August 13, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|---|---|---|
| In the Matter of | ) | |
| | ) | |
| NORTHERN STATES POWER COMPANY | ) | Docket Nos. 50-282-LR/ 50-306-LR |
| | ) | |
| (Prairie Island Nuclear Generating Plant, | ) | |
| Units 1 and 2) | ) | |

NRC STAFF REBUTTAL TESTIMONY
OF RICHARD A. PLASSE CONCERNING
AGING MANAGEMENT PROGRAMS

Q1. Please state your name, occupation, and by whom you are employed.

A1. My name is Richard A. Plasse ("Plasse"). I am employed as a project manager in the Nuclear Regulatory Commission's Office of Nuclear Reactor Regulation, Division of License Renewal. A statement of my professional qualifications is attached to my July 30, 2010 pre-filed testimony.

Q2. What is the purpose of your testimony?

A2. The purpose of my testimony is to respond to testimony and exhibits submitted by the Prairie Island Indian Community (PIIC) and Northern States Power Company ("NSP" or "Applicant") on July 30, 2010.

Q3. In A18 and A31, Mr. Grimes testifies that the Applicant's performance with respect to the leakage of borated water and the Applicant's performance issues with respect to the White finding related to the design of the component cooling water system call into question the Applicant's ability to implement aging management programs during the period of extended operation. Why is Mr. Grimes' reliance on these performance issues misplaced?

A3. Mr. Grimes' reliance on these performance issues in the license renewal is misplaced. These issues are not addressed as part of the license renewal process. They are addressed by the Reactor Oversight Program. As I stated in my July 30, 2010 testimony at A17-18, the Staff's determination of the adequacy of AMPs presumes that if a license is issued, the licensee will implement the AMPs in accordance with its renewed licensing basis. The Staff can presume this because Regional Staff will conduct a post-approval inspection in which it will sample aging management programs to check for implementation and Resident Inspectors and Regional Staff will routinely conduct inspections and assessments of compliance during the period of extended operation. Therefore, when it issues its Safety Evaluation Report, there is no need for the Staff to try to judge the Applicant's ability to implement aging management programs.

Q4. In A22-23, Mr. Grimes testified that performance issues associated with NSP's mispositioning of a valve violate certain elements of an effective aging management program. Do you agree?

A4. No. According to Mr. Grimes testimony and the document he referred to (Information Notice 2009-11, "Configuration Control Errors,"), the performance issues regarding the mispositioned valve included 1) the valve not being labeled, 2) the valve not being locked, and 3) procedures did not identify that the mispositioned valve should be locked. These performance issues are not relevant to whether or not NSP's AMPs effectively manage the effects of aging. Pursuant to NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants," Rev.1, dated September 2005 (NRC Staff Exhibit No. 4A), the Staff's aging management review does not include a review of configuration control errors and these issues were not considered by the Staff in its evaluation of NSP's aging management programs.

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AFFIDAVIT OF RICHARD A. PLASSE

I, Richard A. Plasse, do hereby declare under penalty of perjury that my statements in the foregoing testimony are true and correct to the best of my knowledge and belief.

***Executed in Accordance with 10 CFR § 2.304(d)***

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Dated at Rockville, Maryland
this 13th day of August, 2010