

**ENCLOSURES 1, 2 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

September 22, 2014

L-MT-14-075
10 CFR 50.4

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

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

Monticello Extended Power Uprate: Replacement Steam Dryer – Revised Limit Curve
Methodology (TAC No. MF3330)

- References:
- 1) Letter from T Beltz (NRC) to K Fili (NSPM), "Monticello Nuclear Generating Plant – Issuance of Amendment No. 176 to Renewed Facility Operating License Regarding Extended Power Uprate (TAC No. MD9990)," dated December 9, 2013. (ADAMS Accession No. ML13343A006)
 - 2) Email from T Beltz (NRC) to J Fields (NSPM), "Monticello Nuclear Generating Plant – Draft Request for Additional Information (EMCB) in Support of EPU Power Ascension (TAC No. MF3330)," dated May 15, 2014.
 - 3) Letter from K Fili (NSPM) to Document Control Desk (NRC), "Monticello Extended Power Uprate: Replacement Steam Dryer – Response to NRC Requests for Additional Information, Revised Limit Curves and Supporting Information (TAC N. MF3330)," L-MT-14-060, dated July 22, 2014.
 - 4) Email from T Beltz (NRC) to G Adams (NSPM), "Monticello Nuclear Generating Plant – Draft Request for Additional Information (EMCB) Regarding EPU Power Ascension Data Trend Evaluation (TAC No. MF3330)," (RAI-121) dated September 4, 2014.

Pursuant to 10 CFR 50.92, the NRC issued Reference 1, license amendment 176 to the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License (OL) and Technical Specifications (TS) to increase the maximum authorized power level from

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1775 megawatts thermal (MWt) to 2004 MWt. This change to power level is considered an extended power uprate (EPU).

In Reference 2, the NRC provided Northern States Power Company, a Minnesota corporation (NSPM) doing business as Xcel Energy draft requests for additional information (RAIs). These draft RAIs were also discussed on the May 30, 2014 conference call with the NRC.

In Reference 3, NSPM provided a response to the RAIs along with a revised set of benchmark limit curves based on 2011 data for power ascension to EPU conditions. Subsequently, NSPM has determined that the previous methodology for derivation and use of the benchmark limit curves requires modification for the MNGP power ascension activities.

On September 3, 2014, NSPM held a teleconference with NRC Staff to review the status of MNGP power ascension and to particularly review NSPM's proposed changes to steam dryer limit curves and limit curve methodology. Subsequently, NRC Staff Mechanical and Civil Engineering Branch (EMCB) issued another RAI (Reference 4) and clarifying questions regarding data differences between 2011 and 2014.

The primary purpose of this letter is to request NRC approval of a revised limit curve methodology for monitoring of steam dryer performance during EPU power ascension. Such NRC approval is required by MNGP operating license condition C.15(d). These changes were deemed necessary after determining that the benchmark limit curves (current methodology) were not useable when compared to the current main steam line strain gauge data. The bases for requesting the revised limit curve methodology is described in Enclosure 1. Enclosure 2 provides the revised limit curve methodology and Enclosure 3 provides the response to RAI-121, which provides additional justification for the revised limit curve methodology.

The secondary purpose of this letter is to inform the NRC of actions that NSPM has put in place to correct the errors originating in the Westinghouse Electric Company, LLC (WEC) analysis that supported previous analyses and recent steam dryer operability evaluations. WEC has corrected the analyses and confirmed that the changes did not alter the conclusion of the steam dryer operability evaluation, i.e., the steam dryer remains operable. However, because of the issues identified in the details of the analysis for the steam dryer, NSPM has instituted augmented oversight to assure that the analysis accurately reflects the NRC's analytical requirements for the steam dryer. This increased oversight involves additional actions designed to increase the quality of the analytical products for the steam dryer. These actions include:

- 1) NSPM is using a third-party reviewer for WEC analytical products associated with stress analysis and limit curves prior to distribution of these products to NSPM. This includes oversight of selected analyses at the WEC facilities to engage and challenge the analysis process and to identify any errors early in the process,

- 2) NSPM is providing technical oversight of the WEC analytical process by sending a member of the MNGP plant staff to WEC offices to review selected WEC products prior to distribution of these products to NSPM, and
- 3) NSPM is implementing a verification of the design inputs and assumptions used in the stress analysis. This verification is being performed using a detailed checklist of steam dryer analysis parameters that include assumptions and inputs that are used for performance of stress analyses as well as critical steps and required sequencing. The verification also includes the use of a third-party reviewer.

With these measures, NSPM is being more intrusive in the steam dryer analytical process to assure that a higher quality product will be obtained and that future errors will be identified and corrected prior to transmittal to NSPM or submittal to the NRC.

Enclosure 1 contains WEC report LTR-BWR-ENG-14-034-P, "*Investigation into the Cause of Exceeding the Level 1 (L1) and Level 2 (L2) Limit Curves Generated Based on 2011 Monticello Main Steam Line Strain Gauge Data*," dated September 5, 2014. This document describes three primary reasons that the benchmark limit curves previously provided in Reference 3 are being exceeded. The first of these reasons is a loss of margin resulting from the correction of data errors. The second reason is the approach used for filtering recirculation pump speeds. The final reason is the discovery of small differences in the frequency and amplitude of the data collected in 2011 versus the data collected in 2014. Enclosure 1 provides analysis and data to justify these conclusions. Enclosure 1 contains proprietary information.

Enclosure 2 contains WEC report LTR-BWR-ENG-14-037-P, "*Alternate Power Ascension Process*," dated September 5, 2014. This document provides a revised approach to derivation and use of limit curves during the performance of power ascension testing to EPU conditions. The revised limit curve methodology establishes conservative operating conditions whereby NSPM can more readily identify when a limit is approached and perform the necessary analysis prior to exceeding a limit or advancing in power. Enclosure 2 contains proprietary information.

Enclosure 3 contains WEC report LTR-BWR-ENG-14-043-P, "*Responses to the US NRC Request for Additional Information Relative to the Monticello Replacement Steam Dryer Acoustic/Structural Analyses Set #8*," dated September 19, 2014. This report provides a detailed comparison of data taken from the MNGP steam dryer during 2011 vs data taken during 2014. While small changes in the data can be demonstrated, the data continues to be consistent between these two timeframes. This enclosure responds to the NRC questions provided in Reference 4. Enclosure 3 contains proprietary information.

Enclosure 4 contains WEC affidavits executed to support withholding Enclosures 1, 2, and 3 from public disclosure. The affidavits set 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). NSPM requests that the proprietary information in Enclosures 1, 2 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. Accordingly, it is respectfully requested that the information which is proprietary to WEC be withheld from public disclosure in accordance with 10 CFR 2.390.

Correspondence with respect to the copyright or proprietary aspects of WEC information or the supporting WEC affidavits in Enclosure 4 should be addressed to J. A. Gresham, Manager, Regulatory Compliance, Westinghouse Electric Company, 1000 Westinghouse Drive, Building 3 Suite 310, Cranberry Township, Pennsylvania 16066.

Enclosures 5, 6 and 7 contain a nonproprietary version of Enclosures 1, 2, and 3 respectively. The nonproprietary reports are being provided based on the NRC's expectation that the submitter of the proprietary information should provide, if possible, a nonproprietary version of the document with brackets showing where the proprietary information has been deleted.

Enclosure 8 contains Structural Integrity Associates, Inc. (SIA) letter report 1301246.407.R0, "*Review of Strain Gage Signal Performance over Extended Time Periods*," dated August 14, 2014. This report, which is referenced by Enclosure 1 of this letter, provides documentation of strain gauge data changes occurring at two other nuclear power plants that have undergone EPU power ascension testing plans for steam dryers. The report demonstrates that the data changes that occurred at two other plants are similar to that which has been experienced at MNGP.

Enclosure 9 contains SIA letter report 1301246.409.R1, "*Supporting Information for MNGP EPU-EMCB-RSD-RAI-121*," dated September 19, 2014. This report provides responses to clarification questions 5 and 6 associated with Reference 4. Clarification question 6 requested non-MNGP plant data which was previously provided to the NRC under separate emails on September 12, 2014.

Summary of Commitments

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



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 Nuclear Generating Plant, USNRC
Resident Inspector, Monticello Nuclear Generating Plant, USNRC

ENCLOSURE 4

AFFIDAVITS FOR WITHHOLDING PROPRIETARY DOCUMENTS

The table below provides an index to the affidavits provided within this enclosure. The index correlates the affidavit with the document each affidavit supports.

Affidavit #	Enclosure number - Document number & Name
CAW-14-0423	Enclosure 1 - LTR-BWR-ENG-14-034-P, "Investigation into the Cause of Exceeding the Level 1 (L1) and Level 2 (L2) Limit Curves Generated Based on 2011 Monticello Main Steam Line Strain Gauge Data" (Proprietary) Enclosure 2 - LTR-BWR-ENG-14-037-P, "Alternate Power Ascension Process" (Proprietary)
CAW-14-4037	Enclosure 3 - LTR-BWR-ENG-14-043-P, "Responses to the US NRC Request for Additional Information Relative to the Monticello Replacement Steam Dryer Acoustic/Structural Analyses Set #8" (Proprietary)

12 pages follow

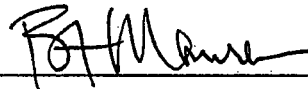
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COMMONWEALTH OF PENNSYLVANIA:

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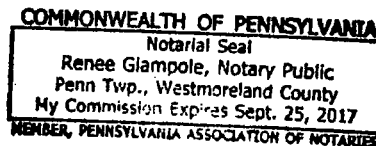
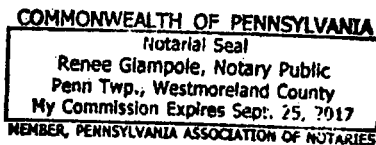
COUNTY OF BUTLER:

Before me, the undersigned authority, personally appeared Bradley F. Maurer, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



Bradley F. Maurer, Principal Engineer
Plant Licensing & Setpoints and Uncertainty
Analysis

Sworn to and subscribed before me
this 4th day of September 2014


Notary Public

- (1) I am Principal Engineer, Plant Licensing & Setpoints and Uncertainty Analysis, in Engineering, Equipment and Major Projects, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) 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 should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitute Westinghouse policy and provide the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of
-

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
 - (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
 - (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.
-

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iv) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in:
- 1) LTR-BWR-ENG-14-034-P, "Investigation into the Cause of Exceeding the Level 1 (L1) and Level 2 (L2) Limit Curves Generated Based on 2011 Monticello Main Steam Line Strain Gauge Data" (Proprietary)
 - 2) LTR-BWR-ENG-14-037-P, "Alternate Power Ascension Process" (Proprietary)
- for submittal to the Commission, being transmitted by Xcel Energy letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the Monticello Main Steam Line Strain Gauge Data and Alternate Power Ascension Process, and may be used only for that purpose.
-

- (a) This information is part of that which will enable Westinghouse to:
 - (i) Assist Xcel Energy in achieving power ascension to EPU operating conditions for the Monticello Nuclear Plant.

- (b) Further this information has substantial commercial value as follows:
 - (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific steam line strain gauge data evaluation and alternate power ascension process development.

 - (ii) Its use by a competitor would improve their competitive position in the development and licensing of a similar methodology for BWR power ascension activities.

 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

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In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the Affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

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AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

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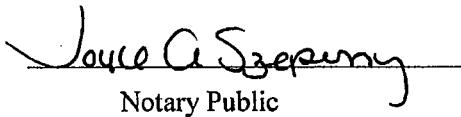
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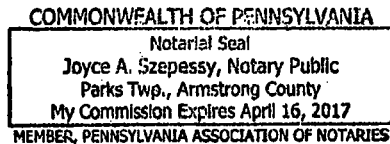


Bradley F. Maurer, Principal Engineer
Plant Licensing & Setpoints and Uncertainty
Analysis

Sworn to and subscribed before me
this 19th day of September 2014



Notary Public



- (1) I am Principal Engineer, Plant Licensing & Setpoints and Uncertainty Analysis, in Engineering, Equipment and Major Projects, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse Application for Withholding Proprietary Information from Public Disclosure accompanying this Affidavit.
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Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
 - (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
 - (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
 - (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
 - (f) It contains patentable ideas, for which patent protection may be desirable.
- (iii) There are sound policy reasons behind the Westinghouse system which include the following:
- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
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- (v) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (vi) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in LTR-BWR-ENG-14-043-P, "Responses to the US NRC Request for Additional Information Relative to the Monticello Replacement Steam Dryer Acoustic/Structural Analyses Set #8" (Proprietary) for submittal to the Commission, being transmitted by Xcel Energy letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted by Westinghouse is that associated with the Monticello Main Steam Line Strain Gauge Data and Replacement Steam Dryer Acoustic/Structural Analyses, and may be used only for that purpose.

- (a) This information is part of that which will enable Westinghouse to:
- (i) Assist Xcel Energy in providing additional data and data analysis in support of achieving power ascension to EPU operating conditions for the Monticello Nuclear Plant.
- (b) Further this information has substantial commercial value as follows:
- (i) Westinghouse plans to sell the use of this information to its customers for purposes of plant specific steam line strain gauge data analysis.
 - (ii) Its use by a competitor would improve their competitive position in the development and licensing of a similar methodology for BWR power ascension activities.
 - (iii) The information requested to be withheld reveals the distinguishing aspects of a methodology which was developed by Westinghouse.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar technical justifications and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

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Further the deponent sayeth not.

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