



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

August 8, 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, UNITS 1 AND 2
BIENNIAL EMERGENCY PREPAREDNESS EXERCISE BASELINE
INSPECTION 05000282/2008502(DRS); 05000306/2008502(DRS)

Dear Mr. Wadley:

On July 25, 2008, the U. S. Nuclear Regulatory Commission (NRC) completed a Biennial Emergency Preparedness Exercise Baseline inspection at your Prairie Island Nuclear Generating Plant, Units 1 and 2. The enclosed report documents the results of the inspection, which were discussed on July 25, 2008, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no NRC-identified and no self-revealed findings of safety significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system

M. Wadley

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(ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA by N. Valos for/

Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Docket Nos. 50-282; 50-306
License Nos. DPR-42; DPR-60

Enclosure: Inspection Report 05000282/200852(DRS);
05000306/2008502(DRS)
w/Attachment: Supplemental Information

cc w/encl: D. Koehl, Chief Nuclear Officer
Regulatory Affairs Manager
P. Glass, Assistant General Counsel
Nuclear Asset Manager
J. Stine, State Liaison Officer, Minnesota Department of Health
Tribal Council, Prairie Island Indian Community
Administrator, Goodhue County Courthouse
Commissioner, Minnesota Department
of Commerce
Manager, Environmental Protection Division
Office of the Attorney General of Minnesota
Emergency Preparedness Coordinator, Dakota
County Law Enforcement Center

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J. Stine, State Liaison Officer, Minnesota Department of Health
Tribal Council, Prairie Island Indian Community
Administrator, Goodhue County Courthouse
Commissioner, Minnesota Department
of Commerce
Manager, Environmental Protection Division
Office of the Attorney General of Minnesota
Emergency Preparedness Coordinator, Dakota
County Law Enforcement Center

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Letter to Michael D. Wadley from Hironori Peterson dated August 8, 2008.

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
BIENNIAL EMERGENCY PREPAREDNESS EXERCISE BASELINE
INSPECTION 05000282/2008502(DRS); 05000306/2008502(DRS)

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-282; 50-306
License Nos: DPR-42; DPR-60

Report No: 05000282/2008502(DRS); 05000306/2008502(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Prairie Island Nuclear Generating Plant, Units 1 and 2

Location: Welch, MN

Dates: July 21 through 25, 2008

Inspectors: Robert Jickling, Sr. Emergency Preparedness Inspector
Regina Russell, Emergency Preparedness Inspector
Dell McNeil, Sr. Operator Licensing Examiner

Approved by: Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000282/2008502, 05000306/2008502; 07/21/2008 - 07/25/2008; Prairie Island Nuclear Generating Plant, Units 1 and 2; Biennial Emergency Preparedness Exercise Baseline Inspection.

This report covers a 1 week period of announced baseline inspection by three regional inspectors. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

No findings of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

.1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed the July 22, 2008, biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of other drills and exercises conducted in 2006, 2007, and 2008, to verify that those drills' scenarios were sufficiently different from the scenario used in the July 22, 2008, exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk significant activities of emergency classification, notification, and protective action decision making, implementation of accident mitigation strategies, and correction of past exercise weaknesses in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the CRS, TSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators and managers to obtain the licensee's findings and assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique its exercise performance. The inspectors reviewed the 27 condition reports that resulted from this exercise. Specific documents reviewed are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.01-05.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance performance indicator (PI) for the period from the 3rd quarter 2007 through the 2nd quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; assessments of PI opportunities during predesignated control room simulator training sessions, performance during the 2007 off-year exercise, and performance during other drills. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one drill/exercise performance sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization (ERO) Drill Participation PI for the period from the 3rd quarter 2007 through the 2nd quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; performance during the 2007 off-year exercise and other drills; and revisions of the roster of personnel assigned to key emergency response organization positions. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO drill participation sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) PI for the period from the 3rd quarter 2007 through the 2nd quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic ANS operability tests. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one alert and notification system sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 (Closed) NRC Temporary Instruction (TI) 2515/175 "Emergency Response Organization, Drill/Exercise Performance Indicator, Program Review"

The inspector performed TI 2515/175, ensured the completeness of the TI's Attachment 1 and then forwarded the data to NRC, Headquarters.

4OA6 Management Meetings

.1 Exit Meeting Summary

On July 25, 2008, the inspectors presented the inspection results to you and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

.2 Public and Media Briefing

On July 25, 2008, the inspector summarized the NRC's preliminary exercise inspection conclusions at a public and media briefing hosted by Department of Homeland Security/Federal Emergency Management Agency Region V Field Office in Red Wing, Minnesota.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. Wadley, Site Vice President
S. Northard, Plant Manager
J. Sorensen, Director of Site Operations
M. Agen, Emergency Preparedness Coordinator
T. Allen, Business Support Manager
J. Callahan, Emergency Preparedness Manager
M. Davis, Regulatory Analyst
M. Davis, Emergency Preparedness Consultant
R. Hite, Radiation Protection/Chemistry Manager
P. Johnson, Regulatory Analyst
J. Kivi, Regulatory Compliance Engineer
M. Klee, Emergency Preparedness Coordinator
S. Lappegaard, On-Line Work Manager
A. Morgan, Senior Engineer Analyst
J. Nematik, Emergency Preparedness Coordinator
M. Pfeffer, Emergency Preparedness Coordinator
M. Schimmer, Engineering Director
M. Schmidt, Maintenance Manager
S. Seilhymer, Assistant Operations Manager
M. Walter, Operations Training General Supervisor
E. Weinkam, Nuclear Licensing and Emergency Preparedness Director

Nuclear Regulatory Commission

K. Stoedter, Senior Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, and Discussed

None

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

PLANT PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
F3-6	Activation and Operation of Technical Support Center	22
F3-9	Emergency Evacuation	24
F3-10	Personnel Accountability	21
F3-12	Emergency Exposure Control	19

PERFORMANCE INDICATOR RECORDS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
PINGP 1120	Monthly Trend Reports 2008	January – December 2008
PINGP 1318G	Performance Indicators - Emergency Preparedness	December 2007 - June 2008
PINGP 1325	PINGP DEP Performance Indicator	October 2007 - June 2008
	Prompt Alert and Notification System Fixed Siren Trend Report	February 13, 2008
CAP01137030	Failure of Pierce County to Sound Sirens	May 7, 2008
CAP01135698	DEP Failure in Week 2 LOR Cycle	April 25, 2008

EXERCISE RECORDS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	PINGP Emergency Plan Exercise Scenario	July 22, 2008
	PINGP Emergency Plan Drill Scenario	June 28, 2008
	PINGP Emergency Plan Drill Scenario	June 10, 2008
	PINGP Emergency Plan Drill Scenario	December 18, 2007
	PINGP Emergency Plan Drill Scenario	July 24, 2007
	PINGP Emergency Plan Drill Scenario	May 21, 2007
	PINGP Emergency Plan Drill Scenario	February 6, 2007
	PINGP Emergency Plan Drill Scenario	October 18, 2006
	PINGP Emergency Plan Drill Scenario	July 18, 2006
	PINGP Emergency Plan Drill Scenario	March 28, 2006

EXERCISE RECORDS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	List of Drill and Exercise Issues CAPs	April 2, 2007 - July 14, 2008

CONDITION REPORTS GENERATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
CAP01145208	2008 Exercise-Simulator Presented Incorrect Release Rate Data	July 24, 2008
CAP01145200	2008 Exercise-Inadequate Number of Certified Engineers	July 24, 2008
CAP01145198	2008 Exercise-Not Enough Food for ERO	July 24, 2008
CAP01145206	2008 Exercise-Inefficient Initial NRC Discussions	July 24, 2008
CAP01145267	2008 Exercise-Controller Issues Negative Impact on the Exercise	July 24, 2008
CAP01145193	2008 Exercise-Followup Messages Missed	July 24, 2008
CAP01145189	2008 Exercise-TSC Radiological Coordinator Issues	July 24, 2008
CAP01145153	2008 Exercise-TSC Engineering Responsibilities and Prioritization Issues	July 24, 2008
CAP0115150	2008 Exercise-Emergency Worker Control and Safety Issues	July 24, 2008
CAP01145147	2008 Exercise-NRC Site Team Access and Briefing Issues	July 24, 2008
CAP01145149	2008 Exercise-Core Damage Assessment and Procedure Issues	July 24, 2008
CAP01145116	2008 Exercise-Dose Assessment Errors in TSC and EOF	July 24, 2008
CAP01145114	2008 Exercise-KI Assessment and Authorization Issues	July 24, 2008
CAP01145113	2008 Exercise-Plant Ventilation Knowledge Issues	July 24, 2008
CAP01145110	2008 Exercise-Scenario and Control Issues	July 24, 2008
CAP01145107	2008 Exercise-OSC Uniformed of CRS to TSC Transfer of Emergency Responsibilities	July 24, 2008
CAP01145105	2008 Exercise-OSC Request for Plant Computers	July 24, 2008
CAP01145104	2008 Exercise-Assembly Point Not Observe Eating and Drinking Restrictions	July 24, 2008
CAP01145102	2008 Exercise-Inability to Quickly Contact CNO	July 24, 2008
CAP01145099	2008 Exercise-OSC RP Supervisor Didn't Follow Team Control and Dispatch Protocol	July 24, 2008
CAP01145097	2008 Exercise-Emergency Response Facility Congestion	July 24, 2008

CONDITION REPORTS GENERATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
CAP01145095	2008 Exercise-No Record of Vendor Contacts in TSC	July 24, 2008
CAP01145090	2008 Exercise-JIC Press Release Error	July 24, 2008
CAP01145087	2008 Exercise-TSC Briefing Deficiencies	July 24, 2008
CAP01145004	2008 Exercise-No RP Support at Assembly Point	July 24, 2008
CAP01144980	2008 Exercise-DEP Notification Failure for Alert Notification	July 24, 2008
CAP01144978	2008 Exercise-Protective Action Recommendation Incorrect	July 24, 2008

LIST OF ACRONYMS USED

ADAMS	NRC's Document System
ANS	Alert and Notification System
CAP	Corrective Action Program
CFR	Code of Federal Regulations
CRS	Control Room Simulator
DEP	Drill and Exercise Performance
DRS	Division of Reactor Safety
EALs	Emergency Action Levels
EOF	Emergency Operations Facility
ERO	Emergency Response Organization
IMC	Inspection Manual Chapter
IR	Inspection Report
JIC	Joint Information Center
KI	Potassium Iodide
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
OSC	Operations Support Center
PARS	Publicly Available Records
PI	Performance Indicator
RP	Radiation Protection
SDP	Significance Determination Process
TI	Temporary Instruction
TSC	Technical Support Center