



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

September 19, 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, UNITS 1
AND 2 - CORRECTION LETTER FOR AMENDMENT NOS. 228 AND 216 TO
RENEWED FACILITY OPERATING LICENSE NOS. DPR-42 AND DPR-60
(EPID L-2018-LLA-0147)

Dear Mr. Sharp:

On July 30, 2019, the U.S. Nuclear Regulatory Commission (NRC or the Commission) issued Amendment No. 228 to Renewed Facility Operating License No. DPR-42 and Amendment No. 216 to Renewed Facility Operating License No. DPR-60 for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, respectively (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19140A447). The amendments revised the licenses for PINGP, Units 1 and 2, to modify the fire protection program. Specifically, the amendments deleted several modifications which are required as part of PINGP's implementation of its risk-informed, performance-based, fire protection program in accordance with paragraph 50.48(c) of Title 10 of the *Code of Federal Regulations*, National Fire Protection Association (NFPA) Standard 805. Subsequently, the NRC staff issued a correction to that amendment by letter dated August 24, 2019 (ADAMS Accession No. ML19225D217).

This letter corrects the issuance of Amendment No. 228 for PINGP, Unit 1, and Amendment No. 216 for PINGP, Unit 2, as corrected by letter dated August 24, 2019, to issue revised license pages. This correction letter corrects changes to the license that were not intended when the license amendment was approved. All of the changes are administrative. The following changes are being made to the correction letter issued August 24, 2019 to reflect license condition existing for both units prior to the issuance of that correction letter because the amendment did not intend to change these conditions:

- License condition 2.C.(4) "Fire Protection:"
 - Change Northern States Power Company to NSPM
 - Add a comma after the word "condition"
- License condition 2.C.(4)(c)1:
 - Change citation at the end of the condition from "2. Above" to "2.C(4)(b)2."

- License condition 2.C.(4)(c)3.:
 - Change L-PI-18-005 to L-PI-16-090
 - Change twelve to 12
 - Add a comma after the number "66"

In addition to the aforementioned administrative changes to both licenses, license condition 2.C.(4)(c)2 for PINGP, Unit 1, the issuance date for issuance of the NFPA 805 amendment was in error in the correction letter. The correction letter stated that this issuance was August 18, 2017, instead of the proper date of August 8, 2017. The license condition prior to the correction letter had the correct date. The enclosed license pages reflect the correct date and are consistent with the license prior to the August 24, 2019, correction letter.

If you have any questions regarding this matter, please call me at (301) 415-3733.

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 Nos. 80- 282 and 50-306

Enclosure:

1. Revised Amendment No. 228 to DPR-28
2. Revised Amendment No. 216 to DPR-60

cc: Listserv



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

NORTHERN STATES POWER COMPANY - MINNESOTA
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
DOCKET NO. 50-282

Amendment No. 228
License No. DPR-42

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 May 18, 2018, as supplemented by letters dated July 10, 2018, December 6, 2018, and April 8, 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 paragraphs 2.C(4) and 2.C(4)(c)2 of Renewed Facility Operating License No. DPR-42 is hereby amended as shown in the attached revised license pages.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Lisa M. Regner, Acting Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License

Date of Issuance: July 30, 2019



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

NORTHERN STATES POWER COMPANY - MINNESOTA
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
AMENDMENT TO RENEWED FACILITY OPERATING LICENSE
DOCKET NO. 50-306

Amendment No. 216
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 May 18, 2018, as supplemented by letters dated July 10, 2018, December 6, 2018, and April 8, 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 paragraphs 2.C(4) and 2.C(4)(c)2 of Renewed Facility Operating License No. DPR-60 is hereby amended as shown in the attached revised license pages.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Lisa M. Regner, Acting Branch Chief
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License

Date of Issuance: July 30, 2019

ATTACHMENT TO LICENSE AMENDMENT NOS. 228 AND 216

RENEWED FACILITY OPERATING LICENSE NOS. DPR-42 AND DPR-60

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NOS. 50-282 AND 50-306

Replace the following pages of the Renewed Facility Operating License Nos. DPR-42 and DPR-60 with the attached revised pages. The changed areas are identified by a marginal line.

REMOVE

Page 4
Page 6

DPR-42

INSERT

Page 4
Page 6

DPR-60

Page 4
Page 6

Page 4
Page 6

Safeguards Information protected under 10 CFR 73.21, is entitled: "Prairie Island Nuclear Generating Plant Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program," submitted by letters dated October 18, 2006, and January 10, 2007, and as supplemented by letters dated March 18 and June 2, 2011, and approved by NRC Safety Evaluation dated August 16, 2011.

NSPM shall fully implement and maintain in effect all provisions of the Commission-approved Northern States Power Company - Minnesota (NSPM) Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The NSPM CSP was approved by License Amendment No. 202 and supplemented by License Amendment No. 212.

(4) Fire Protection

NSPM shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated September 28, 2012 and May 18, 2018 (and supplements dated November 8, 2012, December 18, 2012, May 3, 2013, October 17, 2013, April 30, 2014, May 28, 2015, June 19, 2015, October 6, 2015, October 22, 2015, January 20, 2016, May 24, 2016, August 17, 2016, December 14, 2016, March 6, 2017, July 10, 2018, December 6, 2018, and April 8, 2019), and as approved in the safety evaluations dated August 8, 2017 and July 30, 2019. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition, or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- "Automatic and Manual Water-Based Fire Suppression Systems" (Section 3.9);
- "Gaseous Fire Suppression Systems" (Section 3.10); and
- "Passive Fire Protection Features" (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated August 8, 2017, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2. and 3. below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2.C.(4)(b)2.
2. The licensee shall implement the modifications to its facility, as described in Attachment S, Table S-2, "Plant Modifications Committed," in Northern States Power - Minnesota letter L-PI-18-005, dated May 18, 2018, to complete the transition to full compliance with 10 CFR 50.48(c), before the end of the second full operating cycle for each unit after approval of the NFPA 805 License Amendment dated August 8, 2017. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall implement the items listed in Attachment S, Table S-3, "Implementation Items," of Northern States Power - Minnesota letter L-PI-16-090, dated December 14, 2016, within 12 months after NRC approval, with the exception of Implementation Item 20, 66, and 70 which are associated with modifications and will be completed 180 days after modifications are complete.

Safeguards Information protected under 10 CFR 73.21, is entitled: "Prairie Island Nuclear Generating Plant Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program," submitted by letters dated October 18, 2006 and January 10, 2007, and as supplemented by letters dated March 18 and June 2, 2011, and approved by NRC Safety Evaluation dated August 16, 2011.

NSPM shall fully implement and maintain in effect all provisions of the Commission-approved Northern States Power Company - Minnesota (NSPM) Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The NSPM CSP was approved by License Amendment No. 189 and supplemented by License Amendment No. 200.

(4) Fire Protection

NSPM shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the licensee amendment requests dated September 28, 2012 and May 18, 2018 (and supplements dated November 8, 2012, December 18, 2012, May 3, 2013, October 17, 2013, April 30, 2014, May 28, 2015, June 19, 2015, October 6, 2015, October 22, 2015, January 20, 2016, May 24, 2016, August 17, 2016, December 14, 2016, March 6, 2017, July 10, 2018, December 6, 2018, and April 8, 2019), and as approved in the safety evaluations dated August 8, 2017 and July 30, 2019. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition, or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

1. Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated August 8, 2017, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified by 2. and 3. below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2.C.(v)(b)2.
2. The licensee shall implement the modifications to its facility as described in Attachment S, Table S-2, "Plant Modifications Committed," in Northern States Power – Minnesota letter L-PI-18-005, dated May 18, 2018, to complete the transition to full compliance with 10 CFR 50.48(c), before the end of the second full operating cycle for each unit after approval of the NFPA 805 License Amendment dated August 8, 2017. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall implement the items listed in Attachment S, Table S-3, "Implementation Items," of Northern States Power – Minnesota letter L-PI-16-090, dated December 14, 2016, within 12 months after NRC approval, with the exception of Implementation Item 20, 66, and 70 which are associated with modifications and will be completed 180 days after modifications are complete.

(5) Additional Conditions

The Additional Conditions contained in Appendix B, as revised through Amendment No. 200, are hereby incorporated into this license. NSPM shall operate the facility in accordance with the Additional Conditions.

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(EPID L-2018-LLA-0147) DATED SEPTEMBER 19, 2019

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DATE	09/17/19	09/16/19	09/18/19	09/19/19

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