December 21, 2001

Mr. Mano Nazar
Site Vice President
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 - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE APPLICATION FOR CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.9 (TAC NOS. MB0695 AND MB0696)

Dear Mr. Nazar:

By application dated December 11, 2000, as supplemented March 6, June 5, July 3, August 13, and November 12, 2001, Nuclear Management Company, LLC, submitted a license amendment request to convert the current Technical Specifications (TSs) for the Prairie Island Nuclear Generating Plant, Units 1 and 2, to a set of improved TSs (ITS).

Enclosed is the Nuclear Regulatory Commission staff's request for additional information (RAI) on Section 3.9, "Refueling," of the subject ITS submittal. The contents of the enclosed RAI have been previously forwarded to Mr. Dale Vincent of your staff to facilitate any questions or clarifications on the RAI. Subsequent dialogues have clarified the staff's understanding on a number of items, and thus requires no further information as noted in the enclosure. For the rest of the items in the enclosure, please respond within 60 days from the date of this letter.

Please contact me on (301) 415-1392 if you have any questions regarding this RAI.

Sincerely,

/RA/

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: Request for Additional Information

cc w/encl: See next page

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Prairie Island Nuclear Generating Plant,
Units 1 and 2

cc:

J. E. Silberg, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington, DC 20037

Site Licensing Manager
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

Adonis A. Neblett
Assistant Attorney General
Office of the Attorney General
455 Minnesota Street
Suite 900
St. Paul, MN 55101-2127

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
1719 Wakonade Drive East
Welch, MN 55089-9642

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Mr. Stephen Bloom, Administrator
Goodhue County Courthouse
Box 408
Red Wing, MN 55066-0408

Commissioner
Minnesota Department of Commerce
121 Seventh Place East
Suite 200
St. Paul, MN 55101-2145

Tribal Council
Prairie Island Indian Community
ATTN: Environmental Department
5636 Sturgeon Lake Road
Welch, MN 55089

Mr. Roy A. Anderson
Executive Vice President and
Chief Nuclear Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Nuclear Asset Manager
Xcel Energy, Inc.
414 Nicollet Mall
Minneapolis, MN 55401

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
REQUEST FOR ADDITIONAL INFORMATION
ITS SECTION 3.9, REFUELING

1. ITS 3.9.3 Action B.2
   CTS 3.8.A.1.c

ITS 3.9.3 Action B.2 requires the performance of SR 3.9.1.1 in 12 hours. The 12 hour completion time is not in the CTS. No discussion of changes was provided for the 12 hour completion time of ITS 3.9.3 Action B.2.

Comment: Provide the discussion of changes for the 12 hour completion time of ITS 3.9.3 Action B.2.

2. ITS 3.9.3 Action C.3
   CTS 3.8.A.1.c

ITS 3.9.3 Action C.3 requires the performance of SR 3.9.1.1 in 12 hours. The 12 hour completion time is not in the CTS. No discussion of changes was provided for the 12 hour completion time of ITS 3.9.3 Action C.3.

Comment: Provide the discussion of changes for the 12 hour completion time of ITS 3.9.3 Action C.3.

3. ITS SR 3.9.3.1
   CTS 3.8.A.1.c

ITS SR 3.9.3.1 requires the performance of a channel check every 12 hours. The 12 hour frequency is not in the CTS. No discussion of changes was provided for the 12 hour frequency of ITS SR 3.9.3.1.

Comment: Provide the discussion of changes for the 12 hour frequency of ITS SR 3.9.3.1.

4. ITS SR 3.9.3.2
   CTS 3.8.A.1.c

ITS SR 3.9.3.2 requires the performance of a channel calibration every 24 months. The 24 month frequency is not in the CTS. No discussion of changes was provided for the 24 month frequency of ITS SR 3.9.3.2.

Comment: **Beyond Scope Issue.** Provide the discussion of changes for the 24 month frequency of ITS SR 3.9.3.2.

5. ITS 3.9.3 Action C.2 and C.3
   PA3.9-70

ITS 3.9.3 Action C.2 and C.3 require the immediate suspension of operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1 and the performance of SR 3.9.1.1 every 12 hours. These

required actions are not in the STS or the CTS. PA3.9-70 states that these new required actions have been included to be consistent with the intent of TSTF-268 Rev. 2 which was not considered when TSTF-23 was written. PA3.9-70 does not provide sufficient plant specific information for the adoption of the proposed ITS 3.9.3 Action C.2 and C.3.
Comment: Provide plant specific justification for the adoption of the proposed ITS 3.9.3 Action C.2 and C.3.

6. ITS SR 3.9.3.2 Note

ITS SR 3.9.3.2 has a note which states "Neutron detectors are excluded from CHANNEL CALIBRATION." This note does not appear in the CTS or the CTS mark up. No justification of differences or discussions of changes was provided for adding this note to the ITS.

Comment: Provide an adequate discussion of changes which addresses the addition of ITS 3.9.3.2 Note.

7. CTS 3.8.A.1.a.2) a)
   A3.9-10
   ITS LCO 3.9.4.b

CTS 3.8.A.1.a.2) a) adds the phrase "capable of being closed and" to the CTS and ITS. The addition of this phrase is not discussed in the discussion of changes.

Comment: Provide a discussion of changes for the addition of the phrase "capable of being closed" to the CTS and ITS.

8. CTS 3.8.A.1.a.2) b)
   ITS LCO 3.9.4.b
   A3.9-10
   LR3.9-11
   A3.9-12
   LR3.9-13
   A3.9-14
   CL3.9-62

CTS 3.8.A.1.a.2) b) allows both doors in each air lock to be open if four requirements are met. The CTS mark up proposes to relocate some of those requirements out of the ITS. This change is not consistent with the CTS and is considered to be beyond scope.

Comment: Maintain the CTS requirements in the ITS and provide revised mark up ITS pages and justifications.

9. ITS SR 3.9.4.1
   CTS 3.8-1 Overflow

ITS SR 3.9.4.1 requires the verification of each required containment penetration is in the required status every 7 days. The 7 day frequency is not in the CTS. No discussion of changes was provided for the 7 day frequency of ITS SR 3.9.4.1.

Comment: Provide the discussion of changes for the 7 day frequency of ITS SR 3.9.4.1.

10. ITS SR 3.9.4.2
    CTS 3.8-1 Overflow

ITS SR 3.9.4.2 requires the verification that each required containment inservice (low flow) purge system valve actuates to the isolation position on an actual or simulated actuation signal every 24 months. The 24 month frequency is not in the CTS. No discussion of changes was provided for the 24 month frequency of ITS SR 3.9.4.2.

Comment: **Beyond Scope Issue.** Provide the discussion of changes for the 24 month frequency of ITS SR 3.9.4.2.

11. ITS LCO 3.9.4.c.1
    CL3.9-65

ITS mark up for ITS LCO 3.9.4.c.1 indicates that the changes made are associated with CL3.9-65. However, Part F, Justification for Differences, states that 65 is not used.

Comment: Correct the ITS mark up or Part F to represent what is being changed.

12. ITS SR 3.9.4.2 Note

ITS SR 3.9.4.2 has a note which states “Not required to be met for containment inservice (low flow) purge valve(s) in penetrations closed to comply with LCO 3.9.4.c.1.” This note does not appear in the CTS or the CTS mark up. No justification of differences or discussions of changes was provided for adding this note to the ITS.

Comment: Provide an adequate discussion of changes which addresses the addition of ITS 3.9.4.2 Note.

13. ITS LCO 3.9.5 Note
    TA3.9-68

TA3.9-68 states that the changes incorporate TSTF-153. TSTF-153 has been revoked due to confusion over the wording.

Comment: Please use NUREG 1431 Rev. 1 wording (wording prior to TSTF-153) for all affected specifications.

14. ITS 3.9.5 Action A.4
    ITS 3.9.5 Action A.6.1
    ITS 3.9.5 Action A.6.2

ITS Required Actions A.4, A.6.1 and A.6.2 for Specification 3.9.5 do not appear in the CTS or the CTS mark up. No justification of differences or discussion of changes was provided for the addition of these required actions.

Comment: Provide an adequate discussion of changes for the addition of required actions A.4, A.6.1 and A.6.2 and the associated completion time.

15. ITS 3.9.5 Action A.6.1
    STS 3.9.5 Action A.6.1
    ITS 3.9.6 Action B.5.1
    STS 3.9.6 Action B.5.1

STS 3.9.5 Required Action A.6.1 and 3.9.6 Required Action B.5.1 state "close each penetration providing direct access from the containment atmosphere to the outside atmosphere with a manual or automatic isolation valve, or blind flange, or equivalent." ITS 3.9.5 Action A.6.1 and ITS 3.9.6 Action B.5.1 are missing the phrase "or equivalent." No justification of differences was provided for the change.

Comment: Adopt the STS wording for Action A.6.1 and Action B.5.1 or provide plant specific justification for the change.

16. CTS 3.A.8.1.f
    M3.9-33
    L3.9-34
    ITS 3.9.6 Note 1

CTS 3.8.A.1.f states that the pump (one RHR pump must be operable and running) may be shut down for up to one hour to facilitate movement of fuel or core components. STS 3.9.6 requires two RHR loops to be operable and one RHR loop shall be in operation. M3.9-33 and L3.9-34 provide a discussion of changes to CTS 3.8.A.1.f which would add the phrase "per 8 hour period provided no operations are permitted which would cause reduction of RCS boron concentration," and delete the phrase "to facilitate movement of fuel or core components." These changes are incorporated into ITS 3.9.5 Note and are consistent with the STS. However, the proposed changes are not consistent with STS 3.9.6 Note 1 or the CTS mark up. M3.9-33 and L3.9-34 do not provide any basis for changing STS 3.9.6 Note 1 to that proposed by ITS 3.9.6 Note 1. The proposed ITS 3.9.6 Note 1 is not justified, not consistent with the proposed operation specified in ITS LCO 3.9.6 and therefore is not acceptable.

Comment: Adopt STS 3.9.6 Note 1 wording by providing adequate justification for use at Prairie Island.

17. CTS 3.8.A.1.g
    M3.9-37
    ITS 3.9.6 Note 2

M3.9-37 discusses the addition of a new note (ITS 3.9.6 Note 2) to CTS 3.8.A.1.g which states that "the required operating RHR loop may be removed from operation, and considered OPERABLE and in operation, to support filling and draining the reactor cavity when aligned to, or during transitioning to or from, the refueling water storage tank provided the required RHR loop is capable of being realigned to the RCS." This new note is not consistent with the CTS or the STS. M3.9-37 does not provide any basis for the addition of the new note and therefore, ITS 3.9.6 Note 2 is not acceptable.

Comment: Adopt STS 3.9.6 Note 2 wording by providing adequate justification for use at Prairie Island.

18. ITS SR 3.9.6.1
    CTS 3.8.A.1.g

ITS SR 3.9.6.1 requires the verification that one RHR loop is in operation every 12 hours. The 12 hour frequency is not in the CTS. No discussion of changes was provided for the 12 hour frequency of ITS SR 3.9.6.1.

Comment: Provide the discussion of changes for the 12 hour frequency of ITS SR 3.9.6.1.

19. ITS SR 3.9.6.2
    CTS 3.8.A.1.g

ITS SR 3.9.6.2 requires the verification of correct breaker alignment and indicated power available to the required RHR pump that is not in operation every 7 days. The 7 day frequency is not in the CTS. No discussion of changes was provided for the 7 day frequency of ITS SR 3.9.6.2.

Comment: Provide the discussion of changes for the 7 day frequency of ITS SR 3.9.6.2.

20. ITS 3.9.6 Action A.2
    ITS 3.9.6 Action B.2
    ITS 3.9.6 Action B.3
    ITS 3.9.6 Action B.5.1
    ITS 3.9.6 Action B.5.2

ITS Required Actions A.2, B.2, B.3, B.5.1 and B.5.2 for Specification 3.9.6 do not appear in the CTS or the CTS mark up. No justification of differences or discussion of changes was provided for the addition of these required actions.

Comment: Provide an adequate discussion of changes for the addition of required actions A.2, B.2, B.3, B.5.1 and B.5.2 and the associated completion time.