant, Unit 2. This submittal also serves to reflect the guarantee of payment of deferred premiums for these co-owned units.

Dresden Nuclear Power Station, Unit 1, and Peach Bottom Atomic Power Station, Unit 1 are not included in this report because these units are permanently shutdown reactors in the SAFSTOR status and not subject to this regulation.

Attachment 1 contains information confidential to Exelon Generation Company, LLC. Exelon Generation Company, LLC requests that the contents of Attachment 1 be withheld from public disclosure in accordance with 10 CFR 2.390(a)(4). An affidavit supporting the 2.390(a)(4) request is contained in Attachment 2. A non-confidential version of the projected internal cash flow is contained in Attachment 3.

If you have any questions about this letter, please contact T. Loomis at (610) 765-5510.

Respectfully,

Bryan Q. Wright

Chief Financial Officer

Exelon Generation Company, LLC

#### Attachments:

- 1) Confidential Financial Information Projected Internal Cash Flow
- 2) Affidavit
- 3) Non-Confidential Financial Information Projected Internal Cash Flow

cc: Regional Administrator - NRC Region I

Regional Administrator - NRC Region III

NRC Senior Resident Inspector - Braidwood Station

NRC Senior Resident Inspector - Byron Station

NRC Senior Resident Inspector - Calvert Cliffs Nuclear Power Plant

NRC Senior Resident Inspector - Clinton Power Station

NRC Senior Resident Inspector - Dresden Nuclear Power Station

NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant

NRC Senior Resident Inspector - LaSalle County Station

NRC Senior Resident Inspector - Limerick Generating Station

NRC Senior Resident Inspector - Nine Mile Point Nuclear Station

NRC Senior Resident Inspector - Oyster Creek Nuclear Generating Station

NRC Senior Resident Inspector - Peach Bottom Atomic Power Station

NRC Senior Resident Inspector - Quad Cities Nuclear Power Station

NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant

NRC Senior Resident Inspector - Three Mile Island Nuclear Station, Unit 1

## **ATTACHMENT 2**

# **Exelon Generation Company, LLC**

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**AFFIDAVIT** 

## **ATTACHMENT 2**

## <u>AFFIDAVIT</u>

- I, Bryan P. Wright, Chief Financial Officer of Exelon Generation Company, LLC (Exelon), do hereby affirm and state:
  - I am an officer of Exelon 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. Exelon 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 (2018 Internal Cash Flow Projection, ATTACHMENT 1) is and has been held in confidence by Exelon.
    - ii. This information is of a type that is held in confidence by Exelon, and there is a rational basis for doing so because the information contains sensitive financial information concerning Exelon's projected revenues, and operating expenses.
    - 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 Exelon by disclosing Exelon's internal financial projections to other parties whose commercial interests may be adverse to those of Exelon.
  - 3. Accordingly, Exelon requests that the designated documents be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4).

Exelon Generation Company, LLC

Bryan P. Wright

Chief Financial Officer

Subscribed and sworn before me, A Notary Public in and for the State of Maryland this 7 day of November 2018



## **ATTACHMENT 3**

## **Exelon Generation Company, LLC**

2018 Annual Report - Guarantees of Payment of Deferred Premiums

Non-Confidential Financial Information

Projected Internal Cash Flow

# Non-Confidential Financial Information Submitted Under 10 CFR 2.390 Contains Non-Confidential Financial Information

#### ATTACHMENT 1 Exelon Generation Company, LLC 2018 Internal Cash Flow Projection (Dollars in Thousands)

2018

471,408

Projected UNAUDITED Net Income Less: Dividends Paid Earnings (Loss) Adjustments Depreciation, amortization, and accretion Deferred income taxes and investment tax credits Impairment of certain generating assets Net realized and unrealized mark-to-market transactions Other non-cash operating activities Adjustments Internal Cash Flow Average Quarterly Cash Flow Percentage Ownership Braidwood Station, Units 1 and 2 Byron Station, Units 1 and 2 Dresden Nuclear Power Station, Units 2 and 3 LaSalle County Station, Units 1 and 2 2 Limerick Generating Station, Units 1 and 2 Peach Bottom Atomic Power Station, Units 2 and 3 Quad Cities Nuclear Power Station, Units 1 and 2 Clinton Power Station Oyster Creek Nuclear Generating Station Three Mile Island, Unit 1 Calvert Cliffs Nuclear Power Plan, Units 1 and 2 Nine Mile Point Nuclear Station, Units 1 and 2 R. E. Ginna Nuclear Power Plant James A. FitzPatrick, Units 1 23

#### Certification

Exelon Generation Company, LLC has sufficient cash flow to ensure that its obligations to pay deferred premiums under 10 CFR Part 140 will be met.

Certified By

Maximum Total Contingent Liability

Bryan P. Wright Chief Financial Officer

Exelon Generation Company, LLC