



JUL 13 2016

L-PI-16-056  
10 CFR 50.55a

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

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

Response to Request for Additional Information on the Fourth Ten-Year Inservice Inspection Interval Relief Request Nos. 1-RR-4-11, and 2-RR-4-11 (CAC Nos. MF7210 and MF7211)

References:

- 1) R. Kuntz, USNRC, email to G. Carlson, NSPM, Request for Information on the Fourth Ten-Year Inservice Inspection Interval Requests for Relief Prairie Island Nuclear Generating Plant Units 1 and 2 Docket Nos. 50-282 and 50-306 (CAC Nos. MF7210 and MF7211), 6/16/2016 (ADAMS Accession No. ML16169A002)
- 2) K. Davison, PINGP, letter to NRC Document Control Desk, 10 CFR 50.55a Requests: Relief from Impractical Examination Coverage Requirements for the Fourth Ten-Year Inservice Inspection Program Interval, L-PI-15-106, 12/21/2015 (ADAMS Accession No. ML15355A253)


Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), provides the enclosed responses (Enclosure 1) to requests for additional information (Reference 1) regarding relief requests 1-RR-4-11 and 2-RR-4-11 (Reference 2) for relief pursuant to 10 CFR 50.55a for alternatives to limited examination coverage requirements.

In addition to the enclosed responses, NSPM clarifies that relief requests 1-RR-4-11 and 2-RR-4-11 are made in accordance with 10 CFR 50.55a(g)(5)(iii) rather than 10 CFR 50.55a(z)(2).

Summary of Commitments

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

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

 THOMAS COWBY  
ACTING FOR SCOTT NORTHARD

Scott Northard  
Acting Site Vice President, Prairie Island Nuclear Generating Plant  
Northern States Power Company - Minnesota

Enclosure (1)

cc: Regional Administrator, Region III, USNRC  
Project Manager, Prairie Island Nuclear Generating Plant, USNRC  
Resident Inspector, Prairie Island Nuclear Generating Plant, USNRC

**ENCLOSURE 1**

**Response to Request for Additional Information on  
the Fourth Ten-Year Inservice Inspection Interval  
Relief Request Nos. 1-RR-4-11, and 2-RR-4-11  
(CAC Nos. MF7210 AND MF7211)**

3 pages follow

Response to Request for Additional Information  
on the Fourth Ten-Year Inservice Inspection Interval  
Relief Request Nos. 1-RR-4-11, and 2-RR-4-11  
(CAC Nos. MF7210 AND MF7211)

RAI-2.1 Table 1 of the Relief Requests specifies the code used for the volumetric examination procedure for the Category C-A welds, but not for the surface examination procedure for the Category C-C welds. Provide the applicable code for the surface examination of the Category C-C attachment welds (e.g., ASME Code Section V, Article 6.). Also provide the applicable code criteria used to determine extent of surface to be examined (e.g., ASME Code Figure IWC-2500-5.)

Response:

The fourth interval surface examination of Category C-C attachment welds was performed in accordance with site dye penetrant procedures SWI NDE-PT-1. This procedure incorporated by reference ASME Code Section V, Article 6 and ASME Section XI, Code Figure IWC-2500-5.

RAI-2.2 Section 6 of the Relief Requests states that only one support of PINGP, Unit 1 was surface examined and that the coverage was limited to 71%, but both supports of PINGP, Unit 2 were surface examined. Describe why one of the supports of PINGP, Unit 1 was not surface examined, or clarify your statement. Also, explain why the maximum obtainable coverage of 75% (as stated in Table 2) was not achieved for this surface examination.

Response:

It is important to note that the examinations and coverage discussed in section 6 are from the previous 3rd interval, and included in this request to show that fourth interval limitations are consistent with the previous third interval limitations accepted under previous relief requests. The third interval (Section 6) and fourth interval (Table 2) maximum obtainable coverage for the subject welded attachments are comparable, but somewhat different.

ASME Section XI 2000 Addenda, item C3.10, note 4 states that "For multiple vessels of similar design, function, and service, only one welded attachment of only one of the multiple vessels shall be selected for examination." As such, not all supports are examined.

When an examination limitation is encountered, the site will typically make an effort to substitute another component within the appropriate item number and group in order to

meet code requirements. A review of fourth interval surface examinations of the RHR heat exchanger welded attachments of both units is summarized in Table 1.

**Table 1: Fourth Interval Surface Examinations of the RHR Heat Exchanger Welded Attachments**

<b>Component Description</b>	<b>Exam Report</b>	<b>Code Component, Method and Extent Required</b>	<b>Percent Coverage Obtained and Limitation</b>	<b>Code Cat. And Item No.</b>	<b>Relief Request</b>
12 RHR Heat Exchanger Attachment Weld (B) Int. Attach Weld	2012P004	Class 2 Welded Attachment with no suitable substitute. 100% Surface.	75% Limited due to access.	C-C C3.10	1-RR-4-11
21 RHR Heat Exchanger Attachment Weld (A)	2010P020	Vessel Welded Attachments, Surface, 100% One of similar vessels	85% Limited due to proximity to concrete support.	C-C C3.10	Relief not required as only one welded attachment of only one of the multiple vessels shall be selected for examination.
21 RHR Heat Exchanger Attachment Weld (B)	2010P021	Vessel Welded Attachments, Surface, 100% One of similar vessels	85% Limited due to proximity to concrete support.	C-C C3.10	2-RR-4-11

Review of the RH Heat Exchanger support construction drawing NF-38298-3 (typical both units), examination limitations experienced in the third interval (discussed in Section 6) and fourth interval limitations summarized above, indicate all RH Heat Exchanger support welded attachments have similar limitations.

RAI-2.3 Section 6 of the Relief Requests states that Weld 2 of the PINGP, Unit 1 residual heat removal heat exchanger 12 was ultrasonically examined and found to be limited to 27% coverage. However, Figure 3 stated that the total examination coverage for this weld was 32%. Clarify this apparent discrepancy.

Response:

It is important to note that the examinations and coverage discussed in Section 6 are from the previous 3rd interval, and included in this request to show that fourth interval limitations are consistent with the previous third interval limitations accepted under

previous relief requests. The third interval (Section 6) and fourth interval (Table 2 and Figure 3) maximum obtainable coverage for heat exchanger 12 Weld 2 are comparable, but somewhat different.

RAI-2.4 Table 2 of the Relief Requests states that "Other Examination Results" include a "System Pressure test." Explain how the system pressure test is relevant to determine the acceptability of the two Category C-C attachment welds.

Response:

A system pressure test is relevant to Category C-C (WELDED ATTACHMENTS FOR VESSELS, PIPING, PUMPS, AND VALVES) only to the extent that a pressure test would show a crack that had propagated from an attachment weld through the pressure boundary. There is no implication that pressure test is a substitute for the code required surface examination.