



Prairie Island Nuclear Generating Plant
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SEP 12 2013

L-PI-13-082
10 CFR 50.54(f)

U.S. Nuclear Regulatory Commission
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Prairie Island Nuclear Generating Plant, Unit 2
Docket No. 50-306
Renewed Facility Operating License No. DPR-60

PINGP Unit 2 – Proposed Resolution of the Remaining Seismic Walkdowns Associated with NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident

- 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. ML12053A340.
 2. NSPM Letter to NRC, "PINGP Unit 2 - Final Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendations 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated November 26, 2012, ADAMS Accession No. ML12334A470.
 3. NRC Memorandum, "Summary of the May 7, 2013, Public Conference Call on the Delayed Inspection Items Associated with Japan Lessons-Learned Near-Term Task Force Recommendation 2.3 Seismic Walkdowns," dated June 5, 2013, ADAMS Accession No. ML13136A003.
 4. NRC Memorandum, "Summary of the August 1, 2013, Public Conference Call on the Delayed Inspection Items Associated with Japan Lessons Learned Near-Term Task Force Recommendation 2.3 Seismic Walkdowns," dated August 14, 2013, ADAMS Accession No. ML13218B361.

5. EPRI Technical Report 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," dated June 2012.

On March 12, 2012, the NRC Staff issued Reference 1 to all Nuclear Regulatory Commission (NRC) power reactor licensees and holders of construction permits in active or deferred status. Enclosure 3 of the March 12, 2012 letter contained specific Requested Actions, Requested Information, and Required Responses associated with Near-Term Task Force (NTTF) Recommendation 2.3, Seismic.

On November 26, 2012, Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, submitted the required final response (Reference 2) to the Requested Information to NTTF Recommendation 2.3, Seismic (Enclosure 3 to Reference 1). The letter included an enclosure titled, "Prairie Island Nuclear Generating Plant - Unit 2, NTTF Recommendation 2.3 – Seismic Walkdown Report," that contained the results of the external seismic walkdowns completed for Prairie Island Nuclear Generating Plant (PINGP) Unit 2. Reference 2 included a commitment to complete the walkdowns of inaccessible components, including the internals of certain electrical cabinets or panels, by the second refueling outage after the initial walkdowns (Refueling Outage 2R29).

The schedule for completing the inaccessible walkdowns was based on the next planned refueling outage that provided an opportunity to inspect the internals of electrical equipment, considering the existing plant-specific component outage maintenance schedules. NSPM did not schedule additional unplanned equipment outages to support these cabinet interior inspections since NRC/industry guidance did not require circuits to be interrupted or disconnected to gain access to the interior portions of the cabinet.

The NRC scheduled a public conference call on May 7, 2013 to discuss NRC staff concerns regarding delayed inspection items as identified in seismic walkdown reports for a number of operating reactors (Reference 3). During the meeting, the NRC staff stated its expectation that walkdown activities should be completed as expeditiously as possible and by the next refueling outage, if possible. The NRC staff requested that licensees voluntarily submit a supplemental letter to their walkdown reports to propose an alternate approach for completing the inaccessible walkdowns by the next refueling outage. Another public conference call was scheduled on August 1, 2013 for the NRC staff to provide further clarification on the information that should be provided in the licensee's voluntary letters (Reference 4).

As requested in References 3 and 4, this letter provides NSPM's proposal for final disposition of the remaining NTTF Recommendation 2.3 Seismic Walkdowns for PINGP Unit 2. NSPM has accelerated the deferred seismic walkdown schedules by reviewing the remaining walkdown scope for opportunities where walkdowns could be done at an

earlier date based on current planned maintenance activities. Additionally, substituting current Seismic Walkdown Equipment List 1 (SWEL 1) components with alternate components that will be available for inspection by the next refueling outage was evaluated. The proposal for final disposition of the remaining seismic walkdowns, including an evaluation of component substitution and a detailed breakdown for expected completions of the deferred SWEL 1 items and the internal cabinet inspections, is provided in the enclosure to this letter.

Based on the summary of the status of the deferred seismic walkdowns for PINGP Unit 2 described in the enclosure to this letter, NSPM has determined that the NTTF Recommendation 2.3 Seismic Walkdowns for PINGP Unit 2 will be complete upon performance of the inspections described in the enclosure of this letter.

NSPM anticipates NRC concurrence with the proposed approach to achieve closure of the NTTF Recommendation 2.3 Seismic Walkdowns for PINGP Unit 2. This approach is justified based on the satisfactory results of the large number of walkdown inspections completed to date and the conclusion that a representative sampling of affected components has been achieved. Therefore, NSPM concludes that the intent of the NRC-endorsed Electric Power Research Institute (EPRI) Guidance (Reference 5) has been met.

The letter revises the commitments made in the Reference 2 seismic walkdown report. In an effort to expedite the completion of the seismic walkdowns, NSPM will complete the Seismic Walkdowns of the inaccessible components listed in the enclosure of this letter by the end of Refueling Outage (RFO) 2R28, which is scheduled to start in Fall 2013. NSPM will provide an updated seismic walkdown report with the results of the walkdowns of the inaccessible components 60 days following the end of RFO 2R28.

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

Summary of Commitments

This letter makes no new commitments and revises two existing commitments from Reference 2, as follows.

Regulatory Commitments	Revised Due Date
NSPM will complete the Seismic Walkdowns of the inaccessible components listed in the enclosure of this letter.	Refueling Outage (RFO) 2R28
NSPM will provide an updated seismic walkdown report with the results of the walkdowns of the inaccessible components.	60 days following the end of RFO 2R28

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

Executed on 09/12/2013



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, PINGP, USNRC
Resident Inspector, PINGP, USNRC

ENCLOSURE
Prairie Island Nuclear Generating Plant – Unit 2
Seismic Walkdown Deferred Inspection Evaluation

1.0 Introduction

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, submitted a list of the inaccessible items that were deferred either for containment entry or cabinet internal inspection in Table D-1 of the November 26, 2012 report (Reference 1). NSPM originally committed to complete the seismic walkdowns of the inaccessible components by the end of Refueling Outage (RFO) 2R29. However, during public meetings in May and August 2013, the Nuclear Regulatory Commission (NRC) Staff requested that licensees voluntarily submit a supplemental letter to their walkdown reports to propose an alternate approach for completing the inaccessible walkdowns by the next refueling outage, 2R28. This enclosure provides a proposed approach for final disposition of the remaining Near-Term Task Force (NTTF) Recommendation 2.3 Seismic Walkdowns for Prairie Island Nuclear Generating Plant (PINGP) Unit 2, as well as the justification for the proposed approach.

2.0 Proposed Disposition of Deferred Seismic Walkdowns

In an effort to complete the deferred seismic walkdowns by the end of the next RFO, NSPM evaluated component availability to determine opportunities where the equipment could be accessible for inspection, as well as to determine viable substitutions that could be made to allow earlier inspection. As a result of this evaluation, NSPM identified seven (7) components that will not be out of service during the next RFO (2R28) to allow for internal cabinet inspections. These seven (7) components were Seismic Walkdown Equipment List 1 (SWEL 1) items BUS 211, BUS 221, BUS 222, MCC 2A1, MCC 2K1, MCC 2K2, and MCC 2L2. NSPM identified four (4) similar components that will be available in the next RFO (2R28) for inspection. For the 480V switchgear internal cabinet inspections, BUS 212 will be substituted for BUS 211. SWEL 1 items BUS 221 and BUS 222 will be deleted from SWEL 1, because these components will not be accessible for walkdowns in the next refueling outage, 2R28. As for the 480V Motor Control Center (MCC) internal cabinet inspections, MCC 2LA1 will be substituted for MCC 2A1, and MCC 2M1 will be substituted for MCC 2K1. The other available 480V MCC, MCC 2X1, will be added to SWEL 1 as an additional walkdown inspection.

For SWEL 1 Items MCC 2K2 and MCC 2L2, NSPM proposes to perform partial inspections of the 480V MCCs. Even though internal cabinet inspections of individual compartments of the MCCs will not be performed due to personnel safety issues and operational constraints, NSPM will perform a visual inspection of the MCC's anchorage. Due to the fact that MCC anchorage can be accessed by removing panels at the bottom of the MCC that does not result in exposing energized conductors, these visual inspections will include assessment of the MCC's anchorage. An outage is not required to perform inspections of the MCC anchorage.

For lower voltage cabinets (e.g., 120 VAC distribution panels), the panel faceplate will be removed to allow visual inspection of the anchorage and internals while the component is energized. If wires or other internal components block the view of any anchors, they will not be moved to permit inspections. The operational and personnel safety risk do not justify movement of internal components within energized equipment. NSPM's procedures on electrical safety allow qualified individuals to approach energized electrical components, if the individuals do not cross the specified approach boundary distance for the particular component. The approach boundary for low voltage cabinets will allow visual inspection of the cabinet interiors without impacting personnel safety.

3.0 Justification for Substitutions

The three electrical equipment substitutions were made with other safety related equipment. The substitutions were made with other electrical equipment that is within the power block at a location similar to the original electrical equipment. Therefore, the environmental and location diversity remains similar. Additionally, BUS 211 and BUS 212 are the same class of equipment and are from the same system. MCC 2LA1 and MCC 2M1 are also the same class of equipment and are from the same system as MCC 2A1 and MCC 2K1. Therefore the diversity and representation from every equipment class reported in the original SWEL 1 in Table A-2 of Reference 1 is not impacted by this change. While NSPM will not complete the Seismic Walkdowns of two (2) deferred 480V Bus Switchgear, the one (1) Seismic Walkdown of BUS 211 will provide a representative sample for the two (2) 480V Bus Switchgear that will not be inspected.

4.0 Justification for Partial Inspections of MCCs

While NSPM will not complete the internal cabinet inspections of two (2) deferred 480V MCCs, three (3) internal cabinet inspections will be completed on other 480V MCCs. All of these MCC cabinets are similar and the three (3) available substitutes will provide a representative sample for the two (2) 480V MCCs that will not be inspected internally.

For the internal cabinet walkdown inspections that have been performed to date, the inspection findings have been limited to non-consequential and foreign material exclusion type concerns. No adverse seismic conditions have been identified (see Table 5-2 of Reference 1).

Based on the satisfactory results of the 11 internal cabinet inspections completed thus far, and the substitutes available for internal inspections, NSPM concludes that a representative sampling of affected components has been achieved; and thereby, the intent of the NRC-endorsed Electric Power Research Institute (EPRI) Guidance (Reference 2) has been met.

5.0 Current Status of Deferred Seismic Walkdown Items

The current status of the deferred seismic walkdowns of inaccessible components, identified in Table D-1 of Reference 1, is given in the table below.

Table 1 – Status of Deferred Seismic Walkdowns for PINGP Unit 2

Equipment Tag	Description	Substitute Equipment Tag	Substitute Description	Completed by 2R28	Outage Required?	Notes
50000	D5 DSL GEN BENCHBOARD	N/A	N/A	Yes	Yes	
21 BATT CHG	21 BATTERY CHARGER	N/A	N/A	Yes	Yes	
21 INV	21 INVERTER	N/A	N/A	Yes	Yes	
232-281	21 SFGDS SCRNSHSE ROOF EXHT FAN	N/A	N/A	Yes	No	Scaffolding Required
258-011	21 CLG WTR STRNR	N/A	N/A	Yes	Yes	
274-013	23 CNTMT FCU	N/A	N/A	Yes	Yes	
2FT-464	MN STM FR 21 STM GEN CHNNL I RED F XMTR	N/A	N/A	Yes	Yes	
2LT-428	2 PRZR (CHNL III-BLU)LVL XMTR	N/A	N/A	Yes	Yes	
2LT-461	21 STM GEN LOOP A CHNNL I-RED LVL XMTR	N/A	N/A	Yes	Yes	
23 INV	23 INVERTER	N/A	N/A	Yes	Yes	
B25/LOAD SEQ CAB	BUS 25 SFGDS LOAD SEQUENCER CABINET	N/A	N/A	Yes	Yes	
BUS 211	BUS 211 480V SWITCHGEAR	BUS 212	BUS 212 480V SWITCHGEAR	Yes*	Yes	*Substitution
BUS 221	BUS 221 480V SWITCHGEAR	N/A	N/A	No	Yes	Cannot perform walkdowns in 2R28 – delete from SWEL 1
BUS 222	BUS 222 480V SWITCHGEAR	N/A	N/A	No	Yes	Cannot perform walkdowns in 2R28 – delete from SWEL 1
BUS 26	BUS 26 4.16KV SWITCHGEAR	N/A	N/A	Yes	Yes	
CV-39417	22 CRDM SHRD CLG COIL SPLY CV	N/A	N/A	Yes	Yes	

Table 1 – Status of Deferred Seismic Walkdowns for PINGP Unit 2

Equipment Tag	Description	Substitute Equipment Tag	Substitute Description	Completed by 2R28	Outage Required?	Notes
CV-39419	21 CRDM SHRD CLG COIL SPLY CV	N/A	N/A	Yes	Yes	
MCC 2A1	MOTOR CONTROL CENTER 2A BUS 1	MCC 2LA1	MOTOR CONTROL CENTER 2LA BUS 1	Yes*	Yes	*Substitution
MCC 2K1	MOTOR CONTROL CENTER 2K BUS 1	MCC 2M1	MOTOR CONTROL CENTER 2M BUS 1	Yes*	Yes	*Substitution
MCC 2K2	MOTOR CONTROL CENTER 2K BUS 2	N/A	N/A	Yes	No	Anchorage inspection only
MCC 2L2	MOTOR CONTROL CENTER 2L BUS 2	N/A	N/A	Yes	No	Anchorage inspection only
MCC 2X1	MOTOR CONTROL CENTER 2X BUS 1	N/A	N/A	Yes	Yes	Additional walkdown
MV-32156	24 FCU CLG WTR OUTL ISOL MV A	N/A	N/A	Yes	Yes	
PNL 21	DISTRIBUTION PANEL 21	N/A	N/A	Yes	No	Inspect while energized
PNL 213	INSTRUMENT BUS III PANEL (BLU) 213	N/A	N/A	Yes	No	Inspect while energized
PNL 235	AC DISTRIBUTION PANEL 235	N/A	N/A	Yes	No	Inspect while energized
PNL 253	DC DISTRIBUTION PANEL 253	N/A	N/A	Yes	No	Inspect while energized
PNL 2EM	DISTRIBUTION PANEL 2EM	N/A	N/A	Yes	No	Inspect while energized
SV-33389	21 FCU DISCH TO CNTMT DOME CD-34080 SV	N/A	N/A	Yes	Yes	
SV-37464	U2 TRN A CHLD WTR/CLG WTR ISOL SV	N/A	N/A	Yes	Yes	
SV-37466	UNIT 2 TRAIN A CHILL WTR/CLG WTR ISOL SV	N/A	N/A	Yes	Yes	

Enclosure

6.0 Summary

NSPM will complete the Seismic Walkdowns of the inaccessible components listed above by the end of Refueling Outage (RFO) 2R28, scheduled to start in Fall 2013. NSPM will provide an updated seismic walkdown report with the results of the walkdowns of the inaccessible components 60 days following the end of RFO 2R28. This letter revises the original regulatory commitments made in the seismic walkdown report dated November 26, 2012 (Reference 1). These commitments are being revised to facilitate an expedited schedule for completing the inaccessible walkdowns, as requested by the NRC.

The efforts described above will result in NSPM completing a sufficient number of SWEL 1 and internal cabinet inspection walkdown items to meet the intent of the NRC-endorsed EPRI Guidance document (Reference 2). The table below summarizes the percentage of the Seismic Walkdowns that will be completed by the end of 2R28 (Fall 2013). The total SWEL 1 items identified in Reference 1 was 94. However, NSPM plans to remove BUS 221 and BUS 222 from the SWEL 1, and add a Seismic Walkdown for MCC 2X1. These changes to SWEL 1 will result in a total of 93 completed Seismic Walkdowns.

Total SWEL 1 Items	Seismic Walkdowns to be Completed by End of 2R28		Total Internal Cabinet Inspection Items	Internal Cabinet Inspection Items to be Completed by End of 2014	
	Number	% Complete		Number	% Complete
93	93	100%	31	29	94%

7.0 References

1. NSPM Letter to NRC, "PINGP Unit 2 - Final Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendations 2.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated November 26, 2012, ADAMS Accession No. ML12334A470.
2. EPRI Technical Report 1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic," dated June 2012.