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June 16, 1993

10 CFR Part 50
Section 50.55a(f)

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Submittal of the 3rd 10-Year Inservice Testing (IST)
Program to the Requirements of ASME Section XI

Attached is the ASME Code Section XI Inservice Testing (IST) Program for the third ten-year interval for Units 1 and 2 of the Prairie Island Nuclear Generating Plant. Requests for relief are included in this program which are being submitted for NRC review and approval in accordance with 10 CFR Part 50, Section 50.55a. The Inservice Inspection (ISI) Program for the third ten-year interval will be submitted separately.

The Program is being developed to the following specific revisions of the Code: ASME Section XI, 1989 Edition; ASME/ANSI OM, OMa-1988 Addenda to the OM-1987 Edition. We are invoking the positions stated in Generic Letter 89-04 in the development of the Program. In addition, we assume the Generic Letter guidance is also applicable to OM 6 and OM 10. Alternate forms of testing that conform to the requirements of Attachment 1 of the Generic Letter have been included in the Program without a Request for Relief and are documented in the Plant IST Program Plan, H10.1.

The Unit 1 portion of this Program will become effective on December 16, 1993 and the Unit 2 portion will become effective on December 21, 1994.

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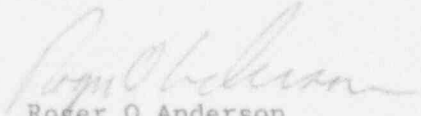
The Scope statements in OM 6 and OM 10 require that components (pumps and valves) be included in the Program that are required ". . . in shutting down a reactor to the cold shutdown condition, in maintaining the cold shutdown condition, or in mitigating the consequences of an accident." However, the Program includes components (pumps and valves) which are required to perform a specific function in shutting down a reactor to the hot shutdown condition and only where those components are utilized under accident conditions. The components which support achievement of hot or cold shutdown under non-accident conditions, and which are not required to achieve shutdown following an accident, are not required to be included in the Program. The Updated Safety Analysis Report Chapter 14, "Safety and Accident Analysis", evaluates the safety aspects of either Unit 1 or Unit 2 of the plant, demonstrates that either or both units can be operated safely, and shows that exposures from credible accidents do not exceed the guidelines of 10 CFR 100. Given these evaluations demonstrate that the units can be operated safely and do not go beyond the plant achieving a hot shutdown condition in any scenario, Section XI Program inservice testing of components which are not required by these analyses go beyond the licensing basis for the plant. Components important to safety which are outside the ASME Program are tested to demonstrate that they will perform satisfactorily in service as part of the augmented testing program as documented in Prairie Island Preventive Maintenance and Surveillance Programs. For these reasons, we are using the Updated Safety Analysis Report Chapter 14 analyses to determine the components which need to be included in the Program. To include components outside this scope would involve inclusion of components which were originally designed and built and subsequently controlled as non-safety related components.

We will provide you with updates to the Inservice Testing Program Manual for information when significant revisions have been incorporated (e.g., the addition of new components because of a significant modification to the plant). Future Requests for Relief will be submitted as the need occurs.

US NRC
June 16, 1993
Page 3

NORTHERN STATES POWER COMPANY

Please contact Jack Leveille (612-388-1121, Ext. 4662) if you have any questions related to this letter.



Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
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A S Jimenez (Hartford)
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Attachments: INSERVICE TESTING PROGRAM MANUAL

PI Operations Manual Section H10.1, Table 1, "ASME Section XI
Valves, Unit 1"

PI Operations Manual Section H10.1, Table 2, "ASME Section XI
Valves, Unit 2"

PI Operations Manual Section H10.1, Appendix B, "Unit 1
Deferral Notes"

PI Operations Manual Section H10.1, Appendix C, "Unit 2
Deferral Notes"

PI Operations Manual Section H10.1, Appendix D, "IST Section
Valve Notes"