

NRR-PMDAPEm Resource

From: Beltz, Terry
Sent: Thursday, June 11, 2015 10:03 AM
To: Carlson, Glenn A. (Glenn.Carlson@xenuclear.com)
Cc: Alley, David; Rezai, Ali
Subject: Prairie Island, Units 1 and 2 - 1-RR-4-9 and 2-RR-4-9 re: System Leakage Test of Safety Injection Accumulator Nitrogen Piping in Containment (TAC Nos. MF4795 and MF4796)

Dear Dr. Carlson:

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3), proposed alternatives to the requirements of 10 CFR 50.55a(g), may be used when authorized by the U.S. Nuclear Regulatory Commission (NRC) if the licensee demonstrates that (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

In the Subject request dated September 3, 2014 (ADAMS Accession Number ML14247A639), as supplemented by letter dated February 4, 2015 (ADAMS Accession Number ML15036A283), Northern States Power Company - Minnesota Corporation (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. The requests 1-RR-4-9 and 2-RR-4-9 pertain to the system leakage test of the safety injection accumulator nitrogen piping in containment.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(3)(i), the licensee proposed an alternative system leakage test for the SI accumulator nitrogen piping on the basis that the alternative provides an acceptable level of quality and safety.

While performing its evaluation of the Subject relief requests, the NRC staff has determined that it will be reviewing the requests under 10 CFR 50.55a(a)(3)(ii), in lieu of Section 50.55a(a)(3)(i).

Finally, please be mindful (and to be noted for future submittals) that the NRC staff will be including the following paragraph in its safety evaluation to avoid any confusion regarding the changing of section numbers in 10 CFR 50.55a:

The paragraph headings in 10 CFR 50.55a were changed by *Federal Register* notice dated November 5, 2014 (79 FR 65776), which became effective on December 5, 2014 (e.g., 10 CFR 50.55a(a)(3)(i) is now 50.55a(z)(1), and 50.55a(a)(3)(ii) is now 50.55a(z)(2)). See the cross reference tables, which are cited in the notice, at ADAMS Accession No. ML14015A191 and ADAMS Package Accession No. ML14211A050.

Please let me know if you have any specific questions or concerns regarding this matter. Thanks.

Sincerely,

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Hearing Identifier: NRR_PMDA
Email Number: 2241

Mail Envelope Properties (87B1F1BDFE5A554CA9DC5EAA75EB6D0D01DE28248381)

Subject: Prairie Island, Units 1 and 2 - 1-RR-4-9 and 2-RR-4-9 re: System Leakage Test of Safety Injection Accumulator Nitrogen Piping in Containment (TAC Nos. MF4795 and MF4796)
Sent Date: 6/11/2015 10:03:15 AM
Received Date: 6/11/2015 10:03:00 AM
From: Beltz, Terry

Created By: Terry.Beltz@nrc.gov

Recipients:

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Tracking Status: None

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Tracking Status: None

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Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	3061	6/11/2015 10:03:00 AM

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received: