



Northern States Power Company

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April 19, 1985

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

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-252 License Nos. DPR-42
50-306 DPR-60

PROPRIETARY (and non-proprietary version) Topical Report -
Reload Safety Evaluation Methods, NSPNAD-8102P, Rev 3

Enclosed are 23 copies of proprietary topical report - NSPNAD-8102P
Revision 3, and 13 copies of the non-proprietary version - NSPNAD-8102NP
for your review. A \$150.00 check is also enclosed in accordance with 10
CFR Part 170 as the required application fee.

Revision 3 includes changes to: 1) replace the thermal hydraulic hot
channel code, COBRA-IIIC/MIT, with the VIPRE-01 code, 2) add the WRB-1 CHF
correlation for use with Westinghouse OFA fuel (the W-3 CHF correlation
will continue to be used for the Exxon fuel), and 3) revise the acceptance
criteria for Condition IV accidents in order to be consistent with current
Westinghouse fuel limits. A list of changes has been inserted into each
copy of the revised topical.

We are planning to use this revised methodology to analyze Unit 1 Cycle 11
operations, scheduled to start up in February of 1986. Please contact us
if you have questions concerning this submittal.

Attached Report, NSPNAD-8102P Revision 3,
Contains 10 CFR Part 2.790(a)(4) Information

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CHANGE

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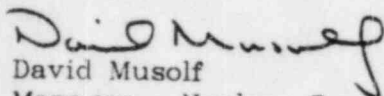
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Acc 1

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Also attached is the affidavit of Mr R O Anderson and Dr J R Fisher which states the basis for our request for exemption from public disclosure of the proprietary version of this topical, in accordance with 10 CFR Part 2.790(a)(4) information.



David Musolf
Manager - Nuclear Support Services

DMM/TMP/tp

- c: Regional Administrator-III, NRC (w/o attachments)
- NRR Project Manager, NRC (w Topical Reports)
- Resident Inspector, NRC (w/o attachments)
- G Charnoff (w/o attachments)

Attachments: Affidavit

Check \$150

23 copies of Topical Report NSPNAD-8102P

13 copies of Topical Report NSPNAD-8102NP

Attached Report, NSPNAD-8102P Revision 3,
Contains 10 CFR Part 2.790(a)(4) Information

AFFIDAVIT

Before me, the undersigned authorities, personally appeared John R. Fisher, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Utility Associates International (UAI), a consulting service of Control Data Corporation, and Roger O. Anderson, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Northern States Power Company (NSP), and that the averments of fact set forth in this Affidavit are true and correct to the best of their knowledge, information, and belief:

John R. Fisher

John R. Fisher

Technical Director

Utility Associates International (UAI)

Roger O. Anderson

Roger O. Anderson

Manager Nuclear Analysis

Northern States Power Company (NSP)

Sworn to and subscribed
before me this 11th day
of April 1985.

Dody A. Brose
Notary Public



- 1.0 J. R. Fisher is Technical Director of Utility Associates International (UAI), a consulting service of Control Data Corporation (CDC), and Roger O. Anderson is Manager of Nuclear Analysis of Northern States Power Company (NSP), and as such we have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing or rule-making proceedings, and are authorized to apply for its withholding on behalf of UAI and NSP.
- 2.0 We are making this Affidavit in conformance with the provisions of 10 CFR Section 2.790 of the Commission's regulations and in conjunction with UAI/NSP application for withholding accompany this affidavit.
- 3.0 We have personal knowledge of the criteria and procedures utilized by UAI/NSP in designating information as a trade secret, privileged or as confidential commercial or financial information.
- 4.0 The following is furnished, per Section 2.790 paragraph (b) (4) of the Commission's regulations, for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - 1) A significant part of UAI/NSP's present and future consulting business to utilities is based on the licensing or proprietary computer codes, proprietary procedures for setup and application of these codes, and proprietary results used for validating said system of computer codes and procedures.
 - 2) The information sought to be withheld from public disclosure is owned and has been held in confidence by UAI and its licensees.
 - 3) This information is the type normally held proprietary by UAI/NSP and not customarily disclosed to the public. There is rational basis for determining the types of information that UAI/NSP normally holds proprietary.

4.1 Information is held proprietary if its release might result in the loss of existing or potential competitive advantage. These types of information are categorized as follows:

- 1) The information reveals the distinguishing aspects of a program, methodology, algorithms, procedures, etc. where prevention of their use without license provides a competitive advantage over other companies.
- 2) The information consists of supporting data, including test data, which aids in validation of methodologies and thereby provides a competitive advantage, e.g., computer runtime, reduced number of computer runs, creditability, etc.
- 3) The use of information by a competitor would reduce his expenditure of resources and/or improve his competitive position in application or licensing of a similar product.
- 4) The information reveals aspects of past, present, or future UAI/CDC and/or NSP funded development plans and programs or potential commercial value to UAI/NSP.
- 5) The information is not the property of UAI or NSP, but must be treated as proprietary by UAI and NSP according to agreements with the owner.

4.2 There are valid reasons for UAI and NSP establishing these categories for evaluation of the confidentiality of information which include the following:

- 1) The use of such information by UAI gives UAI a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the UAI competitive position.
- 2) It is information which is marketable in many ways. The extent to which such information is available to competitors diminishes UAI's and NSP's ability to license systems and services involving the use of the information.

- 3) Use by our competitor would put UAI and NSP at a competitive disadvantage by reducing his expenditure of resources at our expense.
- 4) Each component of proprietary information pertinent to a particular competitive advantage potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information any one component would provide sufficient indication of the total thereby depriving UAI and NSP of a competitive advantage.
- 5) UAI and NSP have begun a concerted effort in the world market. Unrestricted disclosure would jeopardize a potential advantage in this market.
- 6) The UAI/NSP capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage in the licensing of systems and services.

5.0 The information is being transmitted to the Commission in confidence and under the provision in 10 CFR Section 2.790; it is to be received in confidence by the Commission.

6.0 The information is not available in public sources to the best of our knowledge and belief.

7.0 The proprietary information sought to be withheld in this submittal is that which is appropriately marked in the report, "Reload Safety Evaluation Methods for Application to PI Units,"

The document is being submitted as a Topical Report and will be referenced in future licensing or standardized reference approval applications.

The information enables UAI and NSP to:

- 1) Justify the methodology and procedures used in the reload analysis.
- 2) Assist its clients to obtain licenses.
- 3) Provide greater flexibility and additional reload design options to its clients and through in-house capability.
- 4) Provide to its clients a means of supporting the plant on a day-to-day basis and hence the potential of increasing availability.

In addition, the information presented in the subject documents and other similar endeavors is of commercial value to UAI and NSP and can be a source of considerable sums of money, for example:

- 1) UAI and NSP use the information to support the methodology, procedures, and services that UAI/NSP provide to their clients.
- 2) UAI and NSP use the information to provide a database which aids in the validation of the system of computer codes and procedures which UAI and NSP license to their clients.
- 3) Based on the experience gained and the methods developed from this and like information for other clients, UAI and NSP are automating the approach and procedures described and plan to license the resulting system.

8.0 Public disclosure of information concerning the "Reload Safety Evaluation Methods for Application to PI Units" program is likely to cause substantial harm to the competitive position of UAI and NSP by allowing their competitors to develop similar analysis methods and models at a much reduced cost. The analysis performed in this endeavor is a result of an analytical system (methodology, programs, and procedures) which has been developed at UAI and NSP over a period of years. This represents a significant amount of highly qualified development effort resulting in UAI's and NSP's current business posture. Should a potential competitor be able to use the results of this analyses and descriptions of methodology in the attached document to establish and verify their own programs and procedures, the technical and monetary effort to achieve a comparable capability would be vastly reduced. UAI and NSP have expended a significant amount of money and technical resource to achieve their current position which a competitor can attain only through a like investment of money and qualified technical talent.