


**Pre-Application Meeting
License Amendment for TSTF-425**

**Relocation of Specific Surveillance
Frequency Requirements to a Licensee
Controlled Program**

**Xcel Energy (XE)
Prairie Island Nuclear Generating Plant**

02-20-2018



Agenda



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- Background & Schedule
 - Discuss
 - Variations from TSTF-425
 - Site-specific TS SR 3.0.2
 - Probabilistic Risk Assessment (PRA)
 - Fire Model
 - Questions and Feedback

Background & Schedule



- TSTF-425
 - Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Initiative 5b)
 - Licensee controlled program called the Surveillance Frequency Control Program (SFCP) and is in accordance with NEI 04-10
 - Planned submittal first quarter 2018
 - Requesting approval by April 2019
 - Implement prior to Fall 2019 Refueling Outage (RFO)

Variations



- Variations for the application include:
 - Revised (clean) TS pages not included
 - TS Bases insert consistent with the April 14, 2010 NRC letter removing the frequency basis
 - Cross-reference list for TSTF-425 (NUREG-1431) markups to PINGP site specific TS SRs provided
 - Administrative changes
 - An expired one-time frequency extension is deleted
 - Two minor formatting changes

PINGP's TS SR 3.0.2



- PINGP SR 3.0.2 contains a restriction not in NUREG-1431:
 - NUREG-1431 SR 3.0.2 permits a 25% extension of the interval specified in the Frequency
 - PINGP SR 3.0.2 also permits a 25% extension of the specified interval, except for Frequencies specified as 24 months
 - Not a variation to the TSTF
 - Applies to 50 TS SR
 - One exception - TS SR 3.8.1.8 amended in 2010 to allow the application of the 25% extension to its 24 month surveillance requirement

PINGP's TS SR 3.0.2

- PINGP TS SR 3.0.2 does not affect application of TSTF-425 nor does it affect implementation of the SFCP
 - Site specific SR 3.0.2 is applied to the SFCP as described in TSTF-425
 - SFCP Administrative Controls maintained (TS 5.5.17)
 - Current Licensing Basis (CLB) maintained (TS SR 3.0.2)
 - No affect on TSTF-425
 - Model License Amendment Request (LAR) unchanged
 - Model No Significant Hazards Consideration determination unchanged
 - NRC Model Safety Evaluation (SE) unchanged
 - Not considered a variation to the TSTF

PRA Technical Adequacy



- Internal Events including internal flooding
 - RG 1.200 peer reviewed with Appendix X to NEI 05-04 finding closure review complete
- Seismic
 - IPEEE Seismic Margins Analysis (SMA)
- Other External Hazards
 - PINGP IPEEE concluded other external hazards to be negligible contributors to overall plant risk
- Shutdown Events
 - Shutdown risk management program consistent with NUMARC 91-06

PRA Technical Adequacy



- Fire

- Fire PRA developed for NFPA-805
 - NFPA-805 LAR approved August 8, 2017
 - Fire PRA reflects future state of the as-built/as-operated plant following NFPA-805 modifications
 - Unit 1 - Fall 2020 RFO, Unit 2 - Fall 2019 RFO
 - Fire PRA is RG 1.200 peer reviewed with an Appendix X closure review
 - Fire PRA Open F&Os provided in the Technical Adequacy Section of the SFCP LAR
- During transition, the SFCP evaluations use IPEEE FIVE results supplemented by sensitivities from Fire PRA in accordance with NEI 04-10
- Following implementation of NFPA-805, evaluations use the Fire PRA in accordance with NEI 04-10

PRA Technical Adequacy



- Conclusion
 - PINGP PRA models sufficiently robust and suitable for SFCP

Questions and Feedback



Acronyms

- CLB - Current Licensing Basis
- F&O – Finding and Observations
- FIVE – Fire Induced Vulnerability Evaluation
- LAR – License Amendment Request
- IPEEE – Individual Plant Examination of External Events
- NEI – Nuclear Energy Institute
- NSHC – No Significant Hazards Determination
- NSPM – Northern States Power Minnesota
- PINGP – Prairie Island Nuclear Generating Plant
- PRA – Probabilistic Risk Assessment
- RFO – Refueling Outage
- SE – Safety Evaluation

Acronyms



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- SFCP – Surveillance Frequency Control Program
 - SMA – Seismic Margins Analysis
 - TS – Technical Specification
 - TS SR – Technical Specification Surveillance Requirement
 - TSTF – Technical Specification Task Force
 - XE – Xcel Energy