



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

August 26, 2013

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10 CFR 2.202  
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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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

Prairie Island's First Six-Month Status Report in Response to March 12, 2012  
Commission Order Modifying Licenses with Regard to Requirements for Mitigation  
Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736).
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012 (ADAMS Accession No. ML12229A174).
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012.
4. NSPM Letter to NRC, "Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 29, 2012 (ADAMS Accession No. ML12305A287).
5. NSPM Letter to NRC, "Prairie Island Nuclear Generating Plant's Overall Integrated Plan in Response to March 12, 2012 Commission Order

Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 26, 2013 (ADAMS Accession No. ML13060A379).

On March 12, 2012, the NRC staff issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (Reference 1) to all NRC power reactor licensees and holders of construction permits in active or deferred status. Reference 1 was immediately effective and directs Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event for the Prairie Island Nuclear Generating Plant (PINGP). Specific requirements are outlined in Attachment 2 of Reference 1.

Pursuant to Condition C of Section IV, Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (ISG), an overall integrated plan, and status reports at six-month intervals following the submittal of the overall integrated plan. The ISG (Reference 2) endorses, with exceptions and clarifications, the industry guidance document, NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0 (Reference 3). Reference 4 provided the PINGP initial 60-day status report regarding mitigation strategies. Reference 5 provided the overall integrated plan for PINGP.

The purpose of this letter is to provide the first six-month status report pursuant to Section IV, Condition C.2 of Reference 1, which delineates the progress made in implementing the requirements of the Reference 1 Order. The enclosed report provides an update of milestone accomplishments since the overall integrated plan was submitted, including changes to the compliance method, schedule, or the need and basis for relief, if any.

Please contact Lynne Gunderson, Licensing Engineer, at 612-396-0173, if additional information or clarification is required.

Summary of Commitments

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

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

Executed on August 26, 2013.



James E. Lynch  
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  
Project Manager, Prairie Island Nuclear Generating Plant, USNRC  
Resident Inspector, Prairie Island Nuclear Generating Plant, USNRC

**Prairie Island Nuclear Generating Plant Units 1 and 2  
First Six-Month Status Report for Implementation of Order EA-12-049,  
Order Modifying Licenses with Regard to Requirements for  
Mitigation Strategies for Beyond-Design-Basis External Events**

## **1.0 Introduction**

The Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," on March 12, 2012 (Reference 1). The Order required licensees to develop, implement and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. The Order required licensees to submit an overall integrated plan, including a description of how the requirements in Attachment 2 of the Order would be achieved. Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, submitted the overall integrated plan (Reference 2) for the Prairie Island Nuclear Generating Plant (PINGP) on February 26, 2013.

This Enclosure provides the first six-month status report. This status report includes an update of milestone accomplishments since submittal of the overall integrated plan including changes to the compliance method, schedule, or the need and basis for relief, if any.

## **2.0 Milestone Accomplishments**

The original milestone schedule with target dates was provided in Attachment 2 of the Reference 2 Enclosure. No original milestones were scheduled for completion prior to this six-month status report. Therefore, NSPM has no milestone accomplishments to discuss.

## **3.0 Milestone Schedule Status**

The following provides an update of the milestone schedule for the overall integrated plan. This includes a brief milestone status and a revised target date if the target date has changed. The target dates are planning dates subject to change as design and implementation details are developed.

- Validation Walk-throughs or Demonstrations:

A target completion date has been added to the milestone listing for completion of validation walk-throughs. The validation walk-throughs will be completed during the respective FLEX implementation outages for Units 1 and 2.

<b>Milestone</b>	<b>Target Completion Date</b>	<b>Activity Status</b>	<b>Revised Target Date</b>
Submit 60 Day Status Report	October 2012	Complete	
Submit Overall Integrated Plan	February 2013	Complete	
Submit First Six-Month Status Update	August 2013	Complete with this submittal	
Commence Engineering Modification Design – Phase 2 & 3	September 2013	Not Started	
Submit Second Six-Month Status Update	February 2014	Not Started	
Regional Response Center Operational	(TBD)	Started	
Procure Equipment	April 2014	Started	
Submit Third Six-Month Status Update	August 2014	Not Started	
Implement Storage	December 2014	Not Started	
Issue Maintenance Procedures	December 2014	Not Started	
Implement Training	February 2015	Not Started	
Submit Fourth Six-Month Status Update	February 2015	Not Started	
Submit Phase 2 Staffing Assessment	Four months prior to 2R29	Not Started	
Implement Communication Recommendations	Four months prior to 2R29	Not Started	
Issue Procedures updated for FLEX strategies	June 2015	Not Started	
Submit Fourth Six-Month Status Update	August 2015	Not Started	

Unit 2 Implementation Outage	Fall 2015	Not Started	
Submit Fifth Six-Month Status	February 2016	Not Started	
Unit 1 Implementation Outage	Spring 2016	Not Started	
Validation Walk-throughs	Spring 2016	Not Started	
Submit Completion Report	August 2016	Not Started	

#### **4.0 Proposed Changes to Compliance Method**

There are no changes to the compliance method as documented in the overall integrated plan.

#### **5.0 Need and Basis for Relief from the Requirements of the Order**

NSPM expects to comply with the Order implementation date and requirements and no relief is required at this time.

#### **6.0 Status and Impacts of Open Items from Draft Safety Evaluation**

NSPM did not identify any open items in the PINGP mitigating strategies overall integrated plan. The overall integrated plan did contain future actions to ensure compliance with the Order. The future actions were identified internally and are being tracked through NSPM's corrective action program (CAP).

The Overall Integrated Plan submitted for PINGP included the following regarding reactor coolant pump (RCP) seal leakage assumptions:

*NSPM is currently evaluating the option to credit the low leakage RCP seals for the ELAP [Extended Loss of AC Power] strategy, which could increase the coping time for Phase 1. Until a decision on the RCP seals is made, the strategy to Maintain RCS Inventory Control will be based on the existing RCP seal design (Reference 2).*

NSPM has recently made a decision to install a low leakage seal design at PINGP. NSPM will evaluate the seal design to determine if changes to the FLEX strategies are warranted. Any change in strategy will be communicated in future six-month status reports.

No draft Safety Evaluation (SE) has been issued as of July 31, 2013. Closure of the draft SE open items, when issued, will be tracked to closure in future status reports.

## 7.0 References

1. NRC Order EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012 (ADAMS Accession No. ML12054A736).
2. NSPM Letter to NRC, "Prairie Island Nuclear Generating Plant's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 26, 2013 (ADAMS Accession No. ML13060A379).