



DEC 30 2015

L-PI-15-105
10 CFR 50.90

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
Renewed License Nos. DPR-42 and DPR-60

License Amendment Request (LAR) to Revise Technical Specifications (TS) to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process – Response to Request for Additional Information

References:

1. NSPM Letter, S. Sharp to NRC Document Control Desk, *Application to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process*, L-PI-15-030, dated June 29, 2015 (ADAMS Accession No. ML15187A259)
2. NRC email, T. Beltz to G. Carlson, *Prairie Island Nuclear Generating Plant, Requests for Additional Information (Draft) re: License Amendment Request to Adopt TSTF-523*, (TAC Nos. MF6449 and MF6450), dated October 27, 2015
3. NSPM Letter, S. Sharp to NRC Document Control Desk, *Supplement to Responses to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"* L-PI-09-122, dated November 24, 2009 (ADAMS Accession No. ML093280925), NSPM committed to submit an LAR, if necessary, within one year following NRC approval of the Technical Specification Task Force Traveler (TSTF) that provides TS resolution of GL 2008-01. This submittal satisfies the commitment.

In Reference 1, the Northern States Power Company, a Minnesota Corporation ("NSPM") doing business as Xcel Energy requested approval from the Nuclear Regulatory Commission (NRC) to revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," using the Consolidated Line Item Improvement Process. The proposed change revises or adds Surveillance

Requirements to verify that the system locations susceptible to gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification. The changes are being made to address the concerns discussed in Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems."

In Reference 2, the NRC staff provided requests for additional information (RAI) regarding this request.

Enclosure 1 to this letter provides NSPM's response to the RAIs.

This letter is submitted in accordance with 10 CFR 50.90. The additional information provided in this letter does not impact the conclusion of the "No Significant Hazards Evaluation or Environmental Considerations Evaluation" presented in Reference 1.

In accordance with 10 CFR 50.91, NSPM is notifying the State of Minnesota of this additional information by transmitting a copy of this letter to the designated State Official.


If there are any questions or if additional information is needed, please contact Mr. Glenn Carlson, at 651-267-1755.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on *12/30/2015*



Kevin Davison
Site Vice President, Prairie Island Nuclear Generating Plant
Northern States Power Company - Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, PINGP, USNRC
Resident Inspector, PINGP, USNRC
State of Minnesota

L-PI-15-105
Enclosure

Response to Requests for Additional Information (RAI)

License Amendment Request to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process – Response to Request for Additional Information

Introduction

This Enclosure provides additional information from the Northern States Power Company, a Minnesota corporation (hereafter "NSPM") doing business as Xcel Energy, in support of a License Amendment Request (LAR) requesting approval from the Nuclear Regulatory Commission (NRC) to revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation," Using the Consolidated Line Item Improvement Process. The proposed change revises or adds Surveillance Requirements to verify that the system locations susceptible to gas accumulation are sufficiently filled with water and to provide allowance which permit performance of the verification. The changes are being made to address the concerns disused in Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray System."

This enclosure to this letter provides NSPM's response to the RAI.

Each of the RAI questions is quoted in italics and each question is then followed by the NSPM response in normal font.

NRC Request RAI SRXB-1

- a) *Xcel Energy states the following in the proposed TS Bases for SR 3.4.6.4, SR 3.4.7.4, SR 3.4.8.3 and SR 3.9.5.2:*
- b) *The SR can be met by virtue of having an RHR subsystem inservice in accordance with operating procedures.*

If the system is running with sufficient flow, then monitoring the running parameters is effective. If system flow is low, however, then gas voids may not transport through the system. Additionally, stagnant branch lines in an operating system may be susceptible to gas accumulation. This appears to be an alternative to performing the SR.

c)

- (a) *Please explain how the flowrate of the operating system and the stagnant branch lines are taken into consideration when crediting the in-service loop as meeting the SR.*

(b) Please explain why it is acceptable to describe this approach in the TS Bases rather than the TS surveillance. If necessary, revise the TS Bases so that they are in agreement with the approved TSTF-523 language.

NSPM Response (RAI SRXB-1)

These questions are not applicable. NSPM is changing what we currently requested for TS Bases SR 3.4.6.4, SR 3.4.7.4, SR 3.4.8.3 and SR 3.9.5.2 by removing the statement, *"The SR can be met by virtue of having an RHR subsystem in service operating procedures."*

By revising the TS Bases, our request will be in agreement with the approved TSTF-523 language.

NSPM will follow up with a supplemental to the LAR, on January 27, 2016.