

NRR-PMDAPEm Resource

From: Beltz, Terry
Sent: Wednesday, August 26, 2015 6:34 AM
To: Murphy, Martin C.
Cc: Gunderson, Lynne; Eckholt, Gene F. (Eugene.Eckholt@xenuclear.com); marc.pearson@xenuclear.com; Carlson, Glenn A. (Glenn.Carlson@xenuclear.com); Pelton, David; Anderson, Joseph
Subject: Prairie Island Nuclear Generating Plant - Staffing Evaluation (One-Pager) for ERO Staff Augmentation License Amendment Request (TAC Nos. MF3280 and MF3281)
Attachments: Prairie Island Nuclear Generating Plant - Staffing Evaluation (One-Pager) for ERO Staff Augmentation License Amendment Request (TAC Nos. MF3280 and MF3281).docx

Dear Mr. Murphy,

On August 6, 2015, U.S. Nuclear Regulatory Commission (NRC) staff in the Office of Nuclear Reactor Regulation and the Office of Nuclear Security and Incident Response conducted a conference call with you and other staff from Xcel Energy. The purpose of the call was to inform Xcel Energy of the NRC staff's conclusion that there continues to remain an insufficient basis to support further NRC review and approval of the Prairie Island Nuclear Generating Plant license amendment request regarding the extension of Emergency Response Organization staff augmentation times to 90 minutes.

During the phone call, the NRC staff indicated that it would provide broad outline of the specifics leading to the NRC staff's conclusions. The outline is provided in the attached NRC staff one-pager.

Please don't hesitate to contact me if you have any further questions.

Sincerely,

TERRY A. BELTZ, SENIOR PROJECT MANAGER
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From: Beltz, Terry

Created By: Terry.Beltz@nrc.gov

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Post Office:

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**Prairie Island Nuclear Generating Plant, Units 1 and 2
NRC Staff One-Pager for License Amendment Request
Emergency Response Organization (ERO) Staff Augmentation Times
(TAC Nos. MF3280 and MF3281)**

Xcel Energy proposes to move two (2) 30-minute augmentation responders on-shift.

Xcel Energy further proposes to move augmentation response times for seven (7) 30-minute responders and fifteen (15) 60-minute responders to a response time of 90-minutes.

Xcel Energy Provides that 90-minute ERO Response is Supported by the Following	NRC Staff Position
<p>Augmentation Staffing Analysis (ASA)/ On-shift Staffing Analysis (OSA)</p>	<ul style="list-style-type: none"> • NEI 10-05 OSA is an endorsed guidance for evaluating on-shift capabilities only. There is no NRC endorsed evaluation criteria for augmented capabilities or functions. • The ASA/OSA only evaluates the emergency plan functions performed by the on-shift staffing. • The ASA/OSA does not evaluate the additional emergency plan functions provided by the augmenting Emergency Response Organization (ERO). • Staff augmentation times can be extended only if the on-shift personnel have the capability and availability to perform the augmenting function. • The augmented functions of Table B-1 are based on a wide spectrum of events and it is inappropriate to use an ASA to evaluate not performing an augmented function.
<p>On-shift Staffing Level</p>	<ul style="list-style-type: none"> • Current on-shift staffing does not include personnel that are qualified to perform all tasks performed by the augmenting ERO (i.e., engineering, maintenance personnel).
<p>Precedent</p>	<ul style="list-style-type: none"> • SONGS and Salem/Hope Creek included additional on-shift capability to support increases in augmentation time (i.e., fire department on site (no fire brigade collateral duty), all three disciplines of maintenance on-shift with supervision, RP supervision on-shift).