



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

October 25, 2015

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

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2 - RELAXATION OF THE SCHEDULE REQUIREMENTS FOR ORDER EA-12-049, "ISSUANCE OF ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS" (TAC NO. MF0835)

Dear Mr. Davison:

By letter dated March 12, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12054A735), the U.S. Nuclear Regulatory Commission (NRC) ordered Northern States Power Company, Minnesota (the licensee), doing business as Xcel Energy, to take certain actions at the Prairie Island Nuclear Generating Plant (PINGP), associated with the Fukushima Near-Term Task Force Recommendations. Order EA-12-049 directed that actions be taken by licensees to develop and implement strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities during beyond-design-basis external events (BDBEEs).

Section IV of the order states that licensees proposing to deviate from requirements contained in NRC Order EA-12-049 may request that the Director, Office of Nuclear Reactor Regulation, relax or rescind certain conditions, upon demonstration of good cause. By letter dated September 29, 2015 (ADAMS Accession No. ML15272A505), Xcel Energy submitted a request for an extension of the Order EA-12-049 full compliance date to 60 days following completion of the fall 2015 refueling outage at PINGP, Unit 2, in order to complete construction of an equipment storage structure being built as part of the strategy for compliance with Order EA-12-049. The licensee's request dated September 29, 2015, indicates that construction delays caused by labor issues, weather, and complexities associated with first-time unique building construction necessitate the need for schedule relaxation.

The licensee's letter dated September 29, 2015, indicates that the method chosen to implement the requirements of Order EA-12-049 calls for a single robust storage building to provide reasonable protection from a postulated BDBEE for the equipment, such as portable pumps and generators, incorporated into the mitigating strategy for Order EA-12-049. The building is designed to provide protection from all postulated site external events except for flooding, for which an alternative strategy is planned. The design and construction of the new structure was scheduled to be completed in time to allow placement of the equipment and validation of equipment deployment time prior to start up from the fall 2015 refueling outage at PINGP, Unit 2. However, the construction of the building has been delayed, beyond the anticipated schedule, due to three major issues:

- 1.) Shortage of craft labor in the immediate geographical area,
- 2.) Weather delays due to rain and electrical storms that have exceeded expectations,
- 3.) Construction challenges associated with building a structurally complicated one-of-a-kind building.

To allow completion of the building construction, moving equipment and supplies into the building, and performing validation of equipment deployment time, the licensee requests an extension of the PINGP, Unit 2, order implementation date from the completion of the fall 2015 refueling outage to no later than 60 days following completion of the fall 2015 refueling outage. As detailed in the request dated September, 29, 2015, the licensee notes that the equipment necessary to implement the mitigating strategies will be temporarily stored at the deployment locations, providing a degree of protection from a postulated seismic event. Additionally, the proposed extension timeframe corresponds to a seasonal period that is outside the most probable timeframe for tornados. The licensee will also take steps to protect the mitigating strategies equipment from cold weather, rain, snow, and ice. Since the flooding strategy depends on warning time to pre-position any necessary equipment, the storage building construction delay would not adversely impact the ability to cope with a flood scenario. Therefore, during the relaxation period, an enhanced plant capability to mitigate a BDBEE will be in place. Further, the licensee notes that the extension period will not impact the PINGP, Unit 1 (full site) compliance date that occurs in the spring of 2016.

In light of the facts presented in the licensee's letter dated September 29, 2015, the NRC staff has determined that the licensee has demonstrated good cause for relaxation of the order implementation date. Construction of the robust building is a complicated construction activity that must be integrated with safe plant operations at the PINGP site. The NRC staff also considered the enhanced plant capability to mitigate a BDBEE that will be in place at PINGP, Unit 2, during the 60-day relaxation period. Further, the NRC staff notes that following the accident at Fukushima Dai-ichi, the NRC concluded that a sequence of events such as the Fukushima Dai-ichi accident is unlikely to occur in the United States based on the current regulatory requirements and existing plant capabilities. Given the plant-specific circumstances at PINGP and that completion by the proposed date is before December 2016, the ultimate implementation date established by the order, the NRC staff approves the requested relaxation.

Accordingly, based upon the authority granted to the Director, Office of Nuclear Reactor Regulation, the requirement of the order for full order implementation for PINGP, Unit 2 is relaxed until 60 days following the completion of the fall 2015 refueling outage at PINGP, Unit 2, to allow the licensee sufficient time complete the building construction, equipment storage, and equipment deployment time validation needed to fully implement the required strategies.

K. Davison

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If you have any questions, please contact Peter Bamford, at 301-415-2833.

Sincerely,

A handwritten signature in black ink, appearing to read 'W M Dean', with a long horizontal flourish extending to the right.

William M. Dean, Director
Office of Nuclear Reactor Regulation

Docket No. 50-306

cc: Listserv

K. Davison

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If you have any questions, please contact Peter Bamford, at 301-415-2833.

Sincerely,

/RA/

William M. Dean, Director
Office of Nuclear Reactor Regulation

Docket No. 50-306

cc: Listserv

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