

## Exhibit A

### Prairie Island Nuclear Generating Plant License Amendment Request Dated September 11, 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:

#### Background

Generic Letter 88-16, dated October 4, 1988, was issued to encourage licensees to prepare changes to Technical Specifications related to cycle-specific parameters. The generic letter provided guidance for the relocation of certain cycle-dependent core operating limits from the Technical Specifications. This would allow changes to the values of these cycle-dependent core operating limits without prior NRC approval (i.e., license amendment), so long as an NRC-approved methodology for the calculations is followed. A License Amendment Request, which requested the relocation of the cycle-specific core operating limits from the Prairie Island Technical Specifications to a Core Operating Limits Report, was submitted to the NRC by letter dated November 17, 1989.

The resulting license amendment, issued by the NRC on March 13, 1990, revised the administrative controls section of the Technical Specifications to incorporate references to the NRC-approved calculation methodologies to be used to determine the operating limits contained in the Core Operating Limits Report. Those changes to the administrative controls section ensure that the calculation of the core operating limits in the Core Operating Limits Report will be performed in accordance with NRC-approved methodologies.

Technical Specification Section 6.7.A.6.b states that the analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC. Section 6.7.A.6.b then specifically references the documents that describe the approved methodologies.

#### Proposed Changes and Reasons for Change

The proposed changes to the Prairie Island Technical Specifications being requested by this license amendment request are described below, and the specific wording changes to Technical Specifications are shown in Exhibits B and C.

#### A. Proposed changes to Technical Specification Section 6.7.A.6.b

Westinghouse topical report "WCAP-10924-P-A, Westinghouse Large-Break LOCA Best-Estimate Methodology, Addendum 3 to Volume 2, December, 1992" is being added to Technical Specification Section 6.7.A.6.b.

The documents that describe the NRC approved analytical methods used to determine the core operating limits are specified in Technical Specification Section 6.7.A.6.b. Westinghouse Topical Report WCAP-10924-P, Volume 2, Addendum 3 is currently under review by the NRC Staff. Following NRC review and approval, Westinghouse will issue a revised topical report with the NRC Safety Evaluation Report, WCAP-10924-P-A, Volume 2, Addendum 3. We expect this to occur in December of this year.

This license amendment has been submitted to incorporate a reference to the revised methodologies described in WCAP-10924-P into the Prairie Island Technical Specifications following their approval by the NRC Staff. The revised methodologies must be incorporated into Section 6.7.A.6.b so the model revisions can be used in the determination of the core operating limits.

B. Proposed changes to Technical Specification Section 6.7.A.6.a

A typographical error is being corrected in Technical Specification Section 6.7.A.6.a.1. The symbol for the Heat Flux Hot Channel Factor Limit is being corrected from " $F_0^{RPT}$ " to " $F_0^{RTP}$ ".

Safety Evaluation

The proposed administrative change to Technical Specification Section 6.7.A.6.b incorporates a reference to a revised core analysis methodology reviewed and approved by the NRC Staff. Because the proposed change is administrative in nature and because the revised methodology referenced in the change will have prior NRC review and approval, Northern States Power believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed Technical Specification changes.

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 administrative change to Technical Specification Section 6.7.A.6.b incorporates a reference to a revised core analysis methodology reviewed and approved by the NRC Staff. Because the proposed change is administrative in nature and because the revised methodology referenced in the change will have prior NRC review and approval, the proposed change will not involve a significant increase in 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.

As stated above, the proposed change does not contribute in any way to the probability or consequences of an accident. No safety-related equipment, safety function, or plant operations will be altered as a result of the proposed changes. The cycle-specific core operating limits will be calculated using the revised NRC-approved methods and submitted to the NRC. The Technical Specifications will continue to require operation within the required core operating limits and appropriate actions will be taken when or if limits are exceeded.

Therefore, the proposed amendment does not in any way create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The margin of safety is not affected by the addition of a reference to an NRC approved core analysis methodology to the Technical Specifications. The margin of safety provided by the current Technical Specifications remains unchanged. The Technical Specifications continue to require operation within the core limits obtained from NRC-approved reload design methodologies. The actions to be taken when or if limits are violated remain unchanged.

Therefore, the proposed changes are administrative in nature and do not impact the operation of the plant in a manner that involves a reduction in the 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

Northern States Power 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.