

May 16, 2001

Mr. Joel Sorensen  
Site General Manager  
Prairie Island Nuclear Generating Plant  
Nuclear Management Company, LLC  
1717 Wakonade Drive East  
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - SAFETY  
EVALUATION ON REVISION 22 TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM PLAN (TAC NOS. MA9392 AND MA9393)

Dear Mr. Sorensen:

By letter dated May 31, 2000, Northern States Power Company (NSP) submitted proposed Revision 22 to the Prairie Island Nuclear Generating Plant, Units 1 and 2, Operational Quality Assurance Plan (OQAP) for Nuclear Regulatory Commission (NRC) review and approval in accordance with 10 CFR 50.54(a)(4). Subsequently, Nuclear Management Company, LLC (NMC), became the licensee for Prairie Island, Units 1 and 2. By letter dated October 5, 2000, NMC requested that the NRC continue to process and disposition licensing actions previously docketed and requested by NSP.

In its proposed Revision 22 to the OQAP, the licensee's change would remove the listing of "Emergency lighting" in Appendix B, *Prairie Island Structures, Systems, and Components Subject to Appendix B of 10 CFR 50*. This change was identified by the licensee as a reduction in commitment in the OQAP and thus, subject to NRC approval pursuant to 10 CFR 50.54(a)(4). The enclosed safety evaluation (SE) documents the bases for the NRC staff's conclusion that the reduction in commitments identified by the licensee in Revision 22 to the OQAP are consistent with the guidance in NUREG-0800, the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," and therefore, continue to satisfy the requirements of Appendix B to 10 CFR Part 50. However, this conclusion does not establish the technical validity of the *Prairie Island Safety Evaluation SE-559* performed by the licensee under 10 CFR 50.59.

Sincerely,

**/RA by Samuel Miranda for/**

Tae Kim, Senior Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

NUCLEAR MANAGEMENT COMPANY, LLC

OPERATIONAL QUALITY ASSURANCE PLAN, REVISION 22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-282 AND 50-306

1.0 INTRODUCTION

By letter dated May 31, 2000, the Northern States Power Company (NSP) submitted proposed Revision 22 to the Prairie Island Nuclear Generating Plant, Units 1 and 2, Operational Quality Assurance Plan (OQAP) for Nuclear Regulatory Commission (NRC) review and approval in accordance with 10 CFR 50.54(a)(4). Subsequently, Nuclear Management Company, LLC (NMC) became the licensee for Prairie Island, Units 1 and 2. By letter dated October 5, 2000, NMC requested that the NRC continue to process and disposition licensing actions previously docketed and requested by NSP.

Revision 22 would remove the emergency lighting system from the list of electrical systems in Appendix B of the OQAP. This change was identified by the licensee as a reduction in commitment in the OQAP and, thus, subject to NRC approval pursuant to 10 CFR 50.54(a)(4). This reduction in commitment regarding the emergency lighting system description in the OQAP is the subject of this safety evaluation.

2.0 EVALUATION

The licensee's OQAP, Appendix B, entitled, *Prairie Island Structures, Systems, and Components Subject to Appendix B of 10 CFR 50*, currently lists safety-related structures, systems, and components. In Revision 22, the licensee proposed to delete the emergency lighting system from this list based on an evaluation which concluded that this item is not safety-related.

The "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," NUREG-0800, Section 17.1, "Quality Assurance During the Design and Construction Phases," Subsection 17.1.II, "Quality Assurance Program [QAP]," subparagraph 2A1d, states that activities related to the QAP are acceptable if the scope of the program includes "[T]he identification of structures, systems, and components and related consumables covered by the QA program and controlled measures identifying authorized personnel to approve changes to this list and describing methods controlling its distribution." Accordingly, Section 17.1 of the SRP provides the NRC staff's acceptance criteria on this subject for nuclear power plants in the design and construction phase.

As described in Revision 2 to Section 17.1 of the SRP, subparagraph 2A1a, the provisions related to this area of QAP acceptance were modified as follows: "A commitment that activities affecting structures, systems, and components important to safety will be subject to the applicable controls of the QA program. **The structures, systems, components and related**

**consumables covered by the QA program are identified (QA list) in Section 3.2.1 of the SAR** [Safety Analysis Report] [emphasis added]." Thus, Revision 2 to Section 17.1 of the SRP established that the "QA list" information is not required to be included in the OQAP description, but needs to be identified in Section 3.2.1 of the SAR.

SRP Section 17.2, "Quality Assurance During the Operations Phase," Revision 2 (July 1981), endorses Section 17.1 with respect to QAP acceptance in this area. Since the inclusion in the OQAP description of "Emergency lighting" associated with structures, systems, and components subject to the provisions of Appendix B to 10 CFR Part 50 (i.e., safety-related) is not a prerequisite for QAP acceptance in Section 17.2 of the SRP, the licensee's proposal to remove "Emergency lighting" is acceptable.

### 3.0 CONCLUSION

While the licensee's proposed revision to the OQAP described above constitutes a reduction in commitments in the QAP description previously approved by the NRC, such exceptions continue to satisfy the provisions of Section 17.2 of the SRP. Therefore, the NRC staff has determined that proposed Revision 22 to the licensee's OQAP, described in the licensee's letter dated May 31, 2000, continues to comply with the quality assurance criteria of Appendix B to 10 CFR Part 50 and is, therefore, acceptable. However, this conclusion does not establish the technical validity of the *Prairie Island Safety Evaluation SE-559* performed by the licensee which forms the basis for the licensee's decision to exclude emergency lighting from the provisions of Appendix B to 10 CFR Part 50. The requirements at 10 CFR 50.59 and Criterion III of Appendix B to 10 CFR Part 50 govern the process under which the *Prairie Island Safety Evaluation SE-559* was performed and, accordingly, its bases and conclusions are subject to NRC inspection.

Principal Contributor: M. Bugg

Date: May 16, 2001