



July 16, 2003

L-PI-03-062
10 CFR 50.90
GL 99-02

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DOCKETS 50-282 AND 50-306
LICENSE Nos. DPR-42 AND DPR-60

**SUPPLEMENT TO LICENSE AMENDMENT REQUEST (LAR) DATED
FEBRUARY 11, 2003, TECHNICAL SPECIFICATION 5.5.9, "VENTILATION FILTER
TESTING PROGRAM (VFTP)" ENHANCEMENTS**

By letter dated February 11, 2003, the Nuclear Management Company, LLC (NMC) submitted an LAR titled, "Technical Specification 5.5.9, ' Ventilation Filter Testing Program (VFTP)' Enhancements" which proposed changes to the Prairie Island Nuclear Generating Plant Operating License Additional Conditions and to the VFTP.

NMC, in a phone call with the Nuclear Regulatory Commission (NRC) Staff, indicated that a supplement to the subject LAR would be submitted to withdraw revision of the allowable filtration penetration and system bypass. By this supplemental letter, NMC withdraws the proposed revision of the filtration penetration and system bypass limit from 0.05% to 0.5%. NMC continues to request all other VFTP and License Additional Condition changes proposed in the original submittal dated February 11, 2003. NMC submits this supplement in accordance with the provisions of 10 CFR 50.90.

The NRC noted in the phone call that the parenthetical phrase, "for DOP, particles having a mean diameter of 0.7 microns" was deleted from TS paragraph 5.5.9.b. Current TS include this phrase in both TS paragraphs 5.5.9.a and 5.5.9.b. This phrase is appropriate in TS paragraph 5.5.9.a because this paragraph addresses DOP testing requirements. TS paragraph 5.5.9.b does not address DOP testing and thus this parenthetical phrase is not appropriate and is proposed to be removed from TS paragraph 5.5.9.b.

The proposed changes, which NMC continues to request, are shown in the revised Exhibit B and Exhibit C, attached. The only difference from the original submittal is that 0.5% in paragraphs 5.5.9.a and 5.5.9.b has been restored to 0.05%.

A001

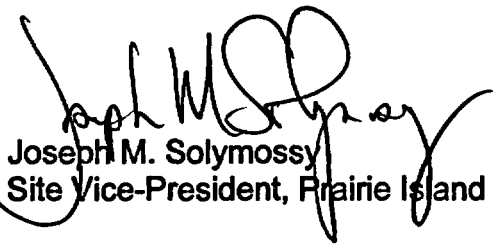
This supplement withdraws the Determination of No Significant Hazards Consideration presented in the original February 11, 2003 submittal related to revision of the allowable filtration penetration and system bypass. The supplemental information provided in this letter does not impact the conclusions of the Determination of No Significant Hazards Consideration and Environmental Assessment presented in the original February 11, 2003 submittal related to the other VFTP and License Additional Condition changes which NMC continues to request.

This letter contains no new commitments and no revisions to existing commitments.

In accordance with 10 CFR 50.91, NMC is notifying the State of Minnesota of this LAR supplement by transmitting a copy of this letter and attachments to the designated State Official.

Please address any comments or questions regarding this LAR supplement to Mr. Dale Vincent at 1-651-388-1121.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on July 16, 2003.



Joseph M. Solymosy
Site Vice-President, Prairie Island Nuclear Generating Plant

C Regional Administrator, USNRC, Region III
Project Manager, Prairie Island Nuclear Generating Plant, USNRC, NRR
NRC Resident Inspector – Prairie Island Nuclear Generating Plant
Glenn Wilson, State of Minnesota

Exhibits:

- B. Marked Up Pages
- C. Revised Pages

EXHIBIT B

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

**Letter L-PI-03-062, Supplement to
License Amendment Request dated February 11, 2003**

**Revised Marked Up Pages
(Additions shaded, deletions strikethrough)**

Appendix A, Technical Specification

Marked Up Pages

TS 5.0-23

TS 5.0-23 overflow designated as TS 5.0-24 for this markup

Appendix B, Additional Conditions

Marked Up Pages

**Facility Operating License No. DPR-42 (Unit 1) B-3
Facility Operating License No. DPR-60 (Unit 2) B-3**

5.5 Programs and Manuals (continued)

5.5.9 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of the Control Room Special Ventilation System **[CRSVS]**, Auxiliary Building Special Ventilation System **[ABSVS]**, Shield Building Ventilation System **[SBVS]**, and the Spent Fuel Pool Special and Inservice Purge Ventilation System **[SFPSIPVS]** each operating cycle (18 months for shared systems).

Demonstrate for the **[ABSVS]** Auxiliary Building Special Ventilation, **[SBVS]** Shield Building Ventilation, **[CRSVS]** Control Room Special Ventilation, and **[SFPSIPVS]** Spent Fuel Pool Special and Inservice Purge Ventilation **[Systems that:**

- a. An inplace DOP test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% (for DOP, particles having a mean diameter of 0.7 microns);
- b. A halogenated hydrocarbon test of the inplace charcoal adsorber shows a penetration and system bypass < 0.05% (for DOP, particles having a mean diameter of 0.7 microns);
- c. A laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than: 1) 15% penetration for **[ABSVS]** Auxiliary Special Ventilation System, 2) 15% penetration for **[SBVS]** Shield Building Ventilation System, 3) 7.5% penetration for the **[SFPSIPVS]** Spent Fuel Pool Special and Inservice Purge System, and 4) 2.5% penetration for the **[CRSVS]** Control Room Special Ventilation System when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and 95% relative humidity (RH); and
- d. The pressure drop across the combined HEPA filters and the charcoal adsorbers is less than 6 inches of water at the system flowrate $\pm 10\%$; and

e. The filter test face velocity shall be greater than or equal to the following values for each system: 1) 54 fpm for the CRSVS, 2) 72 fpm for the ABSVS, 3) 47 fpm for the SBVS, and 4) 47 fpm for the SFPSIPVS.

APPENDIX B

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-42

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
158	<p>The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 158 shall be as follows:</p> <p>For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.</p> <p>For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.</p>	October 31, 2002
158	<p>The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee-controlled documents, as described in Table LR, "Less Restrictive Changes – Relocated Details," and Table R, "Relocated Specifications," attached to the NRC staff's safety evaluation dated July 26, 2002. Those requirements shall be relocated to the appropriate documents no later than October 31, 2002.</p>	October 31, 2002
458	<p>The licensee will complete evaluation of the maximum test face velocity for the ventilation systems included in Technical Specifications (TS) Section 5.5.9 by February 28, 2003. The licensee will also submit a license amendment request for TS amendment by February 28, 2003, to specify the maximum test face velocity if the maximum actual face velocity is greater than 110 percent of 40 fpm based on the licensee's evaluation.</p>	February 28, 2003

APPENDIX B

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-60

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
149	<p>The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 149 shall be as follows:</p> <p>For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.</p> <p>For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.</p>	October 31, 2002
149	<p>The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee-controlled documents, as described in Table LR, "Less Restrictive Changes – Relocated Details," and Table R, "Relocated Specifications," attached to the NRC staff's safety evaluation dated July 26, 2002. Those requirements shall be relocated to the appropriate documents no later than October 31, 2002.</p>	October 31, 2002
149	<p>The licensee will complete evaluation of the maximum test face velocity for the ventilation systems included in Technical Specifications (TS) Section 5.5.9 by February 28, 2003. The licensee will also submit a license amendment request for TS amendment by February 28, 2003, to specify the maximum test face velocity if the maximum actual face velocity is greater than 110 percent of 40 fpm based on the licensee's evaluation.</p>	February 28, 2003

EXHIBIT C

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

**Letter L-PI-03-062, Supplement to
License Amendment Request dated February 11, 2003**

Revised Pages

Appendix A, Technical Specification

Revised Page

TS 5.0-23

Appendix B, Additional Conditions

Revised Pages

**Facility Operating License No. DPR-42 (Unit 1) B-3
Facility Operating License No. DPR-60 (Unit 2) B-3**

5.5 Programs and Manuals (continued)

5.5.9 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of the Control Room Special Ventilation System (CRSVS), Auxiliary Building Special Ventilation System (ABSVS), Shield Building Ventilation System (SBVS), and the Spent Fuel Pool Special and Inservice Purge Ventilation System (SFPSIPVS) each operating cycle (18 months for shared systems).

Demonstrate for the ABSVS, SBVS, CRSVS, and SFPSIPVS systems that:

- a. An inplace DOP test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $< 0.05\%$ (for DOP, particles having a mean diameter of 0.7 microns);
- b. A halogenated hydrocarbon test of the inplace charcoal adsorber shows a penetration and system bypass $< 0.05\%$;
- c. A laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than: 1) 15% penetration for ABSVS, 2) 15% penetration for SBVS, 3) 7.5% penetration for the SFPSIPVS, and 4) 2.5% penetration for the CRSVS when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and 95% relative humidity (RH);
- d. The pressure drop across the combined HEPA filters and the charcoal adsorbers is less than 6 inches of water at the system flowrate $\pm 10\%$; and
- e. The filter test face velocity shall be greater than or equal to the following values for each system: 1) 54 fpm for the CRSVS, 2) 72 fpm for the ABSVS, 3) 47 fpm for the SBVS, and 4) 47 fpm for the SFPSIPVS.

APPENDIX B

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-42

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
1758	<p>The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 158 shall be as follows:</p> <p>For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.</p> <p>For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.</p>	October 31, 2002
158	<p>The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee-controlled documents, as described in Table LR, "Less Restrictive Changes – Relocated Details," and Table R, "Relocated Specifications," attached to the NRC staff's safety evaluation dated July 26, 2002. Those requirements shall be relocated to the appropriate documents no later than October 31, 2002.</p>	October 31, 2002

APPENDIX B

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. DPR-60

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
149	<p>The schedule for performing Surveillance Requirements (SRs) that are new or revised in Amendment No. 149 shall be as follows:</p> <p>For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval, which begins on the date of implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.</p> <p>For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.</p> <p>For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.</p>	October 31, 2002
149	<p>The licensee is authorized to relocate certain Technical Specification requirements previously included in Appendix A to licensee-controlled documents, as described in Table LR, "Less Restrictive Changes – Relocated Details," and Table R, "Relocated Specifications," attached to the NRC staff's safety evaluation dated July 26, 2002. Those requirements shall be relocated to the appropriate documents no later than October 31, 2002.</p>	October 31, 2002