



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 19, 2011

Mr. Mark A. Schimmel  
Site Vice President  
Prairie Island Nuclear Generating Plant  
Northern States Power Company - Minnesota  
1717 Wakonade Drive East  
Welch, MN 55089-9642

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 – AUDIT  
OF THE LICENSEE'S REGULATORY COMMITMENT MANAGEMENT  
PROGRAM (TAC NOS. ME6394 AND ME6395)

Dear Mr. Schimmel:

An audit of the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, commitment management program was performed at the plant site on September 12 - 14, 2011. In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the NRC informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

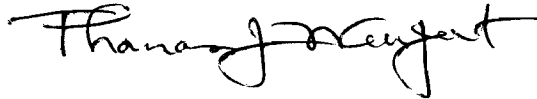
Based on the audit, the NRC staff concludes that Northern States Power Company, a Minnesota corporation (the licensee) has implemented NRC commitments on a timely basis, and the licensee has implemented an effective program for managing NRC commitment changes at PINGP, Units 1 and 2. The details of the results of the audit are set forth in the enclosed audit report.

M. Schimmel

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The NRC staff appreciates the resources that were made available by your staff for performing the audit. If you have any questions, please contact me at (301) 415-4037 or via e-mail at [Thomas.Wengert@nrc.gov](mailto:Thomas.Wengert@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas J. Wengert". The signature is fluid and cursive, with the first name "Thomas" and last name "Wengert" clearly distinguishable.

Thomas J. Wengert, Senior Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure:  
As stated

cc w/encl: Distribution via Listserv



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

NORTHERN STATES POWER COMPANY - MINNESOTA

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-282 AND 50-306

1.0 INTRODUCTION AND BACKGROUND

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), the NRC informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that commitments are implemented and that changes to the commitments are evaluated and, when appropriate, reported to NRC.

The NRC's Office of Nuclear Reactor Regulation (NRR) prepared and issued Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." Revision 3 to LIC-105 was issued on March 30, 2009 (ADAMS Accession No. ML090640415). LIC-105 is consistent with the NEI 99-04 guidance, and provides guidance to the NRC staff for handling regulatory commitments made by licensees of commercial nuclear reactors. NRR, through LIC-105, has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

As defined in NEI 99-04 and LIC-105, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. The guidance provided in LIC-105 instructs the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and licensing activities (bulletins, generic letters, etc.).

A summary of the NRC staff's activities, reviews, and conclusions is presented below.

Enclosure

## 2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, commitment management program was performed at the plant site on September 12 - 14, 2011. The audit scope included a review of commitments made by Northern States Power Company, a Minnesota corporation (NSPM, the licensee), since the previous audit on June 23, 2008, which was documented in an audit report dated August 6, 2008 (ADAMS Accession No. ML082120603).

The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

### 2.1 Verification of Licensee's Implementation of Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

#### 2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments, as defined above, made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) and licensing activities (bulletins, generic letters, etc.). Prior to the audit, the NRC staff performed a search in ADAMS for the licensee's submittals since the last audit, and selected a representative sample of commitments for verification. In addition, the licensee prepared a listing of commitments and commitment changes made during the period of interest. From the lists, the NRC staff selected a representative sample of regulatory commitments and commitment changes to audit. The identified list of commitments and changes was forwarded to the licensee on August 25, 2011, with a request to collect the associated documentation for the listed commitments in advance of the NRC staff audit.

The audit excluded the following types of commitments:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., responding to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

(4) Commitments related to the PINGP license renewal.

2.1.2 Audit Results

The licensee has implemented procedure FP-R-LIC-24, Rev.0, "NRC Commitment Management," dated February 24, 2011, which describes the method and responsibilities for the maintenance of regulatory commitments made to the NRC to ensure that the commitments are properly identified, tracked, closed out, revised/changed, or deleted. The licensee uses the program to track the status and manage the closure of commitments at PINGP. This procedure, which is based on the guidance provided by NEI 99-04, has replaced licensee procedures FG-R-CM-01, "Regulatory Commitment Management," and 5AWI, "Control of Commitments." The licensee explained that FG-R-CM-01 has been retired to FP-R-LIC-24, while 5AWI is now used exclusively for non-NRC commitments.

Two deficiencies in the licensee's commitment management program documents were identified during the audit, as noted below:

- The flow chart in licensee procedure FP-R-LIC-24, Figure 1 (comparable to NEI 99-01, Figure A-1), refers to Figure 2 within the flow chart. However, Figure 2 is not included in the procedure document. Figure 2 is presumably comparable to Figure A-2 of NEI 99-01. During the audit, the licensee entered this apparent deficiency into their corrective action program for resolution (A/R No. 01303685).
- Licensee procedure 5AWI (concerning non-NRC commitments) Section 1.7.0 was not updated to reflect that the new NRC commitment procedure (FP-R-LIC-24) had been implemented. The references to NRC commitments should have been deleted or superseded. During the audit, the licensee entered this apparent deficiency into their corrective action program for resolution (A/R No. 01303464).

The licensee's program provides acceptable tools and guidance for the licensee to capture the NRC guidance on commitment management programs. The licensee enters commitments made to the NRC into a commitment management database called "PassPort." This database is used to track regulatory commitments, as well as corrective action items. The field for Action Request ("A/R") type in the database further identifies the item as a General Action Request ("GAR"), which includes regulatory commitments, or as a corrective action item ("CAP") for the purposes of tracking. The status of the commitments, implementation dates, target implementation document information, and comments associated with each specific commitment are captured in the program and can be summarized in a report.

The documents furnished by the licensee during the audit included summary sheets from the PassPort system, which provided the status of the commitments, and the appropriate backup documentation, as needed (e.g., plant procedures, examination records, and/or other plant documentation incorporating the commitments). The NRC staff reviewed the documents and summarized the results of the review in the table attached to this audit report.

This part of the NRC staff's audit was intended to confirm that the licensee has documented its implementation of commitments made to the NRC staff as part of past licensing communications, and that the commitments that had not yet been implemented or incorporated in design bases documents were captured in an effective manner for future implementation.

During the review, the staff identified the following deficiencies in the implementation of the licensee's commitment management program for PINGP, Units 1 and 2 (refer to the table attached to this report for the commitment number and description of the commitments sampled):

- Commitment 01291634-01: This commitment was made in a letter dated January 30, 2009, but was not entered into the system until June 28, 2011. The commitment was fulfilled via a letter dated February 20, 2009, however, the commitment was not closed in the system until June 28, 2011. This commitment is identified as a "Legacy Commitment" in the PassPort database because it had not been entered into the tracking system until after it had been completed. Note: During the audit, the licensee informed the reviewer that they have prepared and instituted an "Outgoing Correspondence Checklist" (Form QF-0743, Rev. 0) that includes a check-off box for commitments/changes and their entry into the PassPort system.
- Commitment 01298011-01: This commitment was made in a letter dated April 15, 2009, but was not entered into the system until August 5, 2011. The commitment was fulfilled via license amendments 193 (Unit 1) and 182 (Unit 2), which were implemented in 2009, however, the commitment was not closed in the system until August 5, 2011. This commitment is identified as a "Legacy Commitment" in the PassPort database because it had not been entered into the tracking system until after it had been completed. Note: During the audit, the licensee informed the reviewer that they have prepared and instituted an "Outgoing Correspondence Checklist" (Form QF-0743, Rev. 0) that includes a check-off box for commitments/changes and their entry into the PassPort system.
- Commitment 01207012-01: This commitment, which concerns satisfying certain (one-time and continuous) conditions and limitations associated with the use of Optimized ZIRLO™ fuel, was made in a letter dated November 24, 2009, and was originally closed in the PassPort database on November 8, 2010. In January, 2011, an on-site Commitment Control Challenge Board determined that this commitment had been closed prematurely, and requested that the commitment be re-opened and tracked until the associated topical report was approved by the NRC staff. However, following the Challenge Board's decision in January 2011, the original commitment was not correctly re-opened in the commitment tracking system and, consequently, two commitments were open for the same issue. The original commitment was properly re-opened in the tracking system on October 3, 2011, and was assigned a due date of April 30, 2015.
- Commitment 01207012-02: This commitment, which concerns satisfying certain (one-time and continuous) conditions and limitations associated with the use of Optimized ZIRLO™ fuel, was made in a letter dated November 24, 2009, and was originally closed in the PassPort database on November 8, 2010. In January, 2011, an on-site Commitment Control Challenge Board determined that this commitment had been closed prematurely, and requested that the commitment be re-opened until additional closure documentation was provided. However, following the Challenge Board's decision in January 2011, the original commitment was not correctly re-opened in the commitment tracking system and, consequently, two commitments were open for the same issue. The original commitment was properly re-opened in the tracking system on October 3, 2011, and was assigned a due date of April 30, 2015.

Based on the results of the on-site audit, the NRC staff concludes that the licensee has implemented the regulatory commitment management program adequately and consistent with NEI 99-04, with the exception of the deficiencies identified during the audit. The deficiencies identified had no safety significance and, as noted, the licensee has taken appropriate corrective actions to address the deficiencies.

## 2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

### 2.2.1 Audit Scope

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at PINGP, Units 1 and 2, is contained in procedure FP-R-LIC-24, Rev. 0.

The NRC staff reviewed the licensee's procedure against the guidance provided in NEI 99-01. The change process is based on the NEI 99-01 guidance. Regulatory commitment changes are processed and tracked by Regulatory Affairs Department (Site Licensing) and are approved by the Site Management. Regulatory Commitment Change Request Form QF-0729 is used to document the evaluation of commitment changes.

The primary focus of the audit was to ensure that commitments are implemented without a change or, if a change is made, it is made in accordance with approved plant procedures and with the approval of licensee management. Another purpose of the audit was to verify whether the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to design features or operating procedures, which may be subject to regulatory commitments, require evaluation in accordance with the commitment change control process.

### 2.2.2 Audit Results

#### 2.2.2.1 Commitment Changes Reported to the NRC

The NRC staff sampled two commitment changes that were reported to the NRC, as follows:

- Commitment Change No. 09-02, concerning the licensee's 9-Month Response to NRC Generic Letter 2008-01. This change was appropriately evaluated and documented. The NRC was notified of this change by letter dated September 28, 2009 (ADAMS Accession No. ML092730109).
- Commitment Change No. 09-04, concerning the licensee's 30-Day Response to NRC Bulletin 2003-02. This change was appropriately evaluated and documented. The NRC was notified of this change by letter dated October 9, 2009 (ADAMS Accession No. ML092860612).

The NRC staff found no deficiencies in the documents sampled for this part of the audit.

#### 2.2.2.2 Commitment Changes Not Reported to the NRC

The NRC staff sampled two commitment changes that were not reported to the NRC, as follows:

- Commitment Change No. 08-05, concerning the anticipated transient without scram mitigating system actuating circuitry. The NRC reviewer noted that the Commitment Change Evaluation for 08-05 did not include any documentation demonstrating that the change had been approved by the site management, as required by procedure FP-R-LIC-24. The licensee informed the reviewer that this evaluation was prepared in 2008, and that the procedure in effect at that time (FG-R-CM-01) did not require approval for this type of change. The licensee further noted that site management approval is now required per the licensee's new procedure. No other deficiencies were identified.
- Commitment Change No. 10-05, concerning a corrective action associated with LER-1-97-02. This change was appropriately evaluated and documented. No deficiencies were identified.

#### 2.2.2.3 Summary

Based on its review, the NRC staff concludes that the licensee has properly addressed each regulatory commitment change selected for this part of the audit and that the licensee has implemented an effective program to manage commitment changes. In addition, the NRC staff noted that the method of linking specific changes in procedures to specific regulatory commitments was adequate, and resulted in traceability in the most recently revised procedures.

### 3.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the commitment management program effectively, and has implemented commitment changes appropriately consistent with NEI 99-04. The deficiencies identified during the audit, which are summarized in Sections 2.1.2 and 2.2.2 of this report, did not have any safety significance. The NRC staff notes that the licensee has taken appropriate actions to correct the deficiencies identified during the audit.

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Marlys Davis, Regulatory Affairs  
Dale Vincent, Site Licensing

Principal Contributor: T. Wengert

Date: December 19, 2011

Attachment:  
Audit Summary Table

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-08-072, dated September 15, 2008 (ADAMS Accession No. ML082600139)	Updated Three month Response to GL 08-01	01150334-01	NMC will submit all the information requested in GL 2008-01 for the nine-month response, with the exception of the results of the evaluation of piping walkdowns.	Closed 10/14/08  Requested information was submitted in 9-month response dated 10/14/08 (L-PI-08-088)
		01150334-02	NMC will submit the results of the evaluation of accessible area walkdowns and Unit 2 containment and RHR pit walkdowns with the follow-up report 90 days following the completion of 2R25.	Closed 1/30/09  The letter and report were submitted on 1/30/2009 (L-PI-09-012)
		01150334-03	This letter revises the second commitment made in Reference 2 to:  NMC will submit results of the evaluations of the walkdowns of Unit 1 containment and RHR pits 90 days following the completion of 1R26.	Closed 2/18/2010  The letter and report were submitted on 2/18/2010 (L-PI-10-005)

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-08-080 dated November 4, 2008 (ADAMS Accession No. ML083110125)	LAR to Revise EDG Test Loads in SR 3.8.1.3 and 3.8.1.9	01158774-01	<p>Upon approval by the NRC, NSPM will implement the following commitment with implementation of the monthly test load changes proposed in this LAR:</p> <p>The Prairie Island Nuclear Generating Plant Unit 2 Emergency Diesel Generators (EDGs) will be tested at or above 90% of their rated load on a schedule consistent with SR 3.8.1.3. Abnormalities in EDG performance between the SR 3.8.1.3 test load and the rated load will be evaluated under NSPM's corrective action program, which incorporates trending capabilities, and corrected under the maintenance program.</p>	<p>Closed 4/26/2010</p> <p>Commitment was withdrawn per letter dated 3/30/2010 (L-PI-10-023)</p>

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-08-088, dated October 14, 2008 (ADAMS Accession No. ML082880483)	Nine Month Responses to GL 08- 01	01155174-01	1. NSPM will develop a Technical Requirements Manual Surveillance Requirement to periodically verify the piping is sufficiently full such that its functional requirements are maintained.	Closed 7/9/2009  This commitment was revised in letter dated 1/30/2009 (L-PI-09-012).
		01155174-02	2. NSPM will evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler to determine applicability and further assess any changes to the TS and TS Bases.	Closed 11/8/2010  This commitment was closed since it was superseded by 01155174 08.
		01155174-03	3. NSPM will identify corrective actions to minimize gas accumulation and its consequences for Unit 1 outside containment accessible areas and Unit 2 inside and outside containment and the Unit 2 RHR pit areas in the 90-day 2R25 post outage report.	Closed 1/30/2009  The commitment was fulfilled with the submittal of the 90-day 2R25 post-outage report (L-PI-09-012).
L-PI-08-088, dated October 14, 2008 (ADAMS Accession No. ML082880483)	Nine Month Responses to GL 08- 01	01155174-04	4. NSPM will identify corrective actions to minimize gas accumulation and its consequences for Unit 1 inside containment and the Unit 1 RHR pit areas in the 90-day 1 R26 post-outage report.	Closed 1/11/2010  The commitment was fulfilled with the submittal of the 90-day 1R26 post-outage report (L-PI-10-005).

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		01155174-05	5. NSPM will complete a formal evaluation of vortexing in the caustic addition standpipe.	Closed 4/13/2009  Calculation ENG-ME-650 Rev. 0, "Caustic Addition Standpipe Volume Calculation," was approved on 4/13/09, fulfilling the commitment.
		01155174-06	6. NSPM will state in the procedure purpose for procedures that perform RHR and SI check valve testing (e.g., 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 systems.	Closed 12/15/2009  Commitment was revised by QF-0729 on 10/14/08 and captured in commitment no. 01155174-07

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-09-011 dated January 30, 2009 (ADAMS Accession No. ML090300684)	Response to RAI Regarding LAR for Heavy Bundle Fuel LAR	01291634-01	NSPM shall respond to Question 3 no later than February 20, 2009.	Closed 6/28/11  This one-time commitment was fulfilled via letter L-PI-09-025 dated 2/20/2009. This is identified by the licensee as a "Legacy Commitment."  Note: The due date of the commitment in the January 30, 2009 letter was incorrectly identified as February 20, <u>2008</u> .

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-09-012 dated January 30, 2009 (ADAMS Accession No. ML090300705)	90 Day 2R25 Report for GL 08-01	01168385-01 (U1)	1. Corrective actions for fourteen locations were identified during the drawing reviews as inverted U or dead end tee pipe configurations and corrective actions for an additional eleven locations were discussed in Statement 7 of the Enclosure. Unit 1 corrective actions will be completed by the end of refueling outage 1 R27 in 2011, and Unit 2 corrective actions will be completed by the end of refueling outage 2R26 in 2010.	Closed 3/9/2009  These commitments were entered into the system incorrectly (had incorrect descriptions) and were reopened under different commitment numbers.
		01168385-02 (U2)		
		01168385-03	2. An analysis, that assumes a void is present, will be completed on the inaccessible susceptible void location (2SI-32) on the cross-tie line from 21 RHR pump to the 21 SI pump in the second quarter of 2009.	Closed 6/30/2009  An evaluation of susceptible locations was performed per EC 131617. The evaluation demonstrated that the stresses and loads are acceptable.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
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**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		01168385-04 (U1)	3. An extent of condition review of flow element and orifices considering lessons learned from evaluating the voids in the RHR pump miniflow lines, completed January 24, 2009, identified additional locations to evaluate. The corrective actions (that is, walkdowns) for this extent of condition review will be completed for the Units 1 and 2 locations outside containment in the second quarter of 2009. The Units 1 and 2 locations inside containment will be completed consistent with accessibility no later than 1R26 in 2009 and 2R26 in 2010, respectively.	Closed 3/9/2009
		01168385-05 (U2)		These commitments were entered into the system incorrectly (had incorrect descriptions) and were reopened under different commitment numbers.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-XE-09-006, dated April 15, 2009 (ADAMS Accession No. ML091050619)	LAR for Adoption of TSTF-511, Eliminate Working Hour Restrictions from TS 5.2.2	01298011-01	Removal of the plant-specific TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart I requirements. This commitment will be completed no later than October 1, 2009.	Closed 8/5/2011  This commitment was fulfilled via license amendments 193 (U1) and 182 (U2). This is identified by the licensee as a "Legacy Commitment."
L-PI-09-125, dated November 24, 2009 (ADAMS Accession No. ML093280883)	LAR for Optimized ZIRLO™	01207012-01	1. In the course of the core reload process approved for use at PINGP, and prior to first loading of Optimized ZIRLO™ Westinghouse will be programmatically required to evaluate the effects of Optimized ZIRLO™ on PINGP core performance and accident analysis. To satisfy NRC Safety Evaluation (SE) for Optimized ZIRLO™ NSPM will confirm that core reload safety evaluations satisfy conditions and limitations 3, 4, 5, 8, and 10 of the NRC SE for Optimized ZIRLO™. Continuous, until the contingency requirements of the conditions and limitations have been satisfied.	Closed/Re-opened  The TS changes were incorporated in TS Amendment 148, issued on October 1, 2009.  An on-site Commitment Control Challenge Board determined that the commitment had been closed prematurely. The commitment was subsequently re-opened on October 3, 2011.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		01207012-02	2. To satisfy NRC SE for Optimized ZIRLO™, NSPM will confirm that Westinghouse provides additional confirmatory data associated with Lead Test Assembly (LTA) programs at other facilities prior to operation with Optimized ZIRLO™ fuel rod cladding. This commitment relates to conditions and limitations 6 and 7 of the NRC SE for Optimized ZIRLO™. Continuous, until the LTA data up through the fuel burnup limit applicable for PINGP has been provided to the NRC.	<p>Closed/Re-opened</p> <p>The TS changes were incorporated in TS Amendment 148, issued on October 1, 2009.</p> <p>An on-site Commitment Control Challenge Board determined that the commitment had been closed prematurely. The commitment was subsequently re-opened on October 3, 2011.</p>

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-09-122, dated November 24, 2009 (ADAMS Accession No. ML093280925)	Supplement to Responses to GL 2008-01	01155174-08	Industry resolution of the gas accumulation Technical Specification (TS) issues will be monitored and, if necessary, a license amendment request will be submitted within one year following NRC approval of the Technical Specification Task Force Traveler (TSTF) or consolidated line item improvement process (CLIP) Notice of Availability, that is consistent with resolution of the generic changes process.	Open  The NRC has not yet approved a TSTF or CLIP associated with this item.
L-PI-09-133, dated December 28, 2009 (ADAMS Accession No. ML093650046)	LAR for MUR Power Uprate	01212954-01	1. The PINGP Technical Requirements Manual (TRM) will be revised to include LEFM administrative controls. Prior to operating above 1650 MWt (typical for all MUR commitments).	Closed 9/21/2010  New TRM Section 3.3.6 was implemented in TRM Revision 18.
		01212954-02	2. Revise ERCS Alarm Response Procedure to reflect any changes in LEFM status such as outage time and power limits.	Closed 9/17/2010  ERCS Alarm Response Procedure C47041 Revision 12.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
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**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		01212954-03	3. Revise CHECWORKS models to incorporate flow and process system conditions that are determined for the MUR PU conditions.	Closed 9/21/2010  U1 and U2 CHECWORKS SFA 2.1 models were revised to incorporate new MUR power level.
		01212954-04	4. Revise Emergency and Abnormal Operating Procedures that are power dependent.	Closed 8/23/2010  EOPs required to support MUR have been issued as part of EC 13597. No Abnormal Procedures required revision.
		01212954-05	5. Recalibrate BOP system alarms due to small process condition changes.	Closed 9/9/2010  Licensee verified that no BOP alarms are impacted by MUR implementation.
		01212954-06	6. Revise ERCS and Simulator Calorimetric and TPM programs with new administrative power limits based on LEFM status. Other core power dependent ERCS and Simulator programs such as Xenon, NIS Power, and Boron Concentration will be revised to reflect a core power of 1677 MWt.	Closed 10/11/2010  Simulator updated with MUR Uprate values on 9/7/10. Simulator testing complete 9/29/10. U2 ERCS calorimetric, TPM, Xenon, etc. updated on 10/4 and 10/11/2010.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		01212954-07	7. Revise Operator Training Program to include changes to plant procedures and alarm responses in addition to Operator Training regarding the implementation of the allowable at-power administrative limits and new TRM governing LEFM out-of-service time.	Closed 9/17/2010  Operator training required by this commitment is covered in Operator Training lesson plan.
		01212954-08	8. Re-scale applicable control and protection instrumentation consistent with the increase in 100 percent nominal core power from 1650 MWt to 1677 MWt.	Closed 10/15/2010  Completed by work orders 404305 (U1) and 404306 (U2) on 10/14/2011.
		01212954-09	9. Revise ERCS TPM and CALM Programs to adjust the allowable licensed thermal power values used in these programs. Alarms will require evaluation and re-calibration, as required, to reflect small process changes in certain BOP systems. Other core power dependent ERCS programs such as Xenon, NIS Power, and Boron Concentration will be revised to reflect a core power of 1677 MWt.	Closed 10/11/2010  No BOP alarms impacted by MUR. Other programs revised to reflect 1677 MWt.
		01212954-10	10. As part of the ERCS TPM program changes, the time greater than 100 percent power incremental monitoring levels will be based on a power measurement uncertainty of 0.36 percent.	Closed 10/11/2010  Updates made under W.O. 404305 (U1) and 404306 (U2)

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-10-005, dated February 18, 2010, 2010 (ADAMS Accession No. ML100500066)	90-Day 1R26 Post Outage Report for GL 08-01	01168385-15	Corrective actions for three susceptible locations were identified as inverted U or dead end tee pipe configurations (Enclosure Table 2) and for six additional susceptible locations discussed in Statement 7 of the Enclosure. Unit 1 corrective actions will be completed by the end of refueling outage 1R27 in 2011.	Closed 5/27/2011  All locations that were committed to have corrective actions completed by the end of 1R27 in 2011 are complete. These were completed via modifications to add vent valves at each location. Completed under various work orders.
L-PI-10-036, dated April 19, 2010 (ADAMS Accession No. ML101090498)	Supplement to LAR for MUR Power Uprate	01212954-11	NSPM will submit justification for the Main Steam system stress analysis, including piping, supports, and components by August 27, 2010.	Closed 8/2/2010  Justification provided by licensee in supplemental letter dated 6/17/2010.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-10-052, dated June 14, 2010 (ADAMS Accession No. ML101650544)	LAR to Use BEACON Power Distribution Monitoring System	01236136-01	1. Cycle-specific BEACON calibrations performed before startup and at beginning-of cycle conditions will ensure that power peaking uncertainties provide 95% probability upper tolerance limits at the 95% confidence level. These calibrations are to be performed using the Westinghouse methodology. Until these calibrations are complete, more conservative default uncertainties will be applied. The calibrations will be documented and retained as records.	Open  Licensee has action to issue procedure to initiate BEACON TSM calibrations described by the license amendment. Action due by 11/1/2011.
L-PI-10-098, dated October 14, 2010 (ADAMS Accession No. ML102880105)	Exigent LAR to Modify TS 3.8.1.10 for PINGP U1	01263702-01	NSPM will install a modification that will automatically shed the 12 Battery Charger from its normal bus and then repower the charger from the bus within the 60 seconds required by the Prairie Island Nuclear Generating Plant Technical Specifications surveillance requirement 3.8.1.10(c). NSPM will perform the modification during the Unit 1 2011 refueling outage.	Closed 12/20/2010  Commitment was withdrawn via RAI response dated 10/18/2010 (L-PI-10-102).

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
FROM SEPTEMBER 12 TO SEPTEMBER 14, 2011

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-10-104, dated October 20, 2010 (ADAMS Accession No. ML102930575)	RAI Response Associated with Exigent LAR to Modify TS SR 3.8.1.10	01263702-02	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.	Open  Action is due by 12/15/2011.
L-PI-11-024, dated March 15, 2011 (ADAMS Accession No. ML110750198)	Supplement 1 to LAR concerning Battery Charger Replacement	01284353-01	The Updated Safety Analysis Report will be updated to include the description of existing and new Unit 1 battery chargers, as applicable, within 6 months following completion of the Unit 1 2011 refueling outage.	Open  License amendment where the commitment was made was approved on 4/29/2011. Current due date is 12/3/2011.
L-PI-11-057, dated June 22, 2011 (ADAMS Accession No. ML111740866)	Request for Extension of Enforcement Discretion and Commitment to Submit Date for 10 CFR 50.48(c) LAR	01292172-01	NSPM will submit the License Amendment Request (LAR) implementing 10 CFR 50.48(c) for Prairie Island Nuclear Generating Plant no later than September 30, 2012.	Open  Due date is 9/30/2012.

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS PERFORMED  
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**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
L-PI-11-069, dated July 11, 2011 (ADAMS Accession No. ML111930159)	60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies	01296934-01	NSPM will include a requirement for continuing training on Extensive Damage Mitigation Guidelines (EDMG) in the PINGP training program for the Emergency Response Organization (ERO) qualified decision makers by January 13, 2012.	Open  Due date is 1/13/2012.

M. Schimmel

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The NRC staff appreciates the resources that were made available by your staff for performing the audit. If you have any questions, please contact me at (301) 415-4037 or via e-mail at [Thomas.Wengert@nrc.gov](mailto:Thomas.Wengert@nrc.gov).

Sincerely,

*/RA/*

Thomas J. Wengert, Senior Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

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As stated

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NAME	TWengert	BTully	SWilliams	TWengert
DATE	12/16/11	12/16/11	12/19/11	12/19/11

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