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

February 3, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNITS 1 AND 2; BYRON STATION, UNIT NOS. 1 AND 2; CALVERT CLIFFS NUCLEAR POWER PLANT, UNITS 1 AND 2; CLINTON POWER STATION, UNIT NO. 1; LASALLE COUNTY STATION, UNITS 1 AND 2; LIMERICK GENERATING STATION, UNITS 1 AND 2; AND NINE MILE POINT NUCLEAR STATION, UNIT 2 – REQUEST FOR WITHHOLDING INFORMATION REGARDING PROPOSED ALTERNATIVE TO USE ASME CODE CASE N-893 (EPIDS L-2020-LLR-0147 AND -0148)

Dear Mr. Rhoades:

By letter[1] to the U.S. Nuclear Regulatory Commission (NRC) dated November 16, 2020, Exelon Generation Company, LLC (Exelon) submitted a request for a proposed alternative to use the American Society of Mechanical Engineers Code Case N-893. The letter also included an affidavit dated November 11, 2020, executed by William H. Lennon, Chief Executive Officer of Lokring Technology, LLC (Lokring), requesting that marked information contained in Attachment 2 to the letter be withheld from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390. The letter, affidavit, and the nonproprietary version of Attachment 2 have been made publicly available.

The affidavit stated that the submitted information in Attachment 2 constitutes proprietary trade secret information that should be withheld from public disclosure because:

1. This information is and has been held in confidence by Lokring.

2. This information is of a type that is held in confidence by Lokring and there is a rational basis for doing so because the information contains sensitive trade secret information concerning detailed design and testing details.

3. This information is being transmitted to the NRC in confidence.

4. This information is not available in public sources and could not be gathered readily from other publicly available information.

[1] Agencywide Documents Access and Management System (ADAMS) Accession No. ML20321A234.

5. Public disclosure of this information would create substantial harm to the competitive position of Lokring by disclosing Lokring design and testing details to other parties whose commercial interests may be adverse to those of Lokring.

We have reviewed your letter and the material in accordance with the requirements of 10 CFR 2.390 and, based on 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, the information marked as proprietary 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 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 301-415-1380 or by email at Blake.Purnell@nrc.gov.

Sincerely,

/RA/

Blake Purnell, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, STN 50-457,
STN 50-454, STN 50-455, 50-317, 50-318,
50-461, 50-373, 50-374, 50-352, 50-353, and
50-410

cc: Mark Sindelar (MSindelar@lokring.com)

Additional Distribution via ListServ

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