



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

June 4, 1982

Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

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

Information Related to Post-TMI Requirements

In a letter dated May 5, 1982 from Mr Darrell G Eisenhut, Director, Division of Licensing, USNRC (Generic Letter 82-10) we were requested to provide information related to the status of the last group of NUREG-0737 requirements. We were requested to reply in accordance with 10 CFR Part 50, Section 50.54(f) within 30 days.

The requested information is provided on the attached forms for each of the NUREG-0737 items listed in the enclosure to Mr Eisenhut's letter.

Please contact us if you have any questions related to the information we have provided.

DMMusolf

D M Musolf, PE
Acting Head-Nuclear Support Services

DMM/bd

cc: Regional Administrator-III, USNRC
NRR Project Manager, USNRC
Resident Inspector, USNRC
G Charnoff

Attachments

8206150288 820604
PDR ADOCK 05000282
P PDR

A046

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket No. 50-282
50-306

LETTER DATED JUNE 4, 1982
INFORMATION RELATED TO POST-TMI REQUIREMENTS

Northern States Power Company, a Minnesota corporation, by this letter dated June 4, 1982 hereby submits information related to Post-TMI Requirements in response to a letter dated May 5, 1982 from Mr Darrel G Eisenhut, Director, Division of Licensing, USNRC (Generic Letter 82-10).

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By

DM Musolf

D M Musolf

Acting Head-Nuclear Support Services

On this 4th day of June, 1982 before me a notary public in and for said County, personally appeared D M Musolf, Acting Head-Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

Betty J. Dean



PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>I.A.1.3.1</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>October 1, 1982</u>
Requirement	<u>Revise administrative procedures to limit</u> <u>overtime in accordance with NRC Policy</u> <u>Statement issued by Generic Letter No. 82-02</u>
Implementation Status	<u>Not completed</u>

Remarks

The guidelines of Generic Letter 82-02 will be implemented by October 1, 1982. Appropriate Technical Specification changes will be submitted by NSP by January 1, 1983.

The guidelines are understood to apply only to periods when the unit is above cold shutdown (i.e. not to refueling or maintenance outages).

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>I.A.1.3.2</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>July 1, 1982</u>
Requirement	<u>Augment current shift staffing</u> <u>to conform with minimum levels set</u> <u>forth on page 3-9 of NUREG-0737</u>
Implementation Status	<u>Completed 12/30/80</u>

Remarks

By our letter dated December 30, 1980 we agreed to implement the requirements of NUREG-0737, Item I.A.1.3.2, with respect to shift manning. Minor exceptions were taken. These exception were reviewed and found acceptable. The Technical Specification "Minimum Shift Crew Composition" table was revised and found to be acceptable with minor departures from NUREG-0737, page 3-9. Refer to NRC letter dated January 4, 1982.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>I.C.1</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>First refueling after 10/1/82</u>
Requirement	<u>Revise emergency procedures by</u> <u>next refueling outage</u>
Implementation Status	<u>Not complete</u>

Remarks

Emergency procedure guidelines developed by the Westinghouse Owners Group have not yet been approved by the NRC Staff as required by NUREG-0737. This schedule can therefore not be met.

Justification for Proposed Schedule

We understand that the Commission is presently considering a revised implementation schedule for this item with action schedule for this month. A commitment will be made to a revised schedule when the revised requirements have been issued.

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>I.D.1 Control Room Design Review</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>Plant specific proposals</u>
Requirement	<u>Under development; no reply needed</u> <u>at this time</u>
Implementation Status	<u>Not completed</u>

Remarks

As noted in our letter dated April 1, 1982 a preliminary program plan report will be submitted by August 31, 1982.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>I.D.2 SPDS</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>Plant specific proposals</u>
Requirement	<u>Under development; no reply needed</u> <u>at this time</u>
Implementation Status	<u>Not completed</u>

Remarks

A proposed schedule will be provided following the receipt of additional guidance from the NRC.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.B.1</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>First refueling after July 1, 1982</u>
Requirement	<u>Install vents in accordance with</u> <u>revised 10 CFR 50.44 dated 12/2/81</u> <u>No reply required.</u>
Implementation Status	<u>Not complete</u>

Remarks

This modification was described in our letters dated July 6, 1981 and April 26, 1982. The installation schedule was described in our letter dated April 23, 1982. We anticipate no difficulty in completing this modification in both units by the date specified in the rule.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.B.2.3</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>June 30, 1982</u>
Requirement	<u>Document that all safety-related</u> <u>equipment is fully qualified. No</u> <u>reply needed.</u>
Implementation Status	<u>Schedule relief requested</u>

Remarks

All safety related electrical equipment will not be qualified by June 30, 1982. Schedule relief is expected through the current NRC rule making process. Refer to our letter dated April 30, 1982 for the current status of environmental qualification of electrical equipment.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.D.1.2</u>
Applicability	<u>PWRs</u>
NUREG-0737 Schedule	<u>April 1, 1982</u>
Requirement	<u>Submit plant specific reports</u> <u>on relief and safety valve program.</u>
Implementation Status	<u>Not complete</u>

Remarks

Our letter dated April 1, 1982 referenced submittal of the EPRI reports documenting results of the test program. These reports included the results of valve tests representing the designs and conditions applicable to Prairie Island Units 1 and 2.

We are currently working on completing plant specific final evaluations for Prairie Island. A July 1, 1982 submittal will be made. If all work is not completed by that date, additional relief will be requested and a schedule provided for the remaining work.

Justification for Proposed Schedule

The required April 1, 1982 submittal date was met. A submittal will be made, as required by the Commission's letter dated September 29, 1981, by July 1, 1982. If needed, relief will be requested at that time.

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.D.1.3</u>
Applicability	<u>PWRs</u>
NUREG-0737 Schedule	<u>July 1, 1982</u>
Requirement	<u>Submit report of results of</u> <u>block valve test program</u>
Implementation Status	<u>Not complete</u>

Remarks

We are currently working on completing the plant specific submittal for block valve qualification by July 1, 1982. If all work is not completed by that date, additional relief will be requested and a schedule provided for the remaining work.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No. II.F.2 Inadequate Core Cooling Instrumentation

Applicability All

NUREG-0737 Schedule Plant specific proposals

Requirement Under development; no reply needed
at this time

Implementation Status Schedule relief requested

Remarks

In past correspondence we committed to install a qualified core exit thermocouple temperature monitoring system in each unit. As noted in our letter dated March 1, 1982 schedule relief until the next refueling outage of each unit was requested to complete this installation. A proposed schedule for other instrumentation required for II.F.2 will be submitted following the receipt of additional guidance from the NRC.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>ILK.3.18 ADS Actuation</u>
Applicability	<u>BWRs</u>
NUREG-0737 Schedule	<u>September 30, 1982</u>
Requirement	<u>Submit revised position on need for modifications</u>
	<u></u>
	<u></u>
Implementation Status	<u>Not Applicable</u>

Remarks

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.K.3.30 SB LOCA Analysis</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>1/1/82</u>
Requirement	<u>Revise SB LOCA Analysis Methods</u>
	<u></u>
	<u></u>
Implementation Status	<u>Schedule relief requested</u>

Remarks

Westinghouse has submitted its model revisions. Exxon is on schedule for a June 30, 1982 submittal. Schedule relief was requested in our letter dated December 29, 1981.

Justification for Proposed Schedule

This is an extremely difficult and time consuming task. Review of the small break loss of coolant accident analysis methods in the required detailed manner could not be completed within the amount of time originally provided by the NRC's schedule.

Demonstration of Need for Proposed Schedule

Refer to our letter dated December 29, 1981.

Description of Compensatory Measures Being Taken in the Interim

None. Existing analyses provide significant conservatisms.

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>II.K.3. 31 SB LOCA Analysis</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>One year after staff approval of model</u>
Requirement	<u>Submit plant specific analysis</u>
	<u></u>
	<u></u>
Implementation Status	<u>Not complete</u>

Remarks

Reanalysis, if required, will be performed following NRC review and approval of model changes. See response to item II.K.3.30.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No. III.A.1.2

Applicability All

NUREG-0737 Schedule July 1, 1982

Requirement Provide for augmentation of staffing in
accordance with Generic Letter 81-10
dated 2/18/81.

Implementation Status Will be implemented

Remarks

Will be fully implemented on July 1, 1982.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>III.A.1.2</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>October 1, 1982</u>
Requirement	<u>Upgrade TSC, OSC and EOF to include systems and</u> <u>equipment as described in regulatory guidance</u> <u>documents</u>
Implementation Status	<u>interim TSC and EOF operational; permanent</u> <u>OSC now operational</u>

Remarks

Due to lack of integrated regulatory guidance on requirements, a firm design basis cannot be established and therefore implementation dates cannot be committed for the upgraded permanent TSC and EOF.

Justification for Proposed Schedule

Succinct regulatory guidance is anticipated in the near future based on recommendations of the CRGR committee and ACRS. Our letters of April 8, June 8, and December 1, 1981 provided conceptual design information and followup status reporting. Our December 1 letter committed to furnish by June 1, 1982, a further update which this submittal constitutes.

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

During the period November 2-13, 1981, the NRC conducted a special appraisal of the emergency preparedness program at the Prairie Island Nuclear Generating Plant. The inspectors evaluated the licensee's OSC for compliance with NUREG-0654 and 0696. Based on the findings this portion of the licensee's program was found adequate, except, fixed permanent emergency lighting should be provided in the OSC. The required emergency lighting was installed prior to April 1, 1982.

The inspectors examined the TSC and, according to the Inspection Summary, no items of noncompliance or deviations were identified. However the TSC

is considered an open item pending completion of the TSC in accordance with the position of NUREG-0696.

The inspectors also examined the interim nearsite EOF and no items of noncompliance or deviations were identified. However this portion of the program is considered an open item pending completion of the permanent EOF.

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>III.A.2.2</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>Scaled milestones to 6/1/83</u>
Requirement	<u>Meteorological and other equipment to assess and</u> <u>monitor offsite consequences of radiological</u> <u>emergency conditions</u>
Implementation Status	<u>interim system now operational</u> see below

Remarks

Due to lack of integrated regulatory guidance on requirements for later milestones, a firm design basis cannot be set and consequently no final implementation dates can be established.

Justification for Proposed Schedule

Succinct regulatory guidance is anticipated in near future based on recommendation of the CRGR Committee and ACRS. Our letters of January 30, February 6, April 8, June 8 and December 1, 1981 furnished conceptual design information and followup status reporting. Our December 1 letter committed to furnish by June 1, 1982, a further update which this submittal constitutes.

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

During the period November 2-13, 1981, the NRC conducted a special appraisal of the emergency preparedness program at the Prairie Island Nuclear Generating Plant. As a result, prompt corrective action was required for the meteorological measurement system. According to the inspectors, these improvements, implemented by March 13, 1982, were needed to achieve an adequate program. The inspectors determined that the licensee's meteorological capabilities address the requirements of NUREG-0737, TAP III.A.2 and the criteria set forth in NUREG-0654, Appendix 2 in adopting the interim compensating measures to milestone three.

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE
WITH IMPLEMENTATION DATES AFTER MARCH 1, 1982

NUREG-0737 Item No.	<u>III.D.3.4 Control Room Habitability</u>
Applicability	<u>All</u>
NUREG-0737 Schedule	<u>Plant specific proposals</u>
Requirement	<u>Modify facility as identified</u> <u>by licensee study</u>
Implementation Status	<u>Not completed</u>

Remarks

Modifications described in our letter dated July 20, 1981 (toxic gas monitors) are scheduled for installation by January 1, 1983. This date is consistent with the implementation schedule contained in NUREG-0730.

NRC review and approval of our habitability analysis and proposed modifications is documented in a letter dated April 9, 1982.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim