



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 30, 2015

Mr. Peter A. Gardner
Site Vice President
Monticello Nuclear Generating Plant
Northern States Power Company - Minnesota
2807 West County Road 75
Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT – REQUEST FOR WITHHOLDING OF PROPRIETARY INFORMATION FROM PUBLIC DISCLOSURE (CAC NO. MF6730)

Dear Mr. Gardner:

By letter to the U.S. Nuclear Regulatory Commission (NRC) dated November 5, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML083230111), Northern States Power Company – Minnesota (NSPM, the licensee), doing business as Xcel Energy, submitted an extended power uprate license amendment request to revise the Monticello Nuclear Generating Plant (MNGP) Renewed Operating License and technical specifications to increase the maximum authorized licenses thermal power level from 1775 megawatts thermal (MWt) to 2004 MWt.

In a letter dated December 9, 2013 (ADAMS Accession Package No. ML13316C459), the NRC issued License Amendment No. 176, approving the MNGP EPU. License Amendment No. 176 included additional license conditions associated with EPU power ascension testing and data collection/evaluation. License condition 15(e) requires NSPM to provide the results of power ascension testing to verify the continued structural integrity of the steam dryer, including a final load definition and stress report of the steam dryer. The report will be provided to the NRC within 90 days from completion of EPU power ascension testing.

By letter dated October 12, 2015 (ADAMS Accession Package No. ML15289A082), the licensee submitted its 90-day report. Enclosure 4 of the October 12, 2015, submittal (ADAMS Accession No. ML15289A073) included three affidavits (CAW-15-4299, CAW-15-4301, and CAW-15-4300) executed on October 5, 2015, by James A. Gresham of Westinghouse Electric Company, LLC (Westinghouse). The affidavits were executed to support withholding the following documents within the October 12, 2015, submittal from public disclosure pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 2, Section 2.390:

- Enclosure 1 provides a proprietary version of WCAP-17252-P, Revision 5, "Acoustic Loads Definition for the Monticello Steam Dryer Replacement Project," dated September 2015.
- Enclosure 2 provides a proprietary version of WCAP-17549-P, Revision 3, "Monticello Replacement Steam Dryer Structural Evaluation for High-Cycle Acoustic Loads Using ACE," dated October 2015.

- Enclosure 3 provides a proprietary version of WCAP-18064, Revision 0, "Monticello EPU Main Steam Line Strain Gauge Data Evaluation Report," dated September 2015.

The affidavits state that the information submitted in Enclosures 1, 2, and 3 should be considered exempt from mandatory public disclosure for the following reasons:

- a. Public disclosure of this 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 evaluations and licensing defense services for commercial power reactors without commensurate expense.
- b. 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.
- c. The development of the technology described in part by the information is the result of applying many years of experience in an intensive Westinghouse effort and expenditure of a considerable sum of money. In order for competitors to duplicate the 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.

We have reviewed the Westinghouse affidavits in accordance with the requirements of 10 CFR 2.390 and, on the basis of its statements, have determined that the submitted information sought to be withheld contains proprietary commercial information and should be withheld from public disclosure. Therefore, Enclosure 1, 2 and 3, which are marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.390(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Enclosures 5, 6, and 7 contain non-proprietary versions of Enclosures 1, 2, and 3, respectively, and have been placed in the NRC's Public Document Room and added to the NRC Library at ADAMS Accession Nos. ML15289A074, ML15289A075, and ML15289A076.

Withholding from public inspection shall not affect the right, if any, of persons properly and directly concerned to inspect the documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

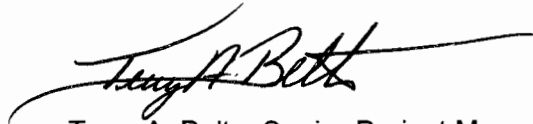
If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You also should understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC makes a determination adverse to the above, you will be notified in advance of any public disclosure.

P. Gardner

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If you have any questions regarding this matter, I may be reached at 301-415-3049.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry A. Beltz". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Terry A. Beltz, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-263

cc: J. A. Gresham, Manager
Regulatory Compliance
Westinghouse Electric Company, LLC
1000 Westinghouse Drive
Building 3, Suite 310
Cranberry Township, PA 16066

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P. Gardner

- 3 -

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Sincerely,

/RA/

Terry A. Beltz, Senior Project Manager
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NAME	TBeltz	MHenderson	TLupold	DPelton	TBeltz
DATE	10/28/2015	10/29/2015	11/06/2015	11/30/2015	11/30/2015

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