



Nuclear Management Company, LLC
Prairie Island Nuclear Generating Plant
1717 Wakonade Dr. East
Welch MN 55089

June 7, 2002

10 CFR Part 50
Section 50.90

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Supplement to License Amendment Request dated December 11, 2000
Conversion to Improved Technical Specifications (ITS)

By letter dated, December 11, 2000, Prairie Island submitted a License Amendment Request (LAR) to convert the current Technical Specifications (CTS) using the guidance of NUREG-1431, Revision 1 as amended by NRC and industry Technical Specification Task Force (TSTF) documents. This letter supplements the subject LAR.

The NRC Staff, in telephone calls, has requested changes in the proposed Technical Specifications and additional documentation to comply with the requests for information in Generic Letter (GL) 99-02. Change designator E52 pages make these changes in response to GL 99-02.

Attachment 1, Page List by RAI Q, provides a cross-reference of change designators and other sources of page changes to the pages that they changed.

Attachment 2 to this letter contains Revision 15 change pages. Changes to the Revision 15 pages are sidlined in the right margin beside the line(s) which have been revised. Change Pages from Parts A, B, D, F, G or Cross-References are dated 5/29/02. Change Pages from Parts C and E are marked as Revision 15 with a small textbox below the revision sideline which contains "R-15".

The Significant Hazards Determinations and Environmental Assessments, as presented in the original December 11, 2000 submittal and as supplemented

Pool

March 6, 2001, July 3, 2001, August 13, 2001, November 12, 2001, December 12, 2001, January 25, 2002, January 31, 2002, February 14, 2002, February 15, 2002, February 16, 2002, March 6, 2002, April 11, 2002, May 10, 2002 and May 30, 2002, bound the proposed license amendment.

On February 2, 2001, NMC submitted an LAR to provide miscellaneous clarifications of current Technical Specifications (CTS) Table 3.5-2B. By this letter, NMC requests to withdraw, effective upon the date of issuance of the improved Technical Specifications, the proposed LAR dated February 2, 2001 since the ITS will replace the affected CTS requirements.

NMC is notifying the State of Minnesota of this LAR supplement by transmitting a copy of this letter and attachments to the designated State Official.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other Prairie Island Nuclear Generating Plant (PINGP) and NMC employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

In this letter NMC has not made any new or revised any Nuclear Regulatory Commission commitments. Please address any comments or questions regarding this matter to myself or Mr. Dale Vincent at 1-651-388-1121.



Mano K. Nazar
Site Vice President
Prairie Island Nuclear Generating Plant

C: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
James Bernstein, State of Minnesota

Attachments:

Affidavit

1. Page List by RAI Q
2. Revision 15 Change Pages

UNITED STATES NUCLEAR REGULATORY COMMISSION

NUCLEAR MANAGEMENT COMPANY, LLC

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NO. 50-282
50-306

REQUEST FOR AMENDMENT TO
OPERATING LICENSES DPR-42 & DPR-60

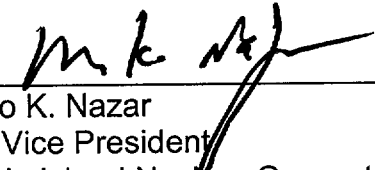
SUPPLEMENT TO LICENSE AMENDMENT REQUEST DATED DECEMBER 11, 2000
CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (ITS)

By letter dated June 7, 2002, Nuclear Management Company, LLC, a Wisconsin corporation, is submitting additional information in support of the License Amendment Request originally submitted December 11, 2000.

This letter contains no restricted or other defense information.

NUCLEAR MANAGEMENT COMPANY, LLC

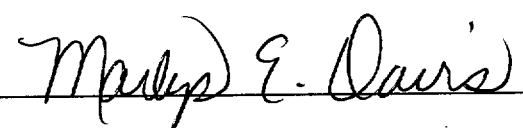
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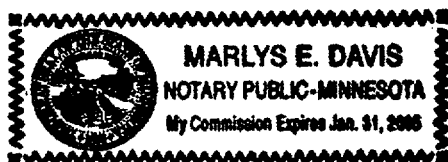

Mano K. Nazar
Site Vice President
Prairie Island Nuclear Generating Plant

State of Minnesota

County of Goodhue

On this 7th day of June 2002, before me a notary public acting in said County, personally appeared Mano K. Nazar, Site Vice President, Prairie Island Nuclear Generating Plant, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Nuclear Management Company, LLC, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true.





Prairie Island Nuclear Generating Plant

Attachment 1

to

Supplement dated June 7, 2002

to License Amendment Request dated December 11, 2000

Conversion to Improved Technical Specifications (ITS)

Page List by RAI Q

RAI Q #	Package #	Part	Page #
E52	5.0	B	5.0-23
E52	5.0	B	5.0-24
E52	5.0	C	25 of 41
E52	5.0	E	5.0-27
E52	5.0	E	5.0-29
E52	5.0	F	8
Repagination	5.0	E	5.0-28
Repagination	5.0	E	5.0-30

Prairie Island Nuclear Generating Plant

Attachment 2

to

**Supplement dated June 7, 2002
to License Amendment Request dated December 11, 2000
Conversion to Improved Technical Specifications (ITS)**

Revision 15 Change Pages

Improved Technical Specifications
Supplement dated 5/29/02
Revision 15 Change Page List

UPDATING INSTRUCTIONS

Remove

Insert

Chapter/ Section	Part	Page	Revision/ Date	Chapter/ Section	Part	Page	Revision/ Date
5.0	B	5.0-23	11/1/01	5.0	B	5.0-23	5/29/02
		5.0-24	12/11/00			5.0-24	5/29/02
	C	25 of 41	5		C	25 of 41	15
	E	5.0-27	None		E	5.0-27	15
		5.0-28	None			5.0-28	15
		5.0-29	5			5.0-29	15
		5.0-30	None			5.0-30	15
	F	--			F	8	5/29/02

5.5 Programs and Manuals (continued)

5.5.9 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of the Control Room Special Ventilation System, Auxiliary Building Special Ventilation System, Shield Building Ventilation System, and the Spent Fuel Pool Special and Inservice Purge Ventilation System each operating cycle (18 months for shared systems).

Demonstrate for the Auxiliary Building Special Ventilation, Shield Building Ventilation, Control Room Special Ventilation, and Spent Fuel Pool Special and Inservice Purge Ventilation Systems that:

- a. An inplace DOP test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $< 0.05\%$ (for DOP, particles having a mean diameter of 0.7 microns);
- b. A halogenated hydrocarbon test of the inplace charcoal adsorber shows a penetration and system bypass $< 0.05\%$ (for DOP, particles having a mean diameter of 0.7 microns);
- c. A laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than; 1) 15% penetration for Auxiliary Special Ventilation System, 2) 15% penetration for Shield Building Ventilation System, 3) 7.5% penetration for the Spent Fuel Pool Special and Inservice Purge System, and 4) 2.5% penetration for the Control Room Special Ventilation System when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and 95% relative humidity (RH); and
- d. The pressure drop across the combined HEPA filters and the charcoal adsorbers is less than 6 inches of water at the system flowrate $\pm 10\%$.

5.5 Programs and Manuals (continued)

5.5.9 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.10 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas holdup system, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

- a. The limits for concentrations of oxygen in the waste gas holdup system and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria;
- b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than or equal to 78,800 curies of noble gas (considered as dose equivalent Xe-133); and
- c. A surveillance program to ensure that the quantity of radioactivity contained in each of the following tanks shall be limited to 10 curies, excluding tritium and dissolved or entrained noble gases:

Condensate storage tanks
Outside temporary tanks

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies

5.5.9

penetration and system bypass < 0.05% (for DOP, particles having a mean diameter of 0.7 microns);

LR5.0-22

- b. A halogenated hydrocarbon test of the inplace charcoal adsorber shows a penetration and system bypass < 0.05% (for DOP, particles having a mean diameter of 0.7 microns);
- c. A laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than; 1) 15% penetration for the Auxiliary Special Ventilation System, 2) 15% penetration for the Shield Building Ventilation System, 3) 7.5% penetration for the Spent Fuel Pool Special and Inservice Purge System, and 4) 2.5% penetration for the Control Room Special Ventilation System) when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and 95% relative humidity (RH) (or 70% RH with humidity controls if the humidity controls are capable of maintaining the humidity of the air entering the charcoal less than or equal to 70% RH under worst-case design-basis conditions); and
- d. The pressure drop across the combined HEPA filters and the charcoal adsorbers is less than 6 inches of water at the system flowrate $\pm 10\%$.

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The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.10 Explosive Gas and Storage Tank Radioactivity Monitoring Program

5.5.10

This program provides controls for potentially explosive gas mixtures contained in the waste gas holdup system, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

- a. The limits for concentration of oxygen in the waste gas holdup system and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria;
- b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank is less than or equal to 78,800 curies of noble gases (considered as dose equivalent Xe-133); and
- c. A surveillance program to ensure that the quantity of radioactivity contained in each of the following tanks shall be limited to 10 curies, excluding tritium and dissolved or entrained noble gases:

Condensate storage tanks
Outside temporary tanks

A5.0-06

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program test surveillance frequencies.

5.5 Programs and Manuals (continued)

~~chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:~~

- ~~a. Identification of a sampling schedule for the critical variables and control points for these variables;~~
- ~~b. Identification of the procedures used to measure the values of the critical variables;~~
- ~~c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage;~~
- ~~d. Procedures for the recording and management of data;~~
- ~~e. Procedures defining corrective actions for all off control point chemistry conditions; and~~
- ~~f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.~~

CL5.0-88

5.5.911 Ventilation Filter Testing Program (VFTP)

CL5.0-66

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems the Control Room Special Ventilation System, Auxiliary Building Special Ventilation System, Shield Building Ventilation System, and the Spent Fuel Pool Special and Inservice Purge Ventilation System each operating cycle (18 months for shared systems) at the frequencies specified in [Regulatory Guide], and in accordance with [Regulatory

R-15

(continued)

5.5 Programs and Manuals (continued)

~~Guide 1.52, Revision 2, ASME N510-1989, and AG-1].~~

Demonstrate for the Auxiliary Building Special Ventilation, Shield Building Ventilation, Control Room Special Ventilation, and Spent Fuel Pool Special and Inservice Purge Ventilation Systems that:

- a. ~~Demonstrate for each of the ESF systems that~~ ~~Aan~~ ~~inplace~~ DOP test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < {0.05}% (for DOP, particles having a mean diameter of 0.7 microns); when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [$\pm 10\%$].

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~~ESF Ventilation System~~

~~Flowrate~~

5.5.911 Ventilation Filter Testing Program (VFTP) (continued)

- b. ~~Demonstrate for each of the ESF systems that~~ ~~Aan~~ ~~inplace~~ halogenated hydrocarbon test of the ~~inplace~~ charcoal adsorber shows a penetration and system bypass < {0.05}% (for DOP, particles having a mean diameter of 0.7 microns); when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [$\pm 10\%$].

CL5.0-66

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~~ESF Ventilation System~~

~~Flowrate~~

(continued)

5.5 Programs and Manuals (continued)

CL5.0-66

- c. ~~Demonstrate for each of the ESF systems that a~~ laboratory test of a sample of the charcoal adsorber, when obtained as-described in [Regulatory Guide 1.52, Revision 2], shows the methyl iodide penetration less than; 1) 15% penetration for Auxiliary Special Ventilation System, 2) 15% penetration for Shield Building Ventilation System, 3) 7.5% penetration for the Spent Fuel Pool Special and Inservice Purge System, and 4) 2.5% penetration for the Control Room Special Ventilation System ~~the value specified below when tested in accordance with [ASTM D3803-1989] at a temperature of \leq [30°C] and 95% greater than or equal to the relative humidity (RH); and specified below.~~

R-15

ESF Ventilation System	Penetration	RH

~~Reviewer's Note: Allowable penetration = [100% - methyl iodide efficiency for charcoal credited in staff safety evaluation]/ (safety factor).
Safety factor = [5] for systems with heaters.
[7] for systems without heaters.~~

- d. ~~Demonstrate for each of the ESF systems that~~ the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than 6 inches of water at the value specified below when tested in accordance with [Regulatory Guide 1.52,

CL5.0-66

5.5.11 ~~Ventilation Filter Testing Program (VFTP) (continued)~~
Revision 2, and ASME N510-1989] at the system flowrate specified below \pm 10%.

ESF Ventilation System	Delta P	Flowrate
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(continued)

5.5 Programs and Manuals (continued)

e. ~~Demonstrate that the heaters for each of the ESF systems~~
~~dissipate the value specified below [$\pm 10\%$] when tested~~
~~in accordance with [ASME N510-1989].~~

	ESF Ventilation System				Wattage	

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.102 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the waste gas holdup system ~~[Waste Gas Holdup System]~~, ~~[the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks]~~. ~~The gaseous radioactivity quantities shall be determined following the methodology in [Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure"].~~ The liquid radwaste quantities shall be determined in accordance with ~~[Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures"]~~.

CL5.0-56

(continued)

Difference Category	Difference Number 5.0-	Justification for Differences
CL	88	ISTS 5.5.11 (ITS 5.5.9) was revised to include the Control Room Special Ventilation System, Auxiliary Building Special Ventilation System, Shield Building Ventilation System, and the Spent Fuel Pool Special and Inservice Purge Ventilation Systems in the Ventilation Filter Testing Program (VFTP). These Systems are credited in the PI USAR accident analysis and will be tested in accordance with the guidance of Regulatory Guide 1.52, Rev. 2 and ASTM D3803 – 1989. The testing conditions for these ventilation systems is 95% Relative Humidity (RH) at 30 °C. Based on the System efficiencies described in the USAR, the following penetration efficiencies have been calculated and listed in the ITS: Control Room Ventilation System $\leq 2.5\%$, Auxiliary Building Special Ventilation System $\leq 15\%$, Spent Fuel Pool Special and Inservice Purge System $\leq 7.5\%$ and Shield Building Ventilation System $\leq 15\%$.