

ENCLOSURE 1 CONTAINS 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

February 29, 2016

L-MT-16-010  
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

License Amendment Request for AREVA Extended Flow Window  
Supplement to Disposition Changes to Non-Limiting Transient Analyses  
(TAC No. MF5002)

- References:
- 1) Letter from Karen D. Fili (NSPM), to Document Control Desk (NRC), "License Amendment Request for AREVA Extended Flow Window," L-MT-14-044, dated October 3, 2014 (ADAMS Accession No. ML14283A125)
  - 2) Letter from Peter A. Gardner (NSPM) to Document Control Desk (NRC), "License Amendment Request for AREVA Extended Flow Window Supplement to Respond to NRC Staff Questions (TAC No. MF5002)," L-MT-15-065, dated September 29, 2015 (ADAMS Accession No. ML15274A473)
  - 3) Letter from Peter A. Gardner (NSPM) to Document Control Desk (NRC), "License Amendment Request for AREVA Extended Flow Window Supplement to Provide Revised Analysis of Anticipated Transient Without Scram Instability (TAC No. MF5002)," L-MT-15-081, dated December 8, 2015 (ADAMS Accession No. ML15345A407)

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 revise the MNGP TS and would approve certain analytical methods that together would support operation in the expanded power-flow operating domain described as the Extended Flow Window (EFW). The purpose of the requested amendment is to transition from the General Electric – Hitachi methodology called Maximum Extended Load Line Limit Analysis Plus (MELLLA+) to the AREVA methodology called EFW.

A001  
NRR

In Reference 2, NSPM provided early identification of errors in AREVA's core depletion code MICROBURN-B2, and the potential effect on the safety analyses under NRC review. Subsequently, in Reference 3, NSPM described the effect of those errors on the limiting transient analyses; providing revised results for the Anticipated Transient Without Scram – Instability (ATWS-I) analysis. Reference 3 stated that the effect of the MICROBURN-B2 errors on non-limiting transient analyses would be managed under the AREVA and NSPM corrective action programs. After discussion with NRC Staff on November 24, 2015 and February 3, 2016, NSPM is addressing the non-limiting transient analyses as described below.

- Unmitigated ATWS-I Analysis. While evaluating the MICROBURN-B2 errors under their corrective action program, AREVA identified a nominally adverse impact on the “unmitigated” case that is described in Sections 4 and 5 of ATWS-I Report ANP-3284 Revision 0. That report was submitted as Enclosure 9 to the LAR (Reference 1). Rather than revising the analysis of the unmitigated case and reissuing ANP-3284, NSPM is deleting the unmitigated case in its entirety. In effect, the unmitigated case is superseded by the mitigated case that was submitted with Reference 2 and revised with Reference 3. As stated in ANP-3435 Revision 1:

“The analysis of Anticipated Transient Without Scram – Instability (ATWSi) described herein should be recognized as the licensee’s analysis of record supporting the proposed amendment to allow operation in the EFW domain.”

Hereby, NSPM considers the unmitigated ATWS-I case described in Sections 4 and 5 of ANP-3284 Revision 0 to be superseded by the mitigated ATWS-I case described by ANP-3435 Revision 1.

- Control Rod Withdrawal Event (CRWE) Transient Analysis and Average Power Range Monitor (APRM) Signal Reduction. While evaluating the MICROBURN-B2 errors under their corrective action program, AREVA also identified nominal impacts on the results for the CRWE transient analysis and the relative value of APRM signal reduction that were originally provided in Report ANP-3295 Revision 2. ANP-3295 Revision 2 was provided as Enclosure 11 to the LAR (Reference 1). The corrected results for the CRWE transient analysis and APRM signal reduction are provided in Revision 3 to ANP-3295.

Thus, Enclosure 1 provides AREVA Report ANP-3295P, Revision 3. Enclosure 1 is proprietary to AREVA. Enclosure 2 provides the non-proprietary AREVA Report ANP-3295NP, Revision 3.

Enclosure 3 provides an affidavit executed to support withholding Enclosure 1 from public disclosure. Enclosure 1 contains 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 AREVA proprietary information in Enclosure 1 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 the AREVA information in Enclosure 1 or the supporting AREVA affidavit in Enclosure 3 should be addressed to Mr. Alan Meginnis, Manager – Product Licensing, AREVA Inc., 2101 Horn Rapids Road, Richland, Washington 99354.

The information offered herein does not affect the conclusions of the No Significant Hazards Consideration and the Environmental Consideration evaluations provided in the Reference 1 license amendment request.

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

If there are any questions or if additional information is needed, please contact Glenn Adams at 612-330-6777.

Summary of Commitments

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

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

Executed on: February 29, 2016



Peter A. Gardner  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company-Minnesota

Enclosures (3)

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

L-MT-16-010

**Enclosure 3**

**AREVA Affidavit**

**3 pages follow**

A F F I D A V I T

COMMONWEALTH OF VIRGINIA )  
  ) ss.  
CITY OF LYNCHBURG             )

1. My name is Morris Byram. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the topical report ANP-3295P, Revision 3, "Monticello Licensing Analysis For EFW (EPU/MELLLA+)," dated February, 2016, and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA 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 Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) 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.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c), and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

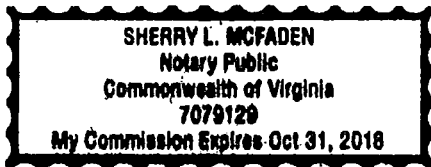
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Thomas E. Byrd

SUBSCRIBED before me this 8th  
day of February, 2016.

Sherry L. McFaden

Sherry L. McFaden  
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES: 10/31/18  
Reg. # 7079129





**SHIPPING DOCUMENT  
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D/B/A Xcel Energy**

Monticello Nuclear Plant, 2807 W Hwy. 75, Monticello, MN 55362

Date: 2/29/2016

Shipping Document  
Tracking Number: 5416-0102

**Ship To:**  
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 11555 Rockville Pike  
 Rockville, MD 20852-2738

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<b>Carrier: UPS – Standard Overnight</b>		<b>RMA No:</b>	
<b>Pro / Tracking No:</b>		<b>PO / Contract No:</b>	
<b>Packaging:</b>		<b>Number of Packages: 1</b>	<b>Weight:</b>
<b>Dangerous Goods/ Hazardous Materials?</b>	<b>UN/NA No:</b>	<b>Insurance Required?</b>	<b>Est. Value</b>

**Reason for Shipment: Overnight Shipment to USNRC**

Melody Imholte – Please ensure tracking number is communicated to me – melody.imholte@xenuclear.com

Item No.	Qty.	Unit	Description	Catalog ID/Q
1	1	Env	Submittal to NRC L-MT-16-010	

**Requestor:** *Melody Imholte* **Date:** 2/29/16

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**SWIP Making Shipment:** *59* **Date:** 3/1/16

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