



Northern States Power Company

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July 17, 1985

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

Prairie Island Nuclear Generating Plant
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Response to NRC Generic Letter 85-07
Implementation of Integrated Living Schedule

The purpose of this letter is to provide, for the information of the NRC Staff, our response to Generic Letter 85-07 dated May 2, 1985. This letter requested our views on the Integrated Living Schedule (ILS) concept as adopted at the Duane Arnold Energy Center.

Northern States Power Company has reviewed the concept of an ILS implemented through an amendment to the plant operating license. We do not, at this time, believe that an ILS of this type is needed. This decision is based on the following considerations:

Manageable Backlog of NRC Required Modifications

The number of outstanding actions required as a result of the NRC TMI Action Plan and the large number of Bulletins and Orders issued beginning in 1979 is now of manageable size.

Improvement in NRC Approach in Issuing New Requirements

The NRC has in recent years displayed a sensitivity to the problems associated with the imposition of arbitrary deadlines for satisfying new requirements. The procedure followed by the NRC Staff in establishing completion schedules for NUREG-0737 Supplement No. 1 modifications is an example of this. Schedules for required modifications were discussed with the NRC Project Manager in the Division of Licensing for our plant. Availability of utility resources and outage schedules were considerations in arriving at a final implementation schedule which was later documented in an NRC Confirmatory Order.

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Efforts of the NRC Committee to Review Generic Requirements (CRGR) and backfit rulemaking activities provide additional assurance that reasonable schedules will be established in the future for NRC required actions.

Willingness of NRC Staff to Approve Schedule Changes
If a Showing of "Good Cause" is Made by Utility

The NRC Staff has recently shown reasonable flexibility in granting schedule relief for completing NRC required backfit modifications if "good cause" is shown. For example, Confirmatory Orders for NUREG-0737 Supplement No. 1 requirements contained this provision.

Northern States Power Company recognizes, however, the need to integrate new NRC requirements with other requirements such as refueling outage schedules, maintenance plans, and scheduled plant upgrades and refurbishment. We have, as a goal, the development of a long range plan for each of our nuclear generating plants. This plan, as currently conceived, would include commitments to NRC requirements as well as all other major activities taking place over a five-year interval. This plan would primarily be a management tool for use by Northern States Power Company to more effectively allocate human and financial resources. It would be our intention to use this plan in discussions with the NRC Staff to support schedules we would propose for completing NRC required actions.

Please contact us if you have any questions related to the information we have provided. Attached is the completed questionnaire which was provided to us as Enclosure (2) to Generic Letter 85-07. As discussed above, the option we have chosen is the implementation of an informal ILS.


David Musolf
Manager - Nuclear Support Services

c: Regional Administrator III, NRC
Resident Inspector, NRC
NRR Project Manager, NRC
G Charnoff

Attachment

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-

PLANT NAME: Prairie Island Nuclear Generating Plant
UTILITY: Northern States Power Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS _____
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only X

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology:

_____ Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

8. If you answered I.B above:

1. Please explain your reservations on separate sheet(s)
or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your
concerns, propose a time frame for such a meeting and
provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the
development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide
a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored
availability/reliability project might be credited for plant safety
enhancement. Provide additional constructive comments as appropriate.