



Northern States Power Company Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East Welch, Minnesota 55089

May 3, 1996

U S Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-50

Steam Generator Tube Sleeves Metallurgical Examination Results

On February 28, 1996, we submitted the steam generator inspection report following the inspections conducted during the Unit 1 refueling outage. During this inspection program certain tube sleeves had indications which we have examined further by removing the tube and sleeve assemblies and performing detailed metallurgical examinations of them. Our February 28, 1996 letter committed to providing the results of the metallurgical examinations to the NRC within 90 days of startup from the outage. Therefore, we are enclosing the report with this letter for NRC review.

Also enclosed is a Combustion Engineering, Inc affidavit pursuant to 10 CFR 2.790 regarding withholding proprietary information from public disclosure. We therefore request that the attached report be treated as proprietary information.

In this letter we have made no new Nuclear Regulatory Commission commitments.

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NORTHERN STATES POWER COMPANY

Please contact Jack Leveille (612-388-1121, Ext. 4662) if you have any questions related to this letter.

Jack Leville

Nor Michael D Wadley

Plant Manager

Prairie Island Nuclear Generating Plant

Regional Administrator - Region III, NRC (w/o attachments)
 Senior Resident Inspector, NRC (w/o attachments)
 NRR Project Manager, NRC
 J E Silberg (w/o attachments)

Attachments:

- 1. Affidavit Pursuant to 10 CFR 2.790
- Verification of the Structural Integrity of the ABB CENO Steam Generator Welded Sleeve

AFFIDAVIT PURSUANT

TO 10 CFR 2.790

I, C. B. Brinkman depose and say that I am the Director, Nuclear Licensing, of Combustion Engineering, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conjunction with the applications of; (1) Northern States Power Co., (2) Entergy Operations, Inc., (3) Commonwealth Edison Co., (4) Rochester Gas and Electric Co., and (5) Wisconsin Public Service Corp. and in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the following document:

CEN-628-P, Rev. 01-P "Verification of the Structural Integrity of the ABB CENO Steam Generator Welded Sleeve," March 1996

This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Combustion Engineering in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.790 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, included in the above referenced document, should be withheld.

- 1. The information sought to be withheld from public disclosure, is owned and has been held in confidence by Combustion Engineering. It consists of a review of a welded steam generator tube sleeve installation problem and the evaluation of pulled steam generator tube samples from an affected facility.
- The information consists of test data or other similar data concerning a
 process, method or component, the application of which results in substantial
 competitive advantage to Combustion Engineering.
- 3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily disclosed to the public. Combustion Engineering 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 details of the aforementioned system were provided to the Nuclear Regulatory Commission via letter DP-537 from F. M. Stern to Frank Schroeder dated December 2, 1974. This system was applied in determining that the subject document herein is proprietary.
- The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
- 5. The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
- 6. Public disclosure of the information is likely to cause substantial harm to the competitive position of Combustion Engineering because:
 - A similar product is manufactured and sold by major pressurized water reactor competitors of Combustion Engineering.

- Development of this information by Combustion Engineering required millions of dollars and thousands of manhours of effort. A competitor would have to undergo similar expense in generating equivalent information.
- c. In order to acquire such information, a competitor would also require considerable time and inconvenience to develop an understanding of welded steam generator tube sleeve installation problems and evaluate specific examples based on test or pulled steam generator tube data.
- d. The information consists of a review of a welded steam generator tube sleeve installation problem and the evaluation of pulled steam generator tube samples from an effected facility, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Combustion Engineering, take marketing or other actions to improve their product's position or impair the position of Combustion Engineering's product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- e. In pricing Combustion Engineering's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of Combustion Engineering's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.
- f. Use of the information by competitors in the international marketplace would increase their ability to market nuclear

steam supply systems by reducing the costs associated with their technology development. In addition, disclosure would have an adverse economic impact on Combustion Engineering's potential for obtaining or maintaining foreign licensees.

Further the deponent sayeth not.

C. B. Brinkman

Director, Nuclear Licensing

Sworn to before me	0	
this 231d day of	april	, 1996
Laurie J.	White	
Notary Public	1 1	
My commission coires:	8/31/99	