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L-PI-09-075 10 CFR 50.46

U S Nuclear Regulatory Commission ATTN: Document Control Desk 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

Corrections to Emergency Core Cooling System (ECCS) Evaluation Models

Enclosed please find enclosure 1, "Westinghouse loss of coolant accident (LOCA) Evaluation Model Changes," which is the 2008 annual report of corrections to the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 ECCS evaluation models. This report is submitted in accordance with the provisions of 10 CFR 50.46 and summarizes changes made to both the large break LOCA (LBLOCA) and small break LOCA (SBLOCA) analyses.

The SBLOCA and LBLOCA peak clad temperature (PCT) assessment sheets for Unit 1 and Unit 2 are enclosed as enclosure 2. The limiting LOCA analysis PCT for PINGP Unit 1 and Unit 2, with consideration of all 10 CFR 50.46 assessments, remains the LBLOCA analysis as summarized in enclosure 2.

Neither enclosure 1 nor enclosure 2 need be withheld from public disclosure.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

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Enclosures (2)

cc: Administrator, Region III, USNRC Project Manager, Prairie Island, USNRC Resident Inspector, Prairie Island, USNRC

ENCLOSURE 1

Westinghouse LOCA Evaluation Model Changes

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January 29, 2009

ERRORS IN REACTOR VESSEL LOWER PLENUM SURFACE AREA CALCULATIONS (Non-Discretionary Change)

Background

Two errors were discovered in the calculations of reactor vessel lower plenum surface area. The corrected values have been evaluated for impact on current licensing-basis analysis results and will be incorporated on a forward-fit basis. These changes represent a closely-related group of Non-Discretionary Changes in accordance with Section 4.1.2 of WCAP-13451.

Affected Evaluation Model(s)

1981 Westinghouse Large Break LOCA Evaluation Model with BASH 1985 Westinghouse Small Break LOCA Evaluation Model with NOTRUMP

Estimated Effect

The differences in vessel lower plenum surface area are relatively minor and would be expected to produce a negligible effect on large and small break LOCA analysis results, leading to an estimated PCT impact of 0°F for 10 CFR 50.46 reporting purposes.

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DISCREPANCY IN METAL MASSES USED FROM DRAWINGS (Non-Discretionary Change)

Background

Discrepancies were discovered in the use of metal masses from drawings. The updated reactor vessel metal masses and fluid volumes have been evaluated for impact on current licensing-basis analysis results and will be incorporated on a forward-fit basis. These changes represent a closely-related group of Non-Discretionary Changes in accordance with Section 4.1.2 of WCAP-13451.

Affected Evaluation Model(s)

1981 Westinghouse Large Break LOCA Evaluation Model with BASH 1985 Westinghouse Small Break LOCA Evaluation Model with NOTRUMP

Estimated Effect

The differences in the reactor vessel metal mass and fluid volume are relatively minor and would be expected to produce a negligible effect on large and small break LOCA analysis results, leading to an estimated PCT impact of 0°F for 10 CFR 50.46 reporting purposes.

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GENERAL CODE MAINTENANCE (Discretionary Change)

Background

Various changes have been made to enhance the usability of the codes and to help preclude errors in analyses. This includes items such as modifying input variable definitions, units, and defaults; improving the input diagnostic checks; enhancing the code output; optimizing active coding; and, eliminating inactive coding. These changes represent Discretionary Changes that will be implemented on a forward-fit basis in accordance with Section 4.1.1 of WCAP-13451.

Affected Evaluation Model(s)

1981 Westinghouse Large Break LOCA Evaluation Model with BASH 1985 Westinghouse Small Break LOCA Evaluation Model with NOTRUMP

Estimated Effect

The nature of these changes leads to an estimated PCT impact of 0°F.

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GENERAL CODE MAINTENANCE (Discretionary Change)

Background

A number of coding changes were made as part of normal code maintenance. Examples include additional information in code outputs, improved automation and diagnostics in the codes, increased code dimensions, and general code cleanup. All of these changes are considered to be Discretionary changes in accordance with Section 4.1.1 of WCAP-13451.

Affected Evaluation Model(s)

1996 Westinghouse Best Estimate Large Break LOCA Evaluation Model 1999 Westinghouse Best Estimate Large Break LOCA Evaluation Model, Application to PWRs with Upper Plenum Injection 2004 Westinghouse Realistic Large Break LOCA Evaluation Model Using ASTRUM

Estimated Effect

The nature of these changes leads to an estimated PCT impact of 0°F for 10 CFR 50.46 reporting purposes.

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HOTSPOT BURST TEMPERATURE LOGIC ERRORS (Non-Discretionary Change)

Background

The HOTSPOT code has been updated to incorporate the following corrections to the burst temperature logic: (1) change the rod internal pressure used to calculate the cladding engineering hoop stress from the value in the previous time step to the value in the current time step; (2) revise the average cladding heat-up rate calculation to reset selected variables to zero at the beginning of each trial and use the instantaneous heat-up rate when fewer than five values are available; and, (3) reflect the assumed saturation of ramp rate effects above 28°C/s for Zircaloy-4 cladding from Equation 7-66 of Reference 1. These changes represent a closely-related group of Non-Discretionary Changes in accordance with Section 4.1.2 of WCAP-13451.

Affected Evaluation Model(s)

1996 Westinghouse Best Estimate Large Break LOCA Evaluation Model 1999 Westinghouse Best Estimate Large Break LOCA Evaluation Model, Application to PWRs with Upper Plenum Injection 2004 Westinghouse Bestivia Large Break LOCA Evaluation Model Using ASTRUM

2004 Westinghouse Realistic Large Break LOCA Evaluation Model Using ASTRUM

Estimated Effect

Sample calculations for each change showed no effect on peak cladding temperature, leading to an estimated impact of 0°F for 10 CFR 50.46 reporting purposes.

Reference(s)

1. WCAP-12945-P-A, Volume 1 (Revision 2) and Volumes 2-5 (Revision 1), "Code Qualification Document for Best Estimate LOCA Analysis," S. M. Bajorek et al., March 1998.

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MODELING ERRORS IN ASTRUM ANALYSES (Non-Discretionary Change)

Background

Several small modeling errors in the Prairie Island plant models were identified during the course of a recent Best Estimate Large Break LOCA analysis. These errors include a small difference in modeled accumulator line losses, the splitting of core average assembly rods into average core channels, and a discrepancy in the volume modeled in the CCFL inner global channel. The impact of each of these modeling errors was assessed individually on a plant-specific basis. These changes represent Non-Discretionary Changes in accordance with Section 4.1.2 of WCAP-13451, and are only applicable to the 2006 OFA ASTRUM analyses.

Affected Evaluation Model(s)

2004 Westinghouse Realistic Large Break LOCA Evaluation Model Using ASTRUM

Estimated Effect

Each of these issues was individually evaluated to have a negligible impact on the PCT. Therefore, a 0°F peak cladding temperature (PCT) impact is assigned to each issue for 10 CFR 50.46 reporting purposes.

ENCLOSURE 2

LBLOCA and SBLOCA Peak Clad Temperature Assessment Sheets

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Westinghouse LOCA Peak Clad Temperature Summary for ASTRUM Best Estimate Large Break Plant Name: Prairie Island Unit 1 Utility Name: Nuclear Management Company, LLC **Revision Date:** 1 /27/09 **Analysis Information** EM: ASTRUM (2004) Analysis Date: 7/1/06 Limiting Break Size: Split FQ: 2.5 FdH: 1.77 Fuel: OFA SGTP (%): 10 Notes: Clad Temp (°F) Ref. Notes LICENSING BASIS Analysis-Of-Record PCT 1594 1 PCT ASSESSMENTS (Delta PCT) A. PRIOR ECCS MODEL ASSESSMENTS 1 . None 0 **B. PLANNED PLANT MODIFICATION EVALUATIONS** 1 . 2 Reconstituted Rods Evaluation 0 C. 2008 ECCS MODEL ASSESSMENTS 0 1 . None **D. OTHER*** 1 . None 0 LICENSING BASIS PCT + PCT ASSESSMENTS PCT = 1594 It is recommended that the licensee determine if these PCT allocations be considered with respect to 10 CFR 50.46 * reporting requirements.

References:

 WCAP-16584-P, "Best-Estimate Analysis of the Large-Break Loss-of-Coolant Accident for the Prairie Island Nuclear Plant Unit 1 Using ASTRUM Methodology," 7/2006.

Notes:

(a) None

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Westinghouse LOCA Peak Clad Temperature Summary for Appendix K Small Break

Plant Name: Utility Name: Revision Date:		Prairie Island U	Unit 1						
		Nuclear Management Company, LLC							
		1 /27/09	1 /27/09						
Analy	sis Informat	ion							
EM:	NOTI	RUMP	Analysis Date:	11/21/03	Limiting Break Size:	6 inch			
FQ:	2.8		FdH:	2					
Fuel:	OFA		SGTP (%):	10					
Notes	: Zirlo ^T	™ (14X14), Framat	ome RSG						
					Clad Temp (°I	7) Ref.	Notes		
LICE	NSING BA	SIS							
Analysis-Of-Record PCT				1409	9 1,2,3	(a)			
PCT	ASSESSME	ENTS (Delta PC	Т)						
	A. PRIOR	ECCS MODEL	ASSESSMEN	TS					
1 . None				0					
	B. PLANN	NED PLANT MO	DIFICATION	EVALUATIONS					
1 . None				0					
	C 2009 E	CCS MODEL A	CORCOMENTO						
1. None				0					
	D OTUFI	D*							
	1.)	None			()			
	LICENSI		L DCT ASSESS	MENTS	$\mathbf{PCT} = 1400$	0			
	LICENSI	IG DASIS FUI	TICI ASSES		101~ 140.				

It is recommended that the licensee determine if these PCT allocations be considered with respect to 10 CFR 50.46 reporting requirements.

References:

1 . NSP-04-10 "Safety Analysis Transition Program Transmittal of Engineering Report," February 20, 2004.

2 . WCAP-16206-P, "Safety Analysis Transition Program Engineering Report for the Prairie Island Nuclear Power Plant, Volume 1 Engineering Analyses," February 2004.

3 . OC-PX-2004.009, "SBLOCA Analysis Loop Seal Restriction Option," Mercier to Brown, March 5, 2004.

Notes:

(a) The 6-inch break is limiting when the loop seal restriction is applied to all break sizes.

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Westinghouse LOCA Peak Clad Temperature Summary for ASTRUM Best Estimate Large Break

Plant Name: Utility Name: Revision Date:		Prairie Islan Nuclear Ma 1 /27/09	nd Unit 2 Inagement Compan	y, LLC					
<u>Analysis</u>	s Informati	on							
EM:	ASTR	UM (2004)	Analysis Date:	6/1/06	Limiting Break Siz	e: S	Split		
FQ:	2.5		FdH:	1.77					
Fuel:	OFA		SGTP (%):	25					
Notes:									
					Clad Temp	• (°F)	Ref.	Notes	
LICEN	SING BA	SIS							
	Analysis-Of-Record PCT					1546	1		
PCT AS	SSESSME	NTS (Delta l	PCT)						
A	A. PRIOR	ECCS MOD	EL ASSESSMEN	TS					
	1.1	0							
r	DIANN		MODIFICATION	EVALUATIONS					
, L	D. FLANNED FLANT WODIFICATION EVALUATIONS					0			
						-			
C	C. 2008 EC	CCS MODEL	ASSESSMENTS			•			
	. 1 . 1	ione				U			
ľ	D. OTHEF	۲ *							
	1.1	lone				0			
L	LICENSING BASIS PCT + PCT ASSESSMENTS					1546			
*	It is recom	mended that the	licensee determine if the	ese PCT allocations be co	unsidered with respect to	10 CEE	50.46		

reporting requirements.

References:

 WCAP-16508-P, "Best-Estimate Analysis of the Large-Break Loss-of-Coolant Accident for the Prairie Island Nuclear Plant Unit 2 Using ASTRUM Methodology," 6/2006

Notes:

(a) None

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Westinghouse LOCA Peak Clad Temperature Summary for Appendix K Small Break

Plant Name: Utility Name: Revision Date:		Prairie Isla Nuclear M 1 /27/09	nd Unit 2 anagement Compan	y, LLC				
<u>Analy</u>	sis Informati	ion						
EM:	NOTH	RUMP	Analysis Date:	9/1/00	Limiting Breal	Size: 3	inch	
FQ:	2.8		FdH:	2				
Fuel:	OFA		SGTP (%):	25				
Notes	: Zirlo ^T	^м (14Х14)						
LICE	NSING BA	SIS			Clad To	emp (°F)	Ref.	Notes
	Analysis-	Of-Record P	СТ			1142	1	(9)
РСТ	ASSESSME	NTS (Delta	PCT)			1142	1	(4)
	A. PRIOR	ECCS MOI No Items for 200	DEL ASSESSMEN 0, 2001 & 2002 Reports	TS		0	2,4,5	
	2 . NOTRUMP Bubble Rise / Drift Flux Model Inconsistency Correction					35	6,7	
	B. PLANN 1 . 1	ED PLANT	MODIFICATION	EVALUATIO	ONS	0		
	C. 2008 EC	CCS MODEI	L ASSESSMENTS			0		
	D. OTHEI 1 . F	{* Evaluation for Re	educed Auxilary Feedwat	ter Flow Rate		0	3	
	LICENSIN	G BASIS P	CT + PCT ASSESS	SMENTS	PCT =	1177		
	 It is reconnected to reporting to the second second	mended that the requirements.	licensee determine if the	ese PCT allocations	be considered with respe	ct to 10 CFR	50.46	

References:

- 1 . NSP-00-045, "SBLOCA Re-analysis with Revised NOTRUMP Code," October 2, 2000.
- NSP-01-006, "Northern States Power Company Prairie Island Units 1 and 2 10 CFR 50.46 Annual Notification and Reporting for 2000," March 6, 2001.
- 3 . NSP-02-36, "SBLOCA Limited FSAR Update and Evaluation for Revised Auxiliary Feedwater Flow Rate," October 2002.
- 4 . NSP-02-5, "Nuclear Management Company Prairie Island Units 1 and 2 10 CFR 50.46 Annual Notification and Reporting for 2001," March 2002.
- 5 NSP-03-19, "Nuclear Management Company Prairie Island Units 1 and 2 10 CFR 50.46 Annual Notification and Reporting for 2002," March 2003.
- 6 . NSP-03-68, "10 CFR 50.46 Mid-Year Notification and Reporting for 2003," November 2003.
- 7 . NSP-03-38, "Nuclear Management Company Prairie Island Units 1 and 2 10 CFR 50.46 Annual Notification and Reporting for 2003," March 2004.

Notes:

(a) Accumulator water volume sensitivity of +/- 30 cubic feet included.