



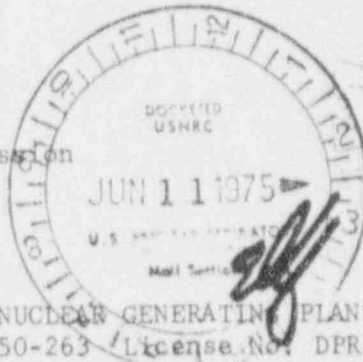
NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

July 9, 1975

Mr. D. L. Ziemann, Chief  
Operating Reactors Branch # 2  
Division of Reactor Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Ziemann:



MONTICELLO NUCLEAR GENERATING PLANT  
DOCKET NO. 50-263 License No. DPR-22

Transmittal of ECCS Analyses

Attached, please find a report entitled "Monticello Nuclear Power Station, Loss-of-Coolant Accident Analyses, Conformance with 10 CFR 50 Appendix K, June 1975." This filing is in response to the following letters from you; December 27, 1974 Order for Modification of License, April 24, 1975 Request for Analyses Including Criteria on Manually Controlled Electrically Operated Valves and June 18, 1975 Identification of Required Information for ECCS Analyses.

On the receipt of the December 27, 1974 Order we immediately made arrangements with the General Electric Company to perform the required analyses. We also requested them to increase the scope of that project on receipt of each of the subsequent letters identified above. As it became apparent that General Electric could not meet our initial request for the analyses by June 1, 1975, (to allow sufficient time to review the material and prepare Technical Specifications by July 9, 1975) we filed a request for extension on June 18, 1975. The July 3, 1975 letter from K. R. Goller to L. O. Mayer in effect denied this request and asked for the analyses prior to licensee review. Contrary to a statement in that letter, we did not indicate that we had received the evaluation from our reactor vendor. Our request for an extension stated General Electric's intention to transmit the analyses by June 26, 1975. The attached evaluation was received on July 7, 1975 and due to the requirement for immediate submittal, it has not had even our most cursory review prior to reproduction. We have not had the opportunity to verify that the two letters increasing the scope of the analyses have been included. Discussions with General Electric indicate that the April 24, 1975 letter is compiled with in full, but that parts of the June 18, 1975 letter may not be addressed completely.

The attached analyses support MAPLHGR limits different from those currently in the Monticello Technical Specifications. These changes will be prepared and reviewed expeditiously in accordance with existing legal requirements concerning proposed Technical Specification Changes. The changes will basically consist of using Figures D-5A, B, C, D and E of the attachment to supercede Figure 3.5.1 of our existing Technical Specification and Figures 3.11.1-A, B and C of our pending License Amendment Request Dated : August 20, 1974.

NORTHERN STATES POWER COMPANY

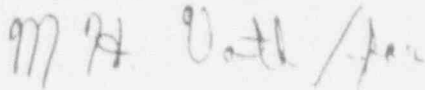
Mr. D. L. Ziemann

2

July 9, 1975

We have been informed by General Electric that Figures B-2, C-1, C-2, D-1, and D-2 of the attached report are considered proprietary for the following reasons. These figures contain information which is of the type which General Electric customarily maintains in confidence and withholds from public disclosure. The information has been handled and classified proprietary by General Electric in accordance with procedures and standards set forth in Attachment A to this letter, and we hereby make application for withholding from public disclosure this information in accordance with the provision of 10 CFR 2.790. The analytical methods and the data which would be compromised by public disclosure of these figures were developed at considerable expense to the General Electric Company and the release of the information would allow competitors to confirm similar designs without incurring similar expense. We have proprietary agreements with General Electric and have handled this information in accordance with those agreements and Attachment A. Non-proprietary versions of the proprietary figures will be submitted with our Technical Specification change request on this matter.

Yours very truly,



L. O. Mayer, PE  
Manager, Nuclear Support Services

LOM/deb

cc: J. G. Keppler (without proprietary figures)  
G. Charnoff  
MPCA  
Attn: J. W. Ferman (without proprietary figures)

## ATTACHMENT A

### GENERAL ELECTRIC PROPRIETARY CLASSIFICATION SYSTEM

General Electric proprietary documents contain information and are of the type which General Electric customarily maintains in confidence and withholds from public disclosure. To the best of General Electric's knowledge and belief, such documents have consistently been maintained in confidence and no public disclosure has been made of them.

Documents are classified proprietary pursuant to standard General Electric procedures pertaining to such classification. General Electric's definition of proprietary information is similar to that used in the courts to define "trade secrets". The definition encompasses "any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advance over competitors who do not know or use it". Additionally, a substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring the information. Some factors to be considered in determining whether given information is proprietary are: (1) the extent to which the information is known outside the business; (2) the extent to which it is known by employees and others involved at General Electric; (3) the extent of measures taken to guard the secrecy of the information; (4) the value of the information to General Electric and its competitors; (5) the amount of effort or money expended by General Electric in developing the information; and (6) the ease or difficulty with which the information could be properly acquired or duplicated by others. Additional information treated as confidential consists of business intelligence such as business plans, forecasts, financial data and similar information which, if obtained by competition, could compromise the interest of the Company.

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TO: Mr Ziemann		ORIG one signed	CC	OTHER	SENT NRC PDR <b>*XX</b>		SENT LOCAL PDR <b>*XX</b>
CLASS	UNCLASS	PROP INFO XXXXXXXXXX	INPUT	NO CYS REC'D 1	DOCKET NO: 50-263		
DESCRIPTION: <i>PROP MARKING CANCELLED PER 5-18-77 GE LTR</i> Ltr requesting withholding pursuant to 10 CFR 2.790.....trans the following:  * DENOTES WITHOUT PROP MATERIAL				ENCLOSURES:  Reanalysis of ECCS Acceptance Criteria.....  (40 cys encl rec'd)			
PLANT NAME: Monticello				ACKNOWLEDGE DO NOT REMOVE			

FOR ACTION/INFORMATION 7-15-75 ehf

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