



FPL Energy

An FPL Group Company

November 1, 2005

Docket Nos. 50-331
72-32

10 CFR 50.80
10 CFR 50.90
10 CFR 72.210

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Response to Staff Request for Additional Information re: Application for Order and
Conforming Amendments for License Transfer (TAC No. MC8026)

Reference: (1) Letter, G. Van Middlesworth (NMC) and J.A. Stall (FPLE) to USNRC, "Application
for Order and Conforming Amendments for License Transfer," NG-05-0419, August 1,
2005.
(2) Letter, G. Van Middlesworth (NMC) and J.A. Stall (FPLE) to USNRC, "Response
to Staff Request for Additional Information re: Application for Order and Conforming
Amendments for License Transfer (TAC No. MC8026), NG-05-0611, November 1, 2005.

Dear Sir or Madam,

In the referenced application, Nuclear Management Company, LLC ("NMC"), Interstate Power and
Light Company ("IPL"), and FPL Energy Duane Arnold, LLC ("FPLE Duane Arnold") (collectively,
"the parties"), submitted an application to the Nuclear Regulatory Commission ("NRC") for an order
and conforming amendments consenting to the transfer of Facility Operating License No. DPR-49 for
Duane Arnold Energy Center ("DAEC"). On October 20, 2005, the NRC Staff ("Staff") transmitted by
facsimile to the parties a set of questions regarding this application. Conference calls were subsequently
held between the parties and Staff to clarify this request for additional information. Reference (2)
provided the responses to these questions, except for the responses to questions 6a and 6b which
contain confidential commercial information.

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The Enclosure to this letter contains FPLE Duane Arnold's response to questions 6a and 6b. This letter requests that the attached responses be withheld from public disclosure pursuant to 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4). An affidavit supporting this request is enclosed.

Sincerely,



J.A. Stall
Senior Vice President, Nuclear and
FPL Energy Duane Arnold, LLC

Enclosure: Proprietary Response to NRC Request for Additional Information
 Affidavit of J.A. Stall

cc: Administrator, Region III, USNRC
 Project Manager, Duane Arnold Energy Center, USNRC
 Resident Inspector, Duane Arnold Energy Center, USNRC
 Director, Spent Fuel Project Office
 State of Iowa - D. McGhee

In the Matter of)
Duane Arnold Energy Center) Docket Nos. 50-331
) 72-32

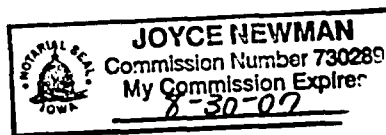
I, J. A. Stall, being duly sworn, hereby depose and state that I am Senior Vice President, Nuclear and Chief Nuclear Officer of FPL Energy Duane Arnold, LLC; that I am duly authorized to file with the Nuclear Regulatory Commission the attached Response to NRC Request for Additional Information; that I am familiar with the content thereof; and that the matters set forth therein pertaining to FPLE Duane Arnold are true and correct to the best of my knowledge and belief.

58.00

J. A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer

Subscribed and sworn to before me, a Notary Public
this 1 day of November, 2005.

Jesse Newman



financial projections to other persons whose commercial interests may be adverse to FPLE and FPL Energy Duane Arnold.

3. Accordingly, FPLE and FPL Energy Duane Arnold request that the designated documents be withheld from public disclosure pursuant to 10 C.F.R. §§ 2.390(a)(4) and 9.17(a)(4).

Further, affiant sayeth naught.

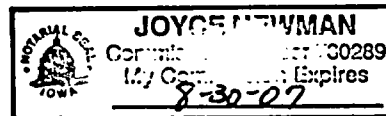


J.A. Stall
Senior Vice President, Nuclear and
Chief Nuclear Officer

Subscribed and sworn to before me
this 1 day of November, 2005.


Notary Public

My commission expires 8-30-07.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
Duane Arnold Energy Center)	Docket Nos. 50-331
)	72-32

10 C.F.R. § 2.390
AFFIDAVIT OF J. A. STALL

I, J. A. Stall, Senior Vice President, Nuclear, and Chief Nuclear Officer, of FPL Energy, LLC ("FPLE") and FPL Energy Duane Arnold, LLC, being duly sworn according to law, depose and state the following:

1. I am authorized to execute this affidavit on behalf of FPLE and its subsidiary, FPL Energy Duane Arnold, LLC ("FPL Energy Duane Arnold").

2. FPL Energy Duane Arnold is providing information in support of the Application for Order and Conforming License Amendments to Transfer Facility Operating License DPR-49, which FPLE Duane Arnold, Nuclear Management Company, LLC, and Interstate Power and Light Company filed on August 1, 2005. On October 20, 2005, the NRC Staff ("Staff") transmitted by facsimile to the parties a set of questions regarding this application. The response to the Staff's questions 6(a) and 6(b) contains the financial projections of FPLE and FPL Energy Duane Arnold related to the operation of the Duane Arnold Energy Center. These documents constitute proprietary commercial information that should be held in confidence by the NRC pursuant to 10 C.F.R. §§ 9.17(a)(4) and 2.390(a)(4), because:

a) The information is and has been held in confidence by FPLE and its subsidiary, FPL Energy Duane Arnold.

b) This information is of a type that is held in confidence by FPLE and FPL Duane Arnold, and there is a rational basis for doing so because the information contains sensitive financial information concerning projected revenues, operating expenses, and finances of FPL Energy Duane Arnold.

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 information would create substantial harm to the competitive position of FPLE and FPL Energy Duane Arnold by disclosing their internal