

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NO. 50-282  
50-306

REQUEST FOR AMENDMENT TO  
OPERATING LICENSES DPR-42 & DPR-60

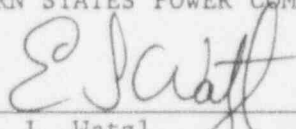
LICENSE AMENDMENT REQUEST DATED July 11, 1994

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Prairie Island Operating License and Appendix A as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, reasons for the changes, and the supporting safety evaluation/significant hazards determination. Exhibit B contains current Prairie Island Technical Specification pages marked up to show the proposed changes. Exhibit C contains the revised Operating License and Technical Specification pages.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

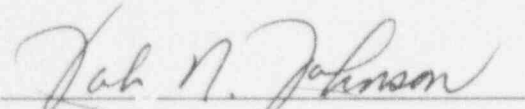
By

  
E. L. Watzl

General Manager

Prairie Island Nuclear Generating Plant

On this 11 day of July 1994 before me a notary public in and for said County, personally appeared E. L. Watzl, General Manager, Prairie Island Nuclear Generating Plant, 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.





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LICENSE AMENDMENT REQUEST DATED July 11, 1994  
Fire Protection Technical Specification Changes

EXHIBIT A

Description of the Proposed Changes, The Reasons for Requesting  
the Changes, and the supporting Safety Evaluation/Significant  
Hazards Determination

Pursuant to 10 CFR Part 50, Sections 50.59 and 50.90, the holders of Operating Licenses DPR-42 and DPR-60 hereby propose the following changes to the Facility Operating Licences and Appendix A, Technical Specifications:

**Description of the Proposed Changes**

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," issued April 24, 1986, requested that licensees incorporate the NRC approved Fire Protection Program in their Final Safety Analysis Reports (FSAR). The FSAR update would include the incorporation of the Fire Protection Program, including the fire hazards analysis and major commitments that form the basis for the Fire Protection Program. GL 86-10 also encouraged licensees to apply for an amendment to their operating license (1) to replace the current license conditions regarding fire protection with a new standard condition, and (2) to remove unnecessary fire protection Technical Specifications. GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," issued August 2, 1988, provided additional guidance for the preparation of a license amendment request to implement GL 86-10.

In accordance with the guidance provided in GL 86-10, the NRC approved Prairie Island Fire Protection Program and major commitments, including the fire hazards analysis, has been incorporated by reference into the Updated Safety Analysis Report (USAR).

The requested amendments would revise License Condition 2.C.4 of Facility Operating Licenses DPR-42 and DPR-60 for Prairie Island Nuclear Generation Plant, Units 1 and 2 respectively to conform to the standard fire protection license condition in GL 86-10.

The requested amendments would also relocate the LIMITING CONDITIONS FOR OPERATION (LCO), SURVEILLANCE REQUIREMENTS and corresponding BASES associated with fire detection and protection systems and administrative controls that address fire brigade staffing and training from the Prairie Island Technical Specifications in accordance with GL 88-12. Operational conditions, remedial actions and test requirements presently in

the Technical Specifications for the fire detection and protection systems, as well as the fire brigade requirements, would be controlled through the Fire Protection Program and associated procedures, including Operations Committee review of special reporting requirements associated with limiting conditions for operations for fire protection systems. Technical Specifications administrative controls would be revised to give the Operations Committee the responsibility for the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Safety Audit Committee. Oversight of the Fire Protection Program by the Safety Audit Committee is currently required by Technical Specifications. The TABLE OF CONTENTS would be revised to reflect the above changes.

### **Reasons for the Proposed Changes**

The proposed changes to Prairie Island Operating License and Technical Specifications are described below, and the specific wording changes are shown in Exhibits B and C.

1. License Conditions 2.C.4 of DPR-42 and DPR-60: Revise in accordance with the guidance provided in Section F of Generic Letter 86-10.

Justification: This will bring the Facility Operating License into conformance with the standard fire protection License Condition as requested in GL 86-10.

2. Table of Contents: Revise to reflect the deletion of Technical Specification Sections 3.14, 4.16, 3.14 Bases and 4.16 Bases and associated Table.

Justification: Table of Contents revised to reflect the requested fire protection Technical Specification changes.

3. Definition of Fire Suppression Water System: Delete definition from Technical Specifications.

Justification: Definition no longer needed since this term would not be used anywhere in the Technical Specifications.

4. Technical Specifications for Fire Detection and Protection Systems: Delete Technical Specification Sections 3.14 (LCO), 4.16 (SURVEILLANCE REQUIREMENTS), B.3.14 and B.4.16 (BASES), and associated Table TS.3.14-1.

Justification: This change is administrative in nature in that the requirements which would be removed from the Technical Specifications have been incorporated into the Fire Protection Program and its implementing procedures. Provision for review of future changes to these requirements and special reporting requirements associated with limiting conditions for operations are covered by the change to T.S.6.2.B.4. Deletion of these sections implements the NRC guidance provided in GL 86-10 and GL 88-12.

5. Technical Specification Administrative Controls, Plant Staff: Delete T.S.6.1.C.6 and associated footnote and delete T.S.6.1.E.

Justification: This change is administrative in nature in that the requirements of these specifications have been incorporated into the Fire Protection Program and its implementing procedures. Provision for review of future changes to these requirements are covered by the change to T.S.6.2.B.4. Deletion of these paragraphs implements the NRC guidance provided in GL 86-10 and GL 88-12.

6. Technical Specification Administrative Controls, Review and Audit: Add new Technical Specifications requirement T.S.6.2.B.4,

- m. Fire Protection Program and implementing procedures and the submittal of recommended changes to the Safety Audit Committee.

Justification: This change reinforces the importance of the Fire Protection Program on plant safety and assures a multidiscipline review by the Operations Committee of proposed changes to those requirements that are being removed from the Technical Specifications. This requirement ensures administrative controls on the Fire Protection Program similar to those on other programs that are implemented by license conditions such as the Emergency Plan. Addition of this paragraph implements the NRC guidance provided in GL 86-10 and GL 88-12.

## Safety Evaluation/Significant Hazards Determination

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

- (1) The proposed amendment will not involve a significant increase in the probability or consequences of accident previously evaluated.

The requested changes are administrative in nature in that they move fire protection requirements from the Technical Specifications to the Fire Protection Program and associated implementing procedures following the guidance provided in GL 86-10 and GL 88-12. The requested changes will not revise the requirements for fire protection equipment operability, testing or inspections. The amendment would give added responsibility to the Operations Committee for review of the Fire Protection Program in accordance with the guidance given in GL 86-10 and 88-12 including special reporting requirements associated with limiting conditions for operation for fire protection systems.

The proposed changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do they affect any assumptions or conditions in any of the accident analyses. Since the accident analyses remain bounding, their radiological consequences are not adversely affected.

Therefore, the probability or consequences of an accident previously evaluated are not affected.

- (2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed:

The requested changes are administrative in nature in that they move fire protection requirements from the Technical Specifications to the Fire Protection Program and associated implementing procedures following the guidance provided in GL 86-10 and GL 88-12. The requested changes will not revise the requirements for fire protection equipment operability, testing or inspections. The amendment would give added responsibility to the Operations Committee for review of the Fire Protection Program in accordance with the guidance given in GL 86-10 and 88-12 including special reporting requirements associated with limiting



conditions for operation for fire protection systems.

The proposed changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident.

Therefore, the possibility of a new or different kind of accident from any accident previously evaluated would not be created.

- (3) The proposed amendment will not involve a significant reduction in the margin of safety.

The requested changes are administrative in nature in that they move fire protection requirements from the Technical Specifications to the Fire Protection Program and associated implementing procedures following the guidance provided in GL 86-10 and GL 88-12. The requested changes will not revise the requirements for fire protection equipment operability, testing or inspections. The amendment would give added responsibility to the Operations Committee for review of the Fire Protection Program in accordance with the guidance given in GL 86-10 and 88-12 including special reporting requirements associated with limiting conditions for operations for fire protection systems.

Therefore, a significant reduction in the margin of safety would not be involved.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation the Prairie Island Nuclear Generating Plant in accordance with the proposed license amendment request does not involve any significant hazards considerations as defined by NRC regulations in 10 CFR Part 50, Section 50.92.

#### Environmental Assessment

Northern States Power Company has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration,
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or

3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR Part 51 Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.