

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NO. 50-282  
50-306

REQUEST FOR AMENDMENT TO  
OPERATING LICENSES DPR-42 & DPR-60

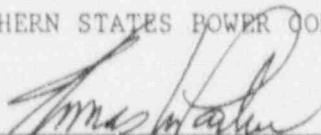
LICENSE AMENDMENT REQUEST DATED January 30, 1991

Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Prairie Island Operating License as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, reasons for the changes, and a significant hazards evaluation. Exhibit B contains current Prairie Island Technical Specification pages marked up to show the proposed changes. Exhibit C contains the revised Technical Specification pages.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By



Thomas M Parker  
Manager, Nuclear Support Services

On this \_\_\_\_\_ day of \_\_\_\_\_ before me a notary public in and for said County, personally appeared Thomas M Parker, Manager, Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true and that it is not interposed for delay.

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## Exhibit A

### Prairie Island Nuclear Generating Plant

License Amendment Request Dated January 30, 1991

#### Evaluation of Proposed Changes to the Technical Specifications Appendix A of Operating License DPR-42 and DPR-60

Pursuant to 10 CFR Part 50, Sections 50.59 and 50.90, the holders of Operating Licenses DPR-42 and DPR-60, hereby propose the following changes to Appendix A, Technical Specifications:

#### Proposed Change

The requirement of Technical Specification Section 6.2.B.4. for Operations Committee review of maintenance procedures has been replaced with requirements for preparation, review, and approval of maintenance procedures included in Technical Specification Section 6.2.C. and referenced by Technical Specification Section 6.2.B.4. These changes are shown in Exhibit B, pages TS.6.2-6 and TS.6.2-7.

#### Reasons for Changes

The Prairie Island Technical Specifications currently require review of maintenance procedures by the Operations Committee and also allow the use of Operations Committee subcommittees. The time demand for the multiple responsibilities of Operations Committee members led to the use of an Operations Committee subcommittee for the review of maintenance procedures at Prairie Island. During a Region III Maintenance Inspection, the Prairie Island use of subcommittee review of maintenance procedures has been challenged as being outside the requirements of the Prairie Island Technical Specifications as currently written. The proposed changes are intended to meet both the need for appropriate review of maintenance procedures and the need to restrict the time demands on the Operations Committee, and to eliminate the divergent interpretations of the existing specification. The proposed changes are consistent with the intent of the NRC staff's typed version of the new Standard Technical Specification section on administrative controls, as contained in correspondence dated April 10, 1990 from Jose A Calvo, Chief, Technical Specifications Branch to Warren J Hall, Nuclear Management and Resources Council.

One component of the change is the addition of the requirement for the Operations Committee to review safety evaluations for procedures or procedure changes to verify that such actions do not constitute an unreviewed safety question. Previously, there has been no Technical Specification requirement for the Operations Committee to review safety evaluations related to procedures or procedure changes. However, all safety evaluations have been reviewed by the Operations Committee and the requirement for such reviews has

been in the Prairie Island administrative controls associated with safety evaluations. Safety evaluations for procedures or procedure changes will be prepared as required by 10 CFR Part 50, Section 50.59.

#### Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10 CFR Part 50, Section 50.91 using the standards provided in Section 50.92. This analysis is provided below:

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The fundamental safety issue in this change is whether there can be reasonable assurance that safety related maintenance procedures will be adequately reviewed by utilizing a review process involving knowledgeable individuals without requiring review by the Operations Committee. There are different methods to administratively control the preparation, review, and approval of safety related procedures. In fact, procedure control is mandated by 10 CFR Part 50 Appendix B - Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants and addressed by various Regulatory Guides without a specific method of procedure control being prescribed. Specific methods are not prescribed because many effective methods are available. The proposed change includes a review process which can reasonably assure adequate review of safety related maintenance procedures. In addition, our quality assurance program, which meets the requirements of 10 CFR 50 Appendix B, has the elements to assure that our procedure review process will be evaluated for effectiveness. Since this change will not cause a decline in effectiveness of the reviews of safety related maintenance procedures, it will not affect the physical configuration of the plant or how it is operated. Therefore it will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

As stated above, the proposed change will not cause a decline in effectiveness of the reviews of safety related maintenance procedures and, thus, it will not affect the physical configuration of the plant or how it is operated. Therefore it will not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

As stated above, the proposed change will not cause a decline in effectiveness of the reviews of safety related maintenance procedures and, thus, will not affect the physical configuration of the plant or how it is

operated. Therefore it will not involve a significant reduction in the margin of safety.

The Commission has provided guidance (March 6, 1986 Federal Register) concerning the application of the standards in 10 CFR 50.92 for determining whether a significant hazards consideration exists by providing certain examples of amendments that will likely be found to involve no significant hazards considerations. The changes to the Prairie Island Technical Specifications proposed in this amendment request are representative of NRC example (i): because they are a purely administrative change. There is no change to the physical configuration of the plant or how the plant is operated. Based on this guidance and the reasons discussed above, we have concluded that the proposed changes do not involve a significant hazards consideration.

#### Environmental Assessment

This license amendment request does not change effluent types or total effluent amounts nor does it involve an increase in power level. Therefore, this change will not result in any significant environmental impact.