ENCLOSURES 1 AND 3 CONTAIN PROPRIETARY INFORMATION
WITHHOLD FROM PUBLIC DISCLOSURE IN ACCORDANCE WITH 10 CFR 2.390

Monticello Nuclear Generating Plant
2807 W County Rd 75
Monticello, MN 55362

October 4, 2013

L-MT-13-096
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Monticello Nuclear Generating Plant
Docket 50-263
Renewed License No. DPR-22

Subject: Maximum Extended Load Line Limit Analysis Plus License Amendment Request – Request for Additional Information Responses (TAC ME3145)

References:
1) Letter from T J O'Connor (NSPM), to Document Control Desk (NRC), "License Amendment Request: Maximum Extended Load Line Limit Analysis Plus," L-MT-10-003, dated January 21, 2010. (ADAMS Accession No. ML100280558)
2) Email from K. Feintuch for T. Beltz (NRC) to J. Fields (NSPM), "Monticello Nuclear Generating Plant - Revised Draft Request for Additional Information Associated with NRC Staff Review of the MELLLA+ License Amendment Request (TAC No. ME3145)," dated September 11, 2013.

In Reference 1, Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, requested approval of an amendment to the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License (OL) and Technical Specifications (TS). The proposed change would allow operation in the expanded Maximum Extended Load Line Limit Analysis Plus (MELLLA+) domain.

In Reference 2 the NRC provided Requests for Additional Information (RAIs) pertaining to information needed to support MELLLA+ and analysis revisions. The purpose of this letter is to provide NSPM's responses to the Reference 2 RAIs.

Enclosure 1 provides a report from General Electric – Hitachi (GEH) letter, GE-MNGP-AEP-3304R1, "GEH Response to MELLLA+ RAI 2." Enclosure 1 contains proprietary information.

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Enclosure 2 provides a non-proprietary copy of the Enclosure 1 RAI responses. The non-proprietary copy of the RAI responses is being provided based on the NRC's expectation that the submitter of the proprietary information should provide, if possible, a non-proprietary version of the document with brackets showing where the proprietary information has been deleted.

Enclosure 3 provides page changes to the MELLLA+ Safety Analysis Report (NEDC-33435P). These page changes are based on corrections and changes in the analysis presented in Enclosure 1. Enclosure 3 contains proprietary information.

Enclosure 4 provides a non-proprietary version of Enclosure 3.

Enclosure 5 provides an affidavit executed to support withholding Enclosures 1 and 3 from public disclosure. Information in Enclosures 1 and 3 contain proprietary information as defined by 10 CFR 2.390. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the NRC and addresses with specificity the considerations listed in 10 CFR 2.390(b)(4). Accordingly, NSPM respectfully requests that the proprietary information in Enclosures 1 and 3 be withheld from public disclosure in accordance with 10 CFR 2.390(a)4, as authorized by 10 CFR 9.17(a)4.

Correspondence with respect to the copyright or proprietary aspects of GEH information or the supporting GEH affidavit in Enclosure 5 should be addressed to Peter M. Yandow, Vice President, Nuclear Plant Projects/Services Licensing, Regulatory Affairs, GE-Hitachi Nuclear Energy Americas LLC, 3901 Castle Hayne Road, Wilmington, NC 28401.

Enclosure 6 contains a response to RAI 1 from Reference 2 and a commitment associated with the MELLLA+ analysis implementation.

The supplemental information provided herein does not change the conclusions of the No Significant Hazards Consideration and the Environmental Consideration evaluations provided in Reference 1 for the MELLLA+ license amendment request.

In accordance with 10 CFR 50.91(b), a copy of this application supplement, without enclosures is being provided to the designated Minnesota Official.

Summary of Commitments

This letter makes the following new commitment:

> NSPM commits to train and test licensed reactor operators to initiate Monticello Nuclear Generating Plant feedwater flow reduction in less than or equal to 90 seconds to support the MELLLA+ Anticipated Transient without Scram Instability analysis.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 4, 2013

Karen D. Fili
Site Vice-President
Monticello Nuclear Generating Plant
Northern States Power Company-Minnesota

Enclosures (6)

cc: Regional Administrator, Region III, USNRC (w/o enclosures)
Project Manager, Monticello Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC (w/o enclosures)
Minnesota Department of Commerce (w/o enclosures)

ENCLOSURE 5

GENERAL ELECTRIC – HITACHI AFFIDAVIT FOR WITHHOLDING PROPRIETARY INFORMATION

3 pages follow

GE-Hitachi Nuclear Energy Americas LLC

AFFIDAVIT

I, Peter M. Yandow, state as follows:

(1) I am the Vice President, Nuclear Plant Projects/Services Licensing, Regulatory Affairs, GE-Hitachi Nuclear Energy Americas LLC (GEH), 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 is contained in Enclosures 1 and 3 of GEH letter, GE-MNGP-AEP-3304R1, "GEH Response to MELLLA Plus Requests for Additional Information," dated October 3, 2013. The GEH proprietary information in Enclosure 1, which is entitled "GEH Response to MELLLA+ RAI 2," and Enclosure 3 which is entitled "NEDC-33435P Corrected Pages," is identified by a dark red dotted underline inside double square brackets. [[This sentence is an example.{3}]]. Figures containing GEH proprietary information are identified with double square brackets before and after the object. In each case, the superscript notation {3} refers to Paragraph (3) of this affidavit that provides the basis for the proprietary determination.

(3) In making this application for withholding of proprietary information of which it is the owner or licensee, GEH relies upon the exemption from disclosure set forth in the *Freedom of Information Act* (FOIA), 5 U.S.C. Sec. 552(b)(4), and the Trade Secrets Act, 18 U.S.C. Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), and 2.390(a)(4) for trade secrets (Exemption 4). The material for which exemption from disclosure is here sought also qualifies under the narrower definition of trade secret, within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975 F.2.d 871 (D.C. Cir. 1992), and Public Citizen Health Research Group v. FDA, 704 F.2.d 1280 (D.C. Cir. 1983).

(4) The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs (4)a. and (4)b. Some examples of categories of information that fit into the definition of proprietary information are:

a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by GEH's competitors without license from GEH constitutes a competitive economic advantage over GEH or other companies.

b. Information that, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.

c. Information that reveals aspects of past, present, or future GEH customer-funded development plans and programs, that may include potential products of GEH.

d. Information that discloses trade secret or potentially patentable subject matter for which it may be desirable to obtain patent protection.

(5) To address 10 CFR 2.390(b)(4), the information sought to be withheld is being submitted to the NRC in confidence. The information is of a sort customarily held in confidence by GEH, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GEH, not been disclosed publicly, and not been made available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary or confidentiality agreements that provide for maintaining the information in confidence. The initial designation of this information as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure are as set forth in the following paragraphs (6) and (7).

(6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, who is the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge, or who is the person most likely to be subject to the terms under which it was licensed to GEH. Access to such documents within GEH is limited to a "need to know" basis.

(7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist, or other equivalent authority for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GEH are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary or confidentiality agreements.

(8) The information identified in paragraph (2) above is classified as proprietary because it contains results of an analysis performed by GEH to support the Monticello Maximum Extended Load Line Limit Analysis Plus (MELLLA+) license application. This analysis is part of the GEH MELLLA+ methodology. Development of the MELLLA+ methodology and the supporting analysis techniques and information, and their application to the design, modification, and processes were achieved at a significant cost to GEH.

The development of the evaluation methodology along with the interpretation and application of the analytical results is derived from the extensive experience database that constitutes a major GEH asset.

(9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GEH's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GEH's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and

analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GEH. The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial. GEH's competitive advantage will be lost if its competitors are able to use the results of the GEH experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to GEH would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive GEH of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing and obtaining these very valuable analytical tools.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on this 3rd day of October, 2013.

Peter M. Yandow
Vice President, Nuclear Plant Projects/Services Licensing
Regulatory Affairs
GE-Hitachi Nuclear Energy Americas LLC
3901 Castle Hayne Rd
Wilmington, NC 28401
Peter.Yandow@ge.com

ENCLOSURE 6

MAXIMUM EXTENDED LOAD LINE LIMIT PLUS (MELLLA+)

REQUEST FOR ADDITIONAL INFORMATION

This enclosure provides a response from the Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, to a request for additional information (RAI) provided by the Nuclear Regulatory Commission (NRC) in Reference 1.

NRC Request

The failure of the reactor to shut down during certain transient can lead to unacceptable reactor coolant system pressure, fuel conditions, and/or containment conditions. Provide a training schedule and tracking method to train operators on the importance of taking action within 90 seconds to mitigate an ATWS event.

NSPM Response

The current MELLLA+ Anticipated Transient Without Scram (ATWS) Instability (ATWSI) analysis demonstrates acceptable performance and resulting fuel protection when operators initiate actions to reduce feedwater flow to the reactor vessel in less than or equal to 90 seconds of the onset of an ATWS event initiation.

The Monticello Nuclear Generating Plant (MNGP) Time Critical Operator Actions (TCOA) procedures identify tasks contained in the plant's operating procedures that are credited by the design and licensing basis to be accomplished in a specified time. For the ATWS event at MNGP, operators are currently required to reduce feedwater flow in 78 seconds. Training for operators, validation of satisfactory performance of the TCOA by operators and periodic validation of the equipment necessary to perform TCOAs are all required and controlled by the TCOA procedures.

Currently, operator training on MELLLA+ revisions to the design and licensing basis are scheduled to be completed by October 4, 2013. The Simulator Exercise Guide (SEG), used for training and verification of operator compliance with the TCOA, requires that the feedwater reduction step be completed in less than or equal to 90 seconds of the onset of an ATWS event.

To ensure continued future compliance of the performance of the ATWS feedwater flow reduction TCOA, NSPM is providing the following commitment:

NSPM commits to train and test licensed reactor operators to initiate Monticello Nuclear Generating Plant feedwater flow reduction in less than or equal to 90 seconds to support the MELLLA+ Anticipated Transient without Scram Instability analysis.

References

1 – Email from K. Feintuch for T. Beltz (NRC) to J. Fields (NSPM), "Monticello Nuclear Generating Plant - Revised Draft Request for Additional Information Associated with NRC Staff Review of the MELLLA+ License Amendment Request (TAC No. ME3145)," dated September 11, 2013.