

boron concentration with the predicted value. The TS was modified so that the comparison will be done monthly, thus, defining the word "periodically" existing in the TS.

The staff concludes that all proposed changes to the surveillance requirements in section TS 4 as described above will not alter or adversely affect the LCO's in section TS 3.0. In addition, these proposed changes will not adversely impact the margin of safety nor change the results of the hazards analyses associated with the potential accidents addressed in the Prairie Island updated safety analysis reports. We also find the proposed changes are consistent with the STS. On this basis, the staff finds the proposed changes to section TS 4 acceptable.

XVI. Section 5.0 -- Design Features

The licensee, by letter dated December 18, 1987, submitted an amendment request that would change the description of the design features in section TS 5.0 of the TS. The design section TS 5.1 (Site) describes the emergency procedure that will necessitate plant shutdown for flood water levels above +692 ft mean sea level (MSL). The emergency procedure is to assure the proper erection of flood protection panels and assure an orderly shutdown of the plant and protecting the safety-related facilities. The TS 5.1 describes the procedures requiring periodic drills to test the flood protection measures. The periodic drills were described in the TS as including the erection of flood protection panels. The licensee has proposed to change the emergency procedure to require the inspection of flood protection measures instead of performing periodic drills. Consequently, the description of the emergency procedure in section 5 of the TS would be changed accordingly. By letter dated March 31, 1989, the licensee withdrew the amendment request as requested by the staff, since the proposed change would be within the scope of this amendment request. The change to the TS is an administrative change to reflect the change to the emergency procedure. However, the licensee will treat the safety evaluation of the emergency procedure within the scope of 10 CFR 50.59. The safety evaluation submitted to justify the amendment request would also serve as justification for changes to the emergency procedure under 10 CFR 50.59.

The staff has reviewed the emergency procedures and has determined most of the tasks that would be executed are typical operating steps that can normally be carried out by plant personnel without the need of drills. We agree with the licensee that sandbagging and installation of bulkheads are not considered typical operations that would be frequently carried out by the plant personnel. Sandbagging is considered a basic task that will not require drills and the installation of the bulkhead will be adequately addressed in the annual inspection of the flood protection measures. In addition, the licensee has committed as part of the periodic inspection of the flood protection measures to develop and implement detailed procedures that will list each bulkhead individually and provide step-by-step actions necessary for bulkhead installation.

Based on the above evaluation, we find the proposed change to TS 5.1, involving the replacement of the reference to periodic drills with the inspection of flood protection measures, is acceptable.

XVII. Section TS 6.7 - Administrative

As part of the TS upgrade the licensee proposed changes to section 6.7 "Reporting Requirements" which is part of the administrative section. The following evaluation addresses the specific changes proposed by the licensee.

1. NSP has reorganized Section TS 6.7, Reporting Requirements. The reorganization revised section TS 6.7.A by establishing a separate category titled "Annual Report" and including within that category two other reports that were required annually and adding a third item that was previously in section TS 3.1.D.4 (see below). No reports currently required were deleted by this proposed change. We find this change acceptable as no reports were deleted and the reorganization of this section conforms more closely to the Standard Technical Specifications.
2. NSP has moved the Primary Coolant Iodine Spike Report requirement from section TS 3.1.D.4 into the new category of Annual Report. This change also removes the requirement to shut down if the 1.0 microcurie per gram Dose Equivalent I-131 limit for a cumulative time of 500 hours in any six-months is exceeded, and revises the reporting frequency from a 30-day report to the annual report. We find this change acceptable since it meets the guidance provided in Generic Letter 85-19, Reporting Requirements on Primary Coolant Iodine Spikes.
3. NSP has also made several editorial changes to update to current IIRC titles. We find these changes acceptable as they are editorial in nature.

XVIII. Bases Sections 2, 3 and 4

The Bases normally serve to interpret and to technically justify the requirements of the TS related to the LCO and the surveillance addressed throughout the body of the TS. The licensee proposed changes to the Bases of the TS to reflect changes proposed in TS sections TS 2.0, TS 3.0, TS 4.0 and TS 6.7 and other administrative changes serving to assist plant operators to interpret requirements of the TS. The Bases that now appear throughout various sections of the TS have been consolidated into three sections and relocated behind Section 6.0 in the back of the TS. Typical administrative changes update references by using the USAR rather than the FSAR title and ambiguous statements have been removed or modified. The staff reviewed all of the proposed changes for possible misinterpretation that could lead to a relaxation of the TS requirements. One proposed change involves relocating the requirement appearing in TS section TS 3.1.B (heatup and cooldown) to the Bases section. Specifically, TS 3.1.B.3, requiring the secondary side of the steam generator must not be pressurized above 200 psig if the temperature of the vessel is below 70°F, would no longer be considered a requirement since under the proposed change this requirement would be transferred to the bases section. A relaxation of the TS would result since this will no longer be considered a requirement if located in the bases. The staff considers TS 3.1.B.3 an LCO and requested that it remain in the TS section as TS 3.1.B.3.(a) with the appropriate action statements. Several minor editorial changes to further clarify the Bases were also requested by the staff. Other minor editorial changes to the Bases were necessary to assure compatibility with modification to other sections (i.e. LCO's surveillance, etc.) of the TS. The modifications and the minor editorial changes were agreed to by the licensee.