

NSP**NORTHERN STATES POWER COMPANY**

MINNEAPOLIS MINNESOTA 55401

May 6, 1980

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket No. 50-287 License No. DPR-42
50-306 DPR-60

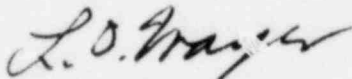
Supplemental Proprietary Document Related
to License Amendment Request dated May 6, 1980

This transmittal is intended to supplement our license amendment request dealing with SI Actuation and Power Distribution Limits (dated May 6, 1980).

Exhibit A is the Exxon Nuclear Company (ENC) affidavit of James N Morgan which states the basis for exemption from public disclosure of the ENC document XN-NF-79-18(P) (in accordance with 10 CFR 2.790(b)(1)(ii)).

Exhibit B is the Exxon Nuclear Company document XN-NF-79-18(P).

For additional information regarding this document or the license amendment request please contact this office.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/jh

cc J G Keppler (w/o attachments)
G Charnoff
MPCA
Attn: J W Ferman (w/o attachments)

Contains 10 CFR 2.790 Proprietary Information

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket No. 50-282 License No. DPR-42
 50-306 DPR-60

Exhibit A

Letter dated May 6, 1980

Exhibit A is Affidavit of James N Morgan (Exxon Nuclear Company)
dated April 17, 1980

A F F I D A V I T

STATE OF Washington)
)
COUNTY OF Benton) ss.

I, James N. Morgan, being duly sworn, hereby say and depose:

1. I am Manager, Licensing and Safety Engineering, for Exxon Nuclear Company, Inc., ("ENC") and as such I am authorized to execute this Affidavit.

2. I am familiar with ENC's detailed document control system and policies which govern the protection and control of information.

3. I am familiar with the document XN-NF-79-18(P), Revision 1, entitled "Exposure Sensitivity Study for ENC XN-1 Reload Fuel at Prairie Island Unit 1 Using the ENC-WREM-IIA PWR Evaluation Model," referred to as "Document". Information contained in this Document has been classified by ENC as proprietary in accordance with the control system and policies established by ENC for the control and protection of information.

4. The Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by ENC and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in the Document as being proprietary and confidential.

5. The Document has been made available to the United States Nuclear Regulatory Commission in confidence, with the request that the information contained in the Document not be disclosed or divulged.

6. The Document contains information which is vital to a competitive advantage of ENC and would be helpful to competitors of ENC when competing with ENC.

7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of design analysis and fuel design which secure competitive economic advantage to ENC for fuel management and safety analysis optimization and improved marketability, and includes information utilized by ENC in its business which affords ENC an opportunity to obtain a competitive advantage over its competitors who do not or may not know or use the information contained in the Document.

8. The disclosure of the proprietary information contained in the Document to a competitor would permit the competitor to reduce its expenditure of money and manpower and to improve its competitive position by giving it extremely valuable insights into ENC's design analysis and fuel design and would result in substantial harm to the competitive position of ENC.

9. The Document contains proprietary information which is held in confidence by ENC and is not available in public sources.

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

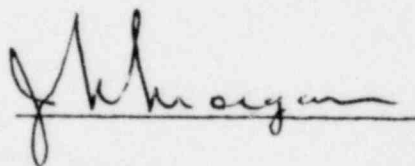
11. ENC policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis. Checks are made routinely to assure the policy procedures are being met.

12. This Document provides information which reveals fuel design and safety analysis methods developed by ENC over the past several years. ENC has invested several hundred thousand dollars and many man-years of effort in related fuel design and safety analysis method development. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, at a minimum, develop the information for the same expenditure of manpower and money as ENC.

13. Based on my experience in the industry, I do not believe that the background data and incentives of ENC's competitors are sufficiently similar to the corresponding background data and incentives of ENC to reasonably expect such competitors would be in a position to duplicate ENC's proprietary information contained in the Document.

THAT the statements made hereinabove are, to the best of my knowledge, information, and belief, truthful and complete.

FURTHER AFFIANT SAYETH NOT.



SWORN TO AND SUBSCRIBED

before me this 17 day of

April, 1980.

Susan L. Backus
NOTARY PUBLIC