



August 21, 2009

L-PI-09-097  
10 CFR 54

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

Supplemental Information 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 May 12, 2009, NSPM updated the LRA to incorporate information regarding the new plant-specific PWR Vessel Internals Program. In a conference call on August 12, 2009, the NRC requested clarification of several items in that submittal. Enclosure 1 provides the requested clarifications.

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 August 21, 2009.

Mark A. Schimmel  
Acting 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

A133  
NRR

**Enclosure 1**  
**Supplemental Information Related to the PWR Vessel Internals Program**

In letter L-PI-09-044 dated May 12, 2009, NSPM updated the LRA to incorporate information regarding the PINGP PWR Vessel Internals Program. In a conference call on August 12, 2009, the NRC requested clarification of several items in that submittal. NSPM agreed to provide clarifying information which is provided below:

**NSPM Clarification A**

Documentation of inspection results associated with the PWR Vessel Internals Program will be in accordance with approved inspection procedures. All necessary program implementing documents, including inspection procedures, will be developed in accordance with the NSPM Quality Assurance Program, which implements the requirements of 10 CFR Part 50, Appendix B.

**NSPM Clarification B**

As stated in Enclosure 1 of letter L-PI-09-044 in the "Scope of Program" element, "The scope does not include consumable items such as fuel assemblies, reactivity control assemblies, and nuclear instrumentation." Fuel assemblies are periodically replaced (i.e., short-lived), and, therefore, are not subject to aging management review. Reactivity control assemblies are active components, and, therefore, are not subject to aging management review. Nuclear instruments (i.e., incore neutron flux detectors) are active electrical components, and, therefore, are not subject to aging management review.

**NSPM Clarification C**

As stated in Enclosure 1 of letter L-PI-09-044 in the "Scope of Program" element, "The scope also does not include welded attachments to the reactor vessel." Welded attachments to the reactor vessel interior are subject to examination in accordance with the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program. The IWB, IWC and IWD Program conducts visual inspection of the accessible interior attachment welds per ASME Section XI, Table IWB-2500-1, Examination Category B-N-2, Welded Core Support Structures and Interior Attachments to Reactor Vessels.

**NSPM Clarification D**

The PINGP PWR Vessel Internals Program is based on the inspection guidance provided in MRP-227, as approved by the NRC, and the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD Program. MRP-227 is based upon industry operating experience, research data, and vendor evaluations. The examination methods, coverage, and schedule prescribed in MRP-227 account for aging experience in both domestic and international reactor vessel internals. Industry operating experience related to the aging degradation of PWR vessel internals is described in the "Operating Experience" program element. Through participation in EPRI MRP activities, the PINGP PWR Vessel Internals Program will continue to evolve as additional inspection experience is gained.