UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 29, 2014

Mr. Kevin K. Davison
Site Vice President
Northern States Power Company - Minnesota
Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089-9642

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 – RELAXATION OF RESPONSE DUE DATE REGARDING FLOODING HAZARD REEVALUATIONS FOR RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF THE INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT (TAC NOS. MF3629 AND MF3630)

Dear Mr. Davison:

By letter dated March 12, 2012,[1] the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (henceforth referred to as the 50.54(f) letter). The NRC issued the request as a part of implementing lessons-learned from the accident at the Fukushima Dai-ichi nuclear power plant. Enclosure 2 to the 50.54(f) letter requested licensees to perform a reevaluation of all external flooding hazards using present-day guidance and methodologies.

By letter dated May 11, 2012,[2] the NRC issued a prioritization of due dates for responses from all sites. The flooding hazard reevaluation report (FHRR) was due on March 12, 2014, for Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2.

By letter dated March 5, 2014,[3] Northern States Power Company, a Minnesota corporation (NSPM, the licensee) requested NRC assistance in obtaining the U.S. Army Corps of Engineers (USACE) analysis of dams that could impact the flood levels at the PINGP site. By letter dated March 10, 2014,[4] NSPM requested a delay in submittal of 10 months after receiving the USACE final analysis for PINGP, Units 1 and 2. The licensee's justification for this request is that the results of the USACE analysis are necessary to complete the flooding hazard reevaluation (FHR) and estimates about 10 months to incorporate the results and finalize the FHRR.

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1 The 50.54(f) letter is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML12053A340.
2 The prioritization letter is available in ADAMS under Accession No. ML12097A509.
3 The request for assistance in obtaining USACE analysis is available in ADAMS under Accession No. ML14064A291.
4 The extension request from NSPM is available in ADAMS under Accession No. ML14069A544.

The NRC reviewed the justification provided by the licensee and considered the following factors when reviewing the new schedule:

- As stated in the NRC's interim staff guidance (ISG) JLD-ISG-2013-01, "Guidance for Assessment of Flooding Hazards Due to Dam Failure," dated July 29, 2013,[5] evaluating flooding hazards for nuclear power plants needs to include consideration of floods resulting from dam failures. The FHR for the PINGP site needs to consider the six dams that are operated by USACE. The NRC entered into an interagency agreement with the USACE to provide the necessary information for NSPM to complete its FHR. Therefore, the FHR for PINGP, Units 1 and 2, cannot be completed until the NRC provides the analysis of the USACE dams to the licensee.

- As stated in the NRC's letter dated March 1, 2013,[6] "incomplete hazard reports that only contain an analysis of some flooding hazard mechanisms would not be of substantive benefit for staff review and would not be acceptable." Therefore, the licensee must incorporate the information requested from the USACE before a FHRR can be acceptable for submittal to the NRC in compliance with the request in the 50.54(f) letter.

- In the March 5, 2014, extension request NSPM provided a rationale for the extension. This rationale was discussed in a public meeting on May 16, 2014.[7] As noted in the May 16, 2014, meeting summary NSPM provided additional information to support their request.[8] The additional information included a discussion of task schedules, in which NSPM estimated 3 to 4 months for evaluation of the revised hydrology from the USACE information which NSPM estimates will take 3 to 4 months. Under the current USACE interagency agreement, those tasks that NSPM described in the additional information will be performed by the USACE and the licensee will not be responsible, nor be, required to perform these tasks.

- Based on discussions during the May 16, 2014, meeting and based on review of the information in the March 5, 2014, extension request and the supplemental information provided by NSPM the NRC staff concludes that NSPM has overestimated the time to integrate the USACE information. Therefore, the integration of the USACE FHR with the licensee-developed FHR should not take 10 months if NSPM removes this duplicative task from the schedule.

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[5] JLD-ISG-2013-01 is available in ADAMS under Accession No. ML13151A153.

[6] NRC's March 1, 2013, letter is available in ADAMS under Accession No. ML13044A561.

[7] The May 16, 2014, meeting summary is available in ADAMS under Accession No. ML14153A025.

[8] The supplemental information is documented in the May 16, 2014, summary and can also be found in ADAMS under Accession No. ML14168A018.

- The six month time frame to integrate the USACE FHR with the licensee developed FHR is consistent with the time frame requested by other licensees to perform a similar integration[9].

- The NRC staff further concludes that prior to receiving the USACE FHR information, NSPM can take steps now to ensure that once the USACE FHR is received it can be integrated with the licensee-developed FHR as expeditiously as possible. The staff considers that NSPM's 10-month estimate be reduced by 4 months based on that designated portion of the analysis being performed by USACE, and that 6 months is a reasonable amount of time to integrate the USACE FHR with the licensee-developed analysis.

Given these considerations, the NRC staff considers the revised schedule proposed by NSPM to be unacceptable. Accordingly, and based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the revised required response date for submitting the FHRR for PINGP, Units 1 and 2 is six months after NSPM receives the USACE final analysis. NSPM is also requested to inform the staff by September 30, 2014, if the licensee-developed FHR (which is independent of the USACE analysis) results in a higher flood hazard relative to the design basis and if this is the case, what interim actions NSPM will take or plans to take to address the higher flood hazard.

The NRC will include the date when the PINGP, Units 1 and 2 FHR is due, based on when the requested USACE information is transmitted to the licensee. The transmittal letter will also note that if the USACE analysis results in a higher flood hazard relative to the design basis, the NRC staff will request that NSPM provide interim actions it will take or plans to take to address the higher flooding hazard within 60 days of receipt of the USACE analysis.

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[9] See Entergy's March 12, 2014 extension request for the Arkansas Nuclear One site available in ADAMS under Accession No. ML14071A459, and FirstEnergy Nuclear Operating Company's March 11, 2014, extension request for the Beaver Valley Power Station site available in ADAMS under Accession No. ML14070A371.

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Mr. Scott Wall, at (301) 415-2855 or via e-mail at Scott.Wall@nrc.gov.

Sincerely,

Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

cc: Listserv

If you have any questions regarding this matter, or if it is necessary to revise the submittal schedule, please contact your NRC project manager, Mr. Scott Wall, at (301) 415-2855 or via e-mail at Scott.Wall@nrc.gov.

Sincerely,

/RA by Jennifer Uhle for/

Daniel H. Dorman, Acting Director
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

cc: Listserv

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