

~~Security-Related Information - Withhold Under 10 CFR 2.390(d)(1)~~

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L-PI-16-095
10 CFR 50.54(f)

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

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

Prairie Island Nuclear Generating Plant, Units 1 and 2, Response to March 12, 2012,
Request for Information Enclosure 2, Recommendation 2.1, Flooding, Required
Response 3, Focused Evaluation

References:

1. NRC Letter, "Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ADAMS Accession No. ML12056A046)
2. NRC Letter, "Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for Beyond-Design-Basis External Events," dated September 1, 2015 (ADAMS Accession No. ML15174A257)
3. NRC COMSECY-15-0019, "Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants," dated June 30, 2015 (ADAMS Accession No. ML15153A104)
4. NRC SRM COMSECY-15-0019, "Staff Requirements – COMSECY-15-0019 – Closure Plan for the Reevaluation of Flooding Hazards for Operating Nuclear Power Plants," dated July 28, 2015 (ADAMS Accession No. ML15209A682)

Enclosure 1 contains ~~Security-Related Information~~. When separated from Enclosure 1, this letter and Enclosure 2 are decontrolled.

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5. NEI 16-05, "External Flooding Assessment Guidelines," Revision 1, June 2016 (ADAMS Accession No. ML16165A178)
6. JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation," Revision 0, dated July 11, 2016 (ADAMS Accession No. ML16162A301)
7. NRC Memo and Guidance, "Regulatory Decision-Making for Reevaluated Flooding and Seismic Hazards for Operating Nuclear Power Plants," dated September 21, 2016 (ADAMS Accession No. ML16237A103)
8. NSPM Letter L-PI-16-039 from S. Northard to Document Control Desk (NRC), "Prairie Island Nuclear Generating Plant, Units 1 and 2, Response to March 12, 2012, Request for Information Enclosure 2, Recommendation 2.1, Flooding, Required Response 2, Flood Hazard Reevaluation Report," dated May 9, 2016 (ADAMS Accession No. ML16133A030)
9. NSPM Letter L-PI-16-076 from S. Northard to Document Control Desk (NRC), "Prairie Island Nuclear Generating Plant, Units 1 and 2 - Supplement to the Response to March 12, 2012, Request for Information Enclosure 2, Recommendation 2.1, Flooding, Required Response 2, Flood Hazard Reevaluation Report," dated September 29, 2016 (ADAMS Accession No. ML16273A556)
10. NRC Letter to NSPM, "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Correction to Interim Staff Response to Reevaluated Flood Hazards Submitted in Response to 10 CFR 50.54(f) Information Request – Flood-Causing Mechanism Reevaluation (CAC NO. MF7710 and MF7711)," dated October 17, 2016 (ADAMS Accession No. ML16248A005)

On March 12, 2012, the NRC issued Reference 1, which included a request for information associated with Near-Term Task Force (NTTF) Recommendation 2.1 for flooding. In Enclosure 2 of Reference 1, the NRC Staff requested licensees to perform a Flood Hazard Reevaluation (Requested Information Item 1) and submit the Flood Hazard Reevaluation Report (Required Response Item 2). Enclosure 2 of Reference 1 also requested licensees to perform an Integrated Assessment if the design basis flood did not bound the reevaluated hazard for all flood causing mechanisms (Requested Information Item 2). Reference 1 required a written response for the Integrated Assessment (Required Response Items 2 and 3, respectively).

Subsequent to the Reference 1 requests, discussions within the NRC and industry resulted in a reassessment of the Flooding Impact Assessment Process (Reference 2). On June 30, 2015, the NRC staff issued COMSECY-15-0019 (Reference 3) that described the closure plan for NTTF Recommendation 2.1 regarding the reevaluation of

flooding hazards. As discussed in COMSECY-15-0019, the majority of sites with flooding hazards exceeding the design-basis flood screen out from the integrated assessments. The screened out licensees would provide a focused evaluation instead of an integrated assessment. The focused evaluation would ensure appropriate actions are taken and that these actions are effective and reasonable. The Commission approved the NRC staff's plans to implement a graded approach to the flood hazard reevaluations in SRM COMSECY-15-0019 (Reference 4) on July 28, 2015.

The industry developed guidance to close out the Reference 1 request. The guidance in NEI 16-05 (Reference 5) describes the methodology for performing focused evaluations and integrated assessments of flood mechanisms that exceed the design basis flood parameters for a facility. The NRC endorsed NEI 16-05 with clarifications as described in the enclosure to JLD-ISG-2016-01 (Reference 6). The ISG states that licensees may use the methodology of NEI 16-05, with clarifications, upon receipt of the flood hazard parameters for use in the Mitigating Strategies Assessments of NEI 12-06, Appendix G (also referred to as the Mitigating Strategies Flood Hazard Information (MSFHI)). The NRC letter providing the flood hazard parameters for use in the mitigating strategies assessment provides the information needed for licensees to perform focused evaluations or integrated assessments.

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, submitted the flood hazard reevaluation report (FHRR) (Reference 8) in May 2016 and supplemented that report (Reference 9) in September 2016. In October 2016, NSPM received the flood hazard parameters from NRC (Reference 10) needed to begin the focused evaluation.

The purpose of this letter is to provide the focused evaluation for PINGP, Units 1 and 2 (Enclosures 1 and 2). Responses to the documentation requirements in Section 9 of NEI 16-05 (Reference 5) are included in Appendix 1 of the enclosed focused evaluation. The Appendix 1 responses fulfill Reference 1, Enclosure 2, Requested Information Item 2.

Enclosure 1 of this letter contains security-related information. NSPM hereby requests that Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390. A redacted version of Enclosure 1 is provided in Enclosure 2.

Please contact Lynne Gunderson, Licensing Engineer, at 651-267-7421, if additional information or clarification is required.

Summary of Commitments

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

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

Executed on December 13, 2016.

A handwritten signature in black ink, appearing to read "Scott Northard". The signature is written in a cursive, somewhat stylized font.

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

Enclosures (2)

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