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Northern States Power Company

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April 21, 1993

Chief, Rules and Directives Review Branch
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Comments on Proposed Generic Letter titled: "Availability and Adequacy of
Design Basis Information".

Attached are our comments on the proposed generic letter.

If you need additional clarification to any of the comments, please contact
Pat Burke at (612) 295-1661.

Roger O Anderson
Director
Licensing and Management Issues

Attachment

c: J E Silberg

OFFICE OF ADMINISTRATION
USNRC
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Subject: Public Comment To Proposed Generic Letter "Availability and Adequacy of Design Basis Information."

NSP endorses NUMARC's response dated April 2, 1993 to the proposed Generic Letter. We would like to add emphasis to several of the points that NUMARC makes.

First, NSP has been submitting informal biannual progress reports to Region III on the progress of our design basis programs (at Prairie Island and Monticello). We also made numerous presentations to the NRC when these programs were first being initiated. Therefore, the NRC has been apprised of our activities in this area.

Second, NSP participates in a regional utility forum on design basis and notes that the utilities in this forum have approached the issue in different ways due to their own specific needs. Thus, NSP agrees with NUMARC that this diversity in programs would make it difficult for the NRC to rate or compare the adequacy of these programs against each other.

Lastly, NSP's greatest concern is how this information is going to be used. The August 10, 1992 policy statement made references to using the DBD program in SALP ratings and for prioritization of inspections. NSP has already made a very significant investment in our self initiated design basis programs and have realized benefits. The proposed use of information submitted in response to this Generic Letter to focus SALP processes on design basis programs could result in additional spending to maintain high ratings, without a corresponding increase in the protection of the health and safety of the public. The adequacy of the design basis programs should be judged by the results of effective management of configuration, not by comparison of the programs. NSP and other utilities cannot afford to escalate spending in areas that offer low marginal safety or operational benefits. We need the flexibility to apply resources where we believe the greatest gains in safety and reliability can be achieved.