December 6, 2001

Mr. Mano Nazar
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE APPLICATION FOR CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.5 (TAC NOS. MB0695 AND MB0696)

Dear Mr. Nazar:

By application dated December 11, 2000, as supplemented March 6, June 5, July 3, August 13, and November 12, 2001, Nuclear Management Company, LLC, submitted a request to convert the current Technical Specifications (TSs) for the Prairie Island Nuclear Generating Plant, Units 1 and 2, to improved technical specifications (ITS).

Enclosed is the Nuclear Regulatory Commission (NRC) staff's request for additional information (RAI) on Section 3.5, "Emergency Core Cooling Systems," of the subject ITS submittal. The contents of the enclosed RAI have been previously forwarded to Mr. Dale Vincent of your staff to facilitate any questions or clarifications on the RAI. Subsequent dialogues have clarified the staff's understanding on a number of items, and thus requires no further information, as noted in the enclosure. For the rest of the items in the enclosure, please respond within 60 days from the date of this letter.

Please let me know if you have any questions regarding this RAI.

Sincerely,

/RA/

Tae Kim, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Request for Additional Information

cc w/encl: See next page

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Units 1 and 2

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PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
REQUEST FOR ADDITIONAL INFORMATION
SECTION 3.5 - EMERGENCY CORE COOLING SYSTEMS

1. Not used

2. ITS 3.5.1 Action C

ITS 3.5.1 Action C requires the unit to be in MODE 3 in 6 hours and reduce RCS pressure to less than 1000 psig in 12 hours if the Required Action and Completion Time of Conditions A or B not met. The CTS mark up does not include ITS 3.5.1 Action C. No JFD was provided for adding ITS 3.5.1 Action C.

Comment: Mark up the CTS and provide the associated JFD for ITS 3.5.1 Action C. Justification of proposed completion time is also required.

3. ITS 3.5.1 Action D

ITS 3.5.1 Action D requires immediate entrance into LCO 3.0.3 is two accumulators are inoperable. The CTS mark up does not include ITS 3.5.1 Action D. No JFD was provided for adding ITS 3.5.1 Action D.

Comment: Mark up the CTS and provide the associated JFD for ITS 3.5.1 Action D.

4. ITS SR 3.5.1.1
CL3.5-32
CTS 3.3.A.1.b
ITS SR 3.5.1.1 BASES
ITS LCO BASES
CL3.5-84

ITS SR 3.5.1.1 proposes to add the words “motor operated” to the surveillance requirement. The propose change is not in the CTS and is generic in nature. The proposed change should be proposed through the TSTF process.

Comment: Maintain the STS SR 3.5.1.1 wording or provide plant-specific justification for the proposed change.

5. ITS 3.5.2 Note

ITS 3.5.2 Note allows both safety injection pump flow paths to be isolated for up to 2 hours to perform pressure isolation valve testing per SR 3.4.15.1. The CTS mark up does not include ITS 3.5.2 Note. No JFD was provided for adding ITS 3.5.2 Note.

Comment: Mark up the CTS and provide the associated JFD for ITS 3.5.2 Note.

ENCLOSURE

6. ITS 3.5.2 Action A
CTS 3.3.A.2.f
L3.5-17
TA3.5-40

L3.5-17 revises CTS 3.3.A.2.f with the addition of the words “at least 100% ECCS flow equivalent to a single OPERABLE ECCS train is available.” This revision was not included in ITS 3.5.2 Action A. TA3.5-40 states that the proposed changes to ITS 3.5.2 Action A are based on TSTF 325 which does not include the AND statement. It is not clear as to what is being revised.

Comment: Correct the CTS or ITS markups and associated JFDs to match the actual changes that are being made.

7. ITS 3.5.2 Action B
CTS 3.3.A.2
L3.5-13

The marked up CTS 3.3.A.2 states that during MODES 1, 2, and 3, STARTUP OPERATION is discontinued until OPERABILITY is restored. If OPERABILITY is not restored within the time specified, be in at least MODE 3 within the next 6 hours and MODE 4 within 12 hours. The marked up CTS 3.3.A.2 is associated with LCO 3.5.2 (Action B - although not stated this way on the mark up). CTS 3.3.A.2 is modified by JFD L3.5-13. L3.5-13 refers to a new specification 3.5.3 and describes placing the plant in MODE 4 within an additional 6 hours in leiu of 30 hours which is a more restrictive change. It is not clear what is being revised in the CTS and how it is applicable to the ITS and whether the change is more or less restrictive.

Comment: Correct L3.5-13 to describe the CTS change. Add an M DOC if necessary to describe a more restrictive change. Provide clarification on the proposed changes to CTS 3.3.A.2.

8. ITS 3.5.2 Action C
TA3.5-40

ITS 3.5.2 Action C is not in the CTS. TA3.5-40 states that it incorporates the changes made by TSTF-325 Rev. 0. The marked up CTS does not show that this change is being incorporated.

Comment: Revise the CTS mark up to show the incorporation of TSTF-325.

9. ITS SR 3.5.2.1
CTS 3.3.A.1.g(1)
CTS 3.3.A.1.g(2)
CL3.5-42

CTS 3.3.A.1.g(1) and (2) list safety injection valves 8801A, 8801B, 8806A, 8816A, and 8816B. In ITS SR 3.5.2.1, the valve designations are not the same as they are in the CTS. CL3.5-42

states that the PI designated valve numbers for each unit are provided for the ease of use. This change is confusing since it not clear how the valves are labeled in the control room and whether this change would confuse operators.

Comment: Provide further explanation/justification for changing the valve numbers in the CTS to the ITS.

10. ITS SR 3.5.2.3
CTS 3.3.A.1.g(1)
CTS 3.3.A.1.g(2)
X3.5-43
CL3.5-41

ITS SR 3.5.2.3 requires the verification that power to the valve operator has been removed for each valve listed in ITS SR 3.5.2.1 every 31 days. X3.5-43 states that this new SR is in lieu of the STS SR 3.5.2.1. STS SR 3.5.2.1 requires the verification that power is removed from the valve operator every 12 hours. CTS 3.3.A.1.g(1) and (2) requires that the motor control center supply breakers are physically locked in the off position. Since verifying that power to the valve operator has been removed for each valve listed in ITS SR 3.5.2.1 is a new requirement, a plant specific justification is required for the 31 day frequency.

Comment: Provide plant specific justification for the 31 day surveillance frequency.

11. ITS SR 3.5.2.6
CTS 4.5.A.1
A3.5-302

A3.5-302 states that CTS 4.5.A.1 title has been changed to ECCS. Although the CTS mark up shows this change, the change is not identified with the appropriate JFD.

Comment: The CTS mark up should identify JFD A3.5-302 for 4.5.A.1. Provide a copy of the revised CTS mark up.

12. ITS SR 3.5.2.7
ITS SR 3.5.2.8
CTS 4.5.B.3.g.3
X3.5-46
ITS SR 3.5.2.7 BASES
ITS SR 3.5.2.8 BASES

X3.5-46 is the JFD for ITS SR 3.5.2.7 and ITS SR 3.5.2.8. X3.5-46 states that this is either a new SR for Prairie Island and therefore the SR Frequency can be set to 24 months or this SR in CTS was on an 18 month cycle and the 24 month cycle has been justified in a NSHD. This is confusing. Two separate JFDs should be provided since ITS SR 3.5.2.7 is in the CTS and ITS SR 3.5.2.8 is a new SR.

Comment: Provide the appropriate JFD for each SR interval.

13. ITS 3.5.3 APPLICABILITY
ITS 3.5.3 APPLICABILITY BASES
CTS 3.3.A.4
CL3.5-48

CL3.5-48 states that both SI pumps have to be made incapable of automatically injecting into the RCS when any RCS cold leg temperature drops below the SI pump disable temperature specified in the COLR. CTS 3.3.A.4 states that no SI pumps shall be capable of injecting into the RCS whenever RCS temperature is less then the temperature specified in the PTLR for disabling both SI pumps. ITS 3.5.3 APPLICABILITY is MODE 4 when both RCS cold leg temperatures are > SI pump disable temperature specified in the PTLR.

Comment: CL3.5-48 should be consistent with CTS 3.3.A.4 and ITS 3.5.3 Applicability (and BASES).

14. ITS 3.5.3 Action A
L3.5-09

ITS 3.5.3 Action A is a new condition, required action and completion time. L3.5-09 does not discuss the new Action A. Since ITS 3.5.3 Action A is not in the CTS, a JFD should be provided which discusses the appropriateness of the new Action at PI.

Comment: Provide a JFD for adopting ITS 3.5.3 Action A.

15. ITS 3.5.3 Action B
L3.5-09
CL3.5-49

ITS 3.5.3 Action B is a new condition, required action and completion time. L3.5-09 and CL3.5-49 do not discuss the new Action B. Since ITS 3.5.3 Action B is not in the CTS, a JFD should be provided which discusses the appropriateness of the new Action at PI.

Comment: Provide a JFD for adopting ITS 3.5.3 Action B

16. ITS 3.5.3 Action C
L3.5-09

ITS 3.5.3 Action C is a new condition, required action and completion time. L3.5-09 does not discuss the new Action C. Since ITS 3.5.3 Action C is not in the CTS, a JFD should be provided which discusses the appropriateness of the new Action at PI.

Comment: Provide a JFD for adopting ITS 3.5.3 Action C.

17. ITS SR 3.5.3.1
M3.5-10

The CTS markup describes a new SR which invokes SRs 3.5.2.1, 3.5.2.3, 3.5.2.4, 3.5.2.7, and 3.5.2.8 when operating in MODE 4 with the RCS temperature above the SI pump disable temperature. The new SR was proposed for consistency to NUREG-1431. However, STS SR 3.5.3.1 is applicable for all of MODE 4, not just above a certain temperature. Plant specific justification for the difference was not provided.

Comment: Provide plant specific justification as to why it is acceptable not to perform the proposed SR below the SI disable temperature while in MODE 4.

18. ITS 3.5.4 Action A
CL3.5-51
STS SR 3.5.4.1
ITS 3.5.4 BACKGROUND BASES
ITS 3.5.4 APPLICABLE SAFETY ANALYSES BASES
ITS 3.5.4 LCO BASES

STS 3.5.4 Action A states that with the RWST boron concentration not within limits or RWST borated water temperature not within limits, restore RWST to OPERABLE status within 8 hours. STS SR 3.5.4.1 requires that the RWST water temperature is between [35°F] and [100°F] every 24 hours. CL3.5-51 states that the RWST is in the Auxiliary Building and is not subject to the temperature extremes which would require an action statement and surveillance requirements. While the Auxiliary Building may provide sufficient protection from the elements outside, it is not clear that the air temperature is maintained via air condition and/or heating inside the Auxiliary Building.

Comment: Provide additional information which supports not adopting the OR statement of STS 3.5.4 Action A.

19. ITS 3.5.4 Action C

ITS 3.5.4 Action C requires the unit to be in MODE 3 in 6 hours and MODE 5 in 36 hours if the Required Action and associated Completion Time not met. The CTS mark up does not include ITS 3.5.4 Action C. No JFD was provided for adding ITS 3.5.4 Action C.

Comment: Mark up the CTS and provide the associated JFD for ITS 3.5.4 Action C.

20. ITS 3.5.4 Action C

ITS 3.5.4 Action C requires the unit to be in MODE 3 in 6 hours and MODE 5 in 36 hours if the Required Action and associated Completion Time not met. Since ITS 3.5.4 Action B was changed to meet the requirements of CTS 3.3.A.1.a, ITS 3.4.5 Action C needs to be modified to address the Required Action and associated Completion Time of Conditions A or B not met.

Comment: Revise ITS 3.5.4 Action C to address the Required Action and associated Completion Time of Conditions A or B not being met.

21. ITS SR 3.5.4.1
CTS 3.3.A.1.a
CL3.5-53
M3.5-05

ITS SR 3.5.4.1 requires the verification of the RWST borated water volume every 7 days. M3.5-05 and CL3.5-53 discuss the new SR requirement but do not justify the 7 day frequency as it applies to PI.

Comment: Provide justification for the 7 day surveillance frequency.

22. ITS 3.5.1 Bases Background
PA3.5-63

PA3.5-63 states that the description of the blowdown phase events has been removed from the refill phase and included in the blowdown discussion. As part of this relocation, the phrase "the core is essentially in adiabatic heatup," was deleted. No JFD was provided for this deletion.

Comment: Provide a plant specific JFD for the deleted phrase or revise the ITS 3.5.1 Bases Background to include the phrase.

23. ITS 3.5.1 Bases Background
CL3.5-66

The ITS 3.5.1 Bases Background mark up shows the addition of the following: "(Unit 1 - MV 32071 and MV 32072, Unit 2 - MV 32174 and MV 32175) ... maintained open with AC power removed under administrative control when RCS pressure is > 2000 psig." CL3.5-66 states that specific details from PI CTS have been relocated to this Bases Background. CL3.5-66 was not specific as to where in the CTS the above words came from. The above words could not be located in the marked up CTS for section 3.5.

Comment: Provide specific details as to which CTS is being relocated to the ITS Bases 3.5.1 and provide the CTS mark up and associated JFD for the relocation.

24. ITS 3.5.1 Bases Applicable Safety Analyses
CL3.5-71

The ITS 3.5.1 Bases Applicable Safety Analyses mark up proposed to delete the following sentence: "The delay time is conservatively set with an additional 2 seconds to account for SI signal generation." CL3.5-71 states that the discussion of ECCS initiation delay has been generalized so these numbers will not require a Bases change. This proposed change is generic and applicable to other Westinghouse PWRs.

Comment: Provide plant specific justification for the proposed change or maintain the STS Bases.

25. ITS 3.5.1 Bases Applicable Safety Analyses
ITS 3.5.2 Bases Applicable Safety Analyses
CL3.5-73

ITS 3.5.1 and 3.5.2 Bases Applicable Safety Analyses mark up proposed to change the wording to describe the acceptance criteria established for the ECCS by 10CFR50.46. CL3.5-73 states that the discussion of the 10CFR50.46 ECCS performance criteria has been revised to be the same as the PI USAR presentation. However, the revised presentation of ECCS performance criteria in ITS 3.5.1 and 3.5.2 Bases does not match the discussion in PI USAR Section 6 Rev. 21 page 6.2-2. In fact, the proposed deleted description in ITS 3.5.1 and 3.5.2 Bases is more similar to the description provided in the PI USAR than the proposed ITS 3.5.1 and 3.5.2 Bases wording.

Comment: The STS 3.5.1 and 3.5.2 Bases should be retained since it is almost identical to the wording presented in the PI USAR Section 6 Rev. 21 page 6.2-2.

26. ITS 3.5.1 Bases Applicable Safety Analyses
ITS 3.5.2 Bases Applicable Safety Analyses
ITS 3.5.3 Bases Applicable Safety Analyses
ITS 3.5.4 Bases Applicable Safety Analyses

ITS 3.5.1, 3.5.2, 3.5.3, and 3.5.4 Bases Applicable Safety Analyses mark up proposed to replace the phrase “the NRC Policy Statement” with “10 CFR 50.36(c)(2)(ii).” No JFD was provided for this change.

Comment: Provide JFD for the proposed change.

27. ITS SR 3.5.1.1 BASES
CL3.5-84
LR3.5-21
CTS 4.5.A.1.a and b

ITS SR 3.5.1.1 BASES proposes to add the phrase “use of control board indication (position monitor lights and alarms) for valve position is an acceptable verification” to the BASES. CL3.5-84 states that it is explicitly allowed to use control board indication for valve position verification. It is not clear where in the CTS this explicit allowance is stated. CTS 4.5.A.1.a and b describe acceptable ECCS system tests that are performed during refueling shutdown not every 12 hours as specified in ITS SR 3.5.1.1.

Comment: Provide further justification for the addition of the phrase described above in the ITS SR 3.5.1.1 BASES.

28. ITS SR 3.5.1.2 and 3.5.1.3 BASES
PA3.5–86

ITS SR 3.5.1.2 and 3.5.1.3 BASES proposes to add the phrase “Main control board instrumentation and alarms are available for verification of these accumulator parameters. PA3.5-86 does not provide sufficient justification for this addition.

Comment: Provide further plant specific justification for the addition of the phrase described above in the ITS SR 3.5.1.2 and 3.5.1.3 BASES.

29. ITS 3.5.2 Background BASES

ITS 3.5.2 Background BASES (a.) is modified with the word “with.” This proposed change appears to change the meaning of the sentence. No JFD was provided for this change.

Comment: Provide a plant specific JFD for the proposed change.

30. ITS 3.5.2 Background BASES
ITS 3.5.2 LCO BASES
ITS 3.5.3 LCO BASES
CL3.5-88

ITS 3.5.2 Background states that during the injection phase, water from the RWST is injected into the RCS through the cold legs and the reactor vessel upper plenum. CL3.5-88 states that injection may be into the RCS cold legs or the reactor vessel upper plenum. CL3.5-88 is not consistent with the discussion in the BASES (Specifically page B 3.5.2-1). This comment also applies the ITS 3.5.2 and 3.5.3 LCO BASES pages 3.5.2-7 and 3.5.3-2.

Comment: Clarify whether the current licensing basis allows injection into the RCS cold legs and reactor vessel upper plenum (implying injection at both places at the same time), or whether the CLB allows injection into the RCS cold legs or reactor vessel upper plenum.

31. ITS 3.5.2 Background BASES
PA3.5-101

PA3.5-101 proposes to delete the word “negative” from the STS BASES since it is redundant in the sentence.

Comment: Maintain the STS Bases wording or provide a plant specific justification for deleting “negative” from the ITS 3.5.2 BASES.

32. ITS 3.5.2 Background BASES

The second to the last paragraph of ITS 3.5.2 Background BASES (page B 3.5.2-4) proposes changes which are not consistent with the STS and no JFD was provided.

Comment: Provide JFD for the proposed wording changes.

33. ITS 3.5.2 Applicability BASES
CL3.5-88

ITS 3.5.2 Applicability BASES discusses that the SI pump performance requirements are based on a small LOCA "and meet required parameters for mitigation of a secondary side loss of fluid accident." CL3.5-88 does not discuss the proposed words in quotes above. Additionally, a description or discussion of a secondary side loss of fluid accident could not be located in Section 6 or Section 14 of the PI USAR.

Comment: Provide justification and explanation for the proposed wording in the ITS 3.5.2 Applicability BASES.

34. ITS 3.5.2 Applicability BASES
PA3.5-111

PA3.5-111 proposes to delete the discussion of ECCS operability requirements below MODE 3. No plant specific justification was provided for the proposed change.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

35. ITS 3.5.2 Bases Note
CL3.5-37

Page B 3.5.2-9 of the marked up Bases shows the first paragraph as not being included in the Bases. The JFD for this change is CL3.5-37. CL3.5-37 does not exist in the JFDs.

Comment: Provide the correct JFD for the proposed change.

36. ITS 3.5.2 Applicability BASES
CL3.5-111

CL3.5-111 is listed as the JFD for proposed additions in the ITS 3.5.2 Applicability BASES. CL3.5-111 does not exist (should be PA3.5-111?). No plant specific justification was provided for the proposed wording changes.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

37. ITS 3.5.2 Action A.1 BASES

Paragraph two of ITS 3.5.2 Action A.1 BASES proposes to add "required" before supporting systems. No JFD was provided for this change.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

38. ITS 3.5.2 Action A.1 BASES
PA3.5-112

PA3.5-112 removes the sentence “Reference 6 describes situations in which one component, such as an RHR crossover valve, can disable both ECCS trains.” PA3.5-112 states that the operator does not need to know this information.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

39. ITS SR 3.5.2.1 BASES
CL3.5-113

ITS adds the phrase “use of control board indication for valve position is an acceptable verification. CL3.5-113 states that guidance is provided that control board indication is an acceptable means of performing these SRs. The basis for this guidance was not provided.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

40. ITS SR 3.5.2.1 BASES
CL3.5-114

CL3.5-114 states that CTS details on control of valves which could affect ECCS performance have been relocated to the BASES. These CTS details could not be located in the marked up copies of CTS provided with Section 3.5. Additionally, no justification was provided for the deletion of the STS wording.

Comment: Provide specific information as to which CTS details are being relocated to the ITS BASES and provide the appropriate marked up pages. Also provide a plant specific JFD for the deletion of the STS wording in the same area.

41. ITS SR 3.5.2.4 BASES

ITS SR 3.5.2.5 BASES replaces ‘only one’ with ‘a single.’ No JFD was provided for the change.

Comment: Maintain the STS wording or provide a plant specific justification for the proposed change.

42. ITS SR 3.5.2.7 BASES
CL3.5-122

CL3.5-122 states that the CTS Bases discussion replaces NUREG-1431 which does not apply to PI.

Comment: Provide specific information as to which CTS Bases are being relocated to the ITS BASES and provide the appropriate marked up pages.

43. ITS 3.5.3 Applicable Safety Analyses BASES
CL3.5-126

CL3.5-126 proposes to replace the ASA to state that there are no Applicable Safety Analyses which specify ECCS operability requirements in MODE 4 due to the stable conditions associated with operation in MODE 4. This is not acceptable. The STS should be maintained.

Comment: Maintain the STS 3.5.3 Applicable Safety Analyses BASES wording.

44. ITS 3.5.4 Applicable Safety Analyses BASES
CL3.5-134

CL3.5-134 proposed to delete the following from the ITS 3.5.4 Applicable Safety Analyses BASES: "For units with no BIT or reduced BIT boron requirements, the minimum boron concentration limit is an important assumption in ensuring the required shutdown capability. CL3.5-134 states that PI does not have a BIT. As such, the above phrase should be retained in the ITS since it describes units without a BIT.

Comment: Maintain the STS wording which discusses plants that do not have a BIT.

45. ITS 3.5.4 Applicable Safety Analyses BASES (Page B 3.5.4-4)
CL3.5-51

CL3.5-51 states that the PI RWST is located within the Auxiliary Building and is not subject to temperature extremes which would require an action statement and surveillance requirement. However, the proposed wording in the ITS 3.5.4 Applicable Safety Analyses BASES (page B 3.5.4-4) states that "temperatures above freezing in the RWST in combination with the maximum boron concentration ensure that the boron will remain soluble while in the RWST." The proposed wording in the BASES does not appear to be consistent with not having an Action Statement or surveillance requirement on RWST temperature.

Comment: PI should consider adopting the Action statement and surveillance requirement for the RWST temperature.

46. ITS 3.5.4 Applicable Safety Analyses BASES (Page B 3.5.4-5)
CL3.5-51

Page B 3.5.4-5 shows the deletion of the discussion of water temperature, either containment spray or RWST, assumed in ECCS analyses. As stated above, CL3.5-51 states that the RWST is not subject to extreme temperatures. CL3.5-51 does not provide sufficient justification for the deletion of the ECCS analyses discussion.

Comment: Maintain the STS words or provide a plant specific justification for the deletions described on page B 3.5.4-5.

47. ITS 3.5.4 Action A.1 BASES
ITS SR 3.5.4.1
CL3.5-132

STS 3.5.4 Action A.1 Bases states that with the RWST inoperable, neither the ECCS nor the containment spray system can perform its design function. ITS 3.5.4 Action A.1 Bases proposes to delete the discussion of containment spray. CL3.5-132 states that the containment spray is not operated in recirculation mode. Since the containment spray is aligned to the RWST during MODES 1, 2, 3, and 4 (and during injection following a LOCA), RWST is required to be operable. Therefore, if the RWST is not operable, then the containment spray cannot perform its function.

Comment: The STS wording should be maintained.