

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 January 10, 1992

Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Prairie Island Operating License as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, reasons for the changes, and a significant hazards evaluation. Exhibits B and C are copies of the Prairie Island Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By


Thomas M. Parker

Manager

Nuclear Support Services

On this 10th day of January, 1992 before me a notary public in and for said County, personally appeared Thomas M. Parker, Manager 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.

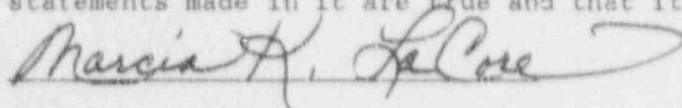




Exhibit A

Prairie Island Nuclear Generating Plant License Amendment Request Dated January 10, 1992

Evaluation of Proposed Changes to the Technical Specifications Appendix A of Operating License DPR-42 and DPR-60

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 Appendix A, Technical Specifications:

1. Snubber Visual Inspection Intervals

Proposed Changes and Reasons for Change

This license amendment request proposes changes to the Prairie Island Technical Specifications provided in response to Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals And Corrective Actions". Generic Letter 90-09 describes line-item Technical Specification improvements developed by the NRC Staff to alleviate problems being encountered with the current Standard Technical Specification snubber visual inspection requirements.

The line-item improvements described in Generic Letter 90-09 provide an alternate schedule for visual inspections of snubbers that maintains the same confidence level for identifying defective snubbers as the existing schedule in the Standard Technical Specifications. The alternate inspection schedule is based on the number of unacceptable snubbers found during the previous inspection, the total snubber category size and the previous inspection interval.

Implementing the proposed changes will reduce future occupational radiation exposure and will generally allow the snubber visual inspections and corrective actions to be performed during plant outages. In addition, the implementation of the proposed alternative snubber visual inspection schedule will allow for less frequent snubber inspections, provided the results of ongoing inspections are favorable.

The proposed changes to the Prairie Island Technical Specifications being implemented in response to Generic Letter 90-09 are described below, and the specific wording changes to Technical Specification Section 4.13, "Snubbers", are shown in Exhibits B and C.

A. Proposed changes to Technical Specification Section 4.13 Objectives

For consistency with the Standard Technical Specifications, the reference to "the integrity" of the hydraulic snubbers is being deleted and only the term operability is being retained. The term operability is being capitalized because it is a term defined in the definition section of the Technical Specifications.

B. Proposed changes to Technical Specification Section 4.13.A

The current snubber visual inspection schedule requirements are being eliminated from Technical Specification Section 4.13.A and are being replaced with a reference to new Technical Specification Table TS.4.13-1 which will incorporate the alternative snubber visual inspection schedule described in Enclosure B to Generic Letter 90-09.

A definition of the term "type of snubber" which is consistent with the guidance in Generic Letter 90-09 is being incorporated into Section 4.13.A. The definition of this term is necessary to implement the other changes being made to Section 4.13 in response to Generic Letter 90-09.

The current definitions of accessible and inaccessible snubbers, and their grouping in Section 4.13.A, is being revised to be consistent with the Standard Technical Specifications and the guidance in Generic Letter 90-09.

The statement at the end of paragraph 4.7.9.b of Enclosure B to Generic Letter 90-09, which discusses the determination of the first inspection interval under the new criteria, has not been included in proposed changes to the Prairie Island Technical Specifications. Prairie Island will establish the first inspection intervals under the new criteria per the guidance in that statement. However, we do not believe it is necessary to place that statement into the Technical Specifications because it is a short term requirement which is no longer meaningful after the first inspection interval.

C. Proposed changes to Technical Specification Section 4.13.B

The current snubber visual inspection acceptance criteria described in Technical Specification Section 4.13.B are being revised to be consistent with the Standard Technical Specifications and the guidance in Generic Letter 90-09. The most significant of the changes which resulted from the revision to Section 4.13.B are described below.

The specific requirement for verification that snubber movement can be manually induced has been deleted. This inspection is not required by Standard Technical Specifications, and in the interest of developing a snubber visual inspection program consistent with the Standard Technical Specifications, the specific requirement is being deleted. The verification of snubber movement will continue to be performed under the requirement for verification that the snubber has no visible indications of damage or impaired operability.

The Standard Technical Specification requirements for visual inspection of the fasteners for attachment of the snubbers to components and anchorages are being incorporated into Section 4.13.B.

The Standard Technical Specification requirements for the justification of continued operation with an unacceptable snubber, and the actions to be taken if continued operation cannot be justified, have been incorporated into Section 4.13.B.

Safety Evaluation and Determination of Significant Hazards Considerations

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 an accident previously evaluated.

The proposed changes incorporate the requirements of the Standard Technical Specifications and the guidance of Generic Letter 90-09 into the Prairie Island snubber visual inspection program. The NRC Staff concluded in Generic Letter 90-09, that the alternative snubber visual inspection schedule, described in Generic Letter 90-09, maintains the same confidence level in the operability of snubbers as the existing visual inspection schedule.

Therefore, since the proposed changes conform with the Standard Technical Specifications and the guidance in Generic Letter 90-09, the confidence level in the operability of the snubbers is unchanged, and the proposed changes will not significantly affect the probability or consequences of an accident previously evaluated.

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

There are no new failure modes or mechanisms associated with the proposed changes. The proposed changes do not involve any modification in operational limits. Only the snubber inspection program is being changed.

Replacing the current snubber visual inspection requirements with requirements consistent with the Standard Technical Specifications and the guidance in Generic Letter 90-09, will not affect the capability of the Prairie Island snubbers to perform their intended function during normal or accident conditions. The resulting snubber visual inspection program will continue to assure the ability of snubbers to provide dynamic load support during a seismic event.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated, and the accident analyses presented in the Updated Safety Analysis Report will remain bounding.

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

The proposed snubber visual inspection requirements are consistent with the Standard Technical Specifications and the guidance in Generic Letter 90-09, and are equivalent to the previous requirements with regard to assuring the capability of the systems which are supported. The snubber functional testing continues to provide incentive for proper maintenance and assurance of the capability of the snubbers.

Therefore, the proposed changes will not result in any reduction in the plant's margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of 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

This license amendment request does not change effluent types or total effluent amounts nor does it involve an increase in power level. Therefore, this change will not result in any significant environmental impact.

2. Snubber Functional Test Interval

Proposed Changes and Reasons for Change

This license amendment request proposes changes to Prairie Island Technical Specification Section 4.13.C and associated Bases to provide additional flexibility in the functional testing of snubbers. Section 4.13.C specifies that functional testing of snubbers shall be conducted at least once per 18 months during cold shutdown. The requirement that snubber functional testing be performed only during cold shutdown is unnecessarily restrictive and we propose that it be deleted from the Prairie Island Technical Specifications.

Section 4.13.C of the Prairie Island Technical Specifications should only specify the frequency of the snubber functional testing, not the plant conditions for the performance of the testing. The plant conditions for the performance of a specific snubber functional test should be established by the operability requirements for the supported systems. It may be in the best interest of ALARA and plant safety to test snubbers on certain systems and in certain locations above cold shutdown or even at power as long as the operability of the supported systems is maintained or the action requirements of Section 3 of the Technical Specifications are properly implemented.

Regardless of plant status, whenever a snubber is removed from service for functional testing, the operability of the supported system(s) should be evaluated and any applicable Technical Specification actions resulting from that operability determination should be implemented. Such actions could result in the voluntary entrance into Technical Specification action statements under certain circumstances.

Prairie Island has implemented administrative controls for controlling the voluntary entrance into a Technical Specification action statement for the purpose of performing maintenance activities. Those same controls would be implemented if the functional testing of a snubber resulted in the voluntary entrance into a Technical Specification action statement. The Prairie Island administrative controls specify that the voluntary entrance into a Technical Specification action statement should be based on the premise that it will increase plant safety. They include recommendations intended to minimize the length of downtime and to maintain operability of redundant equipment and the requirement that voluntary entrance into a Technical Specification action statement shall be authorized by plant management.

The use of the administrative controls described above in place of the requirement for testing during cold shutdown will provide adequate assurance that the removal of snubbers from service for functional testing will be properly evaluated and controlled, such that plant safety will not be adversely affected.

Safety Evaluation and Determination of Significant Hazards Considerations

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 an accident previously evaluated.

The use of existing Prairie Island administrative controls in place of the requirement for testing during cold shutdown will provide adequate assurance that the removal of snubbers from service for functional testing will be properly evaluated and controlled, and that systems supported by the subject snubbers would remain within the requirements of Section 3 of the Prairie Island Technical Specifications during the period of functional testing.

Therefore, since administrative controls will maintain the operability of affected systems within the requirements of the current Prairie Island Technical Specifications, the elimination of the requirement for snubber functional testing only during cold shutdown will not significantly affect the probability or consequences of an accident previously evaluated.

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

There are no new failure modes or mechanisms associated with the proposed changes. The proposed changes do not involve any modification in operational limits. Only the snubber functional test program is being changed.

The use of existing Prairie Island administrative controls in place of the requirement for testing during cold shutdown will provide adequate assurance that the removal of snubbers from service for functional testing will be properly evaluated and controlled, and that systems supported by the subject snubbers would remain within the requirements of Section 3 of the Prairie Island Technical Specifications during the period of functional testing.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated, and the accident analyses presented in the Updated Safety Analysis Report will remain bounding.

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

The Prairie Island administrative control procedures clearly state that the voluntary entrance into a Technical Specification action statement should be based on the premise that it will increase plant safety.

The use of existing Prairie Island administrative controls in place of the requirement for testing during cold shutdown will provide adequate assurance that the removal of snubbers from service for functional testing will be properly evaluated and controlled, such that plant safety will not be adversely affected.

Therefore, the proposed changes will not result in any reduction in the plant's margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of 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

This license amendment request does not change effluent types or total effluent amounts nor does it involve an increase in power level. Therefore, this change will not result in any significant environmental impact.