



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

January 29, 2019

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

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2 - ISSUANCE OF  
AMENDMENT RE: ONE-TIME CHANGE TO TECHNICAL  
SPECIFICATION 3.8.1, CONDITION E, TO EXTEND COMPLETION TIME  
FROM 2 TO 12 HOURS (EPID L-2019-LLA-0009) (**EMERGENCY  
CIRCUMSTANCES**)

Dear Mr. Sharp:

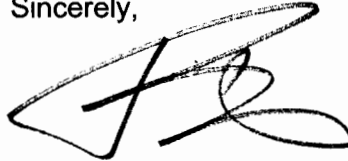
The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 213 to Renewed Facility Operating License No. DPR-60 for the Prairie Island Nuclear Generating Plant (PINGP), Unit 2. The amendment consists of changes to the technical specifications (TSs) in response to your application dated January 29, 2019.

The amendment modifies TS 3.8.1, Condition E, from January 29, 2019 through January 31, 2019, to extend the completion time for two diesel generators inoperable for PINPG, Unit 2 from 2 hours to 12 hours during periods when outside air temperatures fall below -30 degrees Fahrenheit, which is below the intake air temperature limit specified by the diesel generator vendor.

The license amendment is issued under emergency circumstances as provided in the provisions of paragraph 50.91(a)(5) of Title 10 of the *Code of Federal Regulations* due to the time critical nature of the amendment. In this instance, an emergency situation exists due to the inability to anticipate the extreme weather that is being forecast for PINGP.

A copy of the related safety evaluation is also enclosed. The safety evaluation describes the emergency circumstances under which the amendment was issued and the final no significant hazards determination. A Notice of Issuance addressing the final no significant hazards determination and opportunity for a hearing associated with the emergency circumstances will be included in in a future biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Kuntz', written over a horizontal line.

Robert F. Kuntz, Senior Project Manager  
Plant Licensing Branch III  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-306

Enclosures:

1. Amendment No. 213 to DPR-60
2. Safety Evaluation

cc: ListServ



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

NORTHERN STATES POWER COMPANY - MINNESOTA

DOCKET NO. 50-306

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 213  
License No. DPR-60

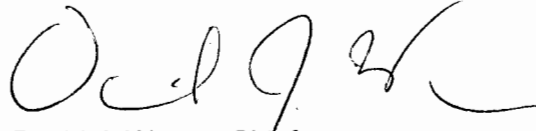
1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), dated January 29, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-60 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 213, are hereby incorporated in the renewed operating license. NSPM shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

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  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Renewed Facility  
Operating License and Technical  
Specifications

Date of Issuance: January 29, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 213

RENEWED FACILITY OPERATING LICENSE NO. DPR-60

DOCKET NO. 50-306

Replace the following page of the Renewed Facility Operating License No. DPR-60 with the attached revised page. The changed areas are identified by a marginal line.

REMOVE

INSERT

Page 3

Page 3

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

REMOVE

INSERT

3.8.1-5

3.8.1-5

- (3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, NSPM to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
  - (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, NSPM to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument and equipment calibration or associated with radioactive apparatus or components;
  - (5) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to possess but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility;
  - (6) Pursuant to the Act and 10 CFR Parts 30 and 70, NSPM to transfer byproduct materials from other job sites owned by NSPM for the purposes of volume reduction and decontamination.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level

NSPM is authorized to operate the facility at steady state reactor core power levels not in excess of 1677 megawatts thermal.
  - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 213, are hereby incorporated in the renewed operating license. NSPM shall operate the facility in accordance with the Technical Specifications.
  - (3) Physical Protection

NSPM shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains

ACTIONS (continued)

| CONDITION   | REQUIRED ACTION                                      | COMPLETION TIME         |
|---|--|-------------------------|
| E. Two DGs inoperable.  | E.1 Restore one DG to OPERABLE status.               | 2 hours*                |
| F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                    | F.1 Be in MODE 3.<br><u>AND</u><br>F.2 Be in MODE 5. | 6 hours<br><br>36 hours |
| G. Two DGs inoperable and one or more paths inoperable.<br><br><u>OR</u><br><br>One DG inoperable and two paths inoperable. | G.1 Enter LCO 3.0.3.                                 | Immediately             |

\*A one-time change increased the Completion Time to 12 hours for Unit 2 during the period from January 29 through January 31, 2019. This change was approved via an emergency license amendment.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 213 TO RENEWED FACILITY

OPERATING LICENSE NO. DPR-60

NORTHERN STATES POWER COMPANY - MINNESOTA

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2

DOCKET NO. 50-306

1.0 INTRODUCTION

By application dated January 29, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19029B311), Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), requested changes to the Technical Specifications (TSs) for Prairie Island Nuclear Generating Plant (PINGP), Unit 2.

The proposed changes would add a note to TS 3.8.1, Condition E, that would extend the completion time (CT) associated with two diesel generators (DGs) inoperable for PINGP, Unit 2, from 2 hours to 12 hours from January 29 through January 31, 2019. The National Weather Service has forecast the ambient temperatures near PINGP may at times fall below -30 degrees Fahrenheit (°F) during this period, which is below the intake air temperature limit specified by the DG vendor, Societe Alsacienne de Constructions Mecaniques de Mulhouse (SACM). NSPM requested this change be approved as an emergency license amendment in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.91(a)(5).

2.0 REGULATORY EVALUATION

The staff of the U.S. Nuclear Regulatory Commission (NRC) reviewed the license amendment request (LAR) based on the following regulatory requirements:

- The PINGP was designed and constructed to comply with the Atomic Energy Commission General Design Criteria as proposed on July 10, 1967 (AEC GDC), as described in the plant's Updated Safety Analysis Report (USAR). AEC GDC's proposed Criterion 39 provides design guidance for the operating capability of alternate power systems.

Criterion 39 - Emergency Power for Engineered Safety Features, states:

Alternate power systems shall be provided and designed with adequate independency, redundancy, capacity, and testability to permit the functioning required of the engineered safety features. As a minimum,



the onsite power system and the offsite power system shall each, independently, provide this capacity assuming a failure of a single active component in each power system.

- Section 50.36, "Technical specifications," requires, in part, that the TS shall be included by applicants for a license authorizing operation of a production or utilization facility. The regulation under 10 CFR 50.36(c) requires that TS include items in five specific categories related to station operation. These categories are (1) safety limits, limiting safety system settings, and limiting control settings, (2) limiting conditions for operation (LCOs), (3) surveillance requirements, (4) design features, and (5) administrative controls. The proposed TS change relates to the LCO category. LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. The remedial actions must provide reasonable assurance that the licensee will comply with the Commission's regulations, and that the health and safety of the public will not be endangered.
- 10 CFR 50.63, "Loss of all alternating current power," requires that a nuclear power plant shall be able to withstand for a specified duration and recover from a complete loss of offsite and onsite alternate current (AC) sources (i.e., a station blackout (SBO)).
- 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," requires, in part, that licensees perform risk assessments before maintenance activities are performed on SSCs and manage the increase in risk resulting from the planned activities.

The NRC staff also reviewed the LAR based on the following regulatory guidance documents:

- Regulatory Guide (RG) 1.155, "Station Blackout," August 1988 (ADAMS Accession No. ML003740034), provides guidance for complying with 10 CFR 50.63 that requires nuclear power plants to be capable of coping with an SBO event for a specified duration.
- NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Branch Technical Position (BTP) 8-8, "Onsite (Emergency Diesel Generators) and Offsite Power Sources Allowed Outage Time Extensions," February 2012 (ADAMS Accession No. ML113640138), provides guidance to the NRC staff in reviewing LARs for licensees proposing a one-time or permanent TS change to extend an emergency DG allowed outage time beyond 72 hours. The BTP 8-8 emphasizes that more defense-in-depth is needed for SBO scenarios that are more likely to occur as compared to the less likely occurrence of the large and medium size loss-of-coolant accident scenarios.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Description of the PINGP, Units 1 and 2, AC Power System

The normal power sources for the safeguards buses are the 161-4.16/4.16 Kilovolt (KV) Reserve Auxiliary Transformer (PINGP, Unit 1, 1R), the 34.5/4.16 KV Reserve Auxiliary

Transformer (PINGP, Unit 2, 2RY), and the redundant 13.8-4.16 KV Cooling Tower Substation buses (PINGP, Unit 1, CT11 and PINGP, Unit 2, CT12).

If the Reserve Auxiliary Transformers and the Cooling Tower Substation buses should fail – resulting in loss of offsite power (LOOP), backup power is provided by two emergency DGs in each unit, sized and connected to serve the engineered safety features equipment of the unit. Each emergency DG is sized to start and carry the engineered safety features load required for the Design Basis Accident and concurrent LOOP.

In the event that an emergency DG fails to start, only one set of redundant safety features components would be lost in that unit. By means of manual switching, safety features components on the bus associated with a failed emergency DG could be fed from the other unit's emergency DG up to the capacity of the running engine.

The air intake temperatures of the PINGP, Unit 2, DGs are limited to -30 °F to 103 °F. The PINGP, Unit 1, DGs were manufactured by Fairbanks Morse and draw combustion air from a protected area within the Service Building.

### 3.2 Station Blackout

An SBO exists when there is a LOOP and concurrent loss of both of a unit's DG's sources. An SBO is assumed to occur on only one unit of a two-unit site, in accordance with RG 1.155. PINGP meets the SBO rule of 10 CFR 50.63 and the related guidance of RG 1.155. PINGP is classified as a 4-hour plant (4-hour SBO duration) based on criteria contained in RG 1.155 and NUMARC-87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors," November 1987 (ADAMS Accession No. ML102710587). In accordance with RG 1.155 and NUMARC-87-00, the licensee has been demonstrated by testing that alternate AC (AAC) from the non-SBO unit's DG is available and the interconnecting bus ties can be manually closed within 10 minutes of the realization that an SBO condition exists to provide power to the required loads on the SBO unit. The licensee's analysis has shown that the AAC has sufficient capacity to supply the required loads for the non-SBO unit plus the required loads of the SBO unit for the required 4-hour SBO duration and that adequate condensate inventory is available to provide decay heat removal for the 4-hour SBO duration.

### 3.3 Proposed TS Changes

#### Current TS Requirements

TS 3.8.1 LCO for PINGP, Unit 2, requires two paths between the offsite transmission grid and the onsite 4 kV Safeguards Distribution System and two DGs capable of supplying the onsite 4 kV Safeguards Distribution System be OPERABLE in MODES 1, 2, 3 and 4.

The REQUIRED ACTION for TS 3.8.1 LCO Condition E when two DGs are inoperable is to restore one DG to OPERABLE status within a CT of 2 hours. If Condition E is not met, Condition F requires the unit be placed in MODE 3 within 6 hours and MODE 5 within 36 hours.

#### Reason for Proposed Change and Basis for Emergency Circumstances

The licensee stated that this emergency LAR is being requested to avoid an unnecessary transient as a result of an unanticipated extreme cold weather pattern. The National Weather

Service has forecast the ambient temperatures in the vicinity of PINGP may periodically drop below the -30 °F minimum intake air temperature limits of the PINGP, Unit 2, DGs, as specified by the vendor (SACM) of the DGs, from January 29 through January 31, 2019. While both PINGP, Unit 2, DGs will remain in a standby mode, their ability to perform their safety function cannot be assured.

#### Description of Proposed Change

This LAR proposes to add a footnote modifying the current CT associated with LCO 3.8.1 Condition E:

| CONDITION             | REQUIRED ACTION                       | COMPLETION TIME |
|-----------------------|---------------------------------------|-----------------|
| E. Two DGs inoperable | E.1 Restore one DG to OPERABLE status | 2 hours*        |

The proposed footnote states: “\*A one-time change increased the Completion Time to 12 hours for Unit 2 during the period from January 29 through January 31, 2019. This change was approved via an emergency license amendment.”

#### 3.4 Deterministic Evaluation

Section 2.1 of the LAR states that PINGP, Unit 2, has two DGs manufactured by SACM. Both DGs have a rated voltage of 4160 volts (V) and a rated frequency of 60 Hertz (Hz). The rated air intake temperatures of the PINGP, Unit 2, SACM DGs are limited to -30 °F to 103 °F. The forecast for the area around PINGP indicates that temperatures could fall to below -30 °F. This is outside of the rated operating temperatures of the DGs. Therefore, the licensee is conservatively assuming that the DGs are inoperable at these temperatures.

The DGs automatically start when certain conditions are met. If the DGs receive a signal to start when air intake temperatures are outside of the rated range, they might fail to start or fail to run for the required time. In this event, backup power supplies will be required to shut down and cool PINGP, Unit 2. The NRC staff agrees that it is appropriate to consider the PINGP, Unit 2 SACM DGs inoperable as long as air intake temperatures remain below -30 °F, unless additional information demonstrates that lower temperatures are acceptable.

In the event that both PINGP, Unit 2, DGs are inoperable and a LOOP occurs, the licensee is prepared to connect the PINGP, Unit 1, DGs to PINGP, Unit 2, to support PINGP, Unit 2, shutdown and cooling. Section 3.2 of the LAR indicates that the PINGP, Unit 1 DGs are capable of supplying power to the hot shutdown loads of PINGP, Unit 1, as well as the essential loads of PINGP, Unit 2 when necessary. Section 2.1 of the LAR indicates that the Unit 1 DGs are of a different make and model (Fairbanks Morse EMD engine) and take combustion air from a protected area within the service building. The NRC staff concludes that the PINGP, Unit 1, DGs are not expected to be adversely affected by the low outside temperature because the rated operating temperatures of the PINGP, Unit 1, DGs will not be challenged.

##### 3.4.1 *Defense in Depth*

The plant has a number of features that support the continued adequacy of defense in depth at the plant:

### PINGP, Unit 1, DGs

Each DG, as a backup to the normal standby AC power supply, is capable of sequentially starting and supplying the power requirements of one of the redundant sets of engineered safety features for its unit. In addition, in the event of an SBO condition, each DG is capable of sequentially starting and supplying the power requirements of the hot shutdown loads for its unit, as well as the essential loads of the blacked-out unit, through the use of manual bus tie breakers interconnecting the 4160 V buses.

### Redundancy of Offsite Sources

There are five transmission lines that connect PINGP to the transmission system. There are four possible paths each between the offsite transmission system and the PINGP, Unit 1 and Unit 2, safeguard 4160 V buses. Each path is capable of providing the required power to shut down the reactor and maintain it in a shutdown condition.

### Auxiliary Feedwater System

Both PINGP, Units 1 and 2, have a steam-driven and motor-driven auxiliary feedwater (AFW) pump. A cross-connection between the discharge lines of the motor-driven pumps also provide flexibility during emergencies.

### Cooling Water System

The PINGP cooling water system has been designed to provide redundant cooling water supplies with isolation valves to auxiliary feedwater pumps, PINGP, Unit 1 DGs, air compressors, component cooling water heat exchangers, containment fan-coil units, and the Auxiliary Building unit coolers. Normal operation utilizes two horizontal pumps with the vertical motor-driven pump as a standby. Two vertical diesel-driven pumps are provided for emergency operation. The diesel-driven pumps are used whenever an engineered safety features sequence is initiated, when discharge header pressure drops below its setpoint, or on a LOOP.

### FLEX Equipment

PINGP has implemented a FLEX program that meets the requirements of the Nuclear Energy Institute's document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," August 2012 (ADAMS Accession No. ML12242A378). The FLEX equipment is capable of operating to -40 °F. The FLEX generators have the ability to repower selected 480 V motor control centers and the FLEX pumps are capable of injecting into the steam generators.

The NRC staff finds that considering no additional single failure in accordance with Generic Letter 80-30 while in TS Action Statement, the plant would have redundant power sources to provide power to the safety-related loads in case of an accident, and thus maintain sufficient safety margins. Also, in case of a LOOP, the cross-ties between the two units would ensure that both units can be safely shut down.

### 3.4.2 *Compensatory Measures*

In the LAR, the licensee stated that the following compensatory measures will be put in place for the duration of the extended LCO 3.8.1 Condition E CT when two DGs are rendered inoperable:

1. The PINGP, Unit 1 and Unit 2, AC power supply systems will be protected including PINGP, Unit 1 and Unit 2, DGs, PINGP, Unit 1 and Unit 2, 4 KV safeguards buses and the station substation/switchyard.
2. The PINGP, Unit 1 and Unit 2, AFW pumps will be protected.
3. The on-shift operation crew will review procedures related to grid conditions and LOOP scenarios, including manual voltage restoration of 4 KV switchgear from opposite unit DG.
4. The on-shift operation crew will review procedures related to AFW pump unit cross-tie alignment and loss of heat sink.
5. Non-essential switchyard and transformer yard activities will be deferred.
6. Non-essential surveillances or other maintenance activities on other risk-significant equipment, such as the DGs, the emergency core cooling systems, and the AFW system will be deferred.
7. The 12 and 22 diesel-driven cooling water pumps will be protected.

The NRC staff finds that the above compensatory measures provide additional defense-in-depth, so that essential equipment remain available during the CT extension of Unit 2 emergency DGs.

### 3.4.3 *Configuration Risk Management Program*

In the LAR, the licensee stated that the plant procedures implement PINGP's configuration risk management control program. The basis for PINGP's configuration risk management control program is the Maintenance Rule under 10 CFR 50.65(a)(4). The Maintenance Rule requires that licensees perform risk assessments before maintenance activities are performed on SSCs and manage the increase in risk resulting from the planned activities.

The above program would ensure that the licensee does not enter any plant configuration that could increase in plant risk.

### 3.5 Risk Insights Evaluation

In the LAR, the licensee stated that the basis for the proposed change would "extend the Completion Time (CT) associated with two diesel generators (DGs) inoperable for Unit 2 from 2 hours to 12 hours from January 29 through January 31, 2019." The licensee did not submit the subject LAR as a risk-informed request and did not cite any risk-informed licensing guidance (such as Regulatory Guide 1.177, Revision 1, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," issued May 2011; ADAMS Accession

No. ML100910008). Therefore, a formal risk evaluation was neither required nor submitted for the purpose of making a regulatory decision.

The NRC staff determined that "special circumstances," as discussed in NUREG-0800, Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis; General Guidance," which would have necessitated additional risk information to be provided, did not exist. As such, the NRC staff did not request any additional risk information associated with the review of this LAR.

While this is not a risk-informed LAR, the licensee did provide risk insights related to the proposed change in Section 3.4 of the enclosure to the LAR. The risk insights provided by the licensee included quantitative evaluations for the change in incremental conditional core damage probability and incremental conditional large early release probability, assuming both PINGP, Unit 2, DGs are inoperable for 24 hours using a zero-maintenance probabilistic risk assessment model. Because this is not a risk-informed LAR, the probabilistic risk assessment models used to derive risk insights by the licensee were not reviewed by the NRC staff to determine their technical acceptability to support this LAR. As a result, the staff did not rely on the numerical results provided by the licensee. The staff considered the licensee-provided qualitative risk insights to aid in the deterministic review of the proposed change. The NRC staff reviewed the PINGP, Units 1 and 2, Standardized Plant Analysis Risk (SPAR) model. The review of the PINGP, Units 1 and 2, SPAR model and the licensee-provided risk insights supported the traditional engineering conclusions associated with the licensee's proposed compensatory actions.

### 3.6 Technical Evaluation Conclusion

Based on the deterministic evaluation provided in Section 3.4 and the risk insights evaluation provided in Section 3.5 above, the NRC staff finds the proposed TS changes will have minimal impact on the continued safe operation and safe shutdown capability of the plant, and are therefore acceptable. The licensee will continue to meet the regulatory requirements listed in Section 2.0 of this safety evaluation, except those GDCs temporarily impacted by inoperability of redundant safety-related onsite power while the plant is in a TS Action Statement, as allowed by the regulations. The staff finds that there is reasonable assurance (i) that the during the CT extension of PINGP, Unit 2, DGs, the activities authorized by the license amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations.

## 4.0 EMERGENCY SITUATION

### Background

The NRC's regulations in 10 CFR 50.91(a)(5) state that where the NRC finds that an emergency situation exists, in that failure to act in a timely way would result in derating or shutdown of a nuclear power plant, or in prevention of either resumption of operation or of increase in power output up to the plant's licensed power level, it may issue a license amendment involving no significant hazards consideration without prior notice and opportunity for a hearing or for public comment. In such a situation, the NRC will publish a notice of issuance under 10 CFR 2.106, providing for opportunity for a hearing and for public comment after issuance.

As discussed in the licensee's application dated January 29, 2019, the licensee requested that the proposed amendment be reviewed by the NRC on an emergency basis. The licensee stated

that the emergency conditions existed due to the inability to anticipate the extreme weather that is being forecast for PINGP.

#### NRC Staff Conclusion

The NRC staff reviewed the licensee's basis for processing the proposed amendment as an emergency amendment (as discussed above) and agrees that an emergency situation exists consistent with the provisions in 10 CFR 50.91(a)(5). Furthermore, the NRC staff determined that: (1) the licensee used its best efforts to make a timely application; (2) the licensee could not reasonably have avoided the situation; and (3) the licensee has not abused the provisions of 10 CFR 50.91(a)(5). Based on these findings, and the determination that the amendment involves no significant hazards consideration as discussed below, the NRC staff has determined that a valid need exists for issuance of the license amendment using the emergency provisions of 10 CFR 50.91(a)(5).

#### 5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION

The NRC's regulation in 10 CFR 50.92(c) states that the NRC may make a final determination, under the procedures in 10 CFR 50.91, that a license amendment involves no significant hazards consideration if operation of the facility, in accordance with the amendment, would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

An evaluation of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The requested action is a one-time extension to the CT of TS LCO 3.8.1 Condition E, two DGs inoperable. Extending the CT does not constitute a precursor to an accident and does not affect the probability of an accident. Therefore, the proposed extension of the CT in the LAR does not increase the probability of an accident.

The licensee provided an evaluation of the consequences of extending the CT. The licensee's analysis demonstrates that extending the CT results in a minimal increase in the consequences of an accident and the staff verified that analysis supports the deterministic review of the amendment request. Additionally, compensatory measures will be put in place to provide defense in depth. No new failure modes have been introduced because of this action and the consequences remain consistent with previously evaluated accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any previously evaluated?

Response: No.

The proposed amendment does not involve a physical alteration of any SSC or a change in the way any SSC is operated. The proposed amendment does not involve operation of any SSCs in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms are introduced by the one-time CT extension requested.

Therefore, the proposed change does not create the possibility of a new or different kind of accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The licensee provided analysis that demonstrate that the overall risk of extending the LCO 3.8.1 Condition E CT from 2 hours to 12 hours for Unit 2 is minimal. Extending the CT does not involve a significant increase in the consequences of an accident. Extending the CT does not involve a change in a methodology used to evaluate consequences of an accident. Extending the CT does not involve a change in any operating procedure or process.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, the NRC staff concludes that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff has made a final determination that no significant hazards consideration is involved for the proposed amendment and that the amendment should be issued as allowed by the criteria contained in 10 CFR 50.91.

## 6.0 STATE CONSULTATION

In accordance with the Commission's regulations, on January 29, 2019, the Minnesota State official was notified of the proposed issuance of the amendment. The State official had no comments.

## 7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.



## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) the amendment does not (a) involve a significant increase in the probability or consequences of an accident previously evaluated; or (b) create the possibility of a new or different kind of accident from any accident previously evaluated; or (c) involve a significant reduction in a margin of safety; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (3) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (4) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: January 29, 2019

**SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2 - ISSUANCE OF AMENDMENT RE: ONE-TIME CHANGE TO TECHNICAL SPECIFICATION 3.8.1, CONDITION E, TO EXTEND COMPLETION TIME FROM 2 TO 12 HOURS (EPID L-2019-LLA-0009) (EMERGENCY CIRCUMSTANCES) DATED JANUARY 29, 2019**

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