

## **NRR-PMDAPem Resource**

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**From:** Kuntz, Robert  
**Sent:** Wednesday, August 09, 2017 3:43 PM  
**To:** 'Fields, John S.'  
**Cc:** 'Gohdes, Peter D.'  
**Subject:** Request for Additional Information for Prairie Island Nuclear Generating Plant License Amendment Request dated February 23, 2017 RE: Emergency Response Organization

Mr. Fields,

On July 17, 2017 I forwarded a draft request for additional information (RAI). On Thursday August 3, 2017 a call to clarify the draft RAI was conducted. Following the clarification call, the final RAI was forward in an e-mail dated August 7, 2017 (and copied below). In addition to the items in the final RAI, the draft RAI contained the following request:

### **PINGP RAI-9**

LAR Enclosure 1, Attachment 1, Table 1, should list all the on-shift and augmented ERO functions and positions that are considered minimum staff consistent with the staffing figures provided in the Emergency Plan. However, Table 1 is not consistent with the information provided for the minimum staff positions listed on the staffing figures for the OSC, TSC, and EOF.

- a. Revise Table 1 and/or facility staffing figures to depict all minimum staffing positions, both on-shift and augmented for the OSC, TSC, and EOF.
- b. Describe whether PINGP has conducted, or plans to conduct drills, tabletops, etc. to validate whether the minimum staffing positions identified in Table 1 can adequately assume and perform the facility's Emergency Plan functions in relief of the on-shift staff prior to full augmentation as described in the emergency plan or implementing procedures.

During the clarification call and subsequent review by the Nuclear Regulatory Commission staff, it was determined that the requested information was provided in the license amendment request and is not required to be provided. This e-mail is to clarify that the requested information in PINGP RAI-9 from the draft RAI is not required.

Robert Kuntz  
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(301) 415-3733

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**From:** Kuntz, Robert  
**Sent:** Monday, August 07, 2017 6:54 AM  
**To:** Fields, John S.  
**Subject:** Request for Additional Information for Prairie Island Nuclear Generating Plant License Amendment Request dated February 23, 2017 RE: Emergency Response Organization

Mr. Fields:

By application dated February 23, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17055C359), Northern States Power Company, a Minnesota corporation (NSPM) submitted a license amendment request (LAR) pursuant to Title 10 of the Code of Federal Regulations (10 CFR) 50.90. The amendment submits changes to the Prairie Island Nuclear Generating Plant (PINGP) Emergency Plan for review and prior approval in accordance with 10 CFR 50.54(q). The proposed changes would revise the PINGP Emergency Plan to increase the staff augmentation times for certain emergency response organization (ERO) positions from 30 and 60 minutes to 60 and 90 minutes, respectively.

The Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. The following is the NRC staff's request for additional information (RAI). The NRC staff expects a response to this RAI within 30 days of this message.

Robert Kuntz  
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REQUEST FOR ADDITIONAL INFORMATION  
LICENSE AMENDMENT REQUEST  
EMERGENCY PLAN CHANGE  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNIT 1 AND UNIT 2  
DOCKET NOS. 50-282 AND 50-306 (CAC NOS. MF9345 AND MF9346)

**PINGP RAI-1**

LAR Enclosure 1, Section 3.1.2.2, "Current on-shift dose assessment," states, in part (on page 12 of 43):

RASCAL software was updated in 2014 to include the Unified RASCAL Interface (URI). The URI application is available on ERF [emergency response facility] dose assessment computers.

Clarify which ERFs have dose assessment computers, consistent with ERO responsibilities for performing dose assessment described in the PINGP Emergency Plan.

**PINGP RAI-2**

LAR Enclosure 1, Section 3.2.2, "Emergency Direction and Control," states (on page 18 of 43):

This change is acceptable in that it identifies minimum staffing positions in the TSC and OSC which enable transfer of the command and control functions (Classification, Notification, Protective Actions and Emergency Exposure Authorization) in advance of the 60-minute activation requirement. Additionally, identification of minimum staffing positions in the EOF allows for the transfer of the Notification and Protective Action functions to the EOF in advance of the 90-minute activation requirement.

LAR Enclosure 1, Attachment 1, Section 5.3.1, "Direction and Coordination," states, in part (on page 21 of 162):

Upon activation of the EOF, responsibility for **offsite functions of notification and protective action recommendations** transfer from the TSC to the EOF Emergency Manager (EM).  
[Emphasis added]

However, the table provided in Section 5.3.1 only illustrates responsibility for classification being transferred from the Control Room (On-Shift/Emergency Director) to the TSC Emergency Director.

In addition, LAR Enclosure 1, Attachment 1, Section 5.4.1, "EOF Direction and Control," states, in part (on page 41 of 162):

The Emergency Manager relieves the Emergency Director of the following responsibilities:

**B. *Authorization of emergency classification*** changes. The Emergency Director retains the primary responsibility for re-classifications and makes recommendations to the Emergency Manager who has the responsibility to review and authorize the new classification.  
[Emphasis added]

Clarify inconsistencies in regards to which ERO position has the responsibility for performing emergency classifications for the duration of an event, based on the activation of the TSC and EOF.

### **PINGP RAI-3**

LAR Enclosure 1, Section 3.2.5, "Plant Stem Engineering, Repair and Corrective Actions Function" (Technical Support Major Task c), states, in part (on page 26 of 43):

A review of procedural actions for this position demonstrated that failed fuel determinations as well as establishing recovery/reentry priorities would not be required during the first 60 minutes of the event. Initial reactor core stabilization activities are performed by the Operations crew under the direction of the STA [Shift Technical Advisor].

Provide further justification for the extension in augmentation timing for the Core Thermal Engineer position. Specifically, clarify whether the STA has the necessary expertise with core/thermal hydraulics, and possesses the ability to offer adequate functional oversight to assess core conditions, in addition to providing direction to the Operations personnel who are performing initial reactor core stabilization activities. This justification should include a description of any procedure and information technology advances since the implementation of NUREG-0654, such as improvements that allow using a symptom-based emergency operating procedure network, and computerized or automated systems for the acquisition and display of parameters used to evaluate core conditions.

### **PINGP RAI-4**

LAR Enclosure 1, Section 3.2.5 (Repair and Corrective Actions Major Task c, 2<sup>nd</sup> paragraph) states, in part (on page 27 of 43):

Historically, the repair functions associated with an event have been completed by Auxiliary Operations (AOs) personnel on-shift who are qualified to respond to plant events and perform actions to stabilize the plant.

Please describe the training and qualifications provided to the AOs that would allow them to perform repair and corrective actions and justify the extension in augmentation times for the maintenance technicians. This justification should include a review that there will not be any conflict between the added collateral duties and other assigned emergency response functions.

### **PINGP RAI-5**

LAR Enclosure 1, Section 3.2.5 (Repair and Corrective Actions Major Task c, 4<sup>th</sup> paragraph) states, in part (on page 27 of 43):

The proposed change to the E-Plan would eliminate the 60-minute RWO [RadWaste Operator] responder. A review of PINGP procedures indicated operation of, or support for the maintenance of, Radwaste equipment was not necessary for implementation of the PINGP

AOPs [Abnormal Operating Procedures], EOPs [Emergency Operating Procedures] and SAMGs [Severe Accident Management Guidelines].

Clarify whether the review of PINGP procedures included a review of procedures used to implement and perform required emergency plan functions/duties.

#### **PINGP RAI-6**

LAR Enclosure 1, Section 3.2.6.c, "Protective Actions (In-Plant) Function," states, in part (on page 28 of 43):

The proposed E-Plan would extend the response time for the Protective Actions 30-minute responder to 60-minutes and the two (2) 60 minute responders to 90 minutes.

However, Table 1, "Guidance for Augmentation of Plant Emergency Organization," in Enclosure 1, Attachment 2, provides that the two 60 minute responders are reduced to one 90 minute responder.

Clarify if the number of responders is being reduced, and if so, provide justification for the reduction.

#### **PINGP RAI-7**

LAR Enclosure 1, Section 3.2.6, "Access Control/Dosimetry" states, in part (on page 28 of 43):

Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with the use of electronic dosimetry. Dedicated emergency electronic dosimetry is provided for use during a declared emergency, which automatically provides the electronic dosimetry with emergency dose and dose rate alarms.

Provide further description about the tools and processes used for the task of access control, including a description of portal/contamination monitors, self-alarmed dosimeters, and automated access control system for the radiologically controlled area (RCA) that maintain active radiation work permits, which are readily available if an emergency is declared (e.g., the system verifies qualifications, dose margins, and access requirements).

#### **PINGP RAI-8**

LAR Enclosure 1, Section 3.2.6, "Protective Actions (In-Plant) Function Summary" states, in part (on page 29 of 43):

The proposed change maintains the existing on-shift RP [Radiation Protection] Specialist for the HP [Health Physics] Coverage task. The proposed change extends the 30-minute and 60-minute response time for the personnel to 60 minutes and 90 minutes respectively. NSPM has implemented improvements in technology in the areas of dosimetry and access control at the PINGP which reduced the need for RP Specialist actions in each of these areas during the early stages of event response.

Provide further justification for the extensions in time for the RP Coverage task, including a description of the availability of installed area, process, airborne and effluent radiation monitors, automated systems and information technology solutions, and enhanced work processes that would be available under accident conditions.

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