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

Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", Commitment Changes

- References:
1. Nuclear Regulatory Commission (NRC) Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated January 11, 2008, Accession Number ML072910759.
 2. Northern States Power Company, a Minnesota corporation (NSPM) letter to NRC RE: Ninety-Day 2R25 Post-Outage Report Pursuant to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated January 30, 2009, Accession Number ML090300705.
 3. Northern States Power Company, a Minnesota corporation (NSPM) letter to NRC RE: Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems", dated October 14, 2008, Accession Number ML082880483.

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," requesting information on this subject (Reference 1). In response to this NRC request, Northern States Power Company, a Minnesota Corporation (NSPM) submitted information for Prairie Island Nuclear Generating Plant (PINGP) in several letters including a ninety day 2R25 post-outage report on January 30, 2009 (Reference 2) and a nine-month response on October 14, 2008 (Reference 3).

As part of the nine-month response (Reference 3), NSPM made the following commitment:

NSPM will state in the procedure purpose for procedures that perform [Residual Heat Removal] RHR and [Safety Injection] SI check valve testing (e.g., [Surveillance Procedure] SP 1092A) that they also dynamically vent the RHR and

SI systems. These procedures will explicitly recognize their dynamic vent capability. NSPM will ensure that these outage procedures will be scheduled appropriately as a post-maintenance verification for activities in an outage that may introduce voids into the system.

In the process of implementing this commitment, opportunities for enhancement were found. The original commitment required that dynamic venting be performed as a portion of other tasks (check valve testing). The commitment has been revised to allow dynamic venting to be done by an independent procedure or work instruction.

As part of the ninety-day 2R25 post-outage report (Reference 2), NSPM made the following commitment:

By the end of third quarter 2009 for Unit 2 and end of second quarter 2010 for Unit 1, NSPM will develop and implement interim surveillance measures in owner-controlled documents (until implementation of Reference 3, Enclosure Section B, Commitment 2 activities is complete) to periodically verify the piping is sufficiently full such that its functional requirements are maintained.

This commitment references a commitment from the nine-month response (Reference 3) to evaluate the resolution of Technical Specification (TS) issues with respect to the changes contained in the Technical Specification Task Force traveler to determine applicability and further assess any changes to the TS and TS Bases.

Currently, surveillance measures for known void locations are being tracked through the corrective action process. The commitment has been revised to indicate that the interim surveillance measures will be implemented in owner-controlled documents for Unit 2 by the end of fourth quarter 2009.

Please contact Kathryn Mews (651-388-1121, ext. 7384) if you have any questions related to this submittal.

Summary of Commitments

This letter revises Commitment 6 in Reference 3, Enclosure Section B to:

Procedures or work instructions will be written to dynamically vent portions of the RHR and SI systems that are currently vented in association with check valve testing. NSPM will state in the purpose that such venting is being performed. NSPM will ensure that these procedures and work instructions will be scheduled appropriately as a post-maintenance verification for activities in an outage that may introduce voids into the systems.

This letter revises Commitment 1 in Reference 2, Enclosure Section B.2 to:

By the end of fourth quarter 2009 for Unit 2 and end of second quarter 2010 for Unit 1, NSPM will develop and implement interim surveillance measures in owner-controlled documents (until implementation of Reference 3, Enclosure Section B, Commitment 2 activities is complete) to periodically verify the piping is sufficiently full such that its functional requirements are maintained.



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