

PrairielslandNPEm Resource

From: Richard Plasse
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To: Eckholt, Gene F.
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November 19, 2008

Mr. Michael D. Wadley
Site Vice President
Prairie Island Nuclear Generating Plant, Units 1 and 2
Northern States Power Company, Minnesota
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 & 2, LICENSE
RENEWAL APPLICATION (TAC NOS. MD8513 AND MD8514)

Dear Mr. Wadley:

By letter dated April 11, 2008, Nuclear Management Company, LLC (NMC), now known as Northern States Power Company, Minnesota (NSPM) submitted an application pursuant to Title 10 Code of the *Federal Regulations* Part 54 (10 CFR Part 54) to renew the operating license for Prairie Island Nuclear Generating Plant Units 1 and 2 for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review. Further requests for additional information may be issued in the future.

Items in the enclosure were discussed with Gene Eckholt, of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-1427 or e-mail Richard.Plasse@nrc.gov.

Sincerely,

/RA/

Richard Plasse, Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure:
As stated

cc w/encl: See next page

November 19, 2008

Mr. Michael D. Wadley
Site Vice President
Prairie Island Nuclear Generating Plant, Units 1 and 2
Northern States Power Company, Minnesota
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Welch, MN 55089

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Sincerely,

/RA/

Richard Plasse, Project Manager
Projects Branch 2
Division of License Renewal
Office of Nuclear Reactor Regulation

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Enclosure:
As stated

cc w/encl: See next page
ADAMs Accession Number: **ML083010585**

OFFICE	LA:DLR	PM:RPB2:DLR	BC:RPB2:DLR
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DATE	10/28/08	11/3/08	11/19/08

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Letter to M. Wadley from R. Plasse, dated November 19, 2008

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Units 1 and 2

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**REQUEST FOR ADDITIONAL INFORMATION
BALANCE OF PLANT SYSTEMS BRANCH
DIVISION OF SAFETY SYSTEMS FOR
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
(TAC NOS. MD8513 (Unit 1) and MD8514 (Unit 2))**

RAI 2.3-01

BACKGROUND:

License renewal rule Title 10 of the *Code of Federal Regulations* (10 CFR) Section 54.21(a)(1) requires applicants to identify and list all components subject to an aging management review (AMR). The staff confirms inclusion of all components subject to AMR by reviewing the component types within the license renewal boundary.

ISSUE:

During the scoping and screening review process the continuation from one drawing to another could not be established. Drawing numbers and/or locations for the continuations were not identified, or could not be located where identified.

**License
Renewal
Application
(LRA)
Section**

Continuation Location

2.3.3.2

Drawing LR-XH-1-41, location H-4, show a line continuing from the Hot Lab (LR-XH-248-1).

2.3.3.3

- Drawing LR-39245-1, location B-2, "Drain to RH Pit Sump #12 See LR-XH-1-31"
- Drawing LR-39246-1, location G-7, "Drain to RH Pit Sump #22 See LR-XH-1001-8"
- Drawing LR-39246-1, location H-2, "From #121 Waste Gas System See LR-39245-2"
- Drawing LR-39246-1, location A-6, "Drain to Aerated System Sump Tank See LR-39248"
- Drawing LR-39245-1, location B-10, "Drain to RH Pit Sump #11 See LR-XH-1-31"
- Drawing LR-39245-2, location C-1, "To Unit 1 Component Cooling Pumps See LR-39245-1"
- Drawing LR-39245-2, locations B-10 and C-8, both have a note that states: "Compressor Seal Make-up Line See LR-XH-1-124"

ENCLOSURE

- Drawing LR-39245-2, location B-8, "To Waste Gas Recombiner #122 See LR-XH-550-6"
 - Drawing LR-39245-2, location B-10, "To Waste Gas Recombiner #121 For Cont. See LR-XH-550-6"
 - Drawing LR-39245-2, location F-11, "Compressor Seal Make-up Line See LR-XH-550-1"
 - Drawing LR-39245-2, locations C-8 and F-11, "Reactor Make-up Water Supply See LR-39242"
 - Drawing LR-39245-2, location C-1, shows a 3-CC-9 pipeline has a continuation note stating "From Unit 1 Component Cooling Heat Exchanger See LR-39245-1" and drawing LR-39245-1, location F-7, also shows a 3-CC-9 that has a continuation note stating "To #11 Seal Water Heat Exchanger See LR-39245-2"
- 2.3.3.6
- Drawing LR-39216-3, locations E-6 and D-5, show 3/4" lines continuing to the corrosion monitors.
 - Drawing LR-39217-1, location B-8, shows a 3/8" line continuing to DPI 11026 through 11029.
 - License renewal LR-39216-2, location G-5, shows a 4" line to admin chiller/fan coil cooling water continued on LR-39603-3, location A-9.
 - License renewal LR-39217-1, locations G-4 and G2, shows 3/4" lines to #12 and #22 AFW pump suctions continued on LR-39223.
- 2.3.3.8
- Drawing LR-39255-1, location C-1, states that pipeline 4-CL-32 continues "To D-1 and D-2 Diesel Gen. Room Sprinkler System."
- 2.3.3.12
- Drawing LR-39247, G-2 and G-5, identify several valves in red boxes labeled #21, 22 and 23, and #11, 12 and 13, respectively. A continuation line or location is not identified.
- 2.3.3.17
- Drawing LR-39244:
- Location B-1, downstream of valve SA-31-53 to Evap. Control Panel
 - Location B-1, downstream of valve SA-32-5 to 121 ADT evaporator
 - Location B-2, 1/2" line to Waste Evap. Control Panel
 - Location B-2, downstream of valve SA-24-2 to Unit 1 Fuel Transfer Control Panel
 - Location C-2, downstream of valve SA-32-20 to Hot Instr. Lab Room

- Location C-2, downstream of valve SA-53-44 to Hot Chemical Lab Water Chiller Pkg
- Location A-2, downstream of valve SA-24-1 to Unit 2 Fuel Transfer Control Panel
- Location D-2, downstream of valve SA-71-1 to Serv/Comp Bldg Addtn
- Location D-2, downstream of valve FP-117-1 to FP-104-1 Low Press
- Location C-3, downstream of valve SA-77-1 to Gas Analyzer Pnl
- Location C-3, downstream of valve SA-53-44 to Hot Chemical Lab Strm Gen Blow-on Monitor Pnl
- Location C-4, downstream of valve SA-32-24 to Hot Chemical Lab.
- Location C-4, downstream of ¾" line to Boric Acid Evap. Cntl Pnl
- Location D-4, downstream of CD-34049 to SV-33001 and SV-33115
- Location D-5, downstream of SA-62-5 to SV-33115 and SV-33116
- Location D-5, downstream of SA-33-40 to SV-31962 and SV-31965
- Location D-6, downstream of valve SA-31-51 to Cold Chemical Lab
- Location B-6, downstream of valve SA-32-17 to Unit1 Control Room Panel
- Location B-6, downstream of valve SA-60-2 to Temp. Conn.
- Location B-6, downstream of valve SA-63-2 to TC-26016 thru TC-26024
- Location B-6, downstream of valve 2SA-20-1 to Instr. Workshop
- Location B-7, downstream of valve 2SA-32-16 to Unit2 Control Room Panel
- Location C-8, downstream of ½" line to Boric Acid Evap. Cntl Pnl
- Location D-7, downstream of 2SA-19-3 to #123 Air Compr Unloader Supply Cntl. Pnl
- Location D-10, downstream of 2SA-33-4 to CV-31966 thru CV-31969.
- Location B-9, downstream of 2SA-33-5 and 2SA-33-6 to #121 and #122 Hydrogen Recombiner Cntl. Pnl
- Location A-9, downstream of 2SA-65-1 to Engage-Disengage for Fuel Assembly Clamp
- Location A-9, downstream of 2SA-63-1 to reactor inflatable seal
- Location A-9, downstream of 2SA-31-1 to air hose conn for manipulator crane.

- Location F-1, downstream of SA-120-3
- Location F-1, downstream of SA-121-2
- Location F-1, downstream of SA-121-1
- Location F-12, downstream of SA-120-4
- Location F-12, downstream of SA-121-4
- Location F-11, downstream of SA-121-3
- Location E-10, downstream of 2SA-22-1 to NF-86172-1

Drawing LR-39243:

- Location C-2, downstream of valve SA-39-5 to warehouses
 - Location C-2, downstream of valve SA-16-1 to #121 neutralizing tank
 - Location C-2, line going to 1/4" to Louver valve assembly at EL.720'-0'
 - Location D-2, line downstream of SA-76-1
 - Location E-1, 3/4" line downstream of SA-81-1 to roof
 - Location E-2, downstream of SA-80-1
 - Location D-3, upstream of the 2-1/2" line and just prior to 1-1/2" line
 - Location A-5, 1/4" line downstream of SA-19-1 to 1/4" to Louver valve assembly at EL.758'-6"
 - Location C-6, 1/2" line downstream of SA-18-3 to Hot Chem Lab and General Chem Table
 - Location D-7, upstream of SA-2-51 to Relay Room
 - Location D-10, 1/4" line downstream of 2SA-19-4 to 1/4" to Louver valve assembly at EL.740'-6"
 - Location D-10 and D-11, downstream of 2SA-80-2 and 2SA-80-3
- 2.3.3.20
- Drawings LR-XH-550-6-1, location H-6, and LR- XH-550-6-2, location H-6, shows piping transitions from a decontamination water source as in scope for license renewal (a)(2).
 - Drawing LR-XH-1-664, location C-7, 1 1/2" piping to aerated sump tank
 - Drawing LR-XH-1-664, location B-3, 3" piping from the evaporator condenser rupture disc
 - Drawing LR-39236, location H-11, downstream of WS-2-11, 2" piping to resin shipping liner, (drawing sheet number and location were not provided).
 - Drawing LR-39248, location G-2, 2" piping 2-RH-28 to #11 sump pump
 - Drawing LR-39248, location E-6, 3" fr c.c. surge tk vent unit #1

- Drawing LR-39248, location E-6, 3" fr c.c. surge tk vent unit #2
 - Drawing LR-39248, location F-9, 2" piping from drain from c.c. surge tank #21
 - Drawing LR-39249, location C-6, downstream of WL-52-4, 3/4" piping to sample conn.
 - Drawing LR-39249, location C-8, 3/4 WL-188, 3/4" piping to non-aerated sump tank (to equipment drain)
 - Drawing LR-39249, location F-8, 3/4" piping demin flush
 - Drawing LR-88740, location C-2, 3/4 SB-2 piping from 12 steam generator
 - Drawing LR-88740, location H-1, 3/4-WL-399 piping to sample
 - Drawing LR-88740, location E-5, 1/2" piping to sample to cold chew. lab.
 - Drawing LR-88740, location D-10, 1.5" piping from S.G.B. Sample panel
 - Drawing LR-88740, location H-8, 2-WL-53 piping drain to aerated waste via floor drain
- 2.3.3.21
- Drawing LR-39241-1, Location G-5, 3/4" downstream of SA-32-18 to Instrument Air (LR-39244)
 - Drawing LR-39241-4, Location D-7, Sample Flush from Reactor Makeup
 - Drawing LR-39241-4, Location E-7, 1/4" Temporary Water Connection
 - Drawing LR-39241-4, Location A-10, From Instrument Air System (LR-39244)
 - Drawing LR-39241-4, Location A-1, From Instrument Air System (LR-39244)
 - Drawing LR-39241-5, Location A-2, From Instrument Air System (LR-39244)
 - Drawing LR-39241-5, Location D-2, From Instrument Air System (LR-39244)
 - Drawing LR-39241-7, Location C-1, From Instrument Air System Drawing LR-39244
 - Drawing LR-39241-7, Location B-9, From Instrument Air System Drawing LR-39244
 - Drawing LR-39241-7, Location E-1, From Instrument Air System Drawing LR-39244
 - Drawing LR-39241-7, Location F-2, Concentrated Caustic from Tote

- Drawing LR-39241-7, Location G-2, Cleaning Solution Return/Tank Fill Water From RO or CDI
- Drawing LR-39241-7, Location G-2, Concentrated Acid From Tote
- Drawing LR-39241-7, Location G-2, Cleaning Solution Return From RO or CDI
- Drawing LR-39241-6, Location C-1, From Degasifier Pumps Drawing LR-39241-4
- Drawing LR-39241-6, Location F-1, Deionized Water from Concentrate Transfer Pumps
- Drawing LR-39241-6, Location G-1, From Instrument Air System Drawing LR-39244
- Drawing LR-39241-6, Location A-2, From Instrument Air System Drawing LR-39244
- Drawing LR-39241-8, Location C-4, Rinse/Recycle to Vacuum Degasifier Inlet, Drawing LR-39241-6
- Drawing LR-39241-8, Location A-8, From Station Air System
- Drawing LR-39241-8, Location A-2, To Recycle Canal
- Drawing LR-39241-8, Location A-2, downstream of valve DE-156-138

2.3.4.2 Drawings LR-39224 and LR-39225:

- Locations B-3 and E-3, shows 1" lines as in scope for license renewal; the lines are continued as 1" "Drains to Waste."
- Location E-4, shows 1-1/2" lines; the lines are continued to "Drain to Traps" on drawing LR-39233
- Location C-11, shows 1" lines; the lines are continued from drawing LR-39218.

2.3.4.3

- Drawing LR-39215-1, location H-5
- Drawing LR-39215-1, locations C-2, C-3, C-4 and C-5

2.3.4.4

- Drawing LR-39253-1, location F-3, shows a line to the Unit 2 reactor make-up pumps continued on LR-39242, location E-4
- Drawing LR-39227, location D-4, shows two 1-1/2" lines continued on LR-XH-1002-43

2.3.4.5

Drawings LR-39222 and LR-39223:

- Locations A-8 and A-2, show continuations of pipe sections without identification numbers (from Unit 1 and Unit 2 cooling water return) to drawings LR-39216-2, LR-39217-1(for Unit 1) and LR-39216, LR-39217(for Unit 2)

- Locations A-7 and A-3, show a continuation of incoming pipe sections with no identification numbers (from station air after cooling system) from drawing LR-39244.
- Location B-5, show a continuation of incoming pipe sections (with no identification numbers [Condensate Transfer]) from drawing LR-39220
- Drawings LR-39222, locations B-5 and B-3, and LR-39223, locations B-7 and B-5, show continuations of incoming pipe sections (with no identification numbers [#21 and #22 Auxiliary Feedwater Pump]) from drawing LR-39223 for unit 1 and from LR-39222 for unit 2.

2.3.4.6

Drawings LR-39218 and LR-39219:

- Location F-2, show a continuation of pipe sections 1-MS-53, 1-MS-54, 1-2MS-53 and 1-2MS-54" (DRAINS TO TRAPS), to drawings LR-39233 and LR-39234, respectively.
- Drawing LR-39218, location F-4, pipe sections 1-1/2-MS-62, 1-MS-55, 1-MS-56 continuation to drawing LR-39233 and drawing LR-39219, location F-4, pipe sections 1-1/2-2MS-2, 1-2MS-55, 1-2MS-56 continuations to drawing LR-39234.
- Drawing LR-39218, locations F-6, G-5, and G-6, pipe sections 10-MS-27, 12-MS-3, 12-MS-4, respectively, continuations to drawing LR-39233
- Drawing LR-39219, locations F-6, G-5, and G-6, pipe sections 10-2MS-27, 12-2MS-3, 12-2MS-4, respectively, continuations to drawing LR-39234.
- Drawing LR-39218, location D-7, pipe sections 6-MS-31 continuations to drawing LR-39233 and drawing LR-39219, location D-7, pipe sections 6-2MS-31 continuation to drawing LR-39234.
- Drawing LR-39218, locations E-6 and E-7, pipe sections 3-MS-30, and upstream pipe sections after the valves TD-6-11, TD-6-12 1" "Drains to Trap" continuations to drawing LR-39233 and drawing LR-39219, locations E-6 and E-7, pipe sections 3-2MS-30, and upstream pipe sections after the valves 2TD-6-11, 2TD-6-12 continuations to drawing LR-39234.
- Drawing LR-39218, location D-7, pipe sections 3/4-MS-31 continuation to drawing LR-39233, 4-MS-31 continuation to drawing LR-39230 and drawing LR-39219, location D-7, pipe sections 3/4-MS-31 continuation to drawing LR-39234, 4-2MS-31 continuation to drawing LR-39230.
- Drawing LR-39218, locations E-8 and H-8, pipe sections 1/2 -MS-59, 12-MS-35 respectively, continuations to LR-39233 and drawing LR-39219, locations E-8 and H-8, pipe sections 1/2 -2MS-32, 12-2MS-35 respectively, continuations to LR-39234.
- Drawing LR-39218, location E-10, pipe section with no identification number (1" Drain to Trap) and G-11, pipe section with no identification

number (1-1/2" Drain to Trap) continuations to drawing LR-39233 and drawing LR-39219, location E-10, pipe section with no identification number (1" Drain to Trap) and G-11, pipe section with no identification number (1-1/2" Drain to Trap) continuations to LR-39234.

- Drawings LR-39218, LR-39219, location G-1, shows a continuation of 3/4-MS-57 and 3/4-2MS-44 pipe (drain to trap) to drawings LR-39233 and LR-39234, respectively, without the pipe identification numbers.
- Drawings LR-39218, LR-39219, locations C-6 and C-7, show a continuation of heater drain piping without identification numbers to drawings LR-39226 and LR-39227, respectively. Note that there are other similar instances on these drawings (from Moisture Separator Reheaters 2A, 1B, 2B at grid locations C-8, C-9 and C-11, respectively).
- Drawings LR-39218 and LR-39219, location C-7, show a continuation of crossover piping without identification numbers to and from drawings LR-39224 and LR-39225, respectively. Note that there are other similar instances on these drawings (to and from Moisture Separator Reheaters 2A, 1B, 2B at grid locations C-8, C-9 and C-10, respectively).
- Drawings LR-39218 and LR-39219, location F-6, show a continuation of) pipe sections 1-1/2-MS-40, 1-1/2-MS-41 and 2-2MS-40, 2-2MS-41 from stop valves of drawings LR-39233 and LR-39234, respectively.
- Drawings LR-39218 and LR-39219, locations B-4 and B-1, show continuations of piping without identification numbers to valves RS-18-3, RS-18-1, 2MS-18-3, and 2MS-18-1 from drawing LR-39247 (1" vent and N2 purge connection).

2.3.4.7

- Drawing LR-88740, locations H-8 through H-10, show a section of piping 2-SB-50.
- Drawing LR-88740, location H-8, shows a continuation of i2-WL-53 pipe to drain (to aerated waste via floor drain).
- Drawing LR-39250, location A-3, shows a continuation of 3/4-2WL-17 pipe to grab sample connection.
- Drawing LR-39250, location D-7, shows a continuation of 8-2SB-37 pipe to drawing LR-39225, location D-11.
- Drawing LR-39250, locations E-10 through E-11, show continuation of pipes 3-2WL-10C, 3-2WL-25, and another 3-2WL-25 to drawings LR-XH-1001-7, LR-39248, and LR-XH-1-40, respectively.

2.3.4.8

- Drawing LR-39230, locations D-6 and D-7, show a continuation of pipes (without identification numbers) to drawing LR-39600 #121 and #122 auxiliary building special exhausts, respectively.
- Drawings LR-39233 for unit 1 and LR-39234 for unit 2, location F-1, show sections of piping (10" pipe sections) continued from (moisture

separator reheater supply lines) drawings LR-39218 and LR-39219, respectively.

- Drawings LR-39233 for unit 1 and LR-39234 for unit 2, locations E-4 and E-5, show sections of pipes continued to (heater drain tank #11 and #21) drawings LR-39224 and LR-39225, respectively.
- License renewal drawings LR-39233 for unit 1 and LR-39234 for unit 2, locations C-1 and C-2, show sections of pipes (16" and 24") continued to (Bleed steam to H.P. heaters) drawings LR-39224 and LR-39225, respectively.
- Drawings LR-39233 for unit 1 and LR-39234 for unit 2, location B-9, show a section of pipe (no identification number) continued from an unspecified drawing.
- Drawings LR-39233 for unit 1 and LR-39234 for unit 2, location B-12, show sections of pipe continued from (main steam bypass) drawings LR-39218 and LR-39219, respectively.
- Drawings LR-39231-1 for unit 1 and LR-39231-2 for unit 2, location C-7, show a section of pipe continued to drawing LR-39230, location E-5.

REQUEST

Provide additional information to locate the license renewal boundaries.

RAI 2.3-02

BACKGROUND:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to identify and list all components subject to an AMR. The staff confirms inclusion of all components subject to AMR by reviewing the component types within the license renewal boundary.

ISSUE:

During the scoping and screening review process the continuation from one drawing to another was potentially identified but not definitively established.

- 2.3.3.2 Drawing LR-XH-1-40, locations D-2, D-4 and D-5, show 10 CFR 54.4(a)(1) drain lines from the holdup tanks to valves 2VC-11-68, (no valve numbers located from tanks 11 and 121). These drain lines are continued to "DH." These three lines are believed to be continued on drawing LR-39248, location F-8.
- 2.3.3.8 Drawing LR-39255-1, location A-3, states that the drawing continuation pipe section 6-CL-124 continues "To Cooling Water Return" on drawing LR-39216-3. It was found that the more likely continuation location was G-3 on drawing LR-39217-2, on pipe section 6-CL-64, instead of pipe section 6-CL-124.
- 2.3.3.10 Drawing LR-39232, location B-4, indicates that the drawing continuation for two pipelines as 3-FO-3 that continue to LRA drawing LR-39255-1 per note stating "To Diesel Generator and Fuel Oil System – See Drawing LR-39255-1." It appears that the correct continuation for these lines could be 3-FO-1 and 3-FO-2 located drawing LR-39255-1 locations E-8 and A-8, respectively.
- 2.3.4.2 Drawings LR-39224, locations B-7 and B-10, and LR-39225, locations F-4 and F-2, shows 2" lines that are continued to 2" "drain to trap" on drawing LR-39233, but location of the continuation was not provided. The review of the drawing LR-39233 found a continuation of the in scope 2" piping at locations E-10 and G-10.
- 2.3.4.8 Drawings LR-XH-2-16 and LR-XH-1002-44, locations D-5, show a section of pipe continued from main steam. Review of main steam system drawings LR-39218 and LR-39219 showed continuations to drawings LR-XH-2-16 and LR-XH-1002-44, respectively, at location E-7. However, the continuations were not confirmed because of the absence of pipe identification numbers.

REQUEST:

Confirm that the continuation locations described are correct or provide the correct continuation locations.

RAI 2.3-03

BACKGROUND:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to identify and list all components subject to an AMR. The staff confirms inclusion of all components subject to AMR by reviewing the component types within the license renewal boundary.

ISSUE:

License renewal drawings show a continuation without the submission of the continuation drawings.

2.3.3.3 Drawing LR-39245-2, location A-11, "Reactor Make-up Water Supply See NF-39242".

2.3.3.17 Drawing LR-39244:

- Location B-1, downstream of valve SA-32-5 to Instrument Air Service (drawing NF-39785-1 not provided)
- Location C-2, downstream of valve SA-33-7 to Instrument Air Service (drawing NF-39772-3 not provided)
- Location C-2, downstream of valve SA-33-7 to Turb. Bldg. Louver Dampers and Admin Bldg (drawing NF-39772-2 not provided)
- Location A-3, downstream of valve SA-39-2 to Unit 1 Screenhouse Instrument Air Service (drawings NF-39772-1 and 2 not provided)
- Location D-5, downstream of valve SA-89-1 to Instrument Air Service (drawing NF-39772-1 not provided)
- Location C-5, downstream of valve SA-23-2 to Instrument Air Service Heating Boiler Area (drawing NF-39787 not provided)
- Location C-6, downstream of valve CV-31188 to Time Pattern Transmitter and Instrument Air Services (drawing NF-39772-2 not provided)
- Location C-8, downstream of valve CV-31368 to Time Pattern Transmitter and Instrument Air Services (drawing NF-39774-3 not provided)
- Location A-11, downstream of valve 2SA-39-2 to Unit 2 Screenhouse Instrument Air Services (drawing NF-39774-1 and 2 not provided)

2.3.3.20 • Drawing LR-39248, location C-3, 1.5" piping from hot instr. lab (drawing NF-39678 not provided)

- Drawing LR-39248, location E-5, piping from GA (drawing LR-XH-1-125 not provided)

- Drawing LR-39248, location C-3, upstream of WL-83-4, 2" piping from main steam relief hdr drns (drawing NF-39339-5) not provided
 - Drawing LR-39248, location C-9, upstream of 2WL-57-29, 2" piping from main steam relief hdr drns 21 SG (drawing LR-39339-5 not provided)
 - Drawing LR-39248, location C-6, 3 continuations from leak detector (drawing NF-39338-1 not provided)
 - Drawing LR-39248, location E-10, 2" piping from leak detector (drawing NF-39338-1 not provided)
 - Drawing LR-39249, location C-5, 2" piping to unit 1 composite sampler tech manual (drawing XH-69-8 not provided)
 - Drawing LR-39250, location B-2, 2" piping to unit 2 composite sampler tech manual (drawing XH-69-8 not provided)
 - Drawing LR-88740, location B-7, 6" piping to DC79L-517 SH. 2 (drawing not provided)
- 2.3.4.6 Drawings LR-39218, LR-39219, location H-3, show a continuation of pipes (to waste) with identification numbers 1/2-MS-49 and 1/2-2MS-49 (drawings NF-98894 or NF-100034 not provided)
- 2.3.4.7
- Drawing LR-88740, location B-7, shows a continuation of pipe (without identification number) (drawing DC79L-517 not provided)
 - Drawing LR-39250, location B-1, shows a continuation 2-2WL-501 pipe to unit-2 composite sampler (drawing X-HIAW-69-8 not provided)
- 2.3.4.8
- License renewal drawings LR-39231-1 for unit 1 and LR-39231-2 for unit 2, location B-2, show a section of pipe continued to (EH control) (drawing 721-J-105-15 not provided)
 - License renewal drawings LR-39231-1 for unit 1 and LR-39231-2 for unit 2, location G-4 and G-2, respectively show a section of pipe continued from (drawing LR-39669 not provided)

REQUEST:

Provide additional missing drawings and locations to locate the license renewal boundary on the continuation drawings.

2.3.3.2 Chemical and Volume Control System

The following requests for additional information (RAIs) were generated as part of the scoping and screening review for the Chemical and Volume Control (VC) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.2-01

Background:

LRA Section 2.1.2.4.2, "Scoping Criteria 2 – Non-Safety Related Affecting Safety Related" states in part "Non-safety related SSCs directly connected to safety related SSCs (typically piping systems) up to and including the first seismic or equivalent anchor past the safety/non-safety interface are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

Drawings LR-XH-1001-5 and LR-XH-1-39, location E-5, show three 10 CFR 54.4(a)(1) 3/4" drain lines from the seal water heat exchangers to valves 2VC-29-1, 2VC-29-2, 2VC-29-3, and VC-29-1, VC-29-2, VC-29-3 in scope for 10 CFR 54.4(a)(1). Downstream of these valves is in scope for 10 CFR 54.4(a)(2). A Quality Assurance (QA) Type designation is not provided to justify the 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2) boundary.

These three drain lines combine and are continued to LR-39248 (D-8) and (D-5). A seismic anchor or seismic endpoint could not be located between the sump tank #121 and valves 2VC-29-1, 2VC-29-2, 2VC-29-3, and VC-29-1, VC-29-2, VC-29-3.

Request:

1. Confirm that a QA Type boundary exists downstream of valves 2VC-29-1, 2VC-29-2, 2VC-29-3, and VC-29-1, VC-29-2, VC-29-3 from QAI (SR) to QAI or QAIII (NSR) or justify the 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2) boundary is in accordance with 10 CFR 54.4.
2. Provide justification for not including a seismic anchor downstream of valves 2VC-29-1, 2VC-29-2, 2VC-29-3, and VC-29-1, VC-29-2, VC-29-3 and before sump tank #121.

RAI 2.3.3.2-02

Background:

LRA Section 2.1.2.4.2, "Scoping Criteria 2 – Non-Safety Related Affecting Safety Related" states in part "Non-safety related SSCs directly connected to safety related SSCs (typically piping systems) up to and including the first seismic or equivalent anchor past the safety/non-safety interface are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

Drawings LR-XH-1001-5 and LR-XH-1-39, location E-6, show 10 CFR 54.4(a)(1) 2-2-VC-183 and 2-VC-186 drain lines from the VCTs respectively to valves 2VC-11-60, and VC-11-60 in scope for 10 CFR 54.4(a)(1). Downstream of these valves is in scope for 10 CFR 54.4(a)(2). A QA Type designation is not provided to justify the 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2) boundary.

These drain lines are continued to drawing LR-39248, locations E-8 and E-5. A seismic anchor or seismic endpoint could not be located between the sump tank #121 and valves 2-2-VC-183 and 2-VC-186.

Request:

1. Confirm that a QA Type boundary exists downstream of valves 2-2-VC-183 and 2-VC-186 from QAI (SR) to QAI1 or QAI11 (NSR), or justify the 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2) boundary is in accordance with 10 CFR 54.4.
2. Provide justification for not including a seismic anchor downstream of valves 2-2-VC-183 and 2-VC-186 and before sump tank #121.

RAI 2.3.3.2-03

Background:

LRA Section 2.1.2.4.2, "Scoping Criteria 2 – Non-Safety Related Affecting Safety Related" states in part "Non-safety related SSCs directly connected to safety related SSCs (typically piping systems) up to and including the first seismic or equivalent anchor past the safety/non-safety interface are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

Drawing LR-XH-1-40, locations D-2, D-4 and D-5, show 10 CFR 54.4(a)(1) drain lines from the holdup tanks to valves 2VC-11-68, (no valve numbers located from tanks 11 and 121). Downstream of these valves is in scope for 10 CFR 54.4(a)(2). A seismic anchor or seismic endpoint could not be located downstream of valve 2VC-11-68.

Request:

1. Provide justification for not including a seismic anchor downstream of the holdup tank drain valves 2VC-11-68 and those without valve numbers from tanks 11 and 121.

RAI 2.3.3.2-04

Background:

In LRA Section 2.3.3.4, portions of the VC System are within scope based on criteria 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2).

Issue:

Drawing LR-XH-1001-4, location E-7, shows pipe section ¾-CS-151R (at Seal 3) from RCP Loop A that is not in scope for license renewal. The similar pipe section for RCP B is in scope for 10 CFR 54.4(a)(2).

Request:

Provide justification for not including pipe section ¾-CS-151R from RCP Loop A in scope for license renewal.

RAI 2.3.3.2-05

Background:

In LRA Section 2.3.3.4, portions of the VC system are within scope based on criteria 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(2).

Issue:

Drawing LR-XH-1-41 from valves VC-11-120 and 2VC-11-120 through the boric acid transfer pumps and tanks and to the RWST are in scope for 10 CFR 54.4(a)(2). These lines are safety related as QA Class IB.

Request:

Provide justification for not including these components in scope for 10 CFR 54.4(a)(1).

2.3.3.3 Component Cooling System

The following RAIs were generated as part of the scoping and screening review of the Component Cooling (CC) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.3-01

Background:

License renewal rule 10 CFR 54.21(a)(3) requires for those components within the scope of license renewal to demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained.

LRA Table 2.3.3-3, "Component Cooling System," provides the list of component cooling system component types and intended functions.

Issue:

Restricting orifices located at license renewal drawing locations G-2, D-1, E-8, and D-11 on LR-39245-1 and B-8, E-8, B-1, and E-1 on drawing LR-39246-1 are in scope for license renewal criterion 10 CFR 54.4(a)(1). In addition to the intended function of pressure boundary restricting orifices can also provide the intended function of flow restriction.

Request:

Provide additional information to explain why LRA Table 2.3.3-3 does not provide the intended function of flow restriction for restricting orifices.

RAI 2.3.3.3-02

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to identify and list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

Drawing LR-39245-2, location C-1, shows a 3-CC-9 pipeline that is in scope for criterion 10 CFR 54.4(a)(1) that has a continuation note stating "From Unit 1 Component Cooling Heat Exchanger See LR-39245-1". Drawing LR-39245-1, location F-7, also shows a 3-CC-9 pipeline that is in scope for criterion 10 CFR 54.4(a)(1) that has a continuation note stating "To #11 Seal Water Heat Exchanger See LR-39245-2".

Request:

Provide additional information to clarify why there are two 3-CC-9 pipelines.

2.3.3.4 Containment Hydrogen Control System

The following RAI was generated as part of the scoping and screening review for the Containment Hydrogen Control (HC) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.4-01

Background:

In LRA Section 2.3.3.4, portions of the Containment Hydrogen Control (HC) System are within scope based on criteria 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2) and 10 CFR 54.4(a)(3).

Issue:

Drawing LR-39251, location E-4, identifies Emergency Air supply lines 3/4-2HC-18 and line 3/4-2HC-9; location E-6, Emergency Air supply lines 3/4-HC-18 and line 3/4-HC-9; location D-3, Emergency Instrument Air supply line (no line number); and location D-6, Emergency Instrument Air supply line (no line numbers). While we understand the Instrument Air (IA) and Station Air (SA) systems can be cross-tied and back up one another on decreasing air pressure, there is no discussion in LRA Section 2.3.3.4 or the USAR Section 10.3.10 regarding emergency air or emergency instrument air supplies to the HC System.

Request:

1. Clarify what is meant by Emergency Air and Emergency Instrument Air supply in the context of its relationship to the HC System.

2. On drawing LR-39251, locations D-6 and D-3, provide line numbers for the four (4) Emergency Instrument Air lines and adequate information so that they can be traced to the appropriate location in the Instrument Air System drawing LR-39244.

2.3.3.6 Cooling Water System

The following RAIs were generated as part of the scoping and screening review for the Cooling Water (CL) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.6-01

Background:

LRA Table 2.3.3.6, "Cooling Water System," states that heat-exchanger tubes in the CL system are within the scope of license renewal and provide a pressure boundary function.

Issue:

License renewal drawing LR-86172-4, locations B-4 and B-8, show the inlet and outlet piping to the CRDM heat exchangers within the scope of license renewal per 10 CFR 54.4(a)(2); however, CRDM cooling coil assemblies 117-141 and 217-141 are shown as not within the scope of license renewal. Failure of these coils could have an effect on the intended pressure boundary functions.

Request:

Explain why the CRDM cooling coil assemblies are not within the scope of license renewal per 10 CFR 54.4(a).

RAI 2.3.3.6-02

Background:

The LRA states that the CL System is within the scope of license renewal based on the criteria of 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2), and 10 CFR 54.4(a)(3).

Issue:

Drawing LR-86172-4, location D-3, shows #13 Fan Coil Unit (FCU) for Unit 1 within the scope of license renewal per 10 CFR 54.4(a)(1). LR-86172-4, location D-2, shows FCU (#14) as not within the scope of license renewal.

Request:

Explain why #14 FCU is not within the scope of license renewal per 10 CFR 54.4(a).

RAI 2.3.3.6-03

Background:

The LRA states that the CL System is within the scope of license renewal based on the criteria of 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2), and 10 CFR 54.4(a)(3).

Issue:

Drawing LR-39216-2, location D-2, and Drawing LR-39217-1, location C11, show portions of 30" standpipes as within the scope of license renewal per 10 CFR 54.4(a)(2) and portions within the scope of license renewal per 10 CFR 54.4(a)(3). The transition from 10 CFR 54.4(a)(2) to 10 CFR 54.4(a)(3) criteria occurs in the middle of the pipe.

Request:

Clarify the criteria for being within the scope of license renewal for these standpipes or explain why portions of this piping have different criteria.

RAI 2.3.3.6-04

Background:

The LRA states that the CL System is within the scope of license renewal based on the criteria of 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2), and 10 CFR 54.4(a)(3).

Issue:

Drawing LR-39223, location A-7, shows pipe section 2-CL-112 (after valve AF-25-6) as in scope for license renewal per 10 CFR 54.4 (a)(3) or 10 CFR 54.4 (a)(1). However, portions of the same pipe section (2-CL-112) before the valve AF-25-6 and after the grid location A-5 are included in scope for license renewal per 10 CFR 54.4 (a)(2). Note similar line 2-CL-111 on LR-39222 is in scope for 10 CFR 54.4 (a)(2).

Request:

Provide additional information explaining why the different criterion was used for the piping (2-CL-112).

2.3.3.8 Diesel Generators and Support System

The following RAIs were generated as part of the scoping and screening review for the Diesel Generators and Support (DG) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.8-01

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to identify and list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

Drawings LR-11824, LR-118243, LR-118244, and LR-118245, locations C-4 and C-9, show diesel engine radiators that are in scope for license renewal based on 10 CFR 54.4(a)(1). The radiators are not shown in LRA Table 2.3.3-8 as components subject to an aging-management review.

Request:

Provide additional information explaining why the radiator is not included in LRA Table 2.3.3-8 as a component type subject to an AMR.

RAI 2.3.3.8-02

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

Drawings LR-118248 and LR-118249, location B-6, show diesel fuel oil day tanks, which have flame arrestors that provide a pressure boundary that are in scope for license renewal based on criterion 10 CFR 54.4(a)(1). The flame arrestors (flame arrestor housing for pressure boundary and flame arrestor element for flame arresting) are not shown in LRA Table 2.3.3-8 as components subject to an aging-management review.

Request:

Provide additional information explaining why the flame arrestor housing and element are not included in LRA Table 2.3.3-8 as component types subject to an AMR.

RAI 2.3.3.8-03

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

Drawings LR-118250 and LR-118251, locations D-3, and D-9, show diesel starting air pipelines with oiler components in scope for license renewal based on 10 CFR 54.4(a)(1). The oilers are not shown in LRA Table 2.3.3-8 as components subject to an aging management review.

Request:

Provide additional information explaining why the oilers are not included in LRA Table 2.3.3-8 as a component type subject to an AMR.

RAI 2.3.3.8-04

Background:

LRA Section 2.3.3-8, "Diesel Generators and Support System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39255-1, location D-9, shows a 2" vent at the top of the D-1 and D-2 fuel oil day tanks, respectively that are in scope for criterion 10 CFR 54.4(a)(1). The 2" vents at the top of the D-1 and D-2 fuel oil day tanks do not have a proper symbol for a vent. The symbol provided is a box which could be a flame arrestor. The D-5 and D-6 fuel oil day tanks shown on drawings LR-118248 and LR-118249, respectively, location B-6, are also shown in scope for 10 CFR 54.4(a)(1) and appear to have the proper symbol and description for a 2" vent and flame arrestor.

Request:

Provide additional information that clarifies whether the symbols at the top of the D-1 and D-2 fuel oil day tanks are a 2" vent and flame arrestor. If not, what do the symbols represent?

2.3.3.12 Miscellaneous Gas System

The following RAIs were generated as part of the scoping and screening review for the Miscellaneous Gas (CG) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.12-01

Background:

LRA Section 2.1.2.4.2, "Scoping Criteria 2 – Non-Safety Related Affecting Safety Related" states in part "Non-safety related SSCs directly connected to safety related SSCs (typically piping systems) up to and including the first seismic or equivalent anchor past the safety/non-safety interface are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

Drawing LR-39247, location C-9, shows one seismic anchor for the 1" nitrogen line supplying the Unit 2 containment where the line forms a T junction. There is only one seismic anchor noted.

Request:

Provide justification for not including a seismic anchor downstream of the T junction.

RAI 2.3.3.12-02

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to identify and list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

Drawing LR-39247, locations G-2 and G-5, identifies several flexible connectors for the hydraulic desurgers as being in scope for 10 CFR 54.4(a)(2), and a note on the drawing states the boundary ends at the flexible connection. LRA Table 2.3.3.12 does not include flexible connectors as a component type requiring an AMR.

Request:

Provide justification for not including flexible connectors as a component type requiring an AMR in LRA Table 2.3.3-12.

2.3.3.13 Plant Sample System

The following RAI was generated as part of the scoping and screening review for the Plant Sample (SM) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.13-01

Background:

In LRA Section 2.1.2.1, "Scoping Process Overview," it is stated that components required to support system level LRA functions were included in scope for license renewal. The Plant Sampling System is identified as in scope for 10 CFR 54.4(a)(2).

Issue:

Drawing LR-XH-248-1-3, location D2, shows Hot Lab pump HP2 discharge pressure indicator, PI-H3 as not in scope for license renewal. Similar to PI-H3 is PI-C3 which is in scope for 10 CFR 54.4(a)(2).

Request:

Provide additional information explaining why pressure indicator PI-H3 is not in scope.

2.3.3.16 Spent Fuel Pool Cooling System

The following RAI was generated as part of the scoping and screening review for the Spent Fuel Pool Cooling System (SF) for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.16-01

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Review of LRA Section 2.3.3.16 indicated that the fuel-transfer tube and blind flange are included as part of the SF System. In the System Function Listing subsection, the fuel-transfer tube is listed under Code SF-05, which applies to SCs relied upon to perform a Primary Containment Boundary Function. The fuel-transfer tube and blank flange with double O-Ring seal constitute the containment boundary. Therefore, the fuel-transfer tube meets the criterion for 10 CFR 54.4(a)(1). The fuel-transfer tube also meets the Code SF-SB requirement because it performs a containment isolation function that demonstrates compliance with 10 CFR 50.63, Station Blackout. Therefore, the fuel transfer tube is also in scope for license renewal per 10 CFR 54.4(a)(3).

Issue:

Although the fuel-transfer tube is in scope for license renewal per 10 CFR 54.4(a)(1) and (a)(3), there was little information describing the fuel-transfer tube or the license renewal boundary in the LRA. A drawing was not provided. The fuel-transfer tube and blind flange are also not included in LRA Table 2.3.3-16.

Request:

1. Provide reference to a LRA drawing showing the fuel-transfer tube and license renewal boundaries.
2. Justify why the fuel-transfer tube and blank flange are not component types requiring an AMR in LRA Table 2.3.3-16, "Spent Fuel Pool Cooling System."

2.3.3.17 Station and Instrument Air System

The following RAIs were generated as part of the scoping and screening review for the SA System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.17-01

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Similar piping is in scope for different criteria. Drawing LR-39253-3, location F-7, shows several lines from air compressor (#125) as in scope for license renewal for 10 CFR 54.4(a)(3). Drawing LR-39253-3, location C-7, also shows that similar lines from the air compressor (#124) are in scope for license renewal for 10 CFR 54.4 (a)(2). LRA Section 2.3.3-17, "Station and Instrument Air System," does not indicate that any portion of the station and instrument air system is in scope for 10 CFR 54.4 (a)(2).

Request:

1. Provide additional information explaining why there is a difference of scope classification between the lines out of air compressors #124 and #125 when both the compressors have essentially the same piping size, function, and destination that enables both units to meet the requirements of 10 CFR 54.4 (a).
2. If the sections of pipe currently in scope for 10 CFR 54.4 (a)(2) on license renewal drawing LR-39253-3 remain in scope for 10 CFR 54.4 (a)(2), explain why LRA Section 2.3.3.17 does not address components in scope for 10 CFR 54.4 (a)(2).

RAI 2.3.3.17-02

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39253-3, location A-8, shows the 2-2CL-50 line in scope for license renewal for 10 CFR 54.4(a)(3). However, the continuation of this 2" line on drawing LR-39217-1, location F-3, shows this line is in scope for 10 CFR 54.4(a)(2).

Request:

Provide additional information explaining why there is a difference of scope classification between the main drawing LR-39253-3 and the continuation on drawing LR-39217-1.

RAI 2.3.3.17-03

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39244, location C-1, downstream of SA-85-2, shows 1/2" lines and the associated control valves as not in scope for license renewal. These lines are directly connected to the safety valve and the upstream 3/4" line that are within the scope of license renewal.

Request:

Provide additional information explaining why these sections of pipe and components are not within the scope of license renewal and justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4(a).

RAI 2.3.3.17-04

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39244, location C-1, downstream of SA-115-1, shows a 3/8" line and the associated control valve CV 31148 as not in scope for license renewal. This line is directly connected to the 1" line that is within the scope of license renewal.

Request:

Provide additional information explaining why the sections of pipe and components are not within the scope of license renewal and justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4(a).

RAI 2.3.3.17-05

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39243, location F-8 through F-10, upstream of 2SA-2-71, shows a 3" line as not in scope for license renewal. This line is directly connected to the upstream 3" line and the downstream 3" line, both of which are within the scope of license renewal for 10 CFR 54.4 (a)(3).

Request:

Provide additional information explaining why this section of pipe is not within the scope of license renewal and justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4(a).

RAI 2.3.3.17-06

Background:

LRA Section 2.3.3.17, "Station and Instrument Air System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39243, location D-9, shows a 1/2" line and valve 2SA-19-2 as not in scope for license renewal. This line is directly connected to the 1" line that is within the scope of license renewal for 10 CFR 54.4(a)(3).

Request:

Provide additional information explaining why this section of pipe is not within the scope of license renewal and justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4 (a).

2.3.3.20 Waste Disposal System

The following RAIs were generated as part of the scoping and screening review for the Waste Disposal (WD) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.3.20-01

Background:

LRA Section 2.1.2.4.2, "Scoping Criteria 2 – Non-Safety Related Affecting Safety Related" states in part "Non-safety related SSCs directly connected to safety related SSCs (typically piping systems) up to and including the first seismic or equivalent anchor past the safety/non-safety interface are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

Drawing LR-XH-1-123, locations C-5 and C-7, shows two seismic endpoints on 3/8" reactor coolant drain tank piping exiting containment as not in scope. The valves, 1-9159B and 2-9159B, that the seismic endpoints are connected to, are shown as within the scope of license renewal for 10 CFR 54.4(a)(1).

Request:

Provide justification for not including the seismic endpoint downstream of valves 1-9159B and 2-9159B within the scope of license renewal.

RAI 2.3.3.20-02

Background:

LRA Section 2.3.3.20, "Waste Disposal System," of the LRA provides the system description as well as a listing of functions associated with the system. Portions of the WD system are in scope for license renewal per 10 CFR 54.4(a)(2).

Issue:

Drawing LR-XH-1-123, locations A-2 and A-10, shows the 3/8-WL-1 and 3/8-2WL-1 lines in scope for license renewal for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3). However, the continuation of this line on drawings LR-XH-1-7, location D-8, and LR-XH-1001-3, location D-8, shows this line is in scope for 10 CFR 54.4(a)(2).

Request:

Provide additional information explaining why there is a difference of scope classification between the main drawing LR-XH-1-123 and the continuations on drawings LR-XH-1-7 and LR-XH-1001-3.

RAI 2.3.3.20-03

Background:

LRA Section 2.3.3.20, "Waste Disposal System," of the LRA provides the system description as well as a listing of functions associated with the system. Portions of the WD system are in scope for license renewal per 10 CFR 54.4(a)(2).

Issue:

Drawing LR-39248, location E-8, shows piping 2-WG-68 from the gas decay tank condensate drain pump as in scope for license renewal for 10 CFR 54.4(a)(2). However, the continuation of this line on drawing LR-XH-1-124, location E-12, 1" piping 1-WG-68 shows this line as not in scope for the license renewal.

Request:

Provide additional information explaining why there is a difference of scope classification between the main drawing LR-39248 and the continuation on drawing LR-XH-1-124.

RAI 2.3.3.20-04

Background:

LRA Section 2.3.3.20, "Waste Disposal System," of the LRA provides the system description as well as a listing of functions associated with the system. The WD system contains non-safety-related components that maintain mechanical and structural integrity to provide structural support to attached safety-related piping or to prevent spatial interactions that could cause failure of safety-related components.

Issue:

Drawing LR-39248, location D-7, shows 3/8" tubing from valve 2CV-38-4 as in scope for license renewal for 10 CFR 54.4(a)(2). However, the continuation of this line on drawing LR-XH-1-1001-5, location F-2, shows valve 2CV-38-4 line as in scope for the license renewal 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3).

Request:

Provide additional information explaining why there is a difference of scope classification between the main drawing LR-39248 and the continuations on drawing LR-1-1001-5.

RAI 2.3.3.20-06

Background:

LRA Section 2.3.3.20, "Waste Disposal System," of the LRA provides the system description as well as a listing of functions associated with the system. The WD system contains non-safety-related components that maintain mechanical and structural integrity to provide structural support to attached safety-related piping or to prevent spatial interactions that could cause failure of safety-related components.

Issue:

Drawing LR-XH-1-124 shows nine gas decay tanks (#121, #122, #123, #124, #125, #126, #127, #128, and #129) as not in scope for license renewal. However, at multiple tank isolation valve locations, it shows that the tanks are classified as QA IC rather than QA IIIC.

Request:

Provide additional information explaining why these safety related (QA Class IC) gas decay tanks and associated components are not within the scope of license renewal for 10 CFR 54.21(a)(1).

2.3.4.2 Bleed Steam System

The following RAI was generated as part of the scoping and screening review for the Bleed Steam (BL) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.4.2-01

Background:

License renewal rule 10 CFR 54.21(a)(1) requires applicants to list all components subject to an AMR. The staff confirms inclusion of all components subject to an AMR by reviewing component types within the license renewal boundary.

Issue:

1. Drawing LR-39224, locations B-2 and C-2, show the #14A and #14B FW Heaters in scope for criterion 10 CFR 54.4(a)(2). However, FW Heaters #15A and #15B, locations D-2 and E-2, are shown as not in scope for license renewal. The corresponding Unit 2 FW Heaters #25A and #25B are shown as in scope on drawing LR-39225.
2. FW Heaters are not included in LRA Table 2.3.4-2 Bleed Steam System, as a component type subject to an AMR.

Request:

1. Provide additional information clarifying why FW Heaters #15A and #15B are not within the scope of license renewal and justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4(a).
2. Justify why the FW Heaters are not included in LRA Table 2.3.4-2 Bleed Steam System, as a component type subject to an AMR.

2.3.4.3 Circulating Water System

The following RAI was generated as part of the scoping and screening review for the Circulating Water (CW) System for the Prairie Island Nuclear Generating Plant LRA.

RAI 2.3.4.3-01

Background:

LRA Section 2.3.4.3, "Circulating Water System," states that piping and fittings are within the scope of license renewal per 10 CFR 54.4(a)(1), 10 CFR 54.4(a)(2) and 10 CFR 54.4(a)(3) and have an intended function of providing a pressure boundary.

Issue:

Drawing LR-39215-1, locations E-2, E-3, E-5, and E-6, show the #1A, #1B, #2A, and #2B Condensers in scope for criterion 10 CFR 54.4 (a)(2). However, the same condensers shown at locations B-7, B-8, B-10, and B-11, are shown as not in scope for license renewal.

Request:

Provide additional information detailing why the condensers shown at locations B-7, B-8, B-10, and B-11 are not within the scope of license renewal and if not in scope justify the boundary locations with respect to the applicable requirements of 10 CFR 54.4 (a).