



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East  
Welch, Minnesota 55089

October 17, 1996

10 CFR Part 50  
Section 50.90

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-60**

**Supplemental Information Related to Elevated F\* Steam Generator**  
**Tube Repair Criteria License Amendment Request**

In our September 24, 1996 License Amendment Request, which proposed the incorporation of Elevated F\* Steam Generator Repair Criteria into the Prairie Island Technical Specifications, we committed to submit a revision to Combustion Engineering Report CEN-620-P which would address rerolling of tubes in the upper region of the steam generator tubesheets. In response to that commitment, a proprietary version of Combustion Engineering Report CEN-620-P, Revision 02-P is provided as Attachment 1 to this submittal. A non-proprietary version of the report is under preparation, and will be submitted when it is received from Combustion Engineering.

As the attached revision to Combustion Engineering Report CEN-620-P contains information proprietary to Combustion Engineering, Inc., it is supported by an affidavit (Attachment 2) signed by Combustion Engineering, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in Paragraph (b)(4) of 10 CFR Part 2, Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Combustion Engineering be withheld from public disclosure in accordance with 10 CFR Part 2, Section 2.790 of the Commission's regulations.

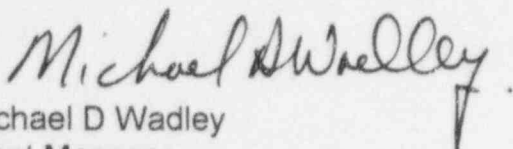
**ATTACHMENT CONTAINS PROPRIETARY INFORMATION TO BE**  
**WITHHELD FROM PUBLIC DISCLOSURE IN ACCORDANCE**  
**WITH 10 CFR PART 2, SECTION 2.790**

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Please contact Gene Eckholt (612-388-1121) if you have any questions related to the attached information.



Michael D Wadley  
Plant Manager  
Prairie Island Nuclear Generating Plant

c: Regional Administrator-III, NRC  
NRR Project Manager, NRC  
Senior Resident Inspector, NRC  
State of Minnesota, Attn: Kris Sanda (w/o proprietary attachment)  
J E Silberg (w/o proprietary attachment)

Attachments:

1. Combustion Engineering Report, CEN-620-P, Revision 02-P, "Series 44 & 51 Design Steam Generator Tube Repair Using a Tube Re-Rolling Technique", October 1996 (Proprietary)
2. Combustion Engineering Affidavit

**ATTACHMENT 2**

**Combustion Engineering Affidavit**

**AFFIDAVIT PURSUANT**

**TO 10 CFR 2.790**

I, Ian C. Rickard, depose and say that I am the Director, Operations 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 application of Northern States Power and in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations.

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

CEN-620-P, Rev. 02-P, "Series 44 & 51 Design Steam Generator Tube Repair Using a Tube Re-Rolling Technique," October 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 the

details concerning the design and development of a tube repair technique involving the re-roll process.

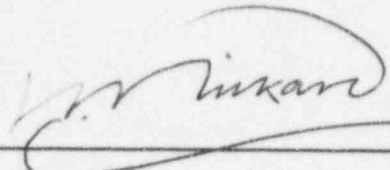
2. The information consists of test data or other similar data concerning a process, method or component, the application of which results in substantial competitive advantage to Combustion Engineering.
3. The information is of a type customarily held in confidence by Combustion Engineering and not customarily 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.
4. 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. A similar product is manufactured and sold by major pressurized water reactor competitors of Combustion Engineering.
  - b. Development of this information by Combustion Engineering required tens of thousands 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 the analyses and testing performed to verify that re-rolling tubes is an acceptable repair technique.
- d. The information consists of the design and development of a tube repair technique involving the re-roll process, 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.

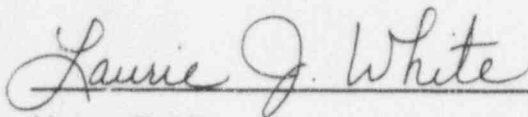


Ian C. Rickard

Director, Operations Licensing

Sworn to before me

this 10<sup>th</sup> day of October, 1996



Notary Public

My commission expires: 8/31/99