

January 23, 2020

**Prairie Island Nuclear Generating Plant, Unit 1 and Unit 2 –Request for Information
for the Upcoming Post-Approval Site Inspection for License Renewal (Phase IV)**

Inspection Procedure: IP 71003, “Post-Approval Site Inspection for License Renewal”
(Phase IV)

Inspection Dates: March 30 – April 3, 2020 (in office prep)
April 6 - 10, 2020 (on-site)

Inspection Report: 05000282/2020011 ; 05000306/2020011

Lead Inspector: Jorge Corujo-Sandin (Lead), Reactor Inspector

On April 6, 2020 the U.S. Nuclear Regulatory Commission (NRC) will begin a Post-Approval Site Inspection for License Renewal (Phase IV) at Prairie Island Nuclear Generating Station, Unit 1 and Unit 2. The purpose of the inspection is to review the implementation of the aging management program elements during the Period of Extended Operation (PEO). The inspection team will select for review a sample of the site’s Aging Management Programs (AMPs).

This Request for Information is separated into three Sections (A, B and C). Section A information will be used to facilitate the AMP sample selections. The team leader will make AMP selections and inform the licensee. Based on these selections, the licensee will provide the additional information requested under Section B. This information will be used as part of the inspection preparation and implementation. Requests under Section C should be available to the inspectors during the on-site week of inspection. See the table below for specific dates:

Requested Action:	Expected Date:
Licensee provides Section A Information	February 19, 2020
Team Leader communicates selection to the licensee	February 28, 2020
Licensee provides Section B Information	March 26, 2020
Licensee provides Section C Information	April 6, 2020

Please provide the information requested below to the NRC Region III Office in care of the lead inspector. The information can be provided in hard copy or electronic format; however, electronic format is preferred, via digital data storage device (i.e. DVDs/CDs).

The Branch Chief responsible for this inspection is Ms. Karla Stoedter. She can be reached at 630-829-9731 or Karla.Stoedter@nrc.gov.

If there are any questions regarding this information request, please contact the lead inspector Mr. Jorge Corujo-Sandin at 630-829-9741 or Jorge.Corujo-Sandin@nrc.gov as soon as possible.

ADAMS Accession Number: ML20023C238

A. Information Requested to Facilitate Aging Management Program (AMP) Sample Selection

- (1) Provide copies of corporate and/or site-specific program document/procedure related to overall aging management program.
- (2) Provide a list of all site AMPs.
- (3) Provide list of AMPs that were new or enhanced in the License Renewal Application (LRA)
- (4) Provide list of AMPs that had commitment changes since entering the PEO. For each listed AMP include a listing of the commitment change titles (or brief descriptions of the change).
- (5) Provide list of AMPs that have incorporated newly identified SSCs since entering the PEO. List or describe which SSCs were incorporated.
- (6) Provide list of AMPs that have incorporated components from One-Time Inspection activities since entering the PEO.
- (7) Provide any self-assessments and/or audits related to license renewal program implementation and/or AMP effectiveness.
- (8) Provide a list of corrective action documents that were initiated as result of license renewal activities, self-assessments, and/or audits. (since entering the PEO)
- (9) Electronic copies of Updated Final Safety Analysis Report, Technical Specifications, Technical Specifications Bases, Technical Requirements Manual, and Individual Plant Examination of External Events (IPEEE) if available.
- (10) Site-specific responses and/or evaluations for NRC generic communications associated with license renewal that were issued after entering the PEO.
- (11) Risk-ranking of top 250 basic events from your internal and external (if available) events site specific probabilistic safety analysis (PSA) sorted by Birnbaum Importance, Risk-Reduction Worth, Risk-Achievement Worth, and Fussell-Veseley (as applicable) (Provide in Excel format). Include basic event names/description.
- (12) Provide a list of the top 10 risk important systems for the internal events model (and external, if available).

B. Information Requested for each AMP Selected for Review (As Applicable)

- (1) Program basis documents and administrative procedures describing key program attributes such as program objectives, scope, detection and monitoring methods, administrative controls, acceptance criteria, corrective actions, and scope expansion requirements
- (2) Provide a summary document listing which implementing procedures are included in the selected AMP and what are their required performance frequency.
- (3) Copies of implementing procedures for program activities (e.g. visual examination procedures, ultrasonic examination procedures, maintenance procedures, system walkdowns, etc.)
- (4) Completed Work Orders (WOs) for the most recent aging management activities performed, including associated inspection and testing reports, as applicable. This request is limited to the last two completed activities (per procedure). If this request becomes too onerous based on the number of WO reach out to the lead inspector for additional scope clarification.
- (5) Copies of aging related corrective actions documents associated with the selected AMP, and SSCs under its purview (for the last three years). A search of corrective actions documents should include keywords such as: “aging”, “age management”, “degradation”, “wear”, “delamination”, “peeling”, “crazing”, “chipping”, “leak”, “crack”, “corrosion”, “rust”, “leaching”, “embrittlement”, “fatigue”, “blister”, “spalling”, “oxidation”, “loss of function”, “failed acceptance criteria”, “flow-accelerated”, or other site specific terms/codes used in aging monitoring as appropriate. This item may vary by licensee. If this request becomes too onerous reach out to team leader for further clarification.
- (6) Updated license renewal scoping drawings showing the SSCs within the scope of the AMP
- (7) “Gap analyses” performed (if any) to assess the differences between the current AMP and the recommendations in the latest revision of NUREG-1801, “Generic Aging Lessons Learned (GALL),” and subsequent Interim Staff Guidance
- (8) Copy of evaluations performed for applicable external and internal operating experience (OE) issues associated with license renewal. This request is limited to OE items issued after entering the PEO.
- (9) Description of instances where examination scope expansion was required based on the examination of a SSC in accordance with the AMP. Please describe the logic to select the scope expansion, and any resulting changes to the AMP. (This request is limited to work performed in the PEO)
- (10) Description of instances where AMP examinations/inspections were eliminated or deferred. (This request is limited to work performed in the PEO)
- (11) Description of instances where examination/inspection scope changes were required based on limitations encountered during the examination. (This request is limited to work performed in the PEO)

C. Information Requested to be available during the onsite week of inspection

- (1) Provide a brief presentation (informal) to the inspection team regarding aging management at the site. Topics to be covered:
 - a. How are aging related issue identified, documented and evaluated within the corrective action program and/or other aging tracking software/program.
 - b. Describe which individuals and/or organizations are responsible for identifying and evaluating aging related issues.
 - c. Describe the responsibilities regarding age management, if any, of the following:
 - i. System Engineers
 - ii. AMP Owners
 - iii. Corporate office

Ideally, this should be presented Monday or Tuesday of the inspection week. Coordinate with the team leader for further detail.

- (2) Copy of simplified system drawings (a.k.a. Horse Notes or Training Notes).
- (3) A computer with network access to the site's corrective action program