



Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089

MAR 31 2016

L-PI-16-029
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
Renewed Facility Operating License Nos. DPR-42 and DPR-60

Response to Requests for Additional Information -- License Amendment Request to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Revision 2, Using the Consolidated Line Item Improvement Process (CAC Nos. MF6449 and MF6450)

References:

1. NSPM letter, S. Sharp to NRC Document Control Desk, Application to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process, L-PI-15-030, dated June 29, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15187A259)
2. Technical Specification Task Force Traveler No. 523 (TSTF-523), "Generic Letter 2008-01, Managing Gas Accumulation," Revision 2 (ADAMS Accession No. ML13053A075). TSTF-523 Notice of Availability, 79 Fed. Reg. 2700 (January 15, 2014)
3. NRC email, T. Beltz to G. Carlson, Prairie Island Nuclear Generating Plant, Requests for Additional Information (Draft) re: License Amendment Request to Adopt TSTF-523, (CAC Nos. MF6449 and MF6450), dated October 27, 2015
4. NSPM letter, K. Davison to NRC Document Control Desk, License Amendment Request (LAR) to Revise Technical Specifications (TS) to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process - Response to Request for Additional Information, L-PI-15-105, dated December 30, 2015 (ADAMS Accession No. ML15364A466)
5. NSPM letter, K. Davison to NRC Document Control Desk, Supplement to License Amendment Request to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation", Revision 2, Using the Consolidated Line Item Improvement Process (CAC Nos. MF6449 and MF6450), L-PI-16-003, dated January 25, 2016 (ADAMS Accession No. ML16025A162)
6. NRC email, R. Kuntz to G. Carlson, Prairie Island Nuclear Generating Plant, Units 1 and 2, Request for Additional Information Related to License Amendment Request to Adopt TSTF-523, "GL 2008-01, Managing Gas Accumulation" (CAC Nos. MF6449 and MF6450), dated March 2, 2016 (ADAMS Accession No. ML16075A080)

7. NRC email, R. Kuntz to G. Carlson, dated 3/29/2015

By Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted to the U.S. Nuclear Regulatory Commission (NRC) a License Amendment Request (LAR) to revise the Technical Specifications for Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, to adopt TSTF-523 (Reference 2) using the Consolidated Line Item Improvement Process. By Reference 3, the NRC Staff provided a request for additional information (RAI) on the LAR. By Reference 4, NSPM responded to the staff RAIs and committed to submit a supplement to the LAR. By Reference 5, NSPM submitted the LAR supplement.

By Reference 6, the NRC Staff provided additional RAIs on the LAR. By this letter, NSPM responds to the staff RAIs SR3.5.2.5-2 and SR3.5.2.5-3 (Attachment 1). By agreement with the NRC Project Manager for PINGP (Reference 7), NSPM will respond to RAI SR3.5.2.5-1 by April 15, 2016.

NSPM submits this letter in accordance with 10 CFR 50.90. This letter does not change the conclusions of the No Significant Hazards Consideration determination nor the Environmental Evaluation in Reference 1.

NSPM requests the NRC issue the requested license amendment by June 30, 2016, with the amendment to be implemented within 90 days of issuance.

In accordance with 10 CFR 50.91, NSPM is providing a copy of this letter to the designated State of Minnesota official.

If there is any question or if additional information is needed, please contact Dr. Glenn A. Carlson, P.E., at 651-267-1755.

Summary of Commitments

This letter contains no new commitment and no revision to an existing commitment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **MAR 31 2016**



Scott Northard
Acting Site Vice President – Prairie Island Nuclear Generating Plant
Northern States Power Company – Minnesota

Attachment (1)

Document Control Desk

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cc: Administrator, Region III, NRC
Project Manager, PINGP, NRC
Resident Inspectors, PINGP, NRC
State of Minnesota

ATTACHMENT 1
Responses to NRC Requests for Additional Information

RAI SR3.5.2.5-2

Back-leakage from accumulators is not mentioned in the LAR. Is accumulator back-leakage of potential concern?

PINGP Response

Yes. Back-leakage is not addressed in the LAR since PINGP's approach to this issue will not change due to the LAR. Currently, PINGP addresses accumulator back-leakage under the PINGP Generic Letter (GL) 08-01 program in accordance with plant procedure H64, "Gas Accumulation Management Program," and periodic test procedures TP 1468, "Unit 1 GL-08-01 Inspections," and TP 2468, "Unit 2 GL-08-01 Inspections."

RAI SR3.5.2.5-3

What follow-up actions will be taken if a void is identified in the piping subject to SR 3.5.2.5?

PINGP Response

PINGP will continue monitoring the locations prior to initiating shutdown cooling during planned outages. If a void is found prior to initiating shutdown cooling, PINGP will evaluate past operability.

During startup, PINGP will verify the relative leakage rates of the check valves are maintained such that void formation during the cycle is mitigated. PINGP will validate the check valve leakage rates to ensure no leakage is present or the leakage rate of the first-off check valves (SI-9-1, SI-9-2, 2SI-9-1, and 2SI-9-2) is greater than the corresponding second-off check valves (SI-16-4, SI-16-5, 2SI-16-4, and 2SI-16-6) in accordance with surveillance procedures SP 1070, "Reactor Coolant System Integrity Test" (Unit 1), and SP 2070, "Reactor Coolant System Integrity Test" (Unit 2), prior to exiting MODE 3 during planned outages or operating procedures 1C1.2-M4, "Unit 1 Startup to MODE 4," and 2C1.2-M4, "Unit 2 Startup to MODE 4" prior to exiting MODE 4 during maintenance outages.

Reasonable assurance of safety is maintained for the system by verifying the conditions necessary for a void to form are not present per SP 1070, SP 2070, 1C1.2-M4 and 2C1.2-M4, by maintaining the as-left condition during the cycle, and by monitoring of the locations when accessible.