



Northern States Power Company

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November 25, 1996

10 CFR Part 50
Section 50.90

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Supplement to License Amendment Request Dated December 14, 1995
Conformance of Administrative Controls Section 6
to the Guidance of Standard Technical Specifications

- Reference 1: NRC letter dated September 25, 1996 to Roger O. Anderson from Beth A. Wetzel entitled, "Review of Northern States Power Company Proposed Quality Assurance Program Description Changes and Prairie Island License Amendment Related to Technical Specifications Administrative Controls (TAC Nos. M95130, M95131, and M95709)."
- Reference 2: License Amendment Request dated July 17, 1995, "Radiological Effluent Technical Specifications Conformance To Standard Technical Specifications and Generic Letter 89-01."
- Reference 3: License Amendments 122/115 RE: Radiological Effluent Technical Specifications (TAC Nos. M93383 and M93384) dated January 24, 1996.
- Reference 4: NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 1, April 7, 1995

This letter is submitted to clarify the subject license amendment request and propose specific Technical Specification page changes as presented in Attachments 1 and 2 to this letter. Attachment 1 contains proposed Prairie Island Technical

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Specification pages from Exhibit C of the subject License Amendment Request marked up to implement the modifications proposed by this supplement to the subject License Amendment Request. Attachment 2 contains Technical Specification pages revised to their final form to reflect the changes proposed by this supplement. Clarifications and supplemental information in support of the proposed Technical Specification changes follows.

NRC Letter, Reference 1

The clarifications and supplemental information provided below contain Technical Specification related responses to Reference 1. An amendment to the Operational Quality Assurance Plan in response to Reference 1 will be submitted under separate letter. In response to Reference 1, paragraph 2(a), 'deleted text under proposed Section 6.4, "Procedures" (currently Section 6.5, "Plant Operating Procedures")', Attachment 3 contains a detailed assessment of the Regulatory Guide 1.33 Appendix A requirements for procedures that proposed Technical Specifications will not explicitly list.

Paragraph 2 (b) requested clarification of Prairie Island Technical Specification conformance to Generic Letter 88-12. License Amendments 120/133 conformed the Technical Specifications to Generic Letter 88-12. Operational Quality Assurance Plan Revision 20, Change Number 39 deleted reference to fire protection requirements in the Technical Specifications since those requirements had been removed from the Technical Specifications. The reference in the Change Summary for Change Number 39 was incorrect and should have referenced Generic Letter 88-12. Revised Operational Quality Assurance Plan Revision 20 to be submitted under separate cover letter includes corrected justification for this change in Change Number 51 and deletes all reference to Generic Letters.

It should be noted that NRC Administrative Letter 95-06 was not considered in preparation of the subject license amendment request since the license amendment request was submitted on December 14, 1995 and the Administrative Letter was received on December 29, 1995. This letter and the forthcoming amendment to the Operational Quality Assurance Plan will incorporate Administrative Letter 95-06 guidance to the extent practical.

Clarifications and Supplemental Information in support of Technical Specification Changes from the subject License Amendment Request. (Exhibits A, B, and C refer to the Exhibits in the subject License Amendment Request)

1. Exhibit A, Page 5: clarification of proposed 6.2.A.3 justification.

For consistency with Reference 4, this License Amendment Request has removed most of the personnel titles from the Technical Specifications as discussed on page 5 of Exhibit A. Organizational titles will continue to be

under control of an NRC approved program through their incorporation into the USAR. This provision has been included in the proposed Technical Specifications through the requirement in 6.2.A.1 that, "... plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Updated Safety Analysis Report." This provision also applies to the corporate vice president position identified in Specification 6.2.A.3.

2. Exhibit A, Page 6: clarification of NRC approval of overtime control program.

The discussion of 6.2.B.5 indicates that the current Prairie Island staff overtime control program was reviewed and approved by NRC Safety Evaluation Report dated March 17, 1983. This statement requires clarification since, subsequent to NRC's March 17, 1983 approval of this program, Prairie Island revised the operating staff work schedule and also revised the overtime control program to accommodate the change. This later change to the overtime control program was approved by the NRC through License Amendments 105/98.

As shown in Attachments 1 and 2, the proposed Technical Specifications for overtime control have been revised to incorporate specific wording from Reference 4. This revised specification also retains the current Technical Specification controls requiring monthly review of individual overtime assignments.

3. Exhibit A, Page 7, Item 10: clarification of Review and Audit requirements status.

The Review and Audit requirements of the Technical Specifications will be relocated to the Operational Quality Assurance Plan in accordance with the guidance of Reference 1 and NRC Administrative Letter 95-04 in a forthcoming amendment to the Operational Quality Assurance Plan which will be submitted under separate cover letter. Thus these specific requirements are proposed to be removed from the current Technical Specifications.

4. Exhibit A, Page 7, Item 11: clarification of Special Inspections and Audits requirements status.

The subject License Amendment Request proposes to relocate the Special Inspections and Audits requirements of the Technical Specifications to the fire protection program and thus remove these specific requirements from the current Technical Specifications.

5. Exhibit A, Page 8, Item 14: clarification of relocation of procedure requirements.

See Attachment 3 for a detailed assessment of Item 14 plant procedures under the proposed commitment to Appendix A to Regulatory Guide 1.33.

6. Exhibit A, Page 9: clarification of commitment to NUREG-0737.

Reference 1 requested clarification of the proposed Technical Specification conformance to Reference 4 emergency operating procedures guidance. Prairie Island, through the Operational Quality Assurance Plan, is committed to comply with Supplement 1 to NUREG-0737 as stated in Generic Letter 82-33. Prairie Island is not committed to NUREG-0737. Thus proposed Technical Specification 6.4.B preserves the current Operational Quality Assurance Plan commitment.

7. Exhibit A, Page 13: clarification of current Technical Specification 6.5.F, Security.

The subject License Amendment Request discussion of the Security Plan is modified in that these Technical Specification administrative controls for the Security Plan will be relocated to the Operational Quality Assurance Plan and implementing Administrative Work Instructions. These provisions will continue under NRC control through the 10CFR50.54 requirements for the Operational Quality Assurance Plan. Thus, the License Amendment Request proposal to remove these specific requirements from the current Technical Specifications remains valid.

8. Exhibit A, Page 14, Item 16: relocation of Section 6.6, Plant Operating Records.

The Plant Operating Records requirements of the Technical Specifications will be relocated to the Operational Quality Assurance Plan in accordance with the guidance of Reference 1 and NRC Administrative Letter 95-04 in a forthcoming amendment to the Operational Quality Assurance Plan which will be submitted under separate cover letter. Thus these specific requirements are proposed to be removed from the current Technical Specifications.

9. Exhibit B, Pages TS-v, TS-ix, TS-x, TS-xi, TS-xii.

License Amendments incorporated into the Prairie Island Technical Specifications about the time of and subsequent to submittal of the subject License Amendment Request resulted in changes to these Table of Contents pages shown in Attachments 1 and 2.

10. Exhibit B, Page TS.6.0-2, Specification 6.2.B.1 and Exhibit C, Page TS.6.0-2, Specification 6.2.B.1: Plant staffing.

The current Technical Specifications take exception to 10CFR50.54 in that when one unit is operating and the other unit is not operating, only two licensed reactor operators are required on site (in addition to two senior reactor operators). The second sentence in this paragraph was included specifically to retain current Technical Specification requirements. Current plant administrative controls do not allow the plant to be staffed at this minimum required level. Thus, Prairie Island proposes to delete the second sentence of Specification 6.2.B.1, as shown in Attachments 1 and 2. This change will eliminate the exception, put Prairie Island under the requirements of 10CFR50.54 and effect an increase in the minimum plant staff requirements.

11. Exhibit B, Page TS.6.0-4, Exhibit C, Page TS.6.0-4, Specification 6.3: clarification of qualifications of personnel performing STA function.

Current plant practice requires that personnel performing the function of STA shall maintain an active Senior Reactor Operator (SRO) license. Attachments 1 and 2 propose changes that require an SRO for personnel performing the STA function. These changes will enable these personnel to maintain an active SRO in accordance with the provisions of 10CFR55.

12. Exhibit C, Page TS.6.0-7, Specification 6.5.D.5 (Page TS.6.0-8 is included to relocate the first two lines of Specification 6.5.D.6 to this page).

This item was conformed to Reference 4 guidance by References 2 and 3. This requirement appears to be a combination of previous Technical Specification requirements. However, plant and industry experience has demonstrated that in the process of combining previous requirements, new requirements may have been subtly introduced. The requirements as written in References 2 through 4, could be interpreted to require dose projections for the calendar quarter and calendar year each month. As proposed in this supplement and as previously required by the Prairie Island Technical

Specifications, doses would be required to be projected each month. The Westinghouse Owner's Group is also developing a generic industry change request to effect this change in Reference 4 and other vender standard technical specifications as applicable.

13. Exhibit C, Page TS.6.0-9, proposed Specification 6.5.J.2.

The limit of 78,000 curies in this specification is a typographical error. The Prairie Island Technical Specifications contained a limit of 78,800 curies prior to submittal of Reference 2 and issuance of the implementing License Amendment, Reference 3. Reference 2 erroneously stated the limit as 78,000 curies in the requested revised pages. Attachments 1 and 2 contain corrected pages for this License Amendment Request.

14. Exhibit C, Page TS.6.0-11, proposed Specification 6.6.B

The specification proposed in the December 14, 1996 submittal is identical to the current Technical Specifications 6.7.C.1 and is identical to the Prairie Island Technical Specifications prior to issuance of Reference 3. However, recent internal audits indicate that the terminology in the last paragraph is confusing. Attachments 1 and 2 contain a proposed revision to the last paragraph. Since Prairie Island is a two unit plant, it is inaccurate to relate sample distances from "one reactor". Actual distances are calculated from the center of the reactor site which is less than 200 feet from the centerline of either reactor. Since the sample distances are typically miles from the plant this change is a minor correction. Also, "all" has been removed since it is superfluous in this sentence.

15. Exhibit C, Pages TS.6.0-14 and 15: Specification 6.7, High Radiation Area, clarification of "greater than", "greater than or equal to", "less than", and "less than or equal to".

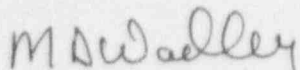
Reference 2 and the implementing License Amendment, Reference 3 conformed the specifications for high radiation area control to Reference 4. Through the process of implementing these new specification requirements, it appeared that the use of inequalities and "or equal to" were inconsistent throughout the specification. Proposed changes in Attachments 1 and 2 will correct these inconsistencies.

A revised Safety Evaluation, Significant Hazards Determination and Environmental Assessment have not been submitted with the changes proposed by this letter since

these evaluations, as originally presented in the December 14, 1995 submittal, continue to bound the proposed license amendment as modified by this supplement.

License Amendments 122/115, 123/116 and 124/117 were reviewed for impact on the subject License Amendment Request and all identified impacts have been incorporated into the clarifications and supplemental information provided above.

If you have any questions related to this information in support of the subject license amendment request, please contact myself or Dale Vincent at 612-388-6758.



M. D. Wadley
Plant Manager,
Prairie Island Nuclear Generating Plant

- Attachment 1: Marked Up Technical Specification Pages from License Amendment Request Dated December 14, 1994 Exhibit C
- Attachment 2: Revised Technical Specification Pages
- Attachment 3: Response to NRC letter dated September 25, 1996

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Senior Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J E Silberg

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 December 14, 1995

Northern States Power Company, a Minnesota corporation, by this letter dated November 25, 1996, with Attachments 1, 2, and 3, provides this supplemental information in support of its license amendment request dated December 14, 1995. Attachment 1 shows marked up Technical Specification pages. Attachment 2 shows the same pages revised to their proposed final form. Attachment 3 provides responses to a portion of NRC letter dated September 25, 1996.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By Michael D. Wadley
Michael D. Wadley
Plant Manager
Prairie Island Nuclear Generating Plant

On this 25th day of November 1996 before me a notary public in and for said County, personally appeared, Michael D. Wadley, Plant 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.

Marcia K. LaCore

