



Northern States Power Company

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10 CFR Part 50
Section 50.90

U S Nuclear Regulatory Commission
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PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

License Amendment Request Dated February 6, 1997
Amendment of Safety Injection Pump Low Temperature Operations

Attached is a request for changes to the Technical Specifications, Appendix A of the Operating Licenses, for the Prairie Island Nuclear Generating Plant. This request is submitted in accordance with the provisions of 10 CFR Part 50, Section 50.90. These requested amendments will revise the restrictions on safety injection system operations when the reactor coolant system is at low temperatures. These changes are necessary to allow performance of required system and component tests and evolutions at low reactor coolant system temperatures.

Exhibit A contains a description of the proposed changes, the reasons for requesting the changes, and the supporting safety evaluation and significant hazards determination. Exhibit B contains current Prairie Island Technical Specification pages marked up to show the proposed changes. Exhibit C contains the revised Prairie Island Technical Specification pages incorporating the proposed changes.

Recently the Prairie Island plant staff has been reviewing the technical specification interpretations to assure that plant operations are in compliance with the technical specifications. Difficulties have been identified with verbatim compliance with

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TS.3.3.A.3 and TS.3.3.A.4. The underlying purpose of these specifications is to assure that the reactor coolant system will not experience a low temperature overpressurization. However, the technical specification wording specifies prescriptive methods for meeting the purpose rather than stating the purpose. As currently worded, with the reactor coolant system below 200 °F these specifications require both safety injection pump switches to be maintained in "pullout" at all times with two exceptions. (1) safety injection pump(s) may be operated as required to maintain reactor coolant system inventory when the level is below the reactor vessel flange, and (2) the safety injection pump(s) may be operated for performance of the integrated safety injection test provided other measures are implemented to assure the reactor coolant system is not overpressurized. Thus, strict verbatim compliance with the current requirement to maintain the switches in pullout does not allow: Safety injection system flow testing (TS.4.5.B.3.g); switch testing; breaker testing; post-modification testing, if required (TS.4.5.B.3.h); or pump OPERABILITY testing, if required (T.S.4.5.B.1.a). This list is not intended to be all inclusive, other pump operations may also be required to meet technical specifications, ASME Section XI, and other requirements.

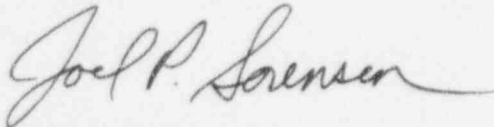
A similar issue also exists with respect to TS.3.3.A.3(a) which states that "the SI pump discharge valves" are shut. The underlying purpose of this specification requirement is to prevent safety injection discharge into the reactor coolant system. Other system valves, under administrative controls as discussed in the Bases, can also prevent safety injection discharge into the reactor coolant system. Thus, changes to this requirement are also proposed to provide the ability to perform required tests and evolutions.

As discussed in Exhibit A, these tests and evolutions can all be performed safely within the purpose of the specification. However, they cannot be performed without moving the switches from "pullout" as literally stated in specifications TS.3.3.A.3 and TS.3.3.A.4 and using other valves for isolating the reactor coolant system from safety injection system discharge. Since Unit 2 is currently shut down for a refueling outage, amendment of the technical specifications is necessary to allow Prairie Island Unit 2 to perform safety injection system testing and evolutions necessary for resumption of plant operations. Since safety injection system tests and evolutions are scheduled to be performed on February 19, 1997, NSP respectfully requests review and approval of this submittal under the rules of 10 CFR Part 50, Section 50.91(a)(6) where exigent circumstances exist. These safety injection system tests and evolutions are required to support the Prairie Island Unit 2 mode change to MODE 4 scheduled for March 5, 1997.

Without timely review and approval of this license amendment request in support of the Unit 2 outage schedule, Prairie Island would be prevented from resumption of plant operation at a cost in excess of \$135,000 per day for replacement power.

NSP has used its best efforts to make a timely application for this amendment and has not intended to create exigent circumstances to take advantage of the procedure for exigent handling. Due to recent industry events, the Prairie Island plant staff initiated a self-assessment of the technical specification interpretations. The Prairie Island staff concluded on February 3, 1997 that these technical specification amendments are required to support the current Unit 2 outage. By submitting this license amendment by February 6, 1997, NSP has responded expeditiously. Thus, this exigency could not be avoided. NSP concluded that this amendment involves no significant hazards considerations. Accordingly NSP requests this submittal be treated as an exigency in accordance with 10 CFR Part 50, Section 50.91(a)(6).

If you have any questions related to this License Amendment Request please contact Dale Vincent at 612-388-6758.



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