



January 15, 2009

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10 CFR 54

U S Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Units 1 and 2  
Dockets 50-282 and 50-306  
License Nos. DPR-42 and DPR-60

Responses to NRC Requests for Additional Information Dated December 16, 2008  
Regarding Application for Renewed Operating Licenses

By letter dated April 11, 2008, Northern States Power Company, a Minnesota Corporation, (NSPM) submitted an Application for Renewed Operating Licenses (LRA) for the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2. In a letter dated December 16, 2008, the NRC transmitted Requests for Additional Information (RAIs) regarding that application. This letter provides responses to those RAIs.

Enclosure 1 provides the text of each RAI followed by the NSPM response.

If there are any questions or if additional information is needed, please contact Mr. Eugene Eckholt, License Renewal Project Manager.

Summary of Commitments

This letter contains no new commitments or changes to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on January 15, 2009.

A handwritten signature in cursive script that reads 'Michael D. Wadley'.

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

Enclosure (1)

cc:

Administrator, Region III, USNRC  
License Renewal Project Manager, Prairie Island, USNRC  
Resident Inspector, Prairie Island, USNRC  
Prairie Island Indian Community ATTN: Phil Mahowald  
Minnesota Department of Commerce

**Enclosure 1**  
**NSPM Responses to NRC Requests for Additional Information**  
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**RAI 2.3-1 (General)**

Background:

Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
- (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.
- (2) All nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any of the functions identified in paragraphs (a)(1)(i), (ii), or (iii) of this section.

Issue:

Vaneaxial and propeller fans can be subject to blade failure. These blades have the potential to become missiles that could impact equipment identified in 10 CFR 54.5(a)(1). Some facilities credit fan housings for vaneaxial or propeller fans as barriers for these missiles.

Request:

Are there any vaneaxial or propeller fans in containment, diesel rooms, screenhouse, or auxiliary building whose housing are relied upon as a barrier from fan blade missiles and are not classified as in-scope? If so, please discuss why these fan housings should not be in-scope for 10 CFR 54.4(a)(2)?

**NSPM Response to RAI 2.3-1 (General)**

PINGP USAR Chapter 12 discusses the sources and types of missiles that are postulated to be generated at PINGP. Vane axial and propeller fans are not identified as potential missile sources or types in the PINGP USAR. Recent industry Operating Experience (OE) identified the potential for failure of a vane axial fan and the potential for collateral damage to adjacent equipment due to "missiles" created by the broken fan parts. The PINGP plant-specific evaluation of this industry OE did not result in the crediting of any fan housings as missile barriers or identify a need for external missile barriers associated with fan blades. The PINGP current licensing basis does not credit vane axial or propeller fan housings as barriers for fan blade missiles.

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**2.3.2.1 Containment Spray System (CS)**

The following requests for additional information (RAIs) were generated as part of the scoping and screening review of the CS System for the Prairie Island Nuclear Generating Plant License Renewal Application (LRA).

**RAI 2.3.2.1-01**

Background

For systems in-scope of license renewal, Title 10 Part 54.4 states, in part, that:  
(a) Plant systems, structures, and components within the scope of this part are:  
(1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:  
(i) The integrity of the reactor coolant pressure boundary;  
(ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;  
or  
(iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue

License Renewal (LR) Drawing No. LR-39237 Rev 3: In drawing coordinates D-5, valve CS-25-2 along with its pipe and end cap are shown as out-of-scope for license renewal. The piping which includes this valve is attached to piping which is in-scope in accordance with 10 CFR 54.4(a)(1).

Request

Provide justification for the exclusion of this valve, pipe and end cap from the scope of license renewal. If these items are in-scope of license renewal, in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1), update the LRA by providing the applicable information in the appropriate LRA sections and tables.

**NSPM Response to RAI 2.3.2.1-01**

On drawing LR-39237, location D-5, valve CS-25-2 and attached piping and end cap should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(1). Piping/Fittings and valves are included in LRA Table 2.3.2-1.

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**RAI 2.3.2.1-02**

Background

For systems in-scope of license renewal, Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
- (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue

LR Drawing No. LR-39237 Rev 3: In drawing coordinates D-4, at the downstream side of spray pump ES-19623 after the 4x6-inch reducer is a threaded end cap shown out-of-scope for license renewal. This end cap is attached to piping which is in-scope in accordance with 10 CFR 54.4(a)(1).

Request

Provide justification for the exclusion of this end cap from the scope of license renewal. If this end cap is in-scope of license renewal, in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1), update the LRA by providing the applicable information in the appropriate LRA sections and tables.

**NSPM Response to RAI 2.3.2.1-02**

On drawing LR-39237, location D-4, the pipe and end cap shown adjacent to Pressure Indicator PI-11989 on #22 Containment Spray Pump discharge piping should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(1). Piping/Fittings are included in LRA Table 2.3.2-1.

**2.3.3.1 Auxiliary and Radwaste Area Ventilation Systems (ZA)**

The following RAI was generated as part of the scoping and screening review of the ZA Systems for the Prairie Island Nuclear Generating Plant LRA.

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**RAI 2.3.3.1-01**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates D-3, the block labeled "Main Steam Penetration Area" has a supply air duct (4825 CFM) that is shown as out-of-scope. This duct is a branch from a duct that is shown as in-scope for 10 CFR 54.4(a)(2). Also in the same area for the block labeled "General Area, Col's G,11 & 12, El. 695'-0"," the exhaust duct from this area is shown as out-of-scope. The supply duct to this area is shown as in-scope for 10 CFR 54.4(a)(2). The out-of-scope duct also exhausts to the Machine Shop. The Machine Shop is indicated as being shown on this drawing at location B-4. The Machine Shop detail was not found at location B-4. However, all areas identified at location B-4 are shown with ductwork as being in-scope for 10 CFR 54.4(a)(2). No discussion of these areas was identified in the application.

Request

- 1.0 Confirm that these sections of duct indicated above are out-of-scope.
- 2.0 Provide justification for not including a seismic or equivalent anchor as indicated in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-01**

On drawing LR-39600, location D-3, the supply duct (4825 cfm) to the block labeled "Main Steam Penetration Area," shown as not within the scope of License Renewal, should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(2). At location D-3, the exhaust duct from the block labeled "General Area, Col's G,11 & 12, El. 695'-0," shown as not within the scope of License Renewal, should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(2). The Hot Machine Shop exhaust ventilation location call out is incorrect; the call out should be to location G-6. A flexible connection should be shown at the discharge of the Hot Machine Shop Exhaust Fan; the flexible connection and exhaust duct connecting to General Area, Col's G,11 & 12 El. 695'-0" exhaust should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(2).

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety

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related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For these locations, all ducting and components attached to the Safety Related Steam Exclusion Dampers (CD-34189, CD-34190, CD-36045 and CD-36046) up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Flexible connections should be shown on the upstream side of dampers CD-34043 and CD-34044 (location D-2) to provide the upstream seismic endpoint for these sections of duct. Damper/Housings, Ducting and Components, and Flex Connections are included in LRA Table 2.3.3-1.

**RAI 2.3.3.1-02**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates D-4, in the block labeled "Aux. Bldg. Sump Area, Waste Hold-up Tank Area," the supply duct for this area is shown as out-of-scope. This supply duct is a branch off of a duct that is shown as in-scope for 10 CFR 54.4(a)(2).

Request

- 1.0 Confirm that these sections of duct indicated above are out-of-scope.
- 2.0 Provide justification for not including a seismic or equivalent anchor as specified in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-02**

On drawing LR-39600, location D-4, the supply duct (5302 cfm) to the block labeled Aux Bldg. Sump Area; Waste Hold-Up Tank Area, shown as not within the scope of License Renewal, should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(2).

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For this location, all ducting and

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components attached to the Safety Related Steam Exclusion Dampers (CD-36037, CD-36038, CD-34187 and CD-34188) up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Flexible connections should be shown on the upstream side of dampers CD-34041 and CD-34042 (location B-2) to provide the upstream seismic endpoint for these sections of duct. Damper/Housings, Ducting and Components, and Flex connections are included in LRA Table 2.3.3-1.

**RAI 2.3.3.1-03**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates D-6, inlet duct for filter 121, Hot Chem Lab Filter, the exhaust duct to this filter is shown as in-scope for 10 CFR 54.4(a)(2) with the exception for a section of duct that has two dampers, HFD-14 and VFD-12, and flow element 27199. These two dampers are shown as in-scope for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3). The section of duct in which these two dampers are located is shown as out-of-scope. No discussion was identified in LRA section 2.3.3.1.

Request

- 1.0 Confirm that this section of duct is out-of-scope while the dampers in this section and the ductwork/filter housing on either side of this section are in-scope.
- 2.0 Provide justification for not including a seismic or equivalent anchor as specified in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-03**

On drawing LR-39600, location D-6, portions of the #121 Hot Chem Lab Filter suction and supply duct that provide an Auxiliary Building Special Ventilation (Category 1) boundary, are within the scope of License Renewal per 10 CFR 54.4(a)(2). The scoping breaks align with the Category 1 boundary break symbols, and the duct and components outside of the Category 1 boundary are correctly shown as not within the scope of License Renewal. Fire dampers HFD-14 and VFD-12 are located in the wall penetrations coincident with the Category 1 boundary breaks (not explicitly shown on the drawings). The fire dampers are correctly shown as within the scope of License



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Renewal per 10 CFR 54.4(a)(3) while the duct that is outside the Category 1 boundary is correctly shown as not in the scope of License Renewal. The primary function of the Hot Lab Ventilation sub-system is to provide outside air and direct exhaust air from areas subject to possible radioactive contamination through activated charcoal beds and high efficiency filters; this is not an intended function.

There are no Safety Related components associated with this section of duct, and therefore, identification of seismic or equivalent anchors in accordance with LRA Section 2.1.2.4.2 is not required.

**RAI 2.3.3.1-04**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates D-7, inlet duct for filter 121, Sample Room Filter Train A, the exhaust duct to this filter is shown as in-scope for 10 CFR 54.4(a)(2) with the exception for a section of duct that has two dampers, HFD-18 and VFD-16, and flow element 27200. These two dampers are shown as in-scope for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3). The section of duct in which these two dampers are located is shown as out-of-scope. No discussion was identified in LRA section 2.3.3.1.

Request

- 1.0 Confirm that this section of duct is out-of-scope while the dampers in this section and the ductwork/filter housing on either side of this section are in-scope.
- 2.0 Provide justification for not including a seismic or equivalent anchor as specified in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-04**

On drawing LR-39600, location D-7, portions of the #121 Sample Room Filter suction and discharge duct that provide an Auxiliary Building Special Ventilation (Category 1) boundary, are within the scope of License Renewal per 10 CFR 54.4(a)(2). The scoping breaks align with the Category 1 boundary break symbols, and the duct and components outside of the Category 1 boundary are correctly shown as not within the

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scope of License Renewal. Fire dampers HFD-18 and VFD-16 are located in the wall penetrations coincident with the Category 1 boundary breaks (not explicitly shown on the drawings). The fire dampers are correctly shown as within the scope of License Renewal per 10 CFR 54.4(a)(3), while the duct that is outside the Category 1 boundary is correctly shown as not within the scope of License Renewal. The primary function of the Sample Room Ventilation sub-system is to provide outside air and direct exhaust air from areas subject to possible radioactive contamination through activated charcoal beds and high efficiency filters; this is not an intended function.

There are no Safety Related components associated with this section of duct, and therefore, identification of seismic or equivalent anchors in accordance with LRA Section 2.1.2.4.2 is not required.

**RAI 2.3.3.1-05**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates D-7, inlet duct for filter 122, Sample Room Filter Train B, the exhaust duct to this filter is shown as in-scope for 10 CFR 54.4(a)(2) with the exception for a section of duct that has two dampers, HFD-19 and VFD-17, and flow element 27201. These two dampers are shown as in-scope for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3). The section of duct in which these two dampers are located is shown as out-of-scope. No discussion was identified in LRA section 2.3.3.1.

Request

- 1.0 Confirm that this section of duct is out-of-scope while the dampers in this section and the ductwork/filter housing on either side of this section are in-scope.
- 2.0 Provide justification for not including a seismic or equivalent anchor as specified in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-05**

On drawing LR-39600, location D-7, portions of the #122 Sample Room Filter suction and discharge duct that provide an Auxiliary Building Special Ventilation (Category 1)

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boundary, are within the scope of License Renewal per 10 CFR 54.4(a)(2). The scoping breaks align with the Category 1 boundary break symbols, and the duct and components outside of the Category 1 boundary are correctly shown as not within the scope of License Renewal. Fire dampers HFD-19 and VFD-17 are located in the wall penetrations coincident with the Category 1 boundary breaks (not explicitly shown on the drawings). The fire dampers are correctly shown as within the scope of License Renewal per 10 CFR 54.4(a)(3), while the duct that is outside the Category 1 boundary is correctly shown as not within the scope of License Renewal. The primary function of the Sample Room Ventilation sub-system is to provide outside air and direct exhaust air from areas subject to possible radioactive contamination through activated charcoal beds and high efficiency filters; this is not an intended function.

There are no Safety Related components associated with this section of duct, and therefore identification of seismic or equivalent anchors in accordance with LRA Section 2.1.2.4.2 is not required.

**RAI 2.3.3.1-06**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue

LR Drawing LR39600: At drawing coordinates B-2 and D-2, Unit 1 11&12 Auxiliary Building Make-up Air Units, and Unit 2 21&22 Auxiliary Building Make-up Air Units, are shown as out-of-scope. Dampers CD-34037, CD-34038, CD-34039, CD-34040, CD-34041, CD-34042, CD-34043, and CD-34044 are shown as in-scope for 10 CFR 54.4(a)(2). LRA Section 2.3.3.1 and 2.3.3.18 indicate that the intended function for dampers/housings is a pressure boundary.

Request

- 1.0 Provide a discussion how the dampers/housings for CD-34037 through CD-34040 can function as an effective pressure boundary if the fan housings and duct work downstream from these dampers are not intact.
- 2.0 Confirm that the air handling unit housing and the duct work between the dampers is not in-scope as a pressure boundary.

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3.0 Provide justification for not including a seismic or equivalent anchor as specified in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.1-06**

On drawing LR-39600, locations B-2 and D-2, scoping of dampers CD-34037, CD-34038, CD-34039 and CD-34040 is shown incorrectly; these dampers should be shown as not within the scope of License Renewal. The 11, 12, 21 and 22 Auxiliary Building Make-Up Air Units and the duct between the dampers are correctly shown as not within the scope of License Renewal.

There are no Safety Related components associated with this section of duct, and therefore, identification of seismic or equivalent anchors in accordance with LRA Section 2.1.2.4.2 is not required.

**2.3.3.4 Containment Hydrogen Control System (HC)**

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

**RAI 2.3.3.4-01**

Background

For systems in-scope of license renewal, Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
  - (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue

LR Drawing No. LR-39251, Rev. 2: Control valves CV-31923 (in zone G-7), CV-31929 (in zone F-7), CV-31924 (in zone G-3), and CV-31930 (in zone F-3) shows pneumatic tubing of the positioner of instrument actuated operator as out-of-scope for license renewal.

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Request

Provide justification for the exclusion of this valve positioner pneumatic tubing from the scope of license renewal. If this tubing is in the scope of license renewal, in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1), update the LRA by providing the applicable information in the LRA sections and tables as appropriate.

**NSPM Response to RAI 2.3.3.4-01**

On drawing LR-39251, the instrument air piping for CV-31923 (location G-7), CV-31929 (location F-7), CV-31924 (location G-3) and CV-31930 (location F-3) is within the scope of License Renewal per 10 CFR 54.4(a)(3). For drawing clarity, Station and Instrument Air (SA) License Renewal system boundary breaks were generally not shown at individual components. Instrument air piping is evaluated in LRA Section 2.3.3.17, Station and Instrument Air System; piping/fittings are included in LRA Table 2.3.3-17.

**2.3.3.5 Control Room and Miscellaneous Area Ventilation System (ZN)**

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

**RAI 2.3.3.5-01**

Background

The ZN System is shared by Units 1 and 2 and consists of two ventilation trains each consisting of an air handler, filters, cooling coils, clean-up fan and the necessary ducts, dampers and instrumentation. The system is designed to maintain the control room at a suitable temperature condition for personnel habitability and equipment operability and to isolate the outside atmosphere and re-circulate a portion of the control room atmosphere through Particulate, Absolute, Charcoal (PAC) filters to maintain the dose to the control room operators less than requirements. This system is listed as QA type 1C.

Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
- (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

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Issue

LR Drawing LR39603-1: At drawing coordinates H-1, the section of outside air duct upstream of damper DC-34180 is marked as out-of-scope. The ductwork either side of this section is marked as in-scope for 10 CFR 54.4(a)(1).

Request

- 1.0 Provide justification for exclusion of this section of ductwork from being in-scope for 10 CFR 54.4(a)(1).

**NSPM Response to RAI 2.3.3.5-01**

On drawing LR-39603-1, location H-1, the section of duct upstream of damper CD-34180, shown as not within the scope of License Renewal, is incorrect; this section of duct should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(1).

**RAI 2.3.3.5-02**

Background:

The ZN System is shared by Units 1 and 2 and consists of two ventilation trains each consisting of an air handler, filters, cooling coils, clean-up fan and the necessary ducts, dampers and instrumentation. The system is designed to maintain the control room at a suitable temperature condition for personnel habitability and equipment operability and to isolate the outside atmosphere and re-circulate a portion of the control room atmosphere through PAC filters to maintain the dose to the control room operators less than requirements. This system is listed as QA type 1C.

Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
  - (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

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Issue

LR Drawing LR39603-1: At drawing coordinates H-4, damper HFD-23 is shown as out-of-scope. All other dampers in this system are shown as being in-scope.

Request

- 1.0 Provide confirmation that this damper is not in-scope for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3).

**NSPM Response to RAI 2.3.3.5-02**

On drawing LR-39603-1, location H-4, fire damper HFD-23, shown as not within the scope of License Renewal, is incorrect; this damper should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(3).

**RAI 2.3.3.5-03**

Background:

The ZN System is shared by Units 1 and 2 and consists of two ventilation trains each consisting of an air handler, filters, cooling coils, clean-up fan and the necessary ducts, dampers and instrumentation. The system is designed to maintain the control room at a suitable temperature condition for personnel habitability and equipment operability and to isolate the outside atmosphere and re-circulate a portion of the control room atmosphere through PAC filters to maintain the dose to the control room operators less than requirements. This system is listed as QA type 1C.

Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
  - (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue:

LR Drawing LR39603-1: Control Room Air Handling Unit 1 and Unit 2.  
It is not clear if the control room ventilation equipment is within the same protected ventilation zone as the control room. If the equipment rooms where the ventilation

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equipment is located has the potential to become contaminated in the event of an accident that includes a radiological release there is the potential to draw that radiological contamination into the control room ventilation system.

Request:

- 1.0 Are there any condensate drains on the air handling units that would be considered to be in-scope as barriers to prevent drawing contaminated air into the air handling units?
- 2.0 If so, are these covered under a different section of the LRA?

**NSPM Response to RAI 2.3.3.5-03**

The control room envelope consists of the control room and the two chiller rooms; see USAR 10.3.3.2.1 for additional details. The Control Room air handling unit condensate 1¼" Drains to Waste are shown on drawing LR-39603-3, locations G-8 and G-5, and are within the scope of License Renewal. The drains are incorrectly shown as within the scope of License Renewal per 10 CFR 54.4(a)(1); they should be shown within the scope of License Renewal per 10 CFR 54.4(a)(2) to prevent spatial interactions that could cause failure of safety related components. On drawing LR-39603-3, location G-8, 122 Control Room Air Conditioning Unit (Train B) 1¼" Drain to Waste continues on drawing LR-39217-2, location G-3, Equipment Condensate Return to the Cooling Water (CL) return header. On drawing LR-39603-3, location G-5, 121 Control Room Air Conditioning Unit (Train A) 1¼" Drain to Waste continues on drawing LR-39216-3, location B-3, Auxiliary Building Roof Drain to the CL Return Header (the equipment condensate return is not explicitly shown on this drawing). On drawing LR-39603-3, License Renewal system boundary breaks between the Control Room and Miscellaneous Area Ventilation (ZN) System and the Cooling Water (CL) System should be shown at the points the Drains to Waste exit the air handling units. The Control Room Air Conditioning Unit Drains to Waste are evaluated in LRA Section 2.3.3.6, Cooling Water (CL) System; Piping/Fittings are included in LRA Table 2.3.3-6.

**RAI 2.3.3.5-04**

Background

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."



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Issue

LR Drawing LR39601: At drawing coordinates E-5, Battery Room 21 has an exhaust duct that is marked as out-of-scope. This duct contains a damper (HFD-54) that is marked as in-scope for 10 CFR 54.4(a)(1) or 10 CFR 54.4(a)(3) and is connected to a duct that is marked as in-scope for 10 CFR 54.4(a)(2).

Request

- 1.0 Confirm that the duct is not in-scope for 10 CFR 54.4(a)(2).
- 2.0 Provide justification for not including a seismic or equivalent anchor as indicated in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.5-04**

On drawing LR-39601, location E-5, the Battery Room 21 exhaust duct (containing fire damper HFD-54), shown as not within the scope of License Renewal, is incorrect; this duct should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(2).

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For this location, all ducting and components attached to the Safety Related Steam Exclusion Dampers (CD-34193, CD-34194, CD-36057 and CD-36058) up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Ducting and Components are included in LRA Table 2.3.3-19.

To address the flexible connections in the Turbine and Administration Building Ventilation (ZB) System within the scope of License Renewal, the following changes are hereby made to the LRA:

In LRA Table 2.3.3-19, Turbine and Administration Building Ventilation System, on page 2.3-109, the following new components are added:

Components	Intended Function
FLEX CONNECTIONS	PRESSURE BOUNDARY

In LRA Section 3.3.2.1.19, Turbine and Administration Building Ventilation System, on page 3.3-29, the following additional entries are made in the bulleted lists:

**Materials**

- EPDM

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**Aging Effects Requiring Management**

- Change in Material Properties - Ozone Exposure
- Change in Material Properties - Thermal Exposure
- Change in Material Properties - Ultraviolet Exposure
- Cracking – Ozone Exposure
- Cracking – Thermal Exposure
- Cracking – Ultraviolet Exposure
- Loss of Material - Wear

In LRA Table 3.3.2-19, Auxiliary Systems – Turbine and Administration Building Ventilation System – Summary of Aging Management Evaluation, the following new lines are added:

<b>Component Type</b>	<b>Intended Function</b>	<b>Material</b>	<b>Environment</b>	<b>Aging Effect Requiring Management</b>	<b>Aging Management Programs</b>	<b>NUREG - 1801 Volume 2 Line Item</b>	<b>Table 1 Item</b>	<b>Notes</b>
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Change in Mat'l Properties - Ozone Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Change in Mat'l Properties - Thermal Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Change in Mat'l Properties - Ultraviolet Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Cracking - Ozone Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Cracking - Thermal Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Cracking - Ultraviolet Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Ext)	Loss of Material - Wear	External Surfaces Monitoring Program	VII.F2-5	3.3.1-34	E

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<b>Component Type</b>	<b>Intended Function</b>	<b>Material</b>	<b>Environment</b>	<b>Aging Effect Requiring Management</b>	<b>Aging Management Programs</b>	<b>NUREG - 1801 Volume 2 Line Item</b>	<b>Table 1 Item</b>	<b>Notes</b>
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Int)	Change in Mat'l Properties - Ozone Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Int)	Change in Mat'l Properties - Thermal Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Int)	Cracking - Ozone Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Int)	Cracking - Thermal Exposure	External Surfaces Monitoring Program	VII.F2-7	3.3.1-11	E
Flex Connections	Pressure Boundary	EPDM	Plant Indoor Air - Uncontrolled (Int)	Loss of Material - Wear	External Surfaces Monitoring Program	VII.F2-6	3.3.1-34	E

**RAI 2.3.3.5-05**

Background:

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

LR Drawing LR39601: At drawing coordinates H-5, the 121 battery room recycle fan is shown as out-of-scope. The ducts and cooling coil on this branch are shown as in-scope for 10 CFR 54.4(a)(2).

Request

- 1.0 Confirm that the fan housing is not in-scope for 10 CFR 54.4(a)(2).

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2.0 Provide justification for not including a seismic or equivalent anchor as indicated in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.5-05**

On drawing LR-39601, location H-5, the 121 battery room recycle fan housing is correctly shown as not within the scope of License Renewal. The ducts and cooling coil on this branch are included within the scope of License Renewal to ensure the structural support intended function associated with safety related steam exclusion dampers is maintained. The function of the battery room recycle fan and coil is to provide a suitable working environment and extend battery life; this is not an intended function and the fan is not within the scope of License Renewal.

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For this location, all ducting and components attached to the Safety Related Steam Exclusion Dampers (CD-34195, CD-34196, CD-36055 and CD-36056) up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Ducting and Components are included in LRA Table 2.3.3-19.

To address the flexible connections in the Turbine and Administration Building Ventilation (ZB) System within the scope of License Renewal, see the changes made to the LRA in response to RAI 2.3.3.5-04.

**RAI 2.3.3.5-06**

Background:

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

LR Drawing LR39601: At drawing coordinates E-5, the 122 battery room recycle fan is shown as out-of-scope. The ducts and cooling coil on this branch are shown as in-scope for 10 CFR 54.4(a)(2).

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Request

- 1.0 Confirm that the fan housing is not in-scope for 10 CFR 54.4(a)(2).
- 2.0 Provide justification for not including a seismic or equivalent anchor as indicated in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.5-06**

On drawing LR-39601, location E-5, the 122 battery room recycle fan housing is correctly shown as not within the scope of License Renewal. The ducts and cooling coil on this branch are included within the scope of License Renewal to ensure the structural support intended function associated with safety related steam exclusion dampers is maintained. The function of the battery room recycle fan and coil is to provide a suitable working environment and extend battery life; this is not an intended function and the fan is not within the scope of License Renewal.

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For this location, all ducting and components attached to the Safety Related Steam Exclusion Dampers (CD-34197, CD-34198, CD-36057 and CD-36058) up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Ducting and Components are included in LRA Table 2.3.3-19.

To address the flexible connections in the Turbine and Administration Building Ventilation (ZB) System within the scope of License Renewal, see the changes made to the LRA in response to RAI 2.3.3.5-04

**RAI 2.3.3.5-07**

Background:

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2)."

Issue:

LR Drawing LR39601: At drawing coordinates H-5, the 121 battery room recycle fan is shown as out-of-scope. At drawing coordinates E-5, the 122 battery room recycle fan is

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shown as out-of-scope. The ducts and cooling coil on this branch are shown as in-scope for 10 CFR 54.4(a)(2).

Request:

- 1.0 Confirm that the fan housings are not in-scope for 10 CFR 54.4(a)(2).
- 2.0 Provide justification for not including seismic or equivalent anchors as indicated in LRA Section 2.1.2.4.2.

**NSPM Response to RAI 2.3.3.5-07**

On drawing LR-39601, location H-5 and E-5, the 121 and 122 battery room recycle fans are correctly shown as not within the scope of License Renewal. The ducts and cooling coil on these branch lines are included within the scope of License Renewal to ensure the structural support intended function associated with safety related steam exclusion dampers is maintained. The function of the battery room recycle fan and coil is to provide a suitable working environment and extend battery life; this is not an intended function and the fan is not within the scope of License Renewal.

As an alternative to specifically identifying a seismic anchor or series of equivalent anchors, a bounding approach was used which included enough of the non-safety related ducting to ensure these anchors are included and thereby ensure the ducting and anchor intended functions are maintained. For these locations all ducting and components attached to the Safety Related Steam Exclusion Dampers up to a free end or flexible connection are included within the scope of License Renewal to ensure the structural support intended functions are maintained. Ducting and Components are included in LRA Table 2.3.3-19.

To address the flexible connections in the Turbine and Administration Building Ventilation (ZB) System within the scope of License Renewal, see the changes made to the LRA in response to RAI 2.3.3.5-04.

**2.3.3.7 Diesel Generator and Screenhouse Ventilation System (ZG)**

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

**RAI 2.3.3.7-01**

Background:

LRA Section 2.1.2.4.2, "Scoping Criterion 2 - Non-Safety Related Affecting Safety Related," states in part "Non-safety related SSCs that are not directly connected to safety related SSCs, or are connected downstream of the first seismic or equivalent anchor past the safety/non-safety interface, but have a potential spatial interaction such

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that their failure could adversely impact the performance of a safety related SSC intended function, are within the scope of License Renewal for 10 CFR 54.4(a)(2).”

Issue:

LR Drawing LR39601: At drawing coordinates C-5 and at D-5, the 122 Diesel Outside Exhaust fan and the 121 Diesel Outside Exhaust fan are shown as out-of-scope. The rest of the diesel room ventilation system is shown as in-scope. LRA Section 2.3.3.7 states that “components subject to an AMR begin at the Diesel Generator Rooms inlet damper, through the supply fans, and exits via exhaust fans and include the dampers, fans and duct.”

Request:

- 1.0 Confirm that the fan housing is not in-scope for 10 CFR 54.4(a)(2).
- 2.0 Provide justification for the exclusion of the fan housing from the scope of license renewal.

**NSPM Response to RAI 2.3.3.7-01**

On drawing LR-39601, locations C-5 and D-5, the 121 and 122 Diesel Outside Exhaust Fans are correctly shown as not within the scope of License Renewal. The components subject to AMR extend to the Diesel Generator (Room) Exhaust fans. The Diesel Outside Exhaust Fans are not relied upon during design basis events and do not perform a function necessary to the satisfactory accomplishment of a safety related intended function. The fans discharge air from the working material and dead storage area to the outside to provide a suitable working environment and maintain temperatures required by machinery during normal plant operation; this is not an intended function. The area exhausted is open to the Turbine Building which provides an alternate non-ducted flow path for exhausted air. The Diesel Outside Exhaust Fans are not attached to Safety Related ducts, and identification of seismic or equivalent anchors in accordance with LRA Section 2.1.2.4.2 is not required.

**2.3.3.14 Primary Containment Ventilation System (ZC)**

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

**RAI 2.3.3.14-01**

Background

For systems in-scope of license renewal, Title 10 Part 54.4 states, in part, that:  
(a) Plant systems, structures, and components within the scope of this part are:

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(1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:

- (i) The integrity of the reactor coolant pressure boundary;
  - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;
- or
- (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue

LR Drawing No. LR-39602-1, Rev. 2: Containment dome air recirculation fans 13 and 14, both located in drawing coordinates G-6, are shown as out-of-scope for license renewal. The remaining portions of the containment air recirculation subsystem are shown as in-scope in accordance with 10 CFR 54.4(a)(1).

Request

Provide justification for the exclusion of these fan housings from the scope of license renewal. If these fan housings are in the scope of license renewal, in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1), update the LRA by providing the applicable information in the appropriate LRA sections and tables.

**NSPM Response to RAI 2.3.3.14-01**

On drawing LR-39602-1, location G-6, scoping of the 13 and 14 Containment Dome Air Recirculation Fan housings (represented by the box around each motor/fan assembly) is correctly shown; the housings are within the scope of License Renewal per 10 CFR 54.4(a)(1). Fan Housings are included in LRA Table 2.3.3-14. The scoping of the associated motor/fan assembly is incorrect; these components should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(1). The motor/fan assembly is an active component, does not require Aging Management Review, and is not included in LRA Table 2.3.3-14.

**RAI 2.3.3.14-02**

Background

Spent fuel pool emergency ventilation is not described in either Prairie Island Nuclear Generating Plant Updated Final Safety Analysis Report (UFSAR) or in Section 2.3.3.14 of LRA.



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Issue

LR Drawing No. LR-39602-2 Rev. 2: A note in drawing coordinates E-3 states "From spent fuel pool emergency ventilation."

Request

Please describe this system. If it is meant to be "From spent fuel pool special ventilation," please clarify.

**NSPM Response to RAI 2.3.3.14-02**

On drawing LR-39602-2, location E-3, Spent Fuel Pool Emergency Ventilation is the same system as discussed in LRA Section 2.3.3.14, Spent Fuel Pool Special Ventilation sub-system. For License Renewal activities, plant systems were consolidated into License Renewal systems based on related functions or function dependencies. The Spent Fuel Pool Special Ventilation sub-system is evaluated with the Primary Containment Ventilation System. Scoping results are presented in Table 2.2-1, Plant Level Scoping Results, and LRA Section 2.3.3.14, Primary Containment Ventilation System.

**RAI 2.3.3.14-03**

Background

For systems in-scope of license renewal, Title 10 Part 54.4 states, in part, that:

- (a) Plant systems, structures, and components within the scope of this part are:
  - (1) Safety related systems, structures, and components which are those relied upon to remain functional during and following design basis events (as defined in 10 CFR Part 50.49(b)(1)) to ensure the following functions:
    - (i) The integrity of the reactor coolant pressure boundary;
    - (ii) The capability to shut down the reactor and maintain it in a safe shutdown condition;or
  - (iii) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11 of this chapter, as applicable.

Issue

LR Drawing No. LR-39602-1 Rev. 2: In drawing coordinates D-2, the in service purge exhaust fan housing ES-46311 is shown out-of-scope for license renewal. This fan housing belongs to spent fuel pool special ventilation subsystem which is required to exhaust the air in the event of high radiation and also during a fuel handling accident. The remaining portions of this subsystem are shown as in-scope in accordance with 10 CFR 54.4(a)(1).

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Request

Provide justification for the exclusion of this fan housing from the scope of license renewal. If this fan housing is in-scope of license renewal, in accordance with 10 CFR 54.4(a), and subject to an aging management review in accordance with 10 CFR 54.21(a)(1), update the LRA by providing the applicable information in the appropriate LRA sections, tables, and drawings.

**NSPM Response to RAI 2.3.3.14-03**

On drawing LR-39602-1, location D-2, scoping of the 121 In-Service Purge Exhaust Fan housing (represented by the box around the motor/fan assembly) is correctly shown; the housing is within the scope of License Renewal per 10 CFR 54.4(a)(1). Note that the tag number ES-46311 represents the fan control switch. Fan Housings are included in LRA Table 2.3.3-14. The scoping of the associated motor/fan assembly is incorrect; these components should be shown as within the scope of License Renewal per 10 CFR 54.4(a)(1). The motor/fan assembly is an active component, does not require Aging Management Review, and is not included in LRA Table 2.3.3-14.