



# Pre-Application Meeting: Prairie Island License Amendment Request for Technical Specification 3.8.1

May 29, 2025

## Agenda

- Purpose
- Background/Proposed Licensing Action
- Schedule
- Closing Remarks

## Purpose

Discuss proposed license amendment for Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 to revise Technical Specifications (TS) 3.8.1, AC Sources – Operating to:

- Relocate discussion of manufacturer's recommendations from Surveillance Requirement (SR) 3.8.1.3 to the Bases.
- Remove expired one-time amendments (Condition E and SR 3.8.1.10).
- Make other editorial corrections.



## Background/Proposed Licensing Actions

- Revise SR 3.8.1.3 to relocate discussion of manufacturer's recommendations to the Bases. A similar change to SR 3.8.1.2 was approved 2024 with Unit 1 and Unit 2 amendments 245 and 233, respectively. Discussion will include:
  - Overview of gradual loading
  - Description of how manufacturer's recommendations and other inputs to gradual loading will be maintained.
- Revise Condition E and SR 3.8.1.10 to remove expired one-time amendments.
- Revise pages 3.8.1-2 thru 3.8.1-5 to remove redundant continuations.



# Proposed Licensing Actions – TS/Bases markups

SURVEILLANCE REQUIREMENTS (continued)	
SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.3 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. DG loadings may include gradual loading in <del>consideration of manufacturer's recommendations.</del></li> <li>2. Momentary transients outside the load range do not invalidate this test.</li> <li>3. This Surveillance shall be conducted on only one DG at a time.</li> <li>4. This SR shall be preceded by and immediately follow without shutdown a successful performance of SR 3.8.1.2 or SR 3.8.1.6.</li> </ol> <p>Verify each DG is synchronized and loaded and operates for <math>\geq 60</math> minutes at a load:</p> <ol style="list-style-type: none"> <li>a. Unit 1; <math>\geq 2500</math> kW; and</li> <li>b. Unit 2; <math>\geq 5100</math> kW and <math>\leq 5300</math> kW.</li> </ol>	In accordance with the Surveillance Frequency Control Program

BASES	
SURVEILLANCE REQUIREMENTS	SR 3.8.1.3 (continued)
<p>informed by manufacturer's recommendations, operating experience, DG subject matter expertise, and other factors</p>	<p>This SR is modified by four Notes. Note 1 indicates that diesel engine runs for this Surveillance may include gradual loading, <del>as recommended by the manufacturer,</del> so that mechanical stress and wear on the diesel engine are minimized. Note 2 states that momentary transients, because of changing loads or system characteristics, do not invalidate this test. Note 3 indicates that this Surveillance should be conducted on only one DG at a time in order to avoid common cause failures that might result from path or grid perturbations. Note 4 stipulates a prerequisite requirement for performance of this SR. A successful DG start must precede this test to credit satisfactory performance.</p>

## Proposed Licensing Actions – TS/Bases markups continued

E. Two DGs inoperable.	E.1 Restore one DG to OPERABLE status.	2 hours*
F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.	F.1 Be in MODE 3.	6 hours
	<u>AND</u> F.2 Be in MODE 5.	36 hours
G. Two DGs inoperable and one or more paths inoperable.  <u>OR</u>  One DG inoperable and two paths inoperable.	G.1 Enter LCO 3.0.3.	Immediately

~~\*A one-time change increased the Completion Time to 12 hours for Unit 2 during the period from January 29 through January 31, 2019. This change was approved via an emergency license amendment~~

Note: Unit 2 Amendment 213 that added one-time Completion Time to TS 3.8.1, Condition E, did not include any changes to the Bases, so no revisions are required as part of this amendment.

# Proposed Licensing Actions – TS/Bases markups continued

SURVEILLANCE REQUIREMENTS (continued)	
SURVEILLANCE	FREQUENCY
<p>SR 3.8.1.10 -----NOTES-----</p> <ol style="list-style-type: none"> <li>1. All DG starts may be preceded by an engine prelube period.</li> <li>2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4.</li> <li>3- <del>12 Battery Charger not required to be energized in SR 3.8.1.10(e) until completion of this SR during Unit 1 2011 refueling outage.*</del></li> </ol> <p>Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated safety injection actuation signal:</p> <ol style="list-style-type: none"> <li>a. De-energization of emergency buses;</li> <li>b. Load shedding from emergency buses; and</li> <li>c. DG auto-starts from standby condition and energizes emergency loads in <math>\leq 60</math> seconds.</li> </ol>	In accordance with the Surveillance Frequency Control Program
<p>SR 3.8.1.11 -----NOTE-----</p> <p>All DG starts may be preceded by an engine prelube period.</p> <p>Verify on an actual or simulated loss of offsite power signal that the DG auto-starts from standby condition.</p>	In accordance with the Surveillance Frequency Control Program

\*A modification will be installed during or prior to the Unit 1 2011 refueling outage to assure the 12 Battery Charger is automatically powered from its normal bus within 60 seconds. Compliance with this SR will be demonstrated after implementation of the modification.

BASES	
SURVEILLANCE REQUIREMENTS	<p>SR 3.8.1.10 (continued) <span style="border: 1px solid red; padding: 2px;">two</span></p> <p>This SR is modified by <del>three</del> Notes. The reason for Note 1 is to minimize wear and tear on the DGs during testing. The reason for Note 2 is that the performance of the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems. <del>Note 3 is provided to allow D2 DG to be OPERABLE without requiring the 12 Battery Charger to be energized until completion of this SR during the Unit 1 2011 refueling outage.</del></p>



## Proposed Licensing Actions – TS/Bases markups continued Example

AC Sources-Operating 3.8.1		
<u>ACTIONS</u> <del>(continued)</del>		
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2 Restore path to OPERABLE status.	7 days <u>OR</u>



## Schedule

NSPM plans to submit the LAR by June 27, 2025, and request NRC approval within 12 months of acceptance and implementation within 90 days of approval.

