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# **Pre-Application Meeting License Amendment for TSTF-425**

## **Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program**

**Xcel Energy (XE)  
Prairie Island Nuclear Generating Plant**

02-20-2018

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# Agenda



- Background & Schedule
- Discuss
  - Variations from TSTF-425
  - Site-specific TS SR 3.0.2
  - Probabilistic Risk Assessment (PRA)
    - Fire Model
- Questions and Feedback

# Background & Schedule



- TSTF-425
  - Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Initiative 5b)
  - Licensee controlled program called the Surveillance Frequency Control Program (SFCP) and is in accordance with NEI 04-10
  - Planned submittal first quarter 2018
  - Requesting approval by April 2019
  - Implement prior to Fall 2019 Refueling Outage (RFO)

# Variations



- Variations for the application include:
  - Revised (clean) TS pages not included
  - TS Bases insert consistent with the April 14, 2010 NRC letter removing the frequency basis
  - Cross-reference list for TSTF-425 (NUREG-1431) markups to PINGP site specific TS SRs provided
  - Administrative changes
    - An expired one-time frequency extension is deleted
    - Two minor formatting changes

# PINGP's TS SR 3.0.2



- PINGP SR 3.0.2 contains a restriction not in NUREG-1431:
  - NUREG-1431 SR 3.0.2 permits a 25% extension of the interval specified in the Frequency
  - PINGP SR 3.0.2 also permits a 25% extension of the specified interval, except for Frequencies specified as 24 months
    - Not a variation to the TSTF
    - Applies to 50 TS SR
    - One exception - TS SR 3.8.1.8 amended in 2010 to allow the application of the 25% extension to its 24 month surveillance requirement

# PINGP's TS SR 3.0.2



- PINGP TS SR 3.0.2 does not affect application of TSTF-425 nor does it affect implementation of the SFCP
  - Site specific SR 3.0.2 is applied to the SFCP as described in TSTF-425
    - SFCP Administrative Controls maintained (TS 5.5.17)
    - Current Licensing Basis (CLB) maintained (TS SR 3.0.2)
  - No affect on TSTF-425
    - Model License Amendment Request (LAR) unchanged
    - Model No Significant Hazards Consideration determination unchanged
    - NRC Model Safety Evaluation (SE) unchanged
    - Not considered a variation to the TSTF

# PRA Technical Adequacy



- Internal Events including internal flooding
  - RG 1.200 peer reviewed with Appendix X to NEI 05-04 finding closure review complete
- Seismic
  - IPEEE Seismic Margins Analysis (SMA)
- Other External Hazards
  - PINGP IPEEE concluded other external hazards to be negligible contributors to overall plant risk
- Shutdown Events
  - Shutdown risk management program consistent with NUMARC 91-06

# PRA Technical Adequacy



- Fire
  - Fire PRA developed for NFPA-805
    - NFPA-805 LAR approved August 8, 2017
    - Fire PRA reflects future state of the as-built/as-operated plant following NFPA-805 modifications
      - Unit 1 - Fall 2020 RFO, Unit 2 - Fall 2019 RFO
    - Fire PRA is RG 1.200 peer reviewed with an Appendix X closure review
    - Fire PRA Open F&Os provided in the Technical Adequacy Section of the SFCP LAR
  - During transition, the SFCP evaluations use IPEEE FIVE results supplemented by sensitivities from Fire PRA in accordance with NEI 04-10
  - Following implementation of NFPA-805, evaluations use the Fire PRA in accordance with NEI 04-10



# PRA Technical Adequacy



- Conclusion
  - PINGP PRA models sufficiently robust and suitable for SFCP



# Questions and Feedback

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# Acronyms



- CLB - Current Licensing Basis
- F&O – Finding and Observations
- FIVE – Fire Induced Vulnerability Evaluation
- LAR – License Amendment Request
- IPEEE – Individual Plant Examination of External Events
- NEI – Nuclear Energy Institute
- NSHC – No Significant Hazards Determination
- NSPM – Northern States Power Minnesota
- PINGP – Prairie Island Nuclear Generating Plant
- PRA – Probabilistic Risk Assessment
- RFO – Refueling Outage
- SE – Safety Evaluation

# Acronyms



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- SFCP – Surveillance Frequency Control Program
  - SMA – Seismic Margins Analysis
  - TS – Technical Specification
  - TS SR – Technical Specification Surveillance Requirement
  - TSTF – Technical Specification Task Force
  - XE – Xcel Energy