

NRR-DMPSPeM Resource

From: Kuntz, Robert
Sent: Monday, January 7, 2019 2:00 PM
To: Gohdes, Peter D.
Cc: Scott, Sara
Subject: Prairie Island Nuclear Generating Plant - Audit Plan Related to the License Amendment Request to Implement 10 CFR 50.69
Attachments: Prairie Island 5069 LAR eportal audit plan.docx

Mr. Gohdes,

By application dated July 20, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML18204A393), Northern States Power Company (NSPM, the licensee) submitted a license amendment request (LAR) for Prairie Island Nuclear Generating Plant, Units 1 and 2 (PINGP). The licensee proposed to add a new license condition to the Renewed Facility Operating Licenses to allow the implementation of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.69, "Risk informed categorization and treatment of structures, systems and components for nuclear power reactors." The provisions of 10 CFR 50.69 allow adjustment of the scope of structures, systems, and components (SSCs) subject to special treatment requirements (e.g., quality assurance, testing, inspection, condition monitoring, assessment, and evaluation) based on a method of categorizing SSCs according to their safety significance.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff and contractors limited read-only access to the basis documents and other reference materials cited in the applications. The staff plans to initially conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit basis documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Documents identified as necessary for analysis of the application will be identified by the NRC staff. The licensee will be formally requested to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- the online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- the online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents; and
- conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the attachment. This is the initial list identified by the NRC staff. The staff may request additional documents during the review, which will be transmitted to you via email. This audit will potentially obviate the need for an onsite audit and potential requests for additional information. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as username and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that NSPM agrees to the terms and conditions set forth in the attached letter.

If you have any questions, please contact me.

Robert F. Kuntz, Sr. Project Manager
Plant Licensing Branch 3

Hearing Identifier: NRR_DMPS
Email Number: 738

Mail Envelope Properties (Robert.Kuntz@nrc.gov20190107135900)

Subject: Prairie Island Nuclear Generating Plant - Audit Plan Related to the License
Amendment Request to Implement 10 CFR 50.69
Sent Date: 1/7/2019 1:59:51 PM
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From: Kuntz, Robert

Created By: Robert.Kuntz@nrc.gov

Recipients:
"Scott, Sara" <Sara.Scott@xenuclear.com>
Tracking Status: None
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Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	3265	1/7/2019 1:59:00 PM
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Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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AUDIT PLAN

BACKGROUND

By application dated July 20, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML18204A393), Northern States Power Company (NSPM, the licensee) submitted a license amendment request (LAR) for Prairie Island Nuclear Generating Plant, Units 1 and 2 (PINGP). The licensee proposed to add a new license condition to the Renewed Facility Operating Licenses to allow the implementation of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors." The provisions of 10 CFR 50.69 allow adjustment of the scope of structures, systems, and components (SSCs) subject to special treatment requirements (e.g., quality assurance, testing, inspection, condition monitoring, assessment, and evaluation) based on a method of categorizing SSCs according to their safety significance.

Nuclear Energy Institute (NEI) 00-04, Revision 0, "10 CFR 50.69 SSC Categorization Guideline" (ADAMS Accession No. ML052900163) describes a process for determining the safety-significance of SSCs and categorizing them into the four risk informed safety class (RISC) categories defined in 10 CFR 50.69. The NRC endorsed the categorization method described in NEI 00-04, with clarifications, limitations, and conditions in RG 1.201, Revision 1 (ADAMS Accession No. ML061090627). In its application, the licensee stated it will implement the risk categorization process in accordance with NEI 00-04, as endorsed by RG 1.201. The licensee also states that, "[t]he decision criteria for the [integrated decision-making panel] IDP for categorizing SSCs as HSS [high safety significance] or LSS [low safety significance] pursuant to 10 CFR 50.69(f)(1) will be documented in NSPM procedures."

The licensee's risk categorization process uses probabilistic risk assessments (PRAs) to assess risks from internal events (including internal flooding) and from fire. For the other applicable risk hazard groups, the licensee's process uses non-PRA methods for the risk characterization. The Nuclear Regulatory Commission (NRC) staff review of this LAR involves an assessment of the licensee's use of risk information and PRA acceptability. The licensee described the process and results of its PRA peer reviews in LAR Sections 3.2.1, 3.3, Attachment 2, and Attachment 3. The licensee performed an independent assessment consistent with Appendix X to NEI 05-04, 07-12, and 12-13 for closure of Facts and Observations (F&Os). In a letter dated May 3, 2017 (ADAMS Accession No. ML17079A427), the NRC transmitted a letter to NEI with conditions of acceptance for the Appendix X process. The letter of acceptance explicitly states in part, "[t]he NRC also intends to periodically conduct audits of a licensee's implementation of the Appendix X F&O closure process, as well as review a sampling of the final independent assessment team reports." In addition, 10 CFR 50.69(b)(B)(4) states in part that, "[t]he Commission will approve an applicant's implementation of this section if it determines that the process for categorization of RISC-1, RISC-2, RISC-3, and RISC-4 SSCs satisfies the requirements of §50.69(c)."

REGULATORY AUDIT BASES

The U.S. Nuclear Regulatory Commission (NRC) staff determined an audit to be the most efficient approach toward a timely resolution of questions associated with this LAR review, since the staff will have an opportunity to minimize the potential for further rounds of requests for

additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting online access to an initial set of documentation to be reviewed at the NRC headquarters. Upon completion of this desk audit, the staff is expected to achieve the following.

1. Determine the need for additional documentation.
2. Develop a request for additional information as needed.
3. Decide if a site audit is required to verify information.

Any RAIs will be issued soon after the audit, with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in the development of the technical NRC staff's safety evaluation will be requested to be submitted on the docket.

REGULATORY AUDIT SCOPE OR METHODOLOGY

The desk audit is being conducted to get a better understanding of the submittals and the availability of the information to make an assessment of the staff's review approach. The areas of focus for the regulatory audit are the information that will be requested by the NRC. The staff will review the documentation and generate any RAIs necessary to complete the review. It will also lead to the decision if a site audit is necessary.

INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The information required for the initial desk audit is:

- The closure report(s) for the independent assessment(s) conducted in October 2017, for electronic audit for staff review.
- All plant-specific or fleet procedures governing PRA configuration and control for maintenance update/upgrade. These procedures should include those used for tracking PRA changes (e.g., PRA tracking database, Corrective Action Program).
- All plant-specific or fleet procedures (including draft procedures) governing the 50.69 risk categorization process.
- All plant-specific or fleet procedures governing the development of PRA analyses or calculations.
- All plant-specific PRA notebooks that provide the methodology and identification of all modeling assumptions and sources of uncertainty (e.g., system, initiating events). An assessment, if conducted, between the process incorporated in these notebooks as compared to NUREG-1855, Revision 1, and supporting documents.

The licensee will be informed via electronic mail if there is a need for additional supporting documentation.

TEAM ASSIGNMENTS

Key licensee personnel involved in the development of the RAI responses should be made available on a mutually agreeable schedule to respond to any questions from the NRC staff.

Team Member*	E-mail address	Association	Area of Responsibility
Robert Kuntz	robert.kuntz@nrc.gov	NRR/DORL/LPL3	Project Management
Candace de Messieres	candace.demessieres@nrc.gov	NRR/DRA/APLA	Technical reviewer
Steven Dinsmore	stephen.dinsmore@nrc.gov	NRR/DRA/APLA	Technical reviewer
Mark Wilk	mark.wilk@pnnl.gov	NRC Contractor	Technical reviewer

* Additional technical review staff may participate.

LOGISTICS

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC staff. The desk audit will be conducted over a few weeks consistent with the internal review schedule for the issuance of the request for additional information. The licensee will be kept informed on a regular basis during bi-weekly discussions with the project manager regarding the progress.

DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 30 days of the completion of the final audit session. The NRC will also finalize the RAIs after completion of the audit and issue them to the licensee.