



March 18, 2011

L-PI-11-020  
10 CFR 50.90

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

License Amendment Request (LAR) to Revise the Physical Security Plan

- Reference: 1. Letter from NSPM to NRC, L-PI-11-021, "Technical Evaluation and Supporting Information in Support of License Amendment Request (LAR) to Revise the Physical Security Plan", dated March 18, 2011.
2. Letter from Nuclear Management Company, LLC (NMC)<sup>1</sup> to NRC, L-PI-06-050, "Response to Request for Additional Information", dated May 17, 2006.
3. Letter from NRC to NMC, Request for Additional Information, dated March 1, 2006.

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), hereby requests an amendment to the Facility Operating Licenses for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2. This change will modify an existing commitment made in Reference 2 in response to Reference 3. This request is being made pursuant to 10 CFR 50.54(p)(1) because the modification of the commitment could be construed as having the potential to reduce the effectiveness of the Physical Security Plan.

The enclosed evaluation of the proposed changes, together with the Technical Evaluation and Supporting Documentation, which contains safeguards information and was submitted under separate cover in Reference 1, provide NSPM's evaluation of the proposed change. NSPM evaluated the proposed changes in accordance with 10 CFR 50.92 and concluded that they involve no significant hazards consideration.

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<sup>1</sup> On September 22, 2008, NMC transferred its operating authority to Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy. By letter dated September 3, 2008, NSPM assumed responsibility for actions and commitments previously submitted by NMC.

NSPM requests approval of this license amendment request by June 30, 2011. Upon NRC approval, NSPM requests 60 days to implement the associated changes. In accordance with 50.91(b)(1), a copy of this request for amendment has been sent to the State of Minnesota.

Should you have any questions, please contact Leonard Sueper, Senior Regulatory Affairs Engineer, at (612) 330-6917.

Summary of Commitments

This license amendment request contains no new commitments but will modify an existing commitment made in Reference 2 in response to Reference 3 to add an armed responder in a specific [security-related] location. The revised commitment will be to retain the additional armed responder but eliminate the requirement to station the armed responder at the specific location.

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

Executed on: 3/18/2011.



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

Enclosure: Evaluation of Proposed Changes

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

## **ENCLOSURE**

### **Evaluation of the Proposed Change**

License Amendment Request to Change the Physical Security Plan

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## CHANGE THE PHYSICAL SECURITY PLAN

### 1. SUMMARY DESCRIPTION

This evaluation supports a request to amend the Operating Licenses DPR-42 and DPR-60 for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, respectively to approve Revision 9 to the PINGP Physical Security Plan (PSP) that modifies a commitment implemented in Section 18.

Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (hereafter "NSPM"), requests that NRC approve the proposed change to the PSP. The proposed change will continue to meet all applicable regulatory requirements and does not reduce the effectiveness of the PINGP PSP.

### 2. DETAILED DESCRIPTION

#### 2.1 Proposed Change

The proposed change to the PINGP Operating Licenses DPR-42 and DPR-60 would approve Revision 9 to the PSP for PINGP Units 1 and 2 which modifies a commitment implemented in Section 18. The details of the proposed change are discussed in a separate safeguards letter, L-PI-11-021, signed this date.

#### 2.2 Background

The current commitment was made in a letter (L-PI-06-050 dated May 17, 2006) in response to NRC's RAI #4 dated March 1, 2006, to ensure PINGP would be able to adequately engage the design basis threat.

### 3.0 TECHNICAL EVALUATION

The technical evaluation contains safeguards information and is being submitted under a separate cover letter, L-PI-11-021, signed this date.

### 4. REGULATORY SAFETY ANALYSIS

#### 4.1 Applicable Regulatory Requirements/Criteria

Regulatory criteria and guidance are contained in 10 CFR 73.1, Security Order EA-03-086 dated April 29, 2003 and Regulatory Guide 5.69. The following lists the regulatory requirements and plant-specific design bases related to the proposed change.

## 1) Regulatory Requirements

10 CFR 73.1 prescribes requirements for the establishment and maintenance of a physical protection system which will have capabilities for the protection of special nuclear material at plants in which special nuclear material is used. The design basis threats include a determined violent external assault, attack by stealth, or deceptive actions, including diversionary actions, by an adversary force capable of operating in each of the following modes: A single group attacking through one entry point, multiple groups attacking through multiple entry points, a combination of one or more groups and one or more individuals attacking through multiple entry points, or individuals attacking through separate entry points. EA-03-086 and Regulatory Guide 5.69 further describe the adversary capabilities of the design basis threat.

The planned PINGP defensive strategy revision and plant modifications to support the strategy will continue to fully comply with 10 CFR 73.1, EA-03-086 and Regulatory Guide 5.69.

### 4.2 Precedent

NSPM is not aware of any similar precedence.

### 4.3 Significant Hazards Consideration Analysis

The proposed amendment would modify a commitment made in a letter (L-PI-06-050 dated May 17, 2006) in response to NRC's RAI #4 dated March 1, 2006.

NSPM has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

#### **1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

**Response: No.**

The requested amendment involves security activities that do not reduce the ability for the security organization to prevent radiological sabotage. The activities of the security organization are not accident initiators nor do they mitigate accidents.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

**2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

**Response: No.**

The proposed change involves functions of the security organization concerning utilization of personnel to implement the revised PINGP defensive strategy. Analysis of the proposed change has not indicated nor identified a new or different kind of accident from any previously evaluated.

**3. Does the proposed amendment involve a significant reduction in a margin of safety?**

**Response: No.**

The proposed change will not reduce the number of armed responders committed to in the PINGP PSP. The change will affect only the functions within the Security organization and has no impact upon nor causes a significant reduction in margin of safety for plant operation. Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, NSPM concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

**4.4 Conclusions**

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

**5. ENVIRONMENTAL CONSIDERATIONS**

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

**6. SUPPORTING DOCUMENTATION**

The supporting documentation contains Safeguards Information and is being submitted under a separate cover letter, L-PI-11-021, signed this date.