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OCT 2 0 2010

L-PI-10-104
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Unit 1
Docket 50-282
License No. DPR-42

Supplement to Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1 (TAC No. ME4871)

References:

1) Letter from Northern States Power Company, a Minnesota corporation, (NSPM) to the Nuclear Regulatory Commission (NRC), "Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1," L-PI-10-098, dated October 14, 2010.

2) Letter from NSPM to the NRC, "Response to NRC Request for Additional Information received October 15, 2010 related to Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1," L-PI-10-100, dated October 16, 2010.

3) Letter from NSPM to the NRC, "Second Response to NRC Request for Additional Information received October 15, 2010 related to Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1," L-PI-10-101, dated October 17, 2010.

4) Letter from NSPM to the NRC, "Response to NRC Request for Additional Information received October 17, 2010 related to Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1," L-PI-10-102, dated October 18, 2010.

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In Reference 1, NSPM, doing business as Xcel Energy, submitted a License Amendment Request (LAR) to request an exigent amendment to the Prairie Island Nuclear Generating Plant (PINGP) Unit 1 Technical Specifications (TS) surveillance requirements (SR). The proposed TS change would allow emergency diesel generator (EDG) D2 to be operable until SR 3.8.1.10 can be performed during the scheduled Unit 1 2011 refueling outage. Reference 1 also identified 12 Battery Charger performance issues that should be corrected prior to performance of SR 3.8.1.10 for D2. In References 2, 3 and 4, NSPM provided supplemental information in support of the license amendment request.

The NRC review of this LAR has identified the need for a dynamic electrical model for evaluation of the Unit 1 emergency diesel generator performance. As stated below, this letter provides an NSPM commitment to develop a dynamic electrical model.

Enclosure 1 provides a listing of issues identified and documented in NSPM's corrective action process (CAP). Enclosure 2 provides proposed TS page 3.8.1-10 revised to clarify that repowering of the battery charger is automatic.

Reference 4 contains a numerical error in the third sentence of the first paragraph on page 8 of Enclosure 1. The sentence should state:

> Using these values, the MCC voltages on EDGs D1 and D2 would remain above 67.7% (80% - 12.3%) and the MCC voltages on EDGs D5 and D6 would remain above 69.3% (85% - 15.7%).

The supplemental information provided in this letter does not impact the conclusions of the Determination of No Significant Hazards Consideration or Environmental Assessment presented in the Reference 1 submittal as supplemented in References 2, 3 and 4.

In accordance with 10 CFR 50.91, NSPM is notifying the State of Minnesota of this LAR supplement by transmitting a copy of this letter and enclosures to the designated State Official.

If there are any questions or if additional information is needed, please contact Jon Anderson at 651-388-1121 x7309.

Summary of Commitments

This letter contains no revisions to existing commitments. This letter makes the following new commitment:

> Northern States Power Company, a Minnesota corporation, will develop a dynamic electrical model for the Prairie Island Nuclear Generating Plant Unit 1 emergency diesel generators by December 15, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on OCT 2 0 2010

Mark A. Schimmel
Site Vice President, Prairie Island Nuclear Generating Plant
Northern States Power Company - Minnesota

Enclosures (2)

cc: Administrator, Region III, USNRC
Project Manager, PINGP, USNRC
Resident Inspector, PINGP, USNRC
State of Minnesota

Enclosure 1

Supplement to Exigent License Amendment Request to Modify Technical Specifications Surveillance Requirement 3.8.1.10 for Prairie Island Nuclear Generating Plant Unit 1

This enclosure provides a list of issues identified and documented in the Northern States Power Company, a Minnesota corporation (NSPM), corrective action process (CAP) to support NRC review the exigent license amendment request (LAR) to modify Technical Specifications (TS) Surveillance Requirement (SR) 3.8.1.10 for Prairie Island Nuclear Generating Plant (PINGP) Unit 1. For completeness, the list includes the CAP numbers previously provided by letter dated October 18, 2010.

CAP Number	Issue
01238842	Overall 12 battery charger and integrated safety injection (SI) test issue
01250561	Undervoltage issue with all battery chargers
01233517	Out of sequence emergency diesel generator (EDG) loading
01254577	D1/D2 EDGs do not have a dynamic electrical model
01090396	Non-conservative Technical Specifications (TS) due to undervoltage values
01192136	Non-conservative Technical Specifications (TS) due to undervoltage values
01243406	Breakers continued to show that the required pickup voltage under degraded voltage conditions could not be satisfied by testing
NCR 19971622	Review the impact of the 12 battery charger failure mode for the following PINGP design basis accidents and applicability to the other chargers

ENCLOSURE 2

Technical Specification Pages (Markup)

3.8.1-10

1 page follows

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.8.1.10 ----------NOTES---------- 1. All DG starts may be preceded by an engine prelube period. 2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. 3. 12 Battery Charger not required to be energized in SR 3.8.1.10(c) until completion of Unit 1 2011 refueling outage.* ---------- Verify on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated safety injection actuation signal: a. De-energization of emergency buses; b. Load shedding from emergency buses; and c. DG auto-starts from standby condition and energizes emergency loads in $\leq$ 60 seconds.	24 months
SR 3.8.1.11 ----------NOTE---------- All DG starts may be preceded by an engine prelube period. ---------- Verify on an actual or simulated loss of offsite power signal that the DG auto-starts from standby condition.	24 months

*A modification will be installed during or prior to the Unit 1 2011 refueling outage to automatically shed the 12 Battery Charger from its normal bus and then automatically repower the charger from the bus within 60 seconds. Compliance with this SR will be demonstrated after implementation of the modification.