Monticello Nuclear Generating Plant



Operated by Nuclear Management Company, LLC

June 4, 2002

10 CFR 140.21

Director of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT Docket No. 50-263 License No. DPR-22

Guarantee of Payment of Deferred Premiums

Federal regulation 10 CFR 140.21 and item 154 of Regulatory Guide 10.1 Rev 4, requires each licensee to provide evidence of maintaining a method to guarantee payment of deferred premiums for each licensed operating reactor. Regulatory Guide 9.4 provides guidelines for the guarantee method of submitting financial statements showing that a cash flow can be generated and would be available for payment of retrospective premiums within three months after submission of a request for payment.

In accordance with the above requirements, the Nuclear Management Company is hereby submitting the required 2001 actual and 2002 projected cash flow statements for the Monticello Nuclear Generating Plant. The proprietary information is appropriately marked as provided by 10 CFR 2.790(b)(1), and with the required affidavit to support withholding the proprietary information from public disclosure.

As noted above, portions of the 2002 cash flow information are considered company confidential, and as such we request that it be withheld from public disclosure pursuant to 10 CFR 2.790(b)(1). The affidavit to support this request is provided as Attachment 1. Proprietary and non-proprietary versions of the cash flow information are provided by Attachment 2 and Attachment 3 respectively.

Attachment 2 Contains Proprietary Information

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NUCLEAR MANAGEMENT COMPANY

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If you have any questions with regard to this information, please call John Lentz at 612-215-5387 or Paul Hartmann at 763-271-5172.

Jeffrey S. Forbes Site Vice President Monticello Nuclear Generating Plant

Attachments:

- 1. Affidavit to Request Withholding of Proprietary Information from Public Disclosure
- 2. 2001 Actual Cash Flow and 2002 Projected Cash Flow (Proprietary Version)
- 3. 2001 Actual Cash Flow and 2002 Projected Cash Flow (Non-Proprietary Version)
- c: Regional Administrator III, NRC
 NRR Project Manager, NRC
 Resident Inspector, NRC
 Minnesota Department of Commerce (without attachments)

Attachment 1

Affidavit to Request Withholding of Proprietary Information from Public Disclosure

UNITED STATES NUCLEAR REGULATORY COMMISSION

NUCLEAR MANAGEMENT COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET NO. 50-263

Request to Withhold Proprietary Information from Public Disclosure

Nuclear Management Company, a Wisconsin corporation, hereby requests that Attachment 2 to the letter entitled "Guarantee of Payment of Deferred Premiums" dated June 4, 2002, be withheld from public disclosure due to its proprietary nature. The details of this request are provided in the following affidavit:

AFFIDAVIT

I, Jeffrey S. Forbes, being duly sworn, depose and state as follows:

- (1) I am the Site Vice President for the Monticello Nuclear Generating Plant, Nuclear Management Company ("NMC") and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld consists of portions of the 2002 Projected Cash Flow that is included in Attachment 2 to NMC's June 4, 2002 letter to the NRC entitled "Guarantee of Payment of Deferred Premiums." Attachment 2, a one page document, has the words "Proprietary Information" on the bottom of the page.
- (3) In making this application for withholding of proprietary information of which it is the owner, Xcel Energy Company (formerly known as Northern States Power Company (NSP)) and NMC rely upon the exemption from disclosure set forth In the NRC regulation 10 CFR 2.790(b)(1) for confidential financial information.
- (4) Justification for the request for withholding from public disclosure is provided by addressing the five items 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 Xcel Energy and NMC.
- b. This information is of the type customarily held in confidence by Xcel Energy and NMC 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. The 2002 projected cash flow information is not available from public sources.

Public disclosure of the information sought to be withheld is likely to cause harm to Xcel e. Energy's and NMC's competitive position and reduce the availability of profit-making opportunities.

This letter contains no restricted or other defense information.

NUCLEAR MANAGEME

Jeffrey S. Forbes Site Vice President

Monticello Nuclear Generating Plant

Subscribed to and sworn before me on this 4th day of

Attachment 3

2001 Actual and 2002 Projected Cash Flow Statements - Non-Proprietary Version

NORTHERN STATES POWER COMPANY MINNESOTA

2000 Actual Cash Flow and 2001 Projected Cash Flow

Related to Prospective Premiums for Monticello, Prairie Island I and Prairie Island II Nuclear Generating Units

(Dollars in Thousands)

	2001 Actual Total	2002 Projected Total
Net Income After Taxes Less Dividends Paid Retained Earnings Adjustments:	207,865 <u>(167,237)</u> 40,628	
Depreciation Deferred Income Taxes & Investment Tax Credits Allowance for Funds Used	400,646 2,368	Withheld from public disclosure
During Construction Total Adjustments	<u>4,898</u> <u>407,912</u>	per Affidavit
Internal Cash Flow	448,540	
Average Quarterly Cash Flow	<u>112,135</u>	
Percentage Ownership in All Operating Nuclear Units	Monticello Prairie Island I Prairie Island II	100% 100% 100%

Maximum Total Contingent Liability for Secondary Financial Protection

\$264,285,000/accident \$ 30,000,000 maximum payment/year

Cash and Banking John Lentz 4/30/2002

NON-PROPRIETARY VERSION