



**Northern States Power Company**

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East  
Welch, Minnesota 55089

January 5, 2000

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

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT**

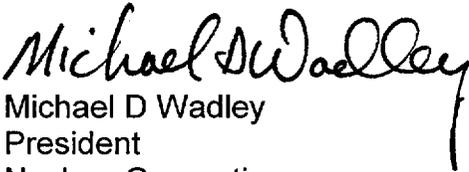
Docket Nos. 50-282 License Nos. DPR-42  
50-306 DPR-60

**NSPNAD-8102, Revision 7:  
Prairie Island Nuclear Power Plant  
Reload Safety Evaluation Methods for Application to PI Units**

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Attached is a copy of Revision 7 to NSPNAD-8102-PA, submitted for your information. Revision 7 was approved in an SER dated July 15, 1999. The enclosed report is identical to the report submitted January 29, 1999 with the inclusion of the three revised pages (Pp. 71, 72, and 298) which were submitted June 23, 1999. NSPNAD-8102-PA is the proprietary version of the report. Also attached are a non-proprietary version (NSPNAD-8102-NPA) and an affidavit requesting withholding of proprietary information from public disclosure.

In this letter we have made no new Nuclear Regulatory Commission commitments. Please contact Jack Leveille (651-388-1121, Ext. 4142) if you have any questions related to this letter.

  
Michael D Wadley  
President  
Nuclear Generation

c: Regional Administrator - Region III, NRC  
Senior Resident Inspector, NRC  
NRR Project Manager, NRC  
J E Silberg

Attachments: (see next page)

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**Attachments:**

1. Affidavit Requesting Withholding of Proprietary Information from Public Disclosure.
2. NSPNAD-8102-PA, Revision 7: Prairie Island Nuclear Power Plant Reload Safety Evaluation Methods for Application to PI Units, July 1999: Proprietary version.
3. NSPNAD-8102-NPA, Revision 7: Prairie Island Nuclear Power Plant Reload Safety Evaluation Methods for Application to PI Units, July 1999: Non-proprietary version.

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET Nos. 50-282  
50-306

REQUEST TO WITHHOLD PROPRIETARY INFORMATION  
FROM PUBLIC DISCLOSURE

Northern States Power Company, a Minnesota corporation, hereby requests that Attachment 2 to the letter entitled, "NSPNAD-8102, Revision 7: Prairie Island Nuclear Power Plant Reload Safety Evaluation Methods For Application to PI Units", be withheld from public disclosure due to its proprietary nature. The details of this request are provided in the following affidavit:

AFFIDAVIT

I, Michael D. Wadley, being duly sworn, depose and state as follows:

- (1) I am President, Nuclear Generation, Northern States Power Company ("NSP") and have been authorized to apply for withholding the information described in paragraph (2).
- (2) The information sought to be withheld is the Report entitled, "NSPNAD-8102-PA, Revision 7: Prairie Island Nuclear Power Plant Reload Safety Evaluation Methods For Application to PI Units; January, 1999", proprietary version presented in  
  
Attachment 2 to NSP's letter to the NRC entitled, "NSPNAD-8102, Revision 7: Prairie Island Nuclear Power Plant Reload Safety Evaluation Methods For Application to PI Units". Attachment 2, which contains 298 pages, has a "-P" in the document alpha-numeric designator indicating that it is the proprietary version.
- (3) In making this application for withholding of proprietary information of which it is the owner, NSP relies upon the exemption from disclosure set forth in the NRC regulation 10 CFR 2.790(b)(1) for confidential commercial information.
- (4) Justification for the request for withholding from public disclosure is provided by addressing the five considerations identified in 10 CFR 2.790(b)(4).

To the best of my knowledge and belief:

- a. This information is considered company confidential and has been held in

confidence by NSP.

- b. This information is of the type customarily held in confidence by NSP and the rationale basis is that it would provide an unfair advantage to competitors if it were disclosed.
- c. This information is transmitted in confidence to the NRC and the purpose of this request is to maintain its confidentiality.
- d. This methodology for the Prairie Island two-loop Westinghouse nuclear plant is not available from public sources.
- e. Public disclosure of the information sought to be withheld is likely to cause harm to NSP's competitive position; NSP expended substantial resources in developing this methodology; failure to withhold this information would allow others to benefit from it without commensurate expenditures.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By Michael D. Wadley  
Michael D. Wadley  
President  
Nuclear Generation

On this 5<sup>th</sup> day of January 2000 before me a notary public in and for said County, personally appeared, Michael D. Wadley, President, Nuclear Generation, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief, the statements made in it are true and that it is not interposed for delay.

Jack Leveille

