

**ENCLOSURES 8 AND 9 CONTAIN PROPRIETARY INFORMATION.
WITHOLD FROM PUBLIC DISCLOSURE UNDER 10 CFR 2.390**



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

October 11, 2013

L-MT-13-102
10 CFR 50.55a

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

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

Subject: Cycle 26 Inservice Inspection and In-Vessel Visual Inspection Summary Reports

Reference: NRC Letter to NSPM, "Monticello Nuclear Generating Plant – Relief from the Requirements of the American Society of Mechanical Engineers Code for the Fifth 10-Year Inservice Inspection Program Interval (TAC Nos. ME8068, ME8070 and ME8071), dated February 26, 2013, ADAMS Accession No. ML13035A158.

Pursuant to 10 CFR 50.55a, Northern States Power Company - a Minnesota corporation (NSPM), d/b/a as Xcel Energy, hereby submits the enclosed Inservice Inspection (ISI) Summary Report (Owner's Activity Report, Form OAR-1) for the Monticello Nuclear Generating Plant (MNGP).

The Owner's Activity Report has been prepared in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI Code Case N-532-5, "Repair / Replacement Activity Documentation Requirements and Inservice Inspection Summary Report Preparation and Submission, Section XI, Division 1." This code case is applied as an alternative to the requirements of ASME Boiler and Pressure Vessel Code, Section XI, Article IWA-4000 and IWA-6000, as authorized by the U. S. Nuclear Regulatory Commission (see Reference) for MNGP Inservice Inspection (ISI) Fifth Interval 10 CFR 50.55a Request RR-006.

The Owner's Activity Report specified by Code Case N-532-5 is contained in Enclosure 1 and is required to be submitted within 90 days from the end of the outage. It provides an overview of the inservice examination results and repair/replacement activities applicable to the Fourth and Fifth 10-year ISI Intervals that were performed during Cycle 26, including the 2013 Refueling Outage. The Fourth ISI Interval ended on August 31, 2012, and the Fifth ISI Interval began on September 1, 2012.

Also enclosed within this submittal is a summary of the comprehensive in-vessel visual inspections (IWI) of the reactor vessel internal components performed in accordance

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NRR

with the Boiling Water Reactor Vessel Internals Project (BWRVIP), BWRVIP-94, "BWR Vessel and Internals Project Program Implementation Guide". The summary of the IWI inspections conducted in accordance with BWRVIP-94 is provided in Enclosure 2.

Additional enclosures 3 through 9 are being submitted per the requirements of ASME Section XI subparagraph IWB-3134(b). These enclosures provide analytical evaluations and related documentation for ISI components that were examined and accepted for continued service under provisions of ASME Section XI subparagraph IWB-3123.3. These components are described in Table 1 of the Owner's Activity Report included in Enclosure 1, with "Analytical evaluation performed" noted in its Evaluation Description column.

Enclosures 4 and 5 provide non-proprietary versions of the engineering evaluation prepared by Structural Integrity Associates, Inc. (SIA). The proprietary versions of the engineering evaluations are provided in Enclosures 8 and 9.

Enclosure 6 provides an affidavit from the Electric Power Research Institute (EPRI) detailing the reason for the request to withhold the proprietary information contained in Enclosure 8. Proprietary information in Enclosure 8, as prepared by SIA, is only proprietary to EPRI, therefore, Enclosure 6 provides an affidavit from EPRI. No affidavit from SIA is required for Enclosure 8.

Enclosure 7 provides an affidavit from SIA detailing the reason for the request to withhold the proprietary information contained in Enclosure 9

NSPM respectfully requests that the information provided in Enclosures 8 and 9 that is proprietary to SIA and EPRI be withheld from public disclosure in accordance with 10 CFR 2.390(b)(1) as authorized by 10 CFR 9.17(a)(4).

Correspondence with respect to the proprietary aspects of EPRI information in Enclosure 8 or the supporting EPRI affidavit in Enclosure 6 should be addressed to Neil Wilmshurst, Electric Power Research Institute, 1300 West W.T. Harris Boulevard, Charlotte, NC 28262-8550

Likewise, correspondence with respect to the proprietary aspects of SIA information in Enclosure 9 or the supporting SIA affidavit in Enclosure 7 should be addressed to Marcos Herrera, Structural Integrity Associates, Inc., 5215 Hellyer Avenue, Suite 210, San Jose, CA 95138-1025

If you have any questions or require additional information, please contact Mr. Randy Rippy at (612) 330-6911.

Summary of Commitments

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

A handwritten signature in black ink, reading "Karen D. Fili". The signature is written in a cursive style with a large, stylized "K" and "F".

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

Enclosures (9)

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC
Minnesota Department of Commerce

ENCLOSURE 6

Monticello Nuclear Generating Plant

Affidavit

Electric Power Research Institute

**Request for Withholding of Proprietary Information Included in
Evaluation of Shear Capacity of Monticello Shroud Welds H8 and H9
File No.: 1300180.301**

(3 pages follow)

NEIL WILMSHURST
Vice President and
Chief Nuclear Officer

June 6, 2013

Document Control Desk
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Request for Withholding of the following Proprietary Information Included in:

"Evaluation of Shear Capacity of Monticello Shroud Welds H8 and H9-2013 RFO26" contained in calculation package, File No: 1300180.301, Project: 1300180

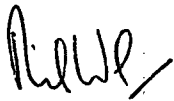
To Whom It May Concern:

This is a request under 10 C.F.R. §2.390(a)(4) that the U.S. Nuclear Regulatory Commission ("NRC") withhold from public disclosure the report identified in the enclosed Affidavit consisting of the proprietary information owned by Electric Power Research Institute, Inc. ("EPRI") identified in the attached report. Proprietary and non-proprietary versions of the Report and the Affidavit in support of this request are enclosed.

EPRI desires to disclose the Proprietary Information in confidence to assist the NRC review of the enclosed submittal to the NRC by Xcel Energy. The Proprietary Information is not to be divulged to anyone outside of the NRC or to any of its contractors, nor shall any copies be made of the Proprietary Information provided herein. EPRI welcomes any discussions and/or questions relating to the information enclosed.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to contact me at (704) 704-595-2732. Questions on the content of the Report should be directed to Andy McGehee of EPRI at (704) 502-6440.

Sincerely,



Together . . . Shaping the Future of Electricity

1300 West W.T. Harris Boulevard, Charlotte, NC 28262-8550 USA • 704.595.2732 • Mobile 704.490.2653 • nwilmshurst@epri.com

AFFIDAVIT

RE: Request for Withholding of the Following Proprietary Information Included In:

"Evaluation of Shear Capacity of Monticello Shroud Welds H8 and H9-2013 RFO26" contained in calculation package, File No: 1300180.301, Project: 1300180

I, Neil Wilmshurst, being duly sworn, depose and state as follows:

I am the Vice President and Chief Nuclear Officer at Electric Power Research Institute, Inc. whose principal office is located at 1300 W WT Harris Blvd, Charlotte, NC. ("EPRI") and I have been specifically delegated responsibility for the above-listed report that contains EPRI Proprietary Information that is sought under this Affidavit to be withheld "Proprietary Information". I am authorized to apply to the U.S. Nuclear Regulatory Commission ("NRC") for the withholding of the Proprietary Information on behalf of EPRI.

EPRI Information is identified by a solid line on the right margin. Tables containing EPRI proprietary information are also identified with a solid line at the right margin.

EPRI requests that the Proprietary Information be withheld from the public on the following bases:

Withholding Based Upon Privileged And Confidential Trade Secrets Or Commercial Or Financial Information:

a. The Proprietary Information is owned by EPRI and has been held in confidence by EPRI. All entities accepting copies of the Proprietary Information do so subject to written agreements imposing an obligation upon the recipient to maintain the confidentiality of the Proprietary Information. The Proprietary Information is disclosed only to parties who agree, in writing, to preserve the confidentiality thereof.

b. EPRI considers the Proprietary Information contained therein to constitute trade secrets of EPRI. As such, EPRI holds the Information in confidence and disclosure thereof is strictly limited to individuals and entities who have agreed, in writing, to maintain the confidentiality of the Information.

c. The information sought to be withheld is considered to be proprietary for the following reasons. EPRI made a substantial economic investment to develop the Proprietary Information and, by prohibiting public disclosure, EPRI derives an economic benefit in the form of licensing royalties and other additional fees from the confidential nature of the Proprietary Information. If the Proprietary Information were publicly available to consultants and/or other businesses providing services in the electric and/or nuclear power industry, they would be able to use the Proprietary Information for their own commercial benefit and profit and without expending the substantial economic resources required of EPRI to develop the Proprietary Information.

d. EPRI's classification of the Proprietary Information as trade secrets is justified by the Uniform Trade Secrets Act which California adopted in 1984 and a version of which has been adopted by over forty states. The California Uniform Trade Secrets Act, California Civil Code §§3426 – 3426.11, defines a "trade secret" as follows:

"Trade secret" means information, including a formula, pattern, compilation, program device, method, technique, or process, that:

(1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

(2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

e. The Proprietary Information contained therein are not generally known or available to the public. EPRI developed the Information only after making a determination that the Proprietary Information was not available from public sources. EPRI made a substantial investment of both money and employee hours in the development of the Proprietary Information. EPRI was required to devote these resources and effort to derive the Proprietary Information. As a result of such effort and cost, both in terms of dollars spent and dedicated employee time, the Proprietary Information is highly valuable to EPRI.

f. A public disclosure of the Proprietary Information would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Proprietary Information both domestically and internationally. The Proprietary Information can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

I have read the foregoing and the matters stated herein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 1300 W WT Harris Blvd being the premises and place of business of Electric Power Research Institute, Inc.

Date: 6-6-2013
Neil Wilmshurst
Neil Wilmshurst

(State of North Carolina)
(County of Mecklenburg)

Subscribed and sworn to (or affirmed) before me on this 6th day of June, 2013 by Neil Wilmshurst, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature Deborah H. Rouse (Seal)

My Commission Expires 2nd day of April, 2016

ENCLOSURE 7

Monticello Nuclear Generating Plant

Affidavit

Structural Integrity Associates, Inc.

**Request for Withholding of Proprietary Information Contained in
Evaluation of the Monticello Shroud H10 Weld
File No.: 1300180.302**

(2 pages follow)



May 24, 2013

AFFIDAVIT

I, Marcos Legaspi Herrera, state as follows:

- (1) I am a Vice President of Structural Integrity Associates, Inc. (SI) 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 SI Calculation 1300180.302, Rev. 2, "Evaluation of the Monticello Shroud H10 Weld". This calculation contains information of a proprietary and confidential nature and is of the type customarily held in confidence by SI and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this calculation as proprietary and confidential.

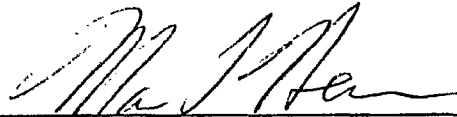
Paragraph 3 of this Affidavit provides the basis for the proprietary determination.

- (3) SI is making this application for withholding of proprietary information on the basis that this material meets the exemption of disclosure requirement set forth in NRC Regulation 10 CFR 2.390(a)(4) pertaining to "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is herein sought is considered proprietary for the following reasons:
 - a) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service; and
 - b) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for SI.

Public disclosure of the information sought to be withheld is likely to cause substantial harm to SI.

I declare under penalty of perjury that the above information and request are true, correct, and complete to the best of my knowledge, information, and belief.

Executed at San Jose, California on this 29th day of May, 2013.



Marcos Legaspi Herrera, P.E.
Vice President
Nuclear Plant Services

State of California

County of Santa Clara

Subscribed and sworn to (or affirmed) before me

on this 29th day of May, 2013,
Date Month Year

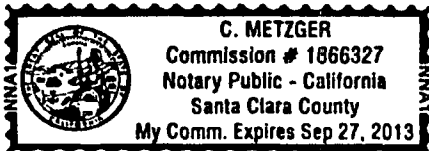
by

(1) Marcos Legaspi Herrera
Name of Signer

proved to me on the basis of satisfactory evidence
to be the person who appeared before me (.) ~~(x)~~
(and

(2) _____
Name of Signer

proved to me on the basis of satisfactory evidence
to be the person who appeared before me.)



Place Notary Seal and/or Stamp Above

Signature _____
Signature of Notary Public

