

October 18, 2001

Generic Letter 99-02

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

**Response to Generic Letter 99-02, "Laboratory
Testing of Nuclear-Grade Activated Charcoal"**

Reference: Letter dated December 3, 1999 from Joel P. Sorensen, Northern States Power Company to US Nuclear Regulatory Commission, "Response to Generic Letter 99-02, 'Laboratory Testing of Nuclear-Grade Activated Charcoal'"

Generic Letter 92-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal" requests that our charcoal filter testing be performed to the requirements of ASTM D3803-1989 or justify an alternative. We responded, by letter dated December 3, 1999, that we have been testing by both our Technical Specifications (TS) requirements and to ASTM D3803-1989. In that response we stated that we would submit a License Amendment Request (LAR) to revise the TS to require testing to ASTM D3803-1989 and that penetration (efficiency) acceptance criteria be determined from the accident analyses. We further stated that, ". . . we prefer to wait to submit an LAR because of ongoing evaluations which will change the filter penetration acceptance criteria." (See Reference)


However, the completion of the analytical work has taken longer than anticipated to complete. Rather than wait any further, we will submit requested TS revisions before completion of all aspects of the analyses. We may submit future requested TS revisions if the results of the analyses warrant relaxation of requirements. Prairie Island currently utilizes Custom Technical Specifications. An LAR proposing conversion to Improved Technical Specifications (ITS) was submitted to the NRC on December 11, 2000. We are due to respond to a Request for Additional Information (RAI) on the ITS submittal early in December 2001. We will include, with our response to the RAI, changes to the ITS requirements for filter testing in order to address the Generic Letter

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99-02 request for an LAR to incorporate the desired requirements for charcoal filter testing.

In the December 1999 letter, we committed to continue testing, using our current practices (i.e., to the requirements of current TS and ASTM D3803-1999), until a TS change has been approved, and to submit a License Amendment Request to change the TS after the dose analyses have been finalized. In today's letter, we are changing the commitment to submit the proposed TS revisions in December 2001.

Please contact Jack Leveille (651-388-1121, Ext. 4142) if you have any questions related to this letter.



Mano K. Nazar
Site Vice President
Prairie Island Nuclear Generating Plant

c: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg