

NRR-PMDAPEm Resource

From: Beltz, Terry
Sent: Friday, June 12, 2015 8:39 AM
To: Carlson, Glenn A.
Cc: Alley, David; Rezai, Ali
Subject: Prairie Island, Units 1 and 2 - 1-RR-5-6 and 2-RR-5-6 re: System Leakage Test of Safety Injection Accumulator Nitrogen Piping in Containment (TAC Nos. MF4841 and MF4842)

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 15, 2014 (ADAMS Accession Number ML14258A073), as supplemented by letter dated February 4, 2015 (ADAMS Accession Number ML15036A255), 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. Requests 1-RR-5-6 and 2-RR-5-6 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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