



Prairie Island Nuclear Generating Plant  
1717 Wakonade Drive East  
Welch, MN 55089-9642

June 11, 2012

L-PI-12-049  
10 CFR 50.54(f)

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

Prairie Island Nuclear Generating Plant Units 1 and 2  
Docket Nos. 50-282 and 50-306  
Renewed License Nos. DPR-42 and DPR-60

Emergency Preparedness Information Requested by NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012

References:

1. NRC Letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" dated March 12, 2012, ADAMs Accession No. ML12056A046.
2. NSPM Letter to NRC, "60-Day Response to NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012," dated May 11, 2012.

On March 12, 2012, the NRC Staff issued Reference 1 to all NRC power reactor licensees and holders of construction permits in active or deferred status. Enclosure 5 of the March 12, 2012 letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs. Addressees were requested to respond to the Requested Information no later than 90 days from the date of issuance of the letter, in accordance with 10 CFR 50.54(f).

In accordance with Enclosure 5 of Reference 1, on May 11, 2012, Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (hereafter "NSPM"), on behalf of the Prairie Island Nuclear Generating Plant (PINGP), submitted a letter with an alternate course of action for providing the requested information for EP Recommendation 9.3

(Reference 2). In that letter, NSPM proposed an alternate schedule for providing the information request responses and the basis of acceptability for these dates. Per the commitments made by NSPM in Reference 2, the enclosure to this letter provides the responses to the following information requests:

- Reference 2, Enclosure 1, Communications request #2
- Reference 2, Enclosure 1, Staffing request #3
- Reference 2, Enclosure 1, Staffing request #4
- Reference 2, Enclosure 1, Staffing request #5

If there are any questions or if additional information is needed, please contact Ms. Jennie Eckholt, Licensing Engineer, at 612-330-5788.

Summary of Commitments

This letter makes two new commitments and no revisions to existing commitments.

	Regulatory Commitments	Due Date
1	NSPM will incorporate the new ERO expectation into the Corporate Directive 10.1, Emergency Response Organization.	June 29, 2012
2	NSPM will re-evaluate its State of Minnesota Letter of Agreement to determine if the agreement can be revised or supplemented to provide additional specificity concerning the resources and support needed for the PINGP in the event of a large-scale natural disaster.	December 15, 2012

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

Executed on June 11, 2012



James E. Molden  
Site Vice President, Prairie Island Nuclear Generating Plant  
Northern States Power Company - Minnesota

Enclosure

cc: Administrator, Region III, USNRC  
Director of Nuclear Reactor Regulation (NRR), USNRC  
NRR Project Manager, PINGP, USNRC  
Senior Resident Inspector, PINGP, USNRC

## ENCLOSURE

### PINGP 90-Day Responses to the Emergency Preparedness Recommendation 9.3 Requests for Information

This enclosure includes responses from Northern States Power Company, a Minnesota corporation, d/b/a Xcel Energy (hereafter "NSPM"), on behalf of the Prairie Island Nuclear Generating Plant (PINGP), to four of the Requests for Information delineated in Enclosure 5 of Reference 1 for the Near Term Task Force (NTTF) Emergency Planning (EP) Recommendation 9.3.

On May 11, 2012, NSPM submitted a letter to the NRC to propose an alternate course of action to responding to the Requested Actions and Requests for Information for EP Recommendation 9.3 (Reference 2). In that letter, NSPM committed to provide responses to Request for Information number 2 for Communications, and request numbers 3 through 5 for Staffing by June 11, 2012. The responses to these Requests for Information are provided in this enclosure.

This enclosure quotes each Request for Information in italics and each question is followed by the NSPM response. Referenced documents are identified at the end of this Enclosure.

#### **Request for Information #2 - Communications:**

*Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.*

#### **NSPM Response:**

The PINGP currently utilizes a sound-powered headphone system for on-site communications. The sound-powered headphone system is installed at 120 different locations throughout the plant, including the control room and Technical Support Center (TSC). Each box contains six independent circuits for sound-powered headphones. This system does not require electrical power for operation. In addition, there are approximately 213 hand held radios available onsite, which upon loss of the repeater and system controller can function as two-way point-to-point radios.

NSPM conducted an analysis of existing communications systems and equipment at the PINGP following the events at Fukushima Dai-ichi, and developed an action plan to address station-identified areas for improvement. A component of that action plan was the procurement of six portable battery-operated satellite phones and battery chargers. These satellite phones will be used as an interim measure until the completion of the communications assessment and implementation of NSPM's long term solution for improved on-site and off-site communications. The satellite phones and battery chargers were purchased and delivered to the site.

Four 12 kW portable diesel generators and 60 extension cords were also purchased and are available for charging satellite phone and radio batteries or supplying power to the site

## ENCLOSURE

### PINGP 90-Day Responses to the Emergency Preparedness Recommendation 9.3 Requests for Information

phone system, if needed. The portable diesel generators and extension cords have been delivered to the site.

NSPM will develop a detailed schedule for implementing the above identified equipment into plant procedures, which will include developing maintenance schedules, procedures, and guidance documents. The implementation schedule for this equipment is an aspect of the communications assessment which will be provided to the NRC by October 31, 2012, in accordance with NSPM's May 11, 2012, letter (Reference 2).

#### **Request for Information #3 - Staffing:**

*Identify how the augmented staff would be notified given degraded communications capabilities.*

#### **NSPM Response:**

In the event of a large-scale natural disaster that affects normal communications within 25 miles of the site, NSPM's current methods to notify the Emergency Response Organization (ERO) would not support direct notification of the augmented staff residing within the 25 mile event radius.

To promote timely staff augmentation by the ERO, NSPM plans to implement the following direction to the Corporate Directive 10.1, Emergency Response Organization:

If an event impacting a wide area proximate to either, or both, Monticello and Prairie Island occurs (for example, a large scale man-made or natural disaster), and if Emergency Response Organization (ERO) activation and call out has not occurred (perhaps as a result of infrastructure failures caused by the disaster that affects pagers, cell towers, internet, land line phone systems, etc.), ERO personnel, after ensuring the safety and security of their families, are expected to promptly report to their assigned, or any accessible, site Emergency Response Facility (ERF). If for any reason your assigned site's ERFs are not accessible, ERO personnel are expected to report to the Xcel Energy Backup Emergency Operations Facility (414 Nicollet Mall Minneapolis, MN 55401, Lower Level, Resource Center).

This new expectation will be incorporated into the Corporate Directive 10.1 by June 29, 2012.

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### PINGP 90-Day Responses to the Emergency Preparedness Recommendation 9.3 Requests for Information

#### **Request for Information #4 - Staffing:**

*Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.*

#### **NSPM Response:**

The PINGP is located within the city limits of Red Wing, Minnesota, on the west bank of the Mississippi River. Primary access to the PINGP is via Sturgeon Lake Road, which is undercut by culverts. The site may become inaccessible by this access route in the event of a large-scale natural disaster. Airborne or waterborne transportation would be required to ferry augmented staff to the PINGP in that event. In accordance with the PINGP flooding abnormal procedures, the site is required to implement a plan to transport employees and other essential personnel to and from the site, which includes arranging for additional heavy duty boat(s) and/or amphibious vehicles.

Xcel Energy, the parent company of NSPM, has a variety of resources available within its service area that could be called upon to facilitate post-event access to the PINGP following a large scale natural disaster. Supplemental resources from Xcel Energy would be requested and made available from the non-nuclear operations of the company by requesting the specific resources during the "Emergency Situation Management Call" that is exercised in accordance with an Xcel Energy process. Situation Management involves use of a command center approach to notify, mobilize, monitor across the enterprise, define and prioritize response plans, execute response plans, and report status to executive management. Situation Management is exercised by Xcel Energy independent of the site's nuclear Emergency Plan.

In addition, NSPM has a letter of agreement (LOA) with the Minnesota Department of Public Safety Division of Homeland Security and Emergency Management (HSEM). Within the state government, the HSEM is the agency responsible for coordinating state disaster/emergency preparedness, response, recovery and mitigation. In the event of a large-scale natural disaster that inhibits site access, in accordance with the broad emergency response and support provided by the LOA, NSPM could receive logistical support from HSEM for emergency responders to gain access to the PINGP. Arrangements have also been made with the State of Minnesota and Wisconsin Emergency Management Divisions, State Police and local law enforcement agencies to control highway, railway and waterway traffic near the site in the event of an emergency.

NSPM will re-evaluate the State of Minnesota LOA to determine if the agreement can be revised or supplemented to provide additional specificity concerning the resources and support needed for the PINGP in the event of a large-scale natural disaster. NSPM will complete this evaluation by December 15, 2012.

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### PINGP 90-Day Responses to the Emergency Preparedness Recommendation 9.3 Requests for Information

#### **Request for Information #5 - Staffing:**

*Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.*

#### **NSPM Response:**

NSPM has taken no interim actions and is not planning to take interim actions prior to the completion of the staffing assessment(s) for NTTF Recommendation 9.3. NSPM is currently assessing on-shift ERO staffing at PINGP for event conditions in response to the revised requirements of 10 CFR 50, Appendix E, Section IV.A.9. NSPM will complete the on-shift staffing assessment to implement that new regulatory requirement by December 24, 2012, as required by 10 CFR 50, Appendix E, Section IV.A.9. The analysis will reflect an enhanced plant-specific understanding of event and emergency response roles and responsibilities. This enhanced understanding, coupled with defense in depth inherent in the plant's design, provides reasonable assurance of emergency response capability until the completion of the requested beyond-design basis staffing analysis for the NTTF Recommendation 9.3.

#### **References:**

1. NRC Letter, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" dated March 12, 2012, ADAMs Accession No. ML12056A046.
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