



JUL 17 2013

L-PI-13-072

U S Nuclear Regulatory Commission
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Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
Renewed License Nos. DPR-42 and DPR-60

Correction to License Amendment Request (LAR) dated December 11, 2000
Conversion to Improved Technical Specifications (ITS)

By letter dated December 11, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003777180), the Nuclear Management Company, LLC, (NMC¹) submitted an LAR to convert the Technical Specifications (TS) for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, to the format and content guidance of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants" (ML011840223). This submittal included Package 3.8 (ML003777281) which provided justifications for differences (JFD) from NUREG-1431 TS 3.8.3, "Diesel Fuel Oil, Lube Oil, and Starting Air".

NSPM determined that the second paragraph of JFD CL3.8-145 (file page 21 in ML003777281), which provided the justification for the contents of PINGP TS 3.8.3, is incorrect. JFD CL3.8-145 is revised to state:

NUREG-1431 LCO 3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air, and associated Bases have been modified by deleting all references to lube oil and starting air. This results in the deletion or revision of various ISTS [improved Standard Technical Specifications] Conditions, Required Actions, and SRs [Surveillance Requirements] as noted in the ITS markup document.

The requirement to ensure lube oil inventory (ISTS Condition B) is within limits and provide explicit action requirements for low lube oil inventory is not an

¹ On September 22, 2008, NMC transferred its operating authority to Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"). By letter dated September 3, 2008 (ML082470648), NSPM assumed responsibility for actions and commitments previously submitted by NMC.

explicit requirement in the CTS [current Technical Specifications, that is, the TS existing in 2000] or CLB [current licensing basis]. The requirement to ensure lube oil inventory (ISTS Condition B) is maintained is adequately addressed in the TS 3.8.1 requirement for the diesel generators (DGs) to be OPERABLE. The TS Section 1.1 definition of OPERABLE explicitly requires consideration of lubrication as a condition for equipment operability. Lube oil level is verified by dipstick indication prior to each normal DG start and when placing a DG in the standby condition in accordance with station procedures. Therefore, adequate means are presently used to verify lube oil inventory and it is justifiable to delete such references from this specification.

The requirement to ensure starting air pressure (ISTS Condition E) is within limits and provide explicit action requirements for low starting air pressure is not an explicit requirement in the CTS or CLB. Along with routine DG standby readiness monitoring, installed DG low air pressure alarms, and the definition of OPERABILITY, adequate assurance of proper maintenance of starting air pressure and necessary actions on low air pressure are provided without explicit TS reference.

If there are any questions or if additional information is needed, please contact Mr. Dale Vincent, P.E., at 651-388-1121.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



James E. Lynch
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cc: Administrator, Region III, USNRC
Project Manager, PINGP, USNRC
Resident Inspector, PINGP, USNRC