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August 17, 2020

L-PI-20-041
10 CFR 50.55a(g)(4)(iv)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant, Units 1 and 2
Docket Nos. 50-282 and 50-306
Renewed Facility Operating License Nos. DPR-42 and DPR-60

10 CFR 50.55a Requests Nos. 1-RR-5-13 and 2-RR-5-13, Request to Use a Provision of a Later Edition of the ASME Boiler and Pressure Vessel Code, Section XI

References: 1) NRC Regulatory Issue Summary 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," dated July 28, 2004

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv), and the guidance provided in Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requests NRC approval to use a specific provision of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, for the units identified above. Specifically, NSPM requests approval to use IWA-4540(b) of the 2017 Edition of the ASME BPV Code.

NSPM requests approval of this request by September 1, 2020.

If there are any questions or if additional information is required, please contact Mr. Jeff Kivi at (612) 330-5788 or Jeffrey.L.Kivi@XcelEnergy.com.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, reading "Scott Sharp". The signature is fluid and cursive, with the first name "Scott" and last name "Sharp" clearly distinguishable.

Scott Sharp
Site Vice President, Prairie Island Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC

10 CFR 50.55a Request 1-RR-5-13, Revision 0 (PINGP Unit 1)
10 CFR 50.55a Request 2-RR-5-13, Revision 0 (PINGP Unit 2)
Proposed Use of Subsequent ASME Code Edition and Addenda
In Accordance with 10 CFR 50.55a(g)(4)(iv)

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(4)(iv) and the guidance provided in Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requests NRC approval to use specific provisions of a later edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (BPV) Code, Section XI, for Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2. Specifically, NSPM requests approval to use IWA-4540(b) of the 2017 Edition of the ASME BPV Code.

1. ASME Code Component(s) Affected:

All Class 1, 2, and 3 items located in the ASME Section XI boundaries.

2. Requested Date for Approval:

Approval requested by September 1, 2020.

3. Applicable Code Edition and Addenda:

<u>PLANT</u>	<u>ISI</u> <u>INTERVAL</u>	<u>EDITION</u>	<u>INTERVAL</u> <u>START</u>	<u>INTERVAL</u> <u>SCHEDULED</u> <u>END</u>
PINGP UNITs 1 and 2	5	2007 Edition, through 2008 Addenda	12/21/2014	12/20/2024

4. Proposed Subsequent Code Edition and Addenda (or Portion):

PINGP performs Repair/Replacement activity in accordance with a site program based on an Edition of ASME Section XI which, at present, is 2007 the Edition through the 2008 Addenda.

Pursuant to 10 CFR 50.55a(g)(4)(iv), NSPM requests permission to utilize IWA-4540(b) from the 2017 Edition. This subparagraph outlines items that are exempt from pressure testing after repair/replacement activities.

5. Related Requirements:

10 CFR 50.55a(g)(4)(iv) states:

“Inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (a) of this section, subject to the conditions listed in paragraph (b) of this section, and subject to Commission approval. Portions of editions or addenda may be used, provided that all related requirements of the respective editions or addenda are met.”

10 CFR 50.55a(b)(2) incorporates by reference Section XI, Division 1, of the ASME BPV Code 2017 Edition as approved in Reference 2. NSPM is requesting to use IWA-4540(b) of the 2017 Edition of ASME Section XI to utilize the exemptions listed. There are no related requirements or applicable conditions associated with this subparagraph, IWA-4540(b).

6. Duration of Proposed Request:

The duration of this request will continue for the remainder of the site’s current Inservice Inspection interval.

7. References:

1. NRC Regulatory Issue Summary 2004-12, “Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI,” dated July 28, 2004.
2. Federal Register, 85 FR 26540, dated May 4, 2020

8. Precedents

- Vogtle Electric Generating Plant, Units 1 and 2- Request to use a Provision of a Later Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI (EPID L-2020-LLR-01 01) (ADAMS Accession Number ML20216A399)