

Enclosures 3 and 4 Contain Proprietary Information



Prairie Island Nuclear Generating Plant
Operated by Nuclear Management Company, LLC

March 28, 2008

L-PI-08-020
10 CFR 72.56

U S Nuclear Regulatory Commission
ATTN: Document Control Desk,
Director, Spent Fuel Project Office,
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

Prairie Island Independent Spent Fuel Storage Installation
Docket No. 72-10
Materials License No. SNM-2506

License Amendment Request (LAR) to Modify TN-40 Cask Design (Designated as TN-40HT)

Pursuant to 10 CFR 72.56, the Nuclear Management Company, LLC (NMC) hereby requests an amendment to the Special Nuclear Materials (SNM) license No. SNM-2506 and Technical Specifications (TS) for the Prairie Island Independent Spent Fuel Storage Installation (PI ISFSI), to modify the TN-40 cask for storage of higher enrichment and higher burnup fuel. The modified cask is designated as the TN-40HT cask.

The changes requested in this LAR (as described in Enclosure 3) include the design of the TN-40HT dry cask system, the associated changes to the PI ISFSI Technical Specifications, and the reformatting of the Technical Specifications. The dry cask system changes are needed to accommodate dry storage of fuel with higher initial enrichment and higher burnup than that currently licensed for storage in the TN-40 dry cask system. The Prairie Island Nuclear Generating Plant (PINGP) has been operating with higher enriched fuel and burning it to higher burnup since 1990. The storage of high enrichment and burnup fuel is necessary to support continued operation of the PINGP following plant license renewal.

Enclosure 1 to this letter contains the oath or affirmation statement required pursuant to 10 CFR 72.16(b).

Enclosure 2 to this letter contains the affidavit and withholding request, pursuant to the requirements in 10 CFR 2.390(b)(1)(iii), of trade secret information contained in

Enclosure 3 and 4 Contains Proprietary Information

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Attachment 6 (i.e., ISFSI Safety Analysis Report Addendum A) to Enclosure 3 and Enclosure 4.

Enclosure 3 to this letter contains the technical evaluation and regulatory safety analysis of the proposed changes. This enclosure includes several attachments that provide the details of the proposed changes along with additional information. Attachment 6 of Enclosure 3 contains trade secret information that is proprietary to Transnuclear, Inc.

Enclosure 4 to this letter contains computer input and output files that were used in the analyses of the TN-40HT cask design. These files are provided to aid NRC review of the requested change. These files contain trade secret information that is proprietary to Transnuclear, Inc. (the cask supplier).

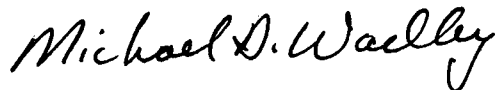
Enclosure 5 contains a nonproprietary version of the proposed ISFSI Safety Analysis Report Addendum A that may be disclosed to the public.

Xcel Energy, parent company to NMC, is preparing to submit a Certificate of Need to the Minnesota Public Utilities Commission, based on the use of the TN-40HT design, with approval anticipated in 2009. The Certificate of Need is necessary for additional dry cask storage to ensure continued operation of PINGP following plant license renewal. NMC plans to place an order for additional dry storage casks, TN-40HTs, by the end of 2009 to support loading in 2011.

NMC requests approval of this LAR within one calendar year of the submittal date. Upon NRC approval, NMC requests 90 days to implement the associated changes. If there are any questions or if additional information is needed, please contact Mr. Dale Vincent, P.E., at 651-388-1121.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



Michael D. Wadley
Site Vice President, Prairie Island Nuclear Generating Plant Units 1 and 2
Nuclear Management Company, LLC

Enclosures (5)

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cc: Administrator, Region III, USNRC (letter only)
SFST Project Manager, Prairie Island, USNRC (8 copies Enclosures 1, 2, and 3;
4 copies Enclosure 4)
NRR Project Manager, Prairie Island, USNRC (letter only)
Resident Inspector, Prairie Island, USNRC (letter only)
State of Minnesota (letter only)

ENCLOSURE 1

Oath or Affirmation Pursuant to 10 CFR 72.16

UNITED STATES NUCLEAR REGULATORY COMMISSION

NUCLEAR MANAGEMENT COMPANY, LLC

PRAIRIE ISLAND INDEPENDENT SPENT FUEL STORAGE FACILITY
DOCKET NO. 72-10

REQUEST FOR AMENDMENT TO
MATERIALS LICENSE No. SNM-2506

LICENSE AMENDMENT REQUEST
TO MODIFY TN-40 CASK DESIGN (DESIGNATED AS TN-40HT)

The Nuclear Management Company, LLC, a Wisconsin corporation, requests authorization for changes to the Prairie Island Independent Spent Fuel Storage Facility Materials License and Appendix A as shown in the attached Enclosure 3 which contains the evaluation of the proposed changes.

This letter contains no restricted or other defense information.

NUCLEAR MANAGEMENT COMPANY, LLC

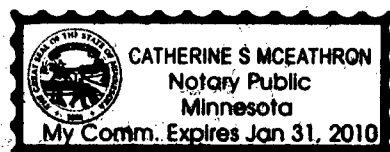
By Michael D. Wadley
Michael D. Wadley
Site Vice President,
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC

State of Minnesota

County of Goodhue

On this 28 day of March 2008 before me a notary public acting in said County, personally appeared Michael D. Wadley, Site Vice President, Prairie Island Nuclear Generating Plant, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Nuclear Management Company, LLC, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true.

Catherine S. McEathron



ENCLOSURE 2

Proprietary Affidavit Pursuant to 10 CFR 2.390

3 Pages Follow

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

Transnuclear, Inc.)
 State of Maryland) SS.
 County of Howard)

I, Robert Grubb, depose and say that I am Senior Vice President of Transnuclear, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission’s regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosures 3 and 4 and as listed below:

1. Portions of SAR Section A1.5, SAR Drawings TN40HT-72 series, as follows:
 - Transnuclear Drawing TN40HT-72-1, Revision 0
 - Transnuclear Drawing TN40HT-72-2, Revision 0
 - Transnuclear Drawing TN40HT-72-3, Revision 0
 - Transnuclear Drawing TN40HT-72-4, Revision 0
 - Transnuclear Drawing TN40HT-72-5, Revision 0
 - Transnuclear Drawing TN40HT-72-6, Revision 0
 - Transnuclear Drawing TN40HT-72-7, Revision 0
 - Transnuclear Drawing TN40HT-72-8, Revision 0
 - Transnuclear Drawing TN40HT-72-9, Revision 0
 - Transnuclear Drawing TN40HT-72-10, Revision 0
 - Transnuclear Drawing TN40HT-72-21, Revision 1
 - Transnuclear Drawing TN40HT-72-22, Revision 0
2. Portions of SAR Section A3.3.2.2.8, “Heat Generation Rate as a Function of Spent Fuel Parameters.”
3. SAR Appendix A3A, “TN-40HT Criticality Evaluation Computer Input.”
4. SAR Section A4.2.3.8, “Analysis of Fuel Cladding under Accident Condition Impact Loading,” plus Tables A4.2-25 through -29 and Figures A4.2-5 through -12.
5. Portions of SAR Section A4B.1.5.6, “Evaluation of Basket Aluminum Components for Long Term Storage Deadweight,” plus Figure A4B.1-1.
6. Portions of SAR Appendix A7B, “TN-40HT Shielding Evaluation Computer Input.”
7. Computer analysis input and output files associated with Transnuclear’s analysis of the TN-40HT cask.

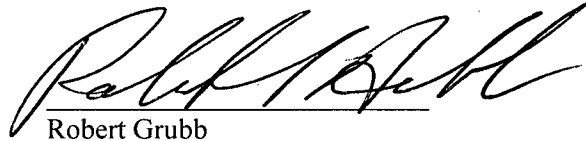
These documents have been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission’s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

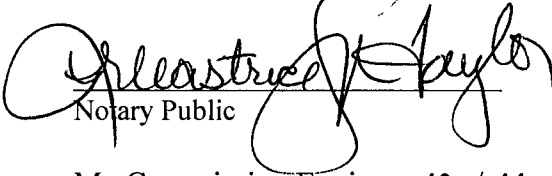
- 1) The information sought to be withheld from public disclosure are portions of certain TN-40HT spent fuel storage cask design drawings and analyses, plus certain computer files associated with those analyses, which are owned and have been held in confidence by Transnuclear, Inc.
- 2) The information is of a type customarily held in confidence by Transnuclear, Inc. and not customarily disclosed to the public. Transnuclear, Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 3) The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.390 with the understanding that it is to be received in confidence by the Commission.
- 4) The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
- 5) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because:
 - a) A similar product is manufactured and sold by competitors of Transnuclear, Inc.
 - b) Development of this information by Transnuclear, Inc. required expenditure of considerable resources. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
 - c) In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of a design and analysis of a dry spent fuel storage system.
 - d) The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
 - e) The information consists of descriptions of the design and analysis of dry spent fuel storage systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Transnuclear, Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear, Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
 - f) In pricing Transnuclear, Inc.'s products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Transnuclear, Inc.'s competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.



Robert Grubb
Senior Vice President, Transnuclear, Inc.

Subscribed and sworn to me before this 20th day of March, 2008.


Notary Public

My Commission Expires 10 / 14 / 2008

