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October 23, 2013

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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 Nos. 50-282 and 50-306 Renewed License Nos. DPR-42 and DPR-60 Monticello Nuclear Generating Plant Docket No. 50-263 Renewed License No. DPR-22

<u>Supplement to Letters Regarding Commitment for Implementation of Multi-Unit/Multi-Source Dose Assessment Capability for Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant</u>

References:

- 1. US NRC Fukushima Near-Term Task Force Report, "Recommendations for Enhancing Reactor Safety in the 21st Century, the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated July 12, 2011 (ADAMS Accession No. ML112510271).
- 2. Nuclear Energy Institute (NEI) letter to NRC, "Industry Implementation of Multi-Unit Dose Assessment Capability," dated January 28, 2013 (ADAMS Accession No. ML13028A200).
- 3. NRC letter to NEI dated February 27, 2013 (ADAMS Accession No. ML13029A632).
- 4. NEI letter to NRC, "Commitment for Implementation of Multi-Unit Dose Assessment Capability," dated March 14, 2013 (ADAMS Accession No. ML13073A522).
- 5. NSPM letter to NRC, "Commitment for Implementation of Multi-Unit/Multi-Source Dose Assessment Capability," dated June 17, 2013 (ADAMS Accession No. ML13169A351).

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- 6. NSPM letter to NRC, "Commitment for Implementation of Multi-Source Dose Assessment Capability," dated June 19, 2013 (ADAMS Accession No. ML13171A011).
- NRC Memorandum, "Summary of September 5, 2013, Public Teleconference to Discuss Licensee Use of Software to Perform Multi-Unit/Multi-Source Dose Assessment Related to Near-Term Task Force Recommendation 9.3," dated September 27, 2013 (ADAMS Accession No. ML13266A390).

The NRC Fukushima Near-Term Task Force (NTTF) Report (Reference 1) dated July 12, 2011, discussed the gap in capability for US commercial nuclear power plants to perform multi-unit dose assessments. In January 2013, NEI provided to the NRC (Reference 2) survey results regarding licensees' capabilities to perform multi-unit dose assessments, implementation time frames to obtain multi-unit dose assessment capability, and compensatory measures for the interim period. The NRC requested further detailed information (Reference 3) regarding the current and the anticipated capabilities of sites to perform multi-unit dose assessment. NEI informed the NRC (Reference 4) that the industry had elected to provide the requested details directly to the NRC staff.

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), provided the requested information on behalf of the Prairie Island Nuclear Generating Plant (PINGP) and the Monticello Nuclear Generating Plant (MNGP) in References 5 and 6. During a public meeting on September 5, 2013, (Reference 7) the NRC requested that licensees supplement or supersede the original submittals to describe a plan to update their software to have the capability to conduct multi-unit/multi-source dose assessment capability without reliance on the next revision of NRC's RASCAL dose assessment model.

The purpose of this letter is to update the Reference 5 and 6 responses to address the Reference 7 request regarding the permanent solution and to revise the regulatory commitments made in References 5 and 6.

Updated responses:

• Section 4.0, "Permanent Solution," of the enclosure to both References 5 and 6, made the statement that the permanent solution is to implement the next expected revision of NRC's RASCAL dose assessment model. As agreed to in the September 5, 2013, conference call (Reference 7), NSPM changes the permanent solution described in References 5 and 6 from the use of RASCAL to

the use of new or modified software that will ensure multi-unit/multi-source dose assessment capability.

- The regulatory commitment described in the cover letter and Section 4.0, "Permanent Solution," of the enclosure to References 5 and 6, stated that the NSPM commitment date was contingent upon the release of the revised RASCAL dose assessment model by November 30, 2013. As agreed to in the September 5, 2013, conference call (Reference 7), NSPM removes the reliance on the release of the revised RASCAL dose assessment model from the commitment. NSPM remains committed to implementing the multi-unit/multisource dose assessment capability by December 31, 2014. The revised commitment statements for PINGP and MNGP are included below under, "Summary of Commitments."
- Section 5.0, "Schedule," of the enclosure to both References 5 and 6, provided schedule milestones for the permanent solution that included reference to the updated revision of RASCAL. Updated schedule milestones that incorporate the changes to NSPM's permanent solution are provided below. The updates remove the reference to RASCAL, revise the target dates, and separate the milestone for procedures and training into two milestones with separate target dates.

The schedule milestones are target dates provided to help with understanding NSPM's internal implementation schedule developed to meet the December 31, 2014 regulatory commitment. The target dates are not considered regulatory commitments but rather planning dates that are administratively controlled by NSPM. Therefore, target dates may be changed by NSPM without NRC notification as long as the target date change does not exceed the regulatory commitment date of December 31, 2014.

Schedule Milestones	Target Date
Permanent Solution	<u> </u>
Install new or modified software/perform software acceptance.	May 30, 2014
Complete procedure markups.	June 30, 2014
Complete initial ERO training.	September 30, 2014
Implement new or modified software for multi-unit/multi- source dose assessment.	December 31, 2014

NSPM continues to track these schedule milestones in PINGP Corrective Action Program (CAP) Action Request 01386421 and in MNGP CAP Action Request 01386448. Document Control Desk Page 4

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

Summary of Commitments:

This letter makes revision to two existing commitments that were provided in References 5 and 6. The revision removes the reliance on the release of the revised RASCAL dose assessment model from the commitment. The revised commitments for PINGP and MNGP are provided below.

Reference 5 (PINGP):

• NSPM commits to having multi-unit/multi-source dose assessment capability for PINGP no later than December 31, 2014.

Reference 6 (MNGP):

• NSPM commits to having multi-source dose assessment capability for MNGP no later than December 31, 2014.

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cc: Administrator, Region III, USNRC Director of Nuclear Reactor Regulation (NRR), USNRC Project Manager, Monticello Nuclear Generating Plant, USNRC Project Manager, Prairie Island Nuclear Generating Plant, USNRC Resident Inspector, Monticello Nuclear Generating Plant, USNRC Resident Inspector, Prairie Island Nuclear Generating Plant, USNRC Director, Nuclear Security and Incident Response, USNRC Director, Japan Lessons Learned Project Directorate (NRR), USNRC