

August 15, 2008

Mr. Michael D. Wadley
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, UNIT 1 - ISSUANCE OF
AMENDMENT RE: EMERGENCY DIESEL GENERATOR MONTHLY LOAD TEST
SURVEILLANCE REQUIREMENT (TAC NO. MD6551)

Dear Mr. Wadley:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 187 to Facility Operating License No. DPR-42 for the Prairie Island Nuclear Generating Plant, Unit 1. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated August 16, 2007, as supplemented by letter dated June 13, 2008.

The amendment revises TS 3.8.1 "AC Sources – Operating" to require monthly testing of the Unit 1 emergency diesel generators at or above 2500 kilowatts.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Thomas J. Wengert, Senior Project Manager
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-282

Enclosures:

1. Amendment No. 187 to DPR-42
2. Safety Evaluation

cc w/encl: See next page

Mr. Michael D. Wadley
 Site Vice President
 Prairie Island Nuclear Generating Plant
 Nuclear Management Company, LLC
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 Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1 - ISSUANCE OF AMENDMENT RE: EMERGENCY DIESEL GENERATOR MONTHLY LOAD TEST SURVEILLANCE REQUIREMENT (TAC NO. MD6551)

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ADAMS Accession No.: Letter: ML081980245; Package: ML081980111; TS: ML082340920

NLO w/comments

OFFICE	NRR/LPL3-1/PM	NRR/LPL3-1/LA	NRR/DE/EEEB	NRR/DIRS/ITSB	OGC	NRR/LPL3-1/BC
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DATE	8/ 15 /08	8/ 15 /08	7/02/08	7/25/08	8/4/08	8/ 15 /08

* SE transmitted by memo of 7/02/08

Prairie Island Nuclear Generating Plant,
Units 1 and 2

cc:

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July 2008

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-282

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.187
License No. DPR-42

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nuclear Management Company, LLC (NMC, the licensee), dated August 16, 2007, as supplemented by letter dated June 13, 2008, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-42 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 187, are hereby incorporated in the license. NMC shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Lois M. James, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Facility Operating License
and Technical Specifications

Date of Issuance: August 15, 2008

ATTACHMENT TO LICENSE AMENDMENT NO.187

FACILITY OPERATING LICENSE NO. DPR-42

DOCKET NO. 50-282

Replace the following page of the Facility Operating License No. DPR-42 with the attached revised page. The changed area is identified by a marginal line.

REMOVE

INSERT

Page 3

Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

3.8.1-7

3.8.1-7

- (4) Pursuant to the Act and 10 CFR Parts 30, 40, and 70, NMC to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument and equipment calibration or associated with radioactive apparatus or components;
- (5) Pursuant to the Act and 10 CFR Parts 30 and 70, NMC to possess but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility;
- (6) Pursuant to the Act and 10 CFR Parts 30 and 70, NMC to transfer byproduct materials from other job sites owned by Northern States Power Company for the purpose of volume reduction and decontamination.

C. This amended license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

NMC is authorized to operate the facility at steady state reactor core power levels not in excess of 1650 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.187, are hereby incorporated in the license. NMC shall operate the facility in accordance with the Technical Specifications.

(3) Physical Protection

NMC shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Prairie Island Nuclear Generating Plant Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Independent Spent Fuel Storage Installation Security Program," Revision 1, submitted by letters dated October 18, 2006, and January 10, 2007.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO.187 TO FACILITY OPERATING LICENSE NO. DPR-42
NUCLEAR MANAGEMENT COMPANY, LLC
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
DOCKET NO. 50-282

1.0 INTRODUCTION

By application dated August 16, 2007 (Agencywide Documents Access Management System (ADAMS) Accession No. ML072320401), as supplemented by letter dated June 13, 2008 (ADAMS Accession No. ML081650451), the Nuclear Management Company, LLC (the licensee), requested changes to the Technical Specifications (TSs) for the Prairie Island Nuclear Generating Plant, Unit 1 (PINGP). The proposed changes would require the Unit 1 monthly emergency diesel generator (EDG) load test to be performed at or above 90 percent of the diesel generator's (DG's) continuous power rating.

Specifically, the licensee proposed to modify surveillance requirement (SR) 3.8.1.3 in TS 3.8.1, "AC [Alternating Current] Sources - Operating," to require testing the Unit EDGs at or above 2500 kilowatts (kW). This license amendment request (LAR) was submitted by the licensee in response to a regulatory commitment identified in the Nuclear Regulatory Commission (NRC) staff's letter to the licensee dated July 5, 2007 (ADAMS Accession No. ML071700568).

2.0 REGULATORY EVALUATION

The NRC staff used the following requirements, guidance, and documents during the review of the LAR:

Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50 includes the NRC's requirement that TS shall be included by applicants for a license authorizing operation of a production or utilization facility. Section 50.36 (d) of 10 CFR requires that TS include items in five specific categories related to station operation. These categories are: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. The proposed change to TS 3.8.1 concerns the third category (SRs).

General Design Criterion (GDC) 17, "Electric Power Systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, requires, in part, that an onsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The onsite electric power supplies and the onsite electric distribution system

shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a single failure. In addition, this criterion requires provisions to minimize the probability of losing electric power from any of the remaining supplies as a result of the loss of power from the unit, the transmission network, or the onsite electric power supplies.

GDC 18, "Inspection and Testing of Electric Power Systems," requires that electric power systems important to safety be designed to permit appropriate periodic inspection and testing to demonstrate operability and functional performance.

The PINGP Updated Safety Analysis Report (USAR), Revision 29, Section 1.5, "General Design Criteria," states that PINGP was designed and constructed to comply with the licensee's understanding of the intent of Atomic Energy Commission (AEC) GDC for Nuclear Power Plant Construction Permits, as proposed on July 10, 1967. Since the construction of the plant was significantly completed prior to the issuance of the GDC of 10 CFR Part 50, Appendix A, the plant was not reanalyzed and the Final Safety Analysis Report (FSAR) was not revised to reflect these later criteria. However, the AEC Safety Evaluation Report acknowledged that the AEC staff assessed the plant, as described in the FSAR, against the Appendix A design criteria and "...are satisfied that the plant design generally conforms to the intent of these criteria." PINGP USAR, Section 1.5, AEC GDC 24, "Emergency Power for Protection Systems," states that in the event of loss of all offsite power, sufficient alternate sources of power shall be provided to permit the required functioning of the protection systems. The facility is supplied with normal, reserve and emergency power to provide for the required functioning of protection systems. In the event of a reactor and turbine trip, emergency power is supplied by two diesel generators per unit, as described in Section 8 of the PINGP USAR. Any one diesel is capable of supplying the emergency power requirements for that unit.

PINGP USAR, Section 1.5, AEC GDC 39, "Emergency Power for Engineered Safety Features [ESF]," states that alternate power systems shall be provided and designed with adequate independency, redundancy, capacity, and testability to permit the functioning required of the engineered safety features (ESF). As a minimum, the onsite power system and the offsite power system shall each, independently, provide this capacity assuming a failure of a single active component in each power system. Reliability of electric power supply is insured through two independent connections to the system grid, and a redundant source of emergency power from four diesel generators installed in the facility. Power to the ESF is assured even with the failure of a single active component in each system.

NRC Regulatory Guide (RG) 1.9, Revision 4, dated March 2007, "Application and Testing of Safety-Related Diesel Generators in Nuclear Power Plants," describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to design and testing of diesel generators.

AEC Safety Guide 9, dated March 1971, "Selection of Diesel Generator Set Capacity for Standby Power Supplies" (subsequently superseded by NRC RG 1.9) described an acceptable basis for the selection of diesel generator sets of sufficient capacity and margin to implement GDC 17 when PINGP U1 received its operating license in 1974.

3.0 TECHNICAL EVALUATION

3.1 Design Considerations

The PINGP USAR, Section 8.1, states that, to satisfy AEC GDC 24 and 39, independent alternate power systems are provided with adequate capacity and testability to supply the required ESF and protection systems. Two EDG sets dedicated to each unit are connected to the safeguards buses to supply shutdown power in the event of loss of all other AC auxiliary power. The EDG arrangement provides adequate capacity to supply the ESF for the design-basis accident (DBA) in one unit, assuming the failure of a single active component in the system. In the event of a Loss-of-Coolant Accident (LOCA) coincident with the Loss of Offsite Power (LOOP) event (LOOP/LOCA), emergency power is available from two EDGs dedicated to each unit.

The U1 EDGs, D1 and D2, are Fairbanks-Morse opposed piston EDGs, which provide onsite standby power sources for the 4160 volt (V) safeguards buses 15 and 16. These EDGs are each rated at 2750 kW continuous (for 8760 hours), 0.8 power factor, 900 revolutions per minute (rpm), 4160 V, three phase, 60 Hertz (Hz). The 1000-hour rating of each EDG is 3000 kW. The 30 minute rating of each unit is 3250 kW. The PINGP USAR, Section 8.4, states that the U1 EDGs were sized per AEC Safety Guide 9, Paragraph C-2, which requires the predicted load seen by an EDG not to exceed the smaller of either the 2000-hour rating or 90 percent of the 30-minute rating. The 2000-hour rating of U1 EDGs is not discussed in the USAR, but the 8760-hour rating of 2750 kW is conservatively assumed to be a bounding value. The 30-minute rating is 3250 kW, and 90 percent of the 30-minute rating is 2925 kW. The NRC staff notes that a conservative limit of 2750 kW is placed on the U1 EDG predicted loads.

The current revision of PINGP USAR Table 8.4-1 shows the maximum predicted sequence load during a LOOP/LOCA on the U1 EDG D2 is 2453 kW, and the maximum predicted short term (0 - 5 minutes) steady state load during the same event is 2479 kW. Section 8.4.4 of the PINGP USAR states that the maximum predicted peak load for either U1 EDG during a Unit 2 Station Blackout (SBO) event is 2624 kW. The redundant U1 EDG D1 has a slightly lower load.

In response to questions that were raised by the NRC staff related to assumptions for intermittent loads operating at 50 percent capacity, additional clarification to the EDG loading calculations was provided by the licensee in letters dated April 24, 2008 (ADAMS Accession Number ML081150606) and June 13, 2008 (ADAMS Accession Number ML081340321). Portions of engineering calculation ENG-EE-021, submitted as attachment 1 to the letter dated April 24, 2008, show that the maximum predicted short term (0 - 5 minutes) sequenced load on U1 EDG D2 is 2538.57 kW. The calculated load on EDG D2 for 1 hour is approximately 2436 kW. Enclosure 2 of letter dated June 13, 2008, provided an evaluation of EDG loading if intermittent loads are considered at 100 percent of their rating. This evaluation indicates that the predicted maximum sequenced load (0 - 5 minutes) on EDG D2 is 2636.99 kW. The licensee has stated that this load corresponds to a Large-Break Loss-of-Coolant Accident (LBLOCA) concurrent with LOOP event. The licensee stated that the assumption of using large loads such as pressurizer heaters at 50 percent of rated capacity is conservative, as the heaters will not be loaded on the EDG during a LBLOCA when the pressurizer is empty. The predicted load on the redundant U1 EDG D1 is slightly less. The licensee has also stated that LBLOCA coupled with LOOP is the limiting DBA loading criteria for EDGs at PINGP.

The proposed amendment request is applicable to the U1 EDGs. However, since the monthly testing requirement for the Unit 2 (U2) EDG D5 and D6 is also part of the same TS SR, the U2 EDG design information is briefly discussed in this safety evaluation for background information purposes. The NRC staff's evaluation applies only to the U1 portion of the EDG monthly testing TS SR. The Unit 2 EDGs consist of two tandem-drive units manufactured by Societe Alsacienne de Constructions Mecaniques de Mulhouse, each rated at 5400 kW continuous (for 8760 hours), 0.8 power factor, 1200 rpm, 4160 V, 3-phase, 60 Hz. As shown in enclosure 2 of letter dated June 13, 2008, the maximum predicted short time (0 - 5 minutes) sequence load during a LOOP/LOCA on the U2 EDG D5 is 3864.53 kW. Section 8.4.4 of the PINGP USAR states that the maximum predicted peak load for either U2 EDG during a Unit 1 SBO event is 3652 kW. These predicted loads are less than the continuous rating of the U2 EDGs.

3.2 Evaluation

The licensee proposed to revise the TS to require the minimum monthly test load to be at or above 2500 kW for the U1 EDGs. Specifically, the licensee proposed to revise TS SR 3.8.1.3, which currently states, in part, that every 31 days:

- “Verify each DG is synchronized and loaded and operates \geq 60 minutes at a load:
- a. Unit 1; \geq 1650 kW
 - b. Unit 2; \geq 5100 kW and \leq 5300 kW.”

The licensee proposed to revise TS SR 3.8.1.3 to state, in part, that every 31 days:

- “Verify each DG is synchronized and loaded and operates \geq 60 minutes at a load:
- a. Unit 1; \geq 2500 kW
 - b. Unit 2; \geq 5100 kW and \leq 5300 kW.”

In a supplement to a previous LAR to extend a TS 3.8.1 completion time (ADAMS Accession Number ML071310108), the licensee committed to submit an LAR to increase the U1 EDG TS-required minimum monthly test load at or above 90 percent of the continuous rating to be consistent with regulatory guidance. The proposed test load of 2500 kW is greater than 90 percent of the 2750 kW continuous rating of the U1 EDGs.

In its LAR dated August 16, 2007, the licensee stated that the proposed change is consistent with the guidance of RG 1.9, Revision 4, Section C, Position 2.2.3, “Load Run (Load Acceptance) Test,” which states:

“Clause 7.5.2 of IEEE Std 387-1995 should be supplemented as follows:

This test involves demonstrating 90 - 100 percent of the continuous rating of the emergency diesel generator, for an interval of not less than 1 hour and until attainment of temperature equilibrium. This test may be accomplished by synchronizing the generator with offsite power. The loading and unloading of an emergency diesel generator during this test should be gradual and based on a prescribed schedule that is selected to minimize stress and wear on the diesel generator.”

RG 1.9, Revision 4, Section C, Design Consideration 1.3 also states:

“During the operating license or combined license stages of review, the maximum design-basis loads should be within the continuous rating (as defined in Section 3.2 of IEEE Std 387-1995) of the diesel generator with sufficient margin (i.e., not less than 5 percent).”

The LAR states that the proposed change is consistent with the guidance of RG 1.9, Revision 4, Section C, Position 2.2.3. However, the licensee stated that the LAR does not commit to compliance with the provisions of RG 1.9, Revision 4. The NRC staff considers selective compliance with revised or updated regulations unacceptable, as some sections of the revised regulations are based on margins developed in different sections of the standard or guide. Specifically, the allowable range of loading (90 percent to 100 percent of EDG continuous rating in Revision 4 of RG 1.9, Section C, Position 2.2.3) assumes that the design of the EDG has a minimum of 5 percent margin above the worst-case design basis loading with respect to the continuous rating, as stated in Revision 4 of RG 1.9, Section C, Design Consideration 1.3.

The licensee’s proposed test load of 2500 kW is within the 90 percent to 100 percent range of the 2750 kW continuous rating of the U1 EDGs. In order for the proposed test to be consistent with Regulatory Position 2.2.3 of Revision 4 of RG 1.9, the licensee’s design would also have to be consistent with Design Consideration in Section C Position 1.3 of this RG. According to the PINGP evaluation, the peak LOOP/LOCA loading on EDG D2 is 2636.99 kW, and the maximum steady state loading (5 - 30 minutes) during this event is 2454.32 kW. These values indicate that the margin between the maximum accident loading requirement and the continuous rating of the EDG is less than the 5 percent margin stated in Position 1.3 of the RG. The calculated worst-case load of 2636.99 kW is above 95 percent of the continuous rating and is therefore, not consistent with Revision 4 of RG 1.9, Design Consideration 1.3.

Although the proposed change is not consistent with Design Consideration 1.3 of Revision 4 of RG 1.9, the licensee’s EDG design was reviewed and approved in accordance with AEC Safety Guide 9 which had less conservative guidance for EDG design. The NRC staff reviewed the proposed change to the TS requirement for the U1 EDGs based on the following considerations:

- 1) The maximum sequenced load (0 - 5 minutes) of 2636.99 kW is less than the 2750 kW rating of the EDG.
- 2) The steady state load of 2436 kW (5 minutes - 1 hour) on U1 EDG D2 is less than the EDG rating and is enveloped by the proposed test load.
- 3) TS SR 3.8.1.9 requires the endurance testing to be performed at Unit 1 with EDG loaded between 2832 kW and 3000 kW for 2 hours followed by a 22-hour run at 2475 kW. The 2-hour surveillance requirement envelopes the predicted maximum short term load of 2636.99 kW and the 22-hour surveillance envelopes the steady state long term loading.

All of the predicted loads are less than the 8760 hour rating limit of 2750 kW. Therefore, the PINGP U1 EDGs continue to meet the loading guidelines of paragraph C-2 of Safety Guide 9. The combination of surveillances performed under TS SR 3.8.1.9 and proposed TS SR 3.8.1.3 will demonstrate that the PINGP U1 EDGs can provide the peak and steady state design loads

for the expected duration of the worst-case DBA. The NRC staff finds that the proposed change to the TS requirement for the U1 EDGs is reasonable and therefore acceptable.

In multiple instances, the phrase "continuous rated load" was referenced in the LAR. The NRC staff has reviewed the proposed change in terms of the EDG "continuous rating" instead of "continuous rated load" in order to avoid confusion about the EDG rating and design loading. Because the peak design loading is bounded by the continuous rating and existing TS-related endurance run load testing, the NRC staff approves the requested change to test the U1 EDGs on a monthly basis to at least 2500 kW.

In its June 13, 2008, supplement, the licensee stated that the PINGP USAR will be updated to resolve the discrepancy in the EDG loading values between the USAR and the calculation of record.

3.3 Summary

The NRC staff has reviewed the licensee's proposed TS changes and supporting documentation. Based on the evaluation discussed above, the NRC staff determined that the proposed amendment to the PINGP U1 TS is reasonable. The NRC staff concludes that the proposed TS change maintains compliance with requirements governing the design, operation, and testing of the electrical power systems (10 CFR Part 50, Appendix A, GDC 17 and GDC 18, and 10 CFR 50.36(d)) and provides adequate assurance of system operability. Therefore, the NRC staff finds the proposed amendment acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Minnesota State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes the requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding (73 FR 5226). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. S. Matharu, NRR

Date: August 15, 2008