



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 30, 2024

Thomas Conboy
Site Vice President
Northern States Power Company – Minnesota
Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1 – RESPONSE TO
ALTERNATIVE RELIEF REQUEST-10, AUXILIARY FEEDWATER VALVE
TESTING (EPID L-2024-LLR-0067)

Dear Thomas Conboy:

By letter dated October 14, 2024, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24288A011), Northern States Power Company, a Minnesota Corporation doing business as Xcel Energy, (NSPM, the licensee), submitted an alternative request pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(z)(2), “Hardship without a compensating increase in quality and safety” for Prairie Island Nuclear Generating Plant (PINGP), Unit 1. The alternative relief request (RR) proposed to defer the quarterly and post-replacement testing of certain valves in the auxiliary feedwater (AFW) system until startup following the current refueling outage when plant conditions support performance of the tests. Specifically, the alternative RR requested to extend the American Society of Mechanical Engineers (ASME) Operation and Maintenance of Nuclear Power Plants (OM Code), paragraphs ISTC-3310 and ISTC-3570, required test interval for a turbine-driven AFW pump (TDAFWP), main steam supply control valve (which is an air-operated valve (AOV)), a TDAFWP recirc/lube oil cooling control valve (also an AOV), a TDAFWP recirc/lube oil cooling line check valve, and a motor-driven AFW pump recirc/lube oil cooling line check valve, until reaching MODE 3 during startup from the fall 2024 refueling outage, which is currently scheduled for November 22, 2024.

Alternative RR-10 indicates the following:

These valves were previously tested on July 18, 2024, and will be overdue for testing on November 10, 2024. The AFW system will be out of service at that time, however, these valves are normally tested at power and are not required to be tested during cold shutdowns or refueling outages. New test equipment or plant modifications would be required to perform these tests prior to MODE 3.

The current Code of Record for the PINGP, Unit 1 inservice testing program is the 2004 Edition through the 2006 Addenda of the ASME OM Code as incorporated by reference in 10 CFR 50.55a.

The ASME OM Code requirements related to the subject valves are located in paragraphs ISTC-3520 and ISTC-3522. The requirements in ISTC-3250 for Category A and Category B valves state that valves be full-stroke exercised during each cold shutdown. Further ISTC-3500 states that during extended shutdowns, the valves shall be exercised every 3 months, if practicable. ISTC-3520 states that for extended outages, testing does not need to be commenced within 48 hours if the valves will be tested as part of plant startup. Also, ISTC-3520 states that it is not the intent of the subsection to keep plants in cold shutdown to complete cold shutdown testing. ISTC-3522 contains similar requirements for Category C check valves.

The U.S. Nuclear Regulatory Commission staff has determined, based on ASME OM Code, paragraphs ISTC-3521 and ISTC-3522, that deferring testing of these valves until plant start-up at PINPG, Unit 1, meets the applicable ASME OM Code requirements, as incorporated by reference in 10 CFR 50.55a. Therefore, the alternative requested in RR-10 is not required.

If you have any questions, please contact Brent Ballard at 301-415-0680 or via e-mail at Brent.Ballard@nrc.gov.

Sincerely,

/RA/

Robert F. Kuntz, Branch Chief, Acting
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-282

cc: Listserv

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