

**From:** Kuntz, Robert  
**Sent:** Thursday, June 9, 2022 6:37 AM  
**To:** Kivi, Jeffrey L.  
**Cc:** Scott, Sara  
**Subject:** DRAFT Request for Additional Information RE: Prairie Island Nuclear Generating Plant, Units 1 and 2, 24-Month operating cycle amendment

Mr. Kivi,

By application dated August 6, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21218A093), as supplemented by letters dated December 7, 2021 (ADAMS Accession No. ML21341B375), and March 7, 2022 (ADAMS Accession No. ML22066B341), Northern States Power Company, a Minnesota Corporation, doing business as Xcel Energy (NSPM, the licensee), requested changes to the Technical Specifications (TSs) for Prairie Island Nuclear Generating Plant, Units 1 and 2 (Prairie Island). The proposed changes would revise the Prairie Island licensing basis to implement a 24-month operating cycle for and corresponding changes to the TSs.

The following DRAFT requests for additional information (RAI) is needed for the Nuclear Regulatory Commission (NRC) staff to complete its review. If Xcel Energy requires clarification on the attached DRAFT RAI contact me to set up a discussion with the NRC staff. If no clarification is required this DRAFT RAI will be considered a final RAI and the staff will expect a response within 30 days of this message.

Robert Kuntz  
Senior Project Manager  
NRC/NRR/DORL/LPL3

---

DRAFT REQUEST FOR ADDITIONAL INFORMATION

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

AMENDMENT TO ADOPT 24-MONTH OPERATING CYCLES

**RAI**

Requirements and Guidance:

The regulation at 10 CFR 50.36(c)(3) states:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

Generic Letter 91-04 (GL 91-04) "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," (ADAMS Accession No. ML013100215) provides guidance for evaluating surveillance intervals to support 24-month fuel cycles.

Issue:

The Prairie Island Nuclear Generating Plant, Units 1 and 2 license amendment request (LAR) dated August 6, 2021, Section 3.1 states that "The Following SRs [surveillance requirements] in the PI [Prairie Island] STI [Surveillance Test Interval] have limitations on application of grace and will be revised to allow grace of up to six months or 30 months total." Included in Section 3.1 of the LAR are TS 3.3.1, "Reactor Trip System (RTS) Instrumentation," SR 3.3.1.13 "Perform Channel Operational Test (COT)" and TS 3.3.6 "Control Room Special Ventilation System (CRSVS) Actuation Instrumentation," SR 3.3.6.3, "Perform TADOT." Enclosure 2 of LAR, Section A "Non-Calibration Changes" provides the basis for concluding the interval extension is acceptable for each of the non-calibration SRs consistent with the guidance in GL 91-04. However, the evaluation that would support the proposed extension of SRs 3.3.1.13 and 3.3.6.3 are not included in LAR Enclosure 2.

Request:

Would the proposed interval extension of up to 30 months be applied to SRs 3.3.1.13 and 3.3.6.3? If so, provide the evaluation that supports this extension.

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1664

**Mail Envelope Properties** (SA9PR09MB46405ADB143BBD8049F5658D99A79)

**Subject:** DRAFT Request for Additional Information RE: Prairie Island Nuclear Generating Plant, Units 1 and 2, 24-Month operating cycle amendment  
**Sent Date:** 6/9/2022 6:37:04 AM  
**Received Date:** 6/9/2022 6:37:00 AM  
**From:** Kuntz, Robert

**Created By:** Robert.Kuntz@nrc.gov

**Recipients:**  
"Scott, Sara" <sara.scott@xcelenergy.com>  
Tracking Status: None  
"Kivi, Jeffrey L." <jeffrey.l.kivi@xcelenergy.com>  
Tracking Status: None

**Post Office:** SA9PR09MB4640.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3193	6/9/2022 6:37:00 AM

**Options**  
**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**