Xcel Energy\*

MAR 1 8 2011

Prairie Island Nuclear Generating Plant 1717 Wakonade Drive East Welch, MN 55089

L-PI-11-032

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk, Director, Division of Spent Fuel Storage and Transportation, 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

## <u>Transmittal of Controlled Copy of Prairie Island Independent Spent Fuel Storage Installation Safety</u> <u>Analysis Report – Revision 13</u>

Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (hereafter "NSPM") submits Revision 13 to the controlled copy holders of the Prairie Island Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR). The effective date of this revision is August 2010.

NSPM requests that the designated portions of the enclosed SAR be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4). The drawings, analyses and methodologies designated in this report are of commercial value and the competitive position of the owner, Transnuclear Inc., would be harmed if disclosed.

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

Enclosure 2 to this letter contains the latest revision of the Prairie Island ISFSI SAR with updating instructions. Volume II of the Prairie Island ISFSI SAR contains trade secret information proprietary to TransNuclear, Inc.

Enclosure 3 contains a nonproprietary version of Volume II of the Prairie Island ISFSI SAR.



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### Summary of Commitments

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

3/18/2011

Mark Schimmel Site Vice President, Prairie Island Nuclear Generating Plant Northern States Power Company-Minnesota

Enclosures (3)

cc: Administrator, Region III, USNRC Director, Spent Fuel Project Office, USNRC NMSS Project Manager, Prairie Island ISFSI, USNRC NRR Project Manager, Prairie Island Nuclear Generating Plant (PINGP), USNRC

# **ENCLOSURE 1**

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# Proprietary Affidavit Pursuant to 10 CFR 2.390

#### AFFIDAVIT PURSUANT TO 10 CFR 2.390

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

I, Jayant Bondre, depose and say that I am a Vice President of Transnuclear, Inc., duly authorized to execute 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 the Prairie Island Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR), (Docket Number: 72-10, License Number: SNM-2506), Revision 13, Addendum A only, as listed below:

- 1. Portions of SAR Section A1.5, SAR Drawings TN40HT-72 series, as follows:
  - Transnuclear Drawing TN40HT-72-2, Revision 1
  - 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-72-21, Revision 3, Sheets 1,3,5,6, and 7
  - Transnuclear Drawing TN40HT-72-22, Revision 3
- 2. Portions of SAR Section A4.2.3.8, "Analysis of Fuel Cladding under Accident Condition Impact Loading," plus Tables A4.2-25 through -26 and Figures A4.2-5 through -12.
- 3. Portions of SAR Section A3.3.2.2.8, "Heat Generation Rate as a Function of Spent Fuel Parameters."
- 4. SAR Appendix A3A, "TN-40HT Criticality Evaluation Computer Input."
- 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."

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, as included in the Prairie Island ISFSI SAR, 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) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because 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.

Further the deponent sayeth not.

Javant Bondre M. DOUGHUM Subscribed and sworn to me befg fich, 2011. ОСТ 17 2001 Notary My Commission Expires / 0