May 29, 2009

LICENSEE: Northern States Power Company, Minnesota

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

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MARCH 30, 2009, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND NORTHERN STATES POWER COMPANY, MINNESOTA, CONCERNING DRAFT REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Northern States Power Company, Minnesota (NSPM) held a telephone conference call on March 30, 2009 to discuss and clarify the staff's draft requests for additional information (D-RAIs) concerning the Prairie Island Nuclear Generating Plant, Units 1 and 2, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's D-RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the D-RAIs discussed with the applicant, including a brief description on the status of the items. Enclosure 3 contains a listing of previous request for additional information (RAIs) discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/

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

Docket Nos. 50-282 and 50-306

Enclosures:
As stated

cc w/encls: See next page

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Richard Plasse, Project Manager
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DATE	04/28/09	05/29/09	05/29/09

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Memo from R. Plasse dated May 29, 2009

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON MARCH 30, 2009, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND NORTHERN STATES POWER COMPANY, MINNESOTA, CONCERNING DRAFT REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION

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Prairie Island Nuclear Generating Plant
Units 1 and 2

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TELEPHONE CONFERENCE CALL
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
March 30, 2009

PARTICIPANTS	AFFILIATIONS
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Bob Jackson	NRC
Wayne Pavinich	NRC
Allen Hiser	NRC
Gene Eckholt	Northern States Power Company, Minnesota (NSPM)
Phil Lindberg	NSPM
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Bill Roman	NSPM
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ENCLOSURE 1

DRAFT REQUEST FOR ADDITIONAL INFORMATION
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION

March 30, 2009

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of NSPM held a telephone conference call on March 30, 2009, to discuss and clarify the following draft requests for additional information (D-RAIs) concerning the Prairie Island Nuclear Generating Plant, Units 1 and 2 license renewal application (LRA).

Draft Follow-up RAI B2.1.38

In letter L-PI-08-098, dated December 5, 2008, "Responses to NRC Requests for Additional Information dated November 5, 2008 Regarding Application for Renewed Operating Licenses," the applicant submitted responses to the staff's RAIs. In addition, the applicant provided information during a public meeting on March 2, 2009. The staff has reviewed the information provided, but needs additional information to complete its review. Please provide the following information to supplement the initial response:

a. Due to the leakage path of borated water along the bottom of the steel containment vessel, the vessel/concrete interface may remain wetted after refueling outages. During the public meeting, the applicant discussed its plan to remove concrete from sump C, below the reactor vessel, to physically assess the condition of the steel vessel, concrete, and rebar. Please provide more detailed information about this plan including actions and schedule. Discuss what other actions will be taken, prior to the period of extended operation, to adequately assess the condition of the steel vessel.

b. In the absence of a commitment to fix the leakage prior to the period of extended operation, please explain how the IWE program, or a plant-specific program, will address the leakage and will ensure that these aging effects will be effectively managed, especially in the inaccessible regions, during the period of extended operation.

c. Provide the chemical properties of the "white deposits" found on the concrete surfaces and the possibility of calcium hydroxide $Ca(OH)_2$ leaching from concrete.

Discussion: The applicant indicated that the question was clear. This draft followup RAI will be sent as a formal RAI.

D-RAI 3.3.2.8-1

RAI 3.3.2.8-1 Natural Rubber in Fuel Oil and Lubricating Oil

In AMR Table 3.3.2-8, there is an AMR line item for Flex Connections/Pressure Boundary/Natural Rubber/Fuel Oil (int) and Lubricating Oil (int)/none/none/ with plant specific Note G, 313.

P.A. Schweitzer, "Corrosion Resistance Tables – Metals, Nonmetals, Coatings, Mortars, Plastics, Elastomers and Linings, and Fabrics," Fourth Edition, Part B, Marcel Dekker, Copyright 1995, discusses natural rubber and EPDM and states that they are not resistant to fuel oil or lubricating oil.

Discussion: The applicant indicated that the question was clear. This draft RAI will be sent as a formal RAI.

Draft RAIs for Section 4.7.5 Turbine Missile Analysis TLAA

D-RAI 4.7.5-1: Part A - Clarify why and how the probabilistic turbine missile analysis for PINGP is considered to meet all the six TLAA identification criteria for analyses that conform to TLAAs, as specified in 10 CFR 54.3. **Part B** - Clarify whether or not the turbine missile analysis was performed under the CLB in order to satisfy the requirements of 10 CFR Part 50, Appendix A, GDC No. 4 for plant missile protection. **Part C** - Clarify whether or not the referenced NUREG-0800 SRP Section should really be SRP Section 3.5.1.3 (as opposed to SRP-Section 3.5.3), and to clarify which Revision of appropriate SRP Section was being implemented as part of the CLB for this TLAA. **Part D -** Identify those safety related components at PINGP that are by the CLB as being within the scope of the turbine missile analysis and a postulated turbine missile ejection event. Collectively, these requests are **Open Item 4.7.5-1, Part A**.

D-RAI 4.7.5-2: Part A - Whether the Westinghouse analysis in WCAP-11525 or WCAP-16054 represented the Westinghouse CLB basis for this TLAA. **Part B -** Clarify whether or not the NRC has ever approved the probabilistic turbine missile analysis as a safety basis in the CLB for either: (1) establishing a specific augmented inservice inspection program and frequency for the turbine rotors and blades, or else (2) to justify that such an inservice inspection program would not be necessary for these components during the current operating term.
Part C - Justify how the analysis in WCAP-11525, as approved in the staff's SE of February 7, 1989, or the analysis in WCAP-16054 (whichever represent the CLB) could be used to justify not performing any inservice inspections of the turbine rotors and blades during the period of extended operation, as accepted in accordance with the requirements of 10 CFR 54.21(c)(1)(i), particularly when it appears to the staff that approval of WCAP-11525 in the NRC SE of February 7, 1989, or the updated probabilistic analysis in WCAP-16054 were never issued to support the establishment of an augmented inservice inspection program basis for these components or the conclusion that an augmented inservice inspection basis for these components would not be needed for the CLB. Collectively, these requests are **Open Item 4.7.5-1, Part B**.

D-RAI 4.7.5-3: **T**he staff is of the opinion that the approval of this TLAA pursuant to 10 CFR 54.21(c)(1)(i), (ii), or (iii) really depends on: (1) the plant and NRC documents establish the CLB for this TLAA, and especially on whether WCAP-11525 or WCAP-16054 and whether Revision 2 or 3 of SRP Section 3.5.1.3 represent the CLB for the TLAA, and (2) whether the NRC has ever reviewed and approved the probabilistic analysis as a basis for either establishing a plant-specific augmented inservice inspection program and frequency for the turbine rotors and blades, or else to justify that such an inservice inspection program would not be necessary for these components during the current operating term. The staff requests a response to the Part of this RAI that applies to the combination of documents representing the CLB for this TLAA, as follows:

Part A – Applicable Part if WCAP-16054 and SRP Section 3.5.1.3, Revision 3 represent the CLB for this TLAA: (1) Clarify whether the probabilistic analysis in the WCAP-16054 was ever approved by the NRC for the CLB in order to support an augmented inservice inspection (ISI) program for the turbine rotors and blades (discs) or else to support the conclusion that an augmented ISI program is not needed for these components during the current operating term. If WCAP-16054 has been approved by the staff for this type of safety basis, clarify which NRC record provides the safety evaluation approving the WCAP-16054 methodology. (2) If WCAP-16054 has not been approved by the staff for this type of safety basis, justify why PINGP has not committed to an augmented ISI program for the turbine rotor and blades, as is recommended in the SRP Section 3.5.1.3, Revision 3 guidance. (3) Identify what the individual P_1 running time, design overspeed, and destructive overspeed ejection probabilities are for the probabilistic analysis in WCAP-16054 analysis and provide your basis for using these values in the summation of the overall P_1 injection probability value for the analysis. (4) Provide your basis for concluding that this CLB combination justifies acceptance of the TLAA in accordance with the requirements of 10 CFR 54.21(c)(1)(i), as used to support the conclusion that PINGP does not need to commit to an augmented inservice inspection program for the turbine rotor and blade components during the period of extended operation.

Part B – Applicable Part if WCAP-16054 and SRP Section 3.5.1.3, Revision 2 represent the CLB for this TLAA: (1) Clarify whether the probabilistic analysis in the WCAP-16054 was ever approved by the NRC for the CLB in order to support an augmented inservice inspection (ISI) program for the turbine rotors and blades (discs) or else to support the conclusion that an augmented ISI program is not needed for these components during the current operating term. If WCAP-16054 has been approved by the staff for this type of safety basis, clarify which NRC record provides the safety evaluation approving the WCAP-16054 methodology. (2) Clarify why the analysis in WCAP-16054 is considered to conform to the probabilistic method of analysis in SRP Section 3.5.1.3, Revision 3. As part of this clarification, explain what the individual P_1 running time, 120% design overspeed, and destructive overspeed ejection probabilities and what the individual contributors to the $[P_2]x[P_3]$ product probabilities are for the WCAP's probabilistic analysis and justify their selection. Clarify how these values are used to establish the overall P_1 ejection probability value and the overall $[P_2]x[P_3]$ product value used in the P_4 probability calculation and how PINGP used methodology conforms to the SRP 3.5.1.3, Revision 2 methodology. (3) Justify why the TLAA instead sets the $[P_2]x[P_3]$ probability product value of $1x10^{-2}$, when SRP Section 3.5.1.3, Revision 2 does not permit the $[P_2]x[P_3]$ product value process to be simplified or permit simplification of the P_2xP_3 product value to a value of

$1x10^{-2}$ (i.e., this was permitted by the SRP 3.5.1.3, Revision 3 methodology). (4) Provide your basis for concluding that this CLB combination justifies acceptance of the TLAA in accordance the requirements of 10 CFR 54.21(c)(1)(i), as used to support the conclusion that PINGP does not need to commit to an augmented inservice inspection program for the turbine rotor and blade components during the period of extended operation.

Part C – Applicable Part if WCAP-11525 and SRP Section 3.5.1.3, Revision 3 represent the CLB for this TLAA: (1) Clarify whether the probabilistic analysis in the WCAP-11525 was ever approved by the NRC for the CLB to support establishment of an augmented inservice inspection (ISI) program for the turbine rotors and blades (discs), or else to support the conclusion that an augmented ISI program is not needed for these components. If WCAP-11525 has been approved by the staff for this type of safety basis, clarify which NRC record provides the safety evaluation approving the WCAP-11525 methodology for this type of safety basis (NOTE: The NRC's approval in the NRC SE of February 7, 1989 was not issued for this type of safety basis; it was issued in approval of a revision to the required Technical Specification surveillance testing frequency for turbine governor valves, stop valves, and intercept valves). (2) If WCAP-11525 has not been approved by the staff for this type of safety basis, justify why PINGP has not committed to an augmented ISI program for the turbine rotor and blades, as is recommended in the SRP Section 3.5.1.3, Revision 3 guidance. (3) Clarify why the analysis in WCAP-11525 is considered to conform to the probabilistic method of analysis in SRP Section 3.5.1.3, Revision 3. As part of this clarification, explain what the individual running time, 120% design overspeed, and destructive overspeed [P_1] ejection probabilities are for WCAP-11525 and how these probabilities relate to the curves in USAR Figure 12.2-38. Justify why USAR Figure 12.2-38 does not include any curve for the destructive overspeed condition in the manner it did for the running time and 120% design overspeed conditions and the selection of a destructive overspeed [P_1] ejection probability of $5x10^{-6}$ in the TLAA through the expiration of the period of extended operation. (4) Provide your basis for concluding that this CLB combination justifies acceptance of the TLAA in accordance the requirements of 10 CFR 54.21(c)(1)(i), as used to support the conclusion that PINGP does not need to commit to an augmented inservice inspection program for the turbine rotor and blade components during the period of extended operation.

Part D – Applicable Part if WCAP-11525 and SRP Section 3.5.1.3, Revision 2 represent the CLB for this TLAA: (1) Clarify whether the probabilistic analysis in the WCAP-11525 was ever approved by the NRC for the CLB to support establishment of an augmented inservice inspection (ISI) program for the turbine rotors and blades (discs), or else to support the conclusion that an augmented ISI program is not needed for these components.
If WCAP-11525 has been approved by the staff for this type of safety basis, clarify which NRC record provides the safety evaluation approving the WCAP-11525 methodology for this type of safety basis (NOTE: The NRC's approval in the NRC SE of February 7, 1989 was not issued for this type of safety basis; it was issued in approval of a revision to the required Technical Specification surveillance testing frequency for turbine governor valves, stop valves, and intercept valves). (2) Clarify why the analysis in WCAP-11525 is considered to conform to the probabilistic method of analysis in SRP Section 3.5.1.3, Revision 2. Explain any deviations between the probabilistic methods and probabilistic values used in the WCAP-11525 analysis and those stated and used in SRP Section 3.5.1.3, Revision 2 methodology, and for these

deviations, justify why the methods and values used in the WCAP are considered valid. (3) For the TLAA and USAR basis referenced, justify why a product value of $1x10^{-2}$ was set as the current P_2xP_3 product value for the overall P_4 probability calculation, when SRP 3.5.1.3, Revision 2 guidance methodology does not permit the P_2xP_3 product value method to be simplified or permit simplification of the P_2xP_3 product value to a value of $1x10^{-2}$. Justify why the sum of the individual 120% design overspeed and destructive overspeed ejection probabilities were set to a value of $5x10^{-6}$ instead of a value of $1.0x10^{-4}$ (i.e., = $6x10^{-5}$ + $4x10^{-5}$), which is the value that would be used if the SRP Section 3.5.1.3, Revision 2 guidance were used to establish the overall [P_1] ejection probability value. Justify why USAR Table 12.2-38 did not include any curve for the destructive overspeed condition in the manner it did for the running time and 120% design overspeed conditions and justify the selection of an individual destructive overspeed ejection probability of $5x10^{-6}$ through the expiration of the period of extended operation. (4) Provide your basis for concluding that this CLB combination justifies acceptance of the TLAA in accordance the requirements of 10 CFR 54.21(c)(1)(i), as used to support the conclusion that PINGP does not need to commit to an augmented inservice inspection program for the turbine rotor and blade components during the period of extended operation.

D-RAI 4.7.5-4: The staff noted that, in the TLAA, the applicant attributed a postulated failure of the turbine rotor or blades only to initiation and growth by a stress corrosion cracking mechanism. The staff was of the opinion that initiation of the cracking could be induced also by high cycle fatigue, particularly at stress riser locations in the turbine rotors or blades and that growth of any flaws that developed in the rotors would occur predominately by a mechanism of high cycle fatigue. In, the staff asked the applicant to clarify which location in the turbine rotor and blade design were the most susceptible stress riser locations in the design and provide its basis why high cycle fatigue was not postulated as an additional mechanism for initiating the postulated cracking in the turbine rotors and why high cycle fatigue was not listed as the predominant mechanism for growing the postulated flaw in the turbine rotor and blade design. This is **Open Item 4.7.5-1, Part D**.

D-RAI 4.7.5-4: The staff requests that the applicant provide an updated USAR Supplement Section A4.9 that: (1) reflects an NRC-approved probabilistic turbine missile analysis for the applicant's CLB that either has been used to establish a safety basis and an NRC-approved augmented inservice inspection program and frequency for the PINGP turbine rotor and blades, or else in approval of a conclusion that augmented inspections are not necessary for these components, (2) currently reflects which plant-specific, industry-wide, and/or NRC documents for the current term, if any, establish the requested CLB is for these components, as related to a safety basis stated in (1), and (3) clearly establishes why the TLAA is acceptable in accordance with 10 CFR 54.21(c)(1)(i), (ii), or (iii), as processed to support either the establishment of a specified inservice inspection program and frequency for the turbine rotor and blade components, or else to justify that an augmented inspection program for these components is not necessary for the period of extended operation. This is **Open Item 4.7.5-1, Part E**.

Discussion: The applicant indicated that further engineering review of LRA Section 4.7.5, turbine missile analysis, has determined that the probability of a turbine rotor failure is a function of the

length of time the rotor is in service and not the operating license term. The applicant has concluded that it appears the turbine missile analysis is not a TLAA. The applicant stated that a supplement to Section 4.7.5 of the LRA will be provided for NRC review. The Section 4.7.5 draft RAIs will not be sent as formal RAIs.

Followup questions to previous RAIs

B2.1.9 Closed-Cycle Cooling Water System Program (CCCW) Follow up Question

The PINGP letter of February 6, 2009, provided an exception to the performance testing recommendations of GALL. The PINGP letter of February 6, 2009, revised the exception to state that periodic visual inspections will be performed on certain chillers. The reviewer determined that the periodic visual inspections should be captured as a commitment.

PINGP explained that the CCCW System Program in the LRA already contains an enhancement to perform periodic inspections of internal surfaces when those surfaces are made accessible during maintenance or surveillance. This enhancement would encompass internal inspections which relate to the chillers in question. This enhancement is captured as License Renewal Commitment 6.

The reviewer indicated that this would be sufficient to resolve the concern. No further action is needed from PINGP.

B2.1.19 Fuel Oil Chemistry Program Follow up Questions

The LRA takes exception to the GALL Report recommendation for cleaning and for wall thickness measurements in the diesel generator day tanks and leakage collection tanks. The reviewer was concerned that no monitoring of tank condition was being performed and indicated that more justification was needed to support the exception.

PINGP acknowledged that the day tanks are raised and may be accessible for ultrasonic testing (UT) thickness testing on their bottom surfaces. It was agreed that PINGP would consider one-time UT thickness testing of day tank(s).

PINGP explained that the leakage collection tanks are very small tanks on the order of a couple of gallons, and the interiors were not accessible for inspection. The clean leakage collection tanks collect clean fuel oil from the injectors, and return the clean oil directly to the engine fuel oil system with virtually no potential for contaminating the fuel oil system. The dirty leakage collection tanks collect drips, etc., from the engine, and the resulting dirty oil is disposed of as waste. PINGP agreed to supplement the discussion provided in the previous RAI response [RAI B2.1.19-3 response dated December 18, 2008] to provide more descriptive information on the leakage collection tanks and further explain how aging effects are adequately managed.

PINGP understands the question and will provide a clarification in a supplemental letter. An RAI will not be issued.

B2.1.19 Fuel Oil Analysis Follow up question

PINGP has provided a commitment to initiate annual testing of fuel oil for particulates, but the GALL Report recommends quarterly testing. The basis for annual particulate testing appears to be that previous sediment testing has not found particulates.

The reviewer indicated that annual testing may be sufficient as long as sediment testing and particulate testing show that fuel oil continues to be clean without particulates. Clarification was requested, however, to state that in the event significant sediment or particulates are detected, the annual test frequency for particulates would be increased.

PINGP understands the question and will provide a clarification in a supplemental letter. An RAI will not be issued.