



JAN 25 2016

L-PI-16-003
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

Supplement to License Amendment Request to Revise Technical Specifications to Adopt TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation", Revision 2, Using the Consolidated Line Item Improvement Process (CAC Nos. MF6449 and MF6450)

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. ML 15187A259)
2. Technical Specification Task Force Traveler No. 523 (TSTF-523), "Generic Letter 2008-01, Managing Gas Accumulation," Revision 2 (ADAMS Accession No. ML13053A075). TSTF-523 Notice of Availability, 79 Fed. Reg. 2700 (January 15, 2014).
3. 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, (CAC Nos. MF6449 and MF6450)*, dated October 27, 2015
4. NSPM Letter, K. Davison to NRC Document Control Desk, *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*, dated December 30, 2015 (ADAMS Accession No. ML15364A466)

By Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted to the U.S. Nuclear Regulatory Commission (NRC) a License Amendment Request (LAR) to revise the Technical Specifications (TS) for Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, to adopt TSTF-523 (Reference 2) using the Consolidated Line Item Improvement Process.

By Reference 3, the NRC Staff provided a request for additional information (RAI) on the LAR. By Reference 4, NSPM responded to the RAI and stated a supplement to the LAR would be submitted by January 27, 2016. This letter provides that LAR supplement.

As stated in our response to the RAI, this supplement to the LAR revises the proposed TS Bases SR 3.4.6.4, SR 3.4.7.4, SR 3.4.8.3, and SR 3.9.5.2 to be in agreement with TSTF-523, Revision 2, by removing the sentence "The SR can be met by virtue of having an RHR subsystem in service in accordance with operating procedures."

In addition, NSPM discovered that the sentence also appears in proposed TS Bases SR 3.9.6.3., but does not appear in the corresponding TS Bases SR 3.9.6.3 of TSTF-523, Revision 2, so this supplement also removes the sentence from proposed TS Bases 3.9.6.3.

Markups of current TS Bases pages revised in accordance with this supplement are included in Attachment 1 for information only. All other proposed TS Bases pages in the June 29, 2015, LAR are unchanged and remain as proposed. Changes to the existing TS Bases, consistent with the technical and regulatory analyses, will be implemented under the Technical Specification Bases Control Program.

All other information in Attachments 1, 2, and 3 to the June 29, 2015, LAR is unchanged by this supplement and remains as proposed: the description and assessment of the proposed change, the existing TS pages marked up to show the proposed change, and the revised (clean) TS pages.

This supplement is submitted in accordance with 10 CFR 50.90 and does not change the conclusions of the proposed No Significant Hazards Consideration determination nor the Environmental Evaluation in Reference 1.

NSPM requests the NRC issue the requested license amendment by June 30, 2016, with the amendment to be implemented within 90 days of issuance.

In accordance with 10 CFR 50.91, NSPM is providing a copy of this LAR supplement to the designated State of Minnesota official.

If there is any question or if additional information is needed, please contact Dr. Glenn A. Carlson, P.E. at 651-267-1755.

Summary of Commitments

This letter contains no new commitment and no revision to an existing commitment.

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

JAN 25 2016



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

Attachment (1)

cc: Administrator, Region III, NRC
Project Manager, PINGP, NRC
Resident Inspectors, PINGP, NRC
State of Minnesota

ATTACHMENT 1
Technical Specification Bases (Markup)

B 3.4.6-8
B 3.4.7-8
B 3.4.8-6
B 3.9.5-7
B 3.9.6-7

5 pages follow

BASES

SURVEILLANCE SR 3.4.6.4 (continued)
REQUIREMENTS

of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

This SR is modified by a Note that states the SR is not required to be performed until 12 hours after entering MODE 4. In a rapid shutdown, there may be insufficient time to verify all susceptible locations prior to entering MODE 4.

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

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- REFERENCES
1. License Amendment Request Dated November 19, 1999. (Approved by License Amendment 152/143, July 14, 2000.)
 2. NRC Information Notice 95-35, "Degraded Ability of Steam Generator to Remove Decay Heat by Natural Circulation."
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BASES

SURVEILLANCE SR 3.4.7.4 (continued)
REQUIREMENTS

not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative sub-set of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

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1. NRC Information Notice 95-35, "Degraded Ability of Steam Generators to Remove Decay Heat by Natural Circulation".
 2. License Amendment Request Dated November 19, 1999. (Approved by License Amendment 152/143, July 14, 2000.)
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BASES

SURVEILLANCE SR 3.4.8.3 (continued)
REQUIREMENTS

Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

REFERENCES None.

BASES

SURVEILLANCE SR 3.9.5.2 (continued)
REQUIREMENTS

locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

REFERENCES None.

BASES

SURVEILLANCE SR 3.9.6.3 (continued)
REQUIREMENTS

same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative sub-set of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the RHR System piping and the procedural controls governing system operation.

REFERENCES None.
