



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 28, 2016

Mr. Peter A. Gardner  
Site Vice President  
Monticello Nuclear Generating Plant  
Northern States Power Company –  
Minnesota  
2807 West County Road 75  
Monticello, MN 55362-9637

Mr. Scott D. Northard  
Site Vice President  
Prairie Island Nuclear Generating Plant  
Northern States Power Company –  
Minnesota  
1717 Wakonade Drive East  
Welch, MN 55089

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT AND PRAIRIE ISLAND  
NUCLEAR GENERATING PLANT, UNITS 1 AND 2 – REVIEW OF CHANGES TO  
THE NORTHERN STATES POWER COMPANY QUALITY ASSURANCE  
TOPICAL REPORT (CAC NOS. MF8418, MF8419, AND MF8420)

Dear Mr. Gardner and Mr. Northard:

The U.S. Nuclear Regulatory Commission (NRC) has completed its review of changes to the Northern States Power Company (NSPM) Quality Assurance Topical Report (QATR) in response to your application dated September 28, 2016. The NSPM QATR is associated with Renewed Facility Operating License Nos. DPR-22, DPR-42, and DPR-60 for the Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, Units 1 and 2, respectively, and Materials License No. SNM-2506 for the Prairie Island Independent Spent Fuel Storage Installation.

Specifically, the proposed changes include revisions related to the conduct of self-assessments and independent assessments. The first change removes requirements for the independent assessment function from the QATR, while retaining the existing NQA-1-1994 commitment for the independent audit function. The second change relocates and retains provisions for line organization self-assessments consistent with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, Criterion II, and NQA-1-1994, Basic Requirement 2. The changes, which are considered to be a reduction in commitment due to the change in description of Nuclear Oversight functions, were submitted for NRC review and approval in accordance with 10 CFR 50.54(a)(4).

The NRC staff has completed its review of your request and determined that the quality assurance (QA) program description adequately describes how the requirements of Appendix B to 10 CFR Part 50 will continue to be implemented. The staff finds that the proposed changes to the NSPM QATR continue to meet the 10 CFR Part 50 requirements for the quality assurance program and is acceptable.

P. Gardner, et al.

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If you have any questions, please contact Robert Kuntz at (301) 415-3733.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. J. Wrona', with a stylized flourish at the end.

David J. Wrona, Chief  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-263, 50-282, 50-306, and 72-010

Enclosure: Safety Evaluation

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE TOPICAL REPORT CHANGE

NORTHERN STATES POWER COMPANY - MINNESOTA

MONTICELLO NUCLEAR GENERATING PLANT

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

PRAIRIE ISLAND INDEPENDENT SPENT FUEL STORAGE INSTALLATION

DOCKET NOS. 50-263, 50-282, 50-306, AND 72-010

1.0 INTRODUCTION

By letter dated September 28, 2016 (Agencywide Documents Management System (ADAMS) Accession No. ML16272A178), Northern States Power Minnesota (NSPM, the licensee), doing business as Xcel Energy, submitted a change to revise the NSPM Quality Assurance Topical Report (QATR) associated with the Monticello Nuclear Generating Plant; Prairie Island Nuclear Generating Plant, Units 1 and 2; and the Prairie Island Independent Spent Fuel Storage Installation (ISFSI). The change was submitted for U.S. Nuclear Regulatory Commission (NRC) review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(4).

The QATR provides a top-level overview of the manner in which quality is to be achieved and presents NSPM's overall philosophy regarding quality assurance (QA), associated with the Monticello Nuclear Generating Plant; Prairie Island Nuclear Generating Plant, Units 1 and 2; and the Prairie Island ISFSI. The QATR is based on the applicable portions of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50.

2.0 REGULATORY EVALUATION

The NRC's regulatory requirements related to QA programs are set forth in Appendix B to 10 CFR Part 50; Section 50.34, "Content of applications; technical information"; and 10 CFR 50.54, "Conditions of licenses."

Appendix B to 10 CFR Part 50 establishes QA requirements for the design, manufacture, construction, and operation of structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. 10 CFR Part 50, Appendix B, XVIII, "Audits," requires, in part, a comprehensive system of planned and periodic audits to verify QA by trained personnel not having direct responsibilities in the areas being audited. 10 CFR Part 50, Appendix B, II, "Quality Assurance Program," requires, in part, that management of organizations participating in the QA program

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shall regularly review the status and adequacy of that part of the program which they are executing.

10 CFR 50.34(b)(6)(ii) requires, in part, that every applicant for an operating license include information that describes the managerial and administrative controls to be used to assure safe operation. 10 CFR Part 50, Appendix B, sets forth the requirements for such controls for nuclear power plants. The information shall include a discussion of how the applicable requirements of 10 CFR Part 50, Appendix B, will be satisfied.

10 CFR 50.54(a)(3) states, in part, that licensees may make a change to a previously accepted QA program description, included or referenced in the safety analysis report, without prior NRC approval provided the change does not reduce the commitments in the program description as accepted by the NRC. 10 CFR 50.54(a)(4) states, in part, that changes to QA program that do reduce commitments must be submitted to the NRC for review and approval.

### 3.0 EVALUATION

In its letter dated September 28, 2016, in accordance with the provisions of 10 CFR 50.54(a)(4), NSPM submitted a request for review and approval of QATR changes considered as reductions in commitment. Enclosure 1 of the September 28, 2016, letter included Revision 10 to the QATR.

In evaluating the adequacy of the NSPM QATR, the NRC staff used the guidance contained in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 17.3, "Quality Assurance Program Description," dated August 1990 (ADAMS Accession No. ML052350376). NUREG-0800, Section 17.3, provides acceptance criteria for a QA program description.

The changes in QATR, Revision 10, include the following:

1. Changes to remove requirements for independent assessments from the QATR.

This change removes the Independent Assessment function of the Nuclear Oversight organization while retaining the Independent Audit function in the QATR. Revision 8 of the QATR had clarified the separation of these two functions and had described NSPM's commitment to the American Society of Mechanical Engineers NQA-1-1994, "Quality Assurance Requirements for Nuclear Facilities." Basic Requirement 18 and Supplement 18S-1 are to continue meeting the audit function requirements. Also noted in NRC safety evaluation of QATR, Revision 8, dated February 20, 2015 (ADAMS Accession No. ML14358A039), the Independent Audit function will verify compliance with all aspects of the QA program and determine the program's effectiveness. Since the retained audit function continues to meet the applicable requirements in 10 CFR Part 50, Appendix B, XVIII, the NRC staff finds this change acceptable.

2. Changes to delete self-assessments section and relocate requirements.

This change relocates a section on self-assessments (i.e., performance assessments performed by the group responsible for the activity being assessed) which was previously created during the clarification and separation of audit and assessment functions in QATR, Revision 8. The newly relocated requirement is the responsibility of NSPM management to conduct regular self-assessments and assure effective implementation that meets the applicable requirement in 10 CFR Part 50, Appendix B, II. Therefore, the NRC staff finds this change acceptable.

4.0 CONCLUSION

The NRC staff used the acceptance criteria guidance of NUREG-0800, Section 17.3, as the basis for evaluating the acceptability of the change to the licensee's QATR in conformance with the applicable portions of Appendix B to 10 CFR Part 50. The QATR program description adequately describes how Appendix B will be implemented. The NRC staff concludes that the proposed Revision 10 to the NSPM QATR follows NRC guidance and conforms to the format of NUREG-0800, Section 17.3. The proposed change to the licensee's QA program continues to meet 10 CFR Part 50 requirements and is, therefore, acceptable.

Principal Contributor: Philip Natividad, NRO/DCIP

Date of issuance: November 28, 2016

If you have any questions, please contact Robert Kuntz at (301) 415-3733.

Sincerely,

**/RA/**

David J. Wrona, Chief  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-263, 50-282, 50-306, and 72-010

Enclosure: Safety Evaluation

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DATE	11/10/2016	11/15/2016	11/02/2016	11/28/2016

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