

April 8, 2019

L-PI-19-016  
10 CFR 50.90

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
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

Supplement: License Amendment Request to Revise License Condition Associated with Implementation of NFPA 805 (EPID L-2018-LLA-0147)

- References:
- 1) Letter (L-PI-18-005) from NSPM to the NRC, "License Amendment Request to Revise License Condition Associated with Implementation of NFPA 805", dated May 18, 2018 (ADAMS Accession No. ML18138A402)
  - 2) Letter (L-PI-16-090) from NSPM to the NRC, "License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactors – Response to Request for Additional Information (CAC Nos. ME9734 and ME9735)", dated December 14, 2016 (ADAMS Accession No. ML16350A105)
  - 3) Letter (L-PI-18-063) from NSPM to the NRC, "Response to Request for Additional Information: Revise License Condition Associated with Implementation of NFPA 805 (EPID L-2018-LLA-0147)", dated December 6, 2018 (ADAMS Accession No. ML18340A205)
  - 4) NRC Public Meeting Summary, "Summary of February 25, 2019, Meeting with Northern States Power Company, Doing Business as Xcel Energy, Related to the Amendment Request to Modify Renewed Facility Operating License Paragraph 2.C(4)(c) (EPID No. L-2018-LLA-0147)", dated March 11, 2019 (ADAMS Accession No. ML19058A467)

In Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requested an amendment to the Renewed Facility Operating Licenses (RFOLs) for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2. Specifically, NSPM requested that License Condition 2.C.(4)(c) be revised in each PINGP RFOL to reflect the deletion of five plant modifications from Table S-2, "Plant Modifications Committed", as submitted in Reference 2. The NRC identified the need for additional

information and provided the Request for Additional Information (RAI) which NSPM responded to in Reference 3.

Specifically, the RAI response stated:

Re-powering Panel 211 and Panel 213 from Panel 217 to provide process monitoring indication in the main control room remains as a defense in depth action. While a lack of electrical coordination on Panel 217 exists between the main fuses and the upstream circuit breaker, electrical coordination is achieved with the branch fuses and the main fuses. Therefore, a fire in Fire Area 31 affecting a branch circuit will not fail the main fuses on Panel 217 and Panel 217 will remain available to support re-powering Panel 211 and Panel 213.

On February 25, 2019, a public teleconference was held between the NRC and NSPM to discuss NSPM's RAI response. As summarized in Reference 4, the NRC staff questioned the ability of Panel 217 to remain available to support re-powering Panel 211 and Panel 213 following an electrical fault in the branch circuits on Panel 217, as it was not indicated if the branch fuses also achieved coordination with the supply breaker upstream of the main fuses.

In response to the question discussed in Reference 4, NSPM confirms that the fuses for branch circuits in Fire Area 31 are coordinated with the upstream supply circuit breaker. A fire in Fire Area 31 damaging cables for branch circuits on Panel 217 will be isolated by the branch circuit fuses prior to the upstream supply circuit breaker clearing the fault.

In summary, a fire in Fire Area 31 affecting a branch circuit will not fail the main fuses or upstream supply circuit breaker on Panel 217 and Panel 217 will remain available to support re-powering Panel 211 and Panel 213; therefore, defense in depth is maintained.

The information provided in this letter does not alter the evaluations performed in accordance with 10 CFR 50.92 in Reference 1.

Please contact Mr. Peter Gohdes at (612) 330-6503 or [Peter.Gohdes@xenuclear.com](mailto:Peter.Gohdes@xenuclear.com) 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 April 8, 2019.

A handwritten signature in black ink, appearing to read "Scott Sharp". The signature is written in a cursive style with a large, looping initial "S".

Scott Sharp

Site Vice President, Prairie Island Nuclear Generating Plant  
Northern States Power Company – Minnesota

cc: Administrator, Region III, USNRC  
Project Manager, Prairie Island, USNRC  
Resident Inspector, Prairie Island, USNRC  
State of Minnesota