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**Docket:** NRC-2014-0071  
Draft Regulatory Issue Summary; Tornado Missile Protection

**Comment On:** NRC-2014-0071-0003  
Tornado Missile Protection; Extension of Comment Period

**Document:** NRC-2014-0071-DRAFT-0009  
Comment on FR Doc # 2014-10586

4/4/2014

79FR 18933

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**Submitter Information**

9

**Name:** Martin Murphy

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**General Comment**

See attached file(s)

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**Attachments**

Draft RIS Tornado Missile Protection\_Xcel Energy Comments

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM-03  
Add-

J. Keene (JTK1)



414 Nicollet Mall – MP4  
Minneapolis, MN 55401

June 18, 2014

L-XE-14-010

Ms. Cindy Bladey  
Chief, Rules, Announcements and Directives Branch  
Office of Administration, Mail Stop 3WFN-06-44M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Request for Comments on Draft Regulatory Issue Summary 2014-XX, "Tornado Missile Protection"

Ms. Bladey:

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, operator of the Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, appreciates the opportunity to comment on the Nuclear Regulatory Commission's (NRC's) Draft Regulatory Issue Summary (RIS), 2014-XX, "Tornado Missile Protection" published in the Federal Register on April 4, 2014 (79 FR 18933) and the draft enforcement discretion published on May 22, 2014 (ADAMS Accession No. ML14142A293).

NSPM agrees with and endorses the comments offered by the Nuclear Energy Institute (NEI) dated June 16, 2014.

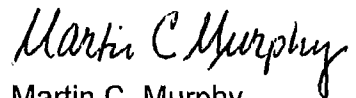
The draft RIS does not provide additional clarity to a licensee's understanding of the requirements for tornado missile protection. The draft RIS could result in confusing and conflicting guidance regarding the meaning of "current licensing basis (CLB)" and the documents that are used to define it, especially in the context of plants licensed prior to the promulgation of the General Design Criteria. The draft RIS appears to add compliance with Regulatory Guide 1.117, "Tornado Design Classification", and Standard Review Plan 3.5.2, "Structures, Systems, and Components to be Protected from Externally-Generated Missiles", to plant CLBs that had not been committed to by licensees, added by way of a safety evaluation, or imposed through established regulatory means such as a 10 CFR 50.109 back-fit. NSPM is concerned with what appears to be a new staff position in the draft RIS that explicitly states, "in the absence of specific descriptions of protective features for tornado missile protection, including procedures and repairs, contained in the licensing basis documents, the staff relies on NRC regulations and guidance provided in regulatory guides and the standard review plans to interpret any generalities in a plant's licensing basis." This position does not appear to be consistent with the definition of current licensing basis as provided in 10 CFR 54.3.

NSPM agrees with NEI's comments regarding the draft enforcement discretion in that it creates a new reporting requirement for Region review that is outside of existing regulatory requirements and a periodic reporting schedule that is complex in comparison to the risk significance of the issue.

NSPM shares NEI's concerns and urges the NRC to withdraw the proposed RIS or, in the alternative, substantially revise it to address the industry's concerns.

NSPM appreciates the NRC's consideration of NSPM's comments.

Sincerely,

A handwritten signature in cursive script that reads "Martin C. Murphy".

Martin C. Murphy  
Director, Nuclear Licensing and Regulatory Affairs  
Northern States Power Company-Minnesota