

NRR-PMDAPEm Resource

From: Beltz, Terry
Sent: Thursday, April 16, 2015 7:21 AM
To: Gunderson, Lynne
Cc: Eckholt, Gene F. (Eugene.Eckholt@xenuclear.com); Murphy, Martin C.; Vincent, Dale M.; Pelton, David; Anderson, Joseph; Hoffman, Raymond; Norris, Michael
Subject: Prairie Island Nuclear Generating Plant, Units 1 and 2 - Supplemental RAIs (Draft) re: License Amendment to Revise ERO Staff Augmentation Times (TAC Nos. MF3280 and MF3281)
Attachments: Prairie Island Units 1 and 2 - Supplemental Requests for Additional Information (DRAFT) - LAR to Revise Staff Augmentation Times for ERO (TAC Nos. MF32.docx

Dear Ms. Gunderson:

By letter dated December 20, 2013, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (NSPM, the licensee), submitted a license amendment request for Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2. NSPM submitted a supplemental letter dated October 15, 2014, in response to U.S. Nuclear Regulatory Commission (NRC) staff requests for additional information (RAIs). The proposed amendment would revise the PINGP Emergency Plan to increase staff augmentation response times for certain Emergency Response Organization positions from 30 and 60 minutes to 90 minutes.

The NRC staff has reviewed the aforementioned information provided by NSPM and determined that additional information is needed to complete its review. An e-mail was provided to NSPM on March 20, 2015, transmitting draft supplemental requests for additional information (RAIs). The draft supplemental RAIs were discussed in a teleconference between NSPM and the NRC staff on May 7, 2015. As a result of the teleconference, the draft supplemental RAIs were modified and are being provided as an attachment to this e-mail.

You may accept the draft supplemental RAIs as formal requests for additional information and provide a response by May 29, 2015. Alternatively, you may request to discuss the contents of the draft supplemental RAIs with the NRC staff in a conference call, including any change to the proposed response date.

Please don't hesitate to contact me if you have any additional questions or concerns.

Sincerely,

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Subject: Prairie Island Nuclear Generating Plant, Units 1 and 2 - Supplemental RAIs
(Draft) re: License Amendment to Revise ERO Staff Augmentation Times (TAC Nos. MF3280 and MF3281)

Sent Date: 4/16/2015 7:20:49 AM

Received Date: 4/16/2015 7:20:00 AM

From: Beltz, Terry

Created By: Terry.Beltz@nrc.gov

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MESSAGE	2378	4/16/2015 7:20:00 AM
Prairie Island Units 1 and 2 - Supplemental Requests for Additional Information (DRAFT) - LAR to Revise Staff Augmentation Times for ERO (TAC Nos. MF32.docx		39674

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

SUPPLEMENTAL DRAFT REQUESTS FOR ADDITIONAL INFORMATION

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

LICENSE AMENDMENT REQUEST

TO REVISE STAFF AUGMENTATION TIMES IN THE EMERGENCY PLAN

DOCKET NOS. 50-282 AND 50-306

(TAC NOS. MF3280 AND MF3281)

By application dated December 20, 2013 (Reference 1), as supplemented by letter dated October 15, 2014 (Reference 2), Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (NSPM), requested an amendment to the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, Site Emergency Plan (PISEP). NSPM requested review and approval of a revision to the PISEP to increase staff augmentation times for certain emergency response organization (ERO) positions from 30 or 60 minutes to 90 minutes.

The following requests for additional information (RAIs) are necessary to facilitate the technical evaluation being conducted by the NRC staff in the Operating Reactor Licensing and Outreach Branch, Division of Preparedness and Response, in the Office of Nuclear Security and Incident Response. The draft RAIs are based upon information provided in the NSPM application dated December 20, 2013 (Reference 1), as supplemented by letter dated October 15, 2014 (Reference 2). Timely and accurate response to these draft RAIs is requested.

General Discussion

NUREG-0654/FEMA-REP-1 (Reference 3) provides guidance for on-shift staffing and timely augmentation. On-shift staffing is required to be evaluated by Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix E.IV.A.9. Generally, licensees used Nuclear Energy Institute (NEI) document 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," Revision 0 (Reference 4), and NRC Interim Staff Guidance (ISG) document NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants" (Reference 5), to perform these reviews. NSIR/DPR-ISG-01 provides a series of events that are to be used in the analysis to demonstrate that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan.

The guidance for timely augmentation of on-shift staffing continues to be Table B-1 of NUREG-0654/FEMA-REP-1 (Reference 3), which states under the planning basis that no single specific accident sequence should be isolated as the one for which to plan because each accident could have different consequences, both in nature and degree. Further, the range of possible selection for a planning basis is very large, starting with a zero point of requiring no planning at all because significant offsite radiological accident consequences are unlikely to occur, to planning for the worst possible accident, regardless of its extremely low likelihood.

Licensees may submit alternatives to this guidance for NRC staff review and approval; however, the staff must reach a reasonable assurance finding in accordance with 10 CFR

50.47(a)(1)(i), as well as meeting 10 CFR 50.47(b)(2) and the applicable requirements of Appendix E to 10 CFR Part 50.

By application dated December 20, 2013 (Reference 1), as supplemented by letter dated October 15, 2014 (Reference 2), NSPM stated “why” augmentation was not required for 90 minutes following event declaration for specific accident scenarios. However, as part of the response to the RAs listed below, the NRC staff requests NSPM to clearly explain “how” augmentation capability, as defined in Table B-1, is maintained.

Requests for Additional Information

1. Please explain how the functions of the 30- and 60-minute responders performing the Major Functional Area of Notification/Communication will be performed by the on-shift staff for 90 minutes following event classification.
2. Please explain how the functions of the 30- and 60-minute responders performing the Major Functional Area of Radiological Accident Assessment and Support of Operational Accident Analysis will be performed by the on-shift staff for 90 minutes from event classification for the following:
 - a) Emergency Operations Facility Director (60-minute responder)
 - b) Offsite Surveys (30- and 60-minute responders)
 - c) Onsite (out-of-plant) Surveys (60-minute responder)
 - d) In-plant Surveys (60-minute responder)
 - e) Chemistry/Radiochemistry (60-minute responder)
3. Please explain how the functions of the 30- and 60-minute responders performing the Major Functional Area of Plant System Engineering, Repair and Corrective Actions will be performed by the on-shift staff for 90 minutes from event classification for the following:
 - a) Core/Thermal Hydraulics Engineering Technical Support (30-minute responder)
 - b) Electrical Engineering Technical Support (60-minute responder)
 - c) Mechanical Engineering Technical Support (60-minute responder)
 - d) Mechanical Maintenance Repair and Corrective Actions (60-minute responder)
 - e) Radwaste Operator Repair and Corrective Actions (60-minute responder)
 - f) Electrical Maintenance Repair and Corrective Actions (30- and 60-minute responders)
 - g) Instrument and Control Technician Repair and Corrective Actions (30-minute responder)

4. Please explain how the functions of the 30- and 60-minute responders performing the Major Functional Area of Protective Actions (In-Plant) will be performed by the on-shift staff from 60 to 90 minutes after event classification.
 - a) Access Control (30- and 60-minute responders)
 - b) HP Coverage for repair, corrective actions, search and rescue, first-aid, and firefighting (30- and 60-minute responders)
 - c) Personnel monitoring (30- and 60-minute responders)
 - d) Dosimetry (30- and 60-minute responders)

REFERENCES

1. Letter from Kevin Davison, NSPM, to the U.S. NRC Document Control Desk (DCD), "License Amendment Request (LAR) to Revise Staff Augmentation Times in the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plan," dated December 20, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13358A405).
2. Letter from Scott Sharp, NSPM, to the U.S. NRC DCD, "Responses to Request for Additional Information (RAI) for License Amendment Request (LAR) to Revise Staff Augmentation Times in the Prairie Island Nuclear Generating Plant (PINGP) Site Emergency Plan (MF3280 and MF3281)," dated October 15, 2014 (ADAMS Accession No. ML14288A543).
3. NUREG-0654/FEMAREP-1, Revision 1, Supplement 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 30, 1980 (ADAMS Accession No. ML040420012).
4. NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," Revision 0, dated June 23, 2011 (ADAMS Accession No. ML111751698).
5. NRC Interim Staff Guidance document NSIR/DPR-ISG-01, "Emergency Planning for Nuclear Power Plants," dated November 20, 2011 (ADAMS Accession No. ML113010523).