

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

January 8, 1979

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

> PRAIRIE ISLAND NUCLEAR GENERATING PLANT Docket No. 50-282 License No. DPR-42 50-306 DPR-60

Supplemental Documentation related to December 29, 1978 License Amendment

On December 29, 1978 Northern States Power Company submitted a license amendment request related to use of Exxon Nuclear Company reload fuel in Prairie Island Units 1 and 2. The safety evaluation for changes in Section 5.3.A of the Technical Specifications referenced XN-NF-78-34 "Generic Mechanical and Thermal Hydraulic Design for Exxon Nuclear 14x14 Reload Fuel Assemblies with Zircaloy Guide Tubes for Westinghouse 2-Loop Pressurizer Water Reactors". We stated in the cover letter of that request that we would be transmitting XN-NF-78-34 under separate cover due to the proprietary nature of the document.

This document transmits 40 copies of XN-NF-78-34(P) in accordance with the provisions of 10CFR2.790(a)(4) and (b).

Exhibit A is the affidavit of Mr R Nilson of Exxon Nuclear Company submitted in accordance with 10CFR2.790(b)(1)(ii). This affidavit describes the basis of the request for exemption from public disclosure. One signed affidavit and 39 copies are included.

Exhibit B is the proprietary document XN-NF-78-34(P).

Non-proprietary copies of XN-NF-78-34 will be submitted in the near future.

7901110124

Yours very truly,

L Ø Mayer,

Manager of Nuclear support Services

LOM/JAG/ak

cc: J G Keppler G Charnoff MPCA - Attn: J W Ferman

Attachment: Contains 10CFR2.790 Proprietary Information

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY PRAIRIE ISLAND NUCLEAR GENERATING PLANT

> Docket No. 50-282 50-306

LETTER DATED JANUARY 8, 1979 TRANSMITTING SUPPLEMENTAL PROPRIETARY INFORMATION RELATED TO DECEMBER 29, 1978 LICENSE AMENDMENT REQUEST FOR OPERATING LICENSE NO. DPR-42 & DPR-60

Northern States Power Company, a Minnesota corporation, by this letter dated January 8, 1979 hereby submits supplemental proprietary information related to the December 29, 1978 License Amendment Request. Exhibit A is an Exxon Nuclear Company (ENC) affidavit stating the basis for exemption from public disclosure. Exhibit B is the proprietary document XN-NF-78-34(P).

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

Caller?

Markter Wachter

Vice President, Power Production & System Operation

On this <u>8th</u> day of <u>January</u>, 1979, before me a notary public in and for said County, personally appeared L J Wachter, Vice President, Power Production and System Operation, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

Talvarson

DENISE E. HALVORSON NOTARY PUBLIC - MINNESOTA HENNEPIN COUNTY My Commission Expires Oct. 10, 1981 EXHIBIT A January 8, 1979 transmittel of supplemental documentation related to the December 29, 1978 License Amendment Request. A F F I D A V I T

STATE OF Washington) ss.

I, Roy Nilson, being duly sworn, hereby say and depose:

 I am Manager, Licensing, 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-78-34, entitled "Generic Mechanical and Thermal-Hydraulic Design for Exxon Nuclear 14x14 Reload Fuel Assemblies with Zircaloy Guide Tubes for Westinghouse 2-Loop Pressurized Water Reactors," referred to as "Document", which is being submitted by Northern States Power Company in support of its Cycle 5 fuel reload poplication for the Prairie Island Nuclear Plant - Unit 1. Information critained 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 contidential.

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. DPR-42 DPR-60 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.

EXHIBIT A

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7. The information contained in the Document is considered to be proprietary by ENC because it reveals certain distinguishing aspects of fuel and thermal-hydraulic design and analysis methods which secure competitive economic advantage to ENC by design 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 analysis, design and testing procedures and would result in substantial harm to the competitive position of ENC.

 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. EXHIBIT A - 3 -

This Document provides information which reveals fuel 12. characteristics and analysis methods developed by ENC over the past several years. ENC has invested several million dollars and many man-years of effort in the related fuel development efforts. Assuming a competitor had available the same background data and incentives as ENC, the competitor might, as a minimum cost, 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 that it is reasonable to expect such competitors would be in a position to duplicate ENC's proprietary information contained in the documents.

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

FURTHER AFFIANT SAYETH NOT.

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SWORN TO AND SUBSCRIBED before me this 3 day of

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DPR-42 DPR-60

CONTAINS 10CFR2.790 INFORMATION PROPRIETARY

EXHIBIT B

January 8, 1979 transmittal of supplemental documentation related to the December 29, 1978 License Amendment Request.

Exhibit B contains the following proprietary Exxon Nuclear Company report:

XN-NF-78-34(P)

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"Generic Mechanical and Thermal Hydraulic Design for Exxon Nuclear 14x14 Reload Fuel Assemblies with Zircaloy Guide Tubes for Westinghouse 2-Loop Pressurized Water Reactors"

CONTAINS 10CFR2.790 INFORMATION PROPRIETARY

EXEMPT FROM PUBLIC DISCLOSURE