



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 27, 2019

Mr. Bryan C. Hanson  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Officer (CNO)  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE  
FOR DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3, AND QUAD  
CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 (EPID L-2018-LLA-0499)

Dear Mr. Hanson:

By letter dated December 5, 2018 (RS-18-124), you included an affidavit which was executed by Mr. Alan B. Meginnis, Framatome Inc., on October 23, 2018, requesting that the information contained in the following documents be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

FS1-0029827, Revision 2, "Quad Cities Unit 1 Cycle 25 24 Month (SLM CPR) [Safety Limit Minimum Critical Power Ratio] Analysis," (Proprietary)

FS1-0034209, Revision 2, "Quad Cities Unit 2 Cycle 25 SLM CPR Analysis," (Proprietary)

FS1-0031933, Revision 2, "Dresden Unit 2 Cycle 26 SLM CPR Analysis," (Proprietary)

FS1-0037152, Revision 2, "Dresden Unit 3 Cycle 26 SLM CPR Analysis," (Proprietary)

The affidavit stated that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

- (a) The information reveals details of Framatome's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.

- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Framatome in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Framatome.

We have reviewed your application and the material in accordance with the requirements of 10 CFR 2.390 and, on the basis of the statements in the affidavit, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure.

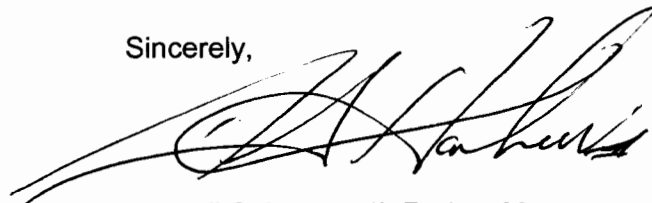
Therefore, FS1-0029827, Revision 2, "Quad Cities Unit 1 Cycle 25 24 Month SLMCPR Analysis"; FS1-0034209, Revision 2, "Quad Cities Unit 2 Cycle 25 SLMCPR Analysis"; FS1- 0031933, Revision 2, "Dresden Unit 2 Cycle 26 SLMCPR Analysis"; and FS1-0037152, Revision 2, "Dresden Unit 3 Cycle 26 SLMCPR Analysis"; will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the Nuclear Regulatory Commission (NRC). You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination, adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at 301-415-1129.

Sincerely,



Russell S. Haskell II, Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-237, 50-249,  
50-254, and 50-265

cc: Listserv

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F. Forsaty, NRR

J. Kaizer, NRR

C. Tilton, NRR

**ADAMS Accession No. ML19078A107**

\* via e-mail

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