



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

December 6, 1982

Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Information Related to Compliance with Safe Shutdown
Requirements of 10 CFR Part 50 Appendix R and Request
for Exemption from Requirements of 10CFR Part 50,
Appendix R, Section III.G.3

Ref: Fire Protection Safe Shutdown Analysis in Compliance with
10 CFR 50, Appendix R, Section III.G and Substantive Basis
for Exemption Request, Prairie Island Nuclear Generating
Plant, June 30, 1982

The referenced report was submitted to the Nuclear Regulatory Commission on June 30, 1982. Northern States Power Company presented a method of equivalent protection, in this report, for those areas not meeting the specific requirements of Section III.G.2 of Appendix R.

Subsequent to the issuance of this report, meetings were held with the NRC Staff which indicated that the criteria of Section III.L would be used in the review of Appendix R submittals. With this in mind the following information should be considered in the review of the Prairie Island Appendix R submittal.

Northern States Power Company will provide the necessary instrumentation, hardware, and repair procedures for a direct reading source range monitor outside of containment at a location other than the Control Room/Cable Spreading Room. This source range monitor will be connected to one of the existing detector channels. A spare source range drawer will be available at all times for this specific purpose along with the necessary procedures for its operation and maintenance. NSP anticipates that this will fulfill the requirements of Section III.L.2.d.

The Prairie Island plant has always had redundant hot shutdown panels which, following relatively minor modifications now in progress, will meet the requirements of Section III.G.2. These panels will provide an alternate shutdown capability outside of the Control Room.

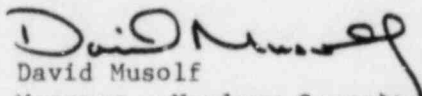
NORTHERN STATES POWER COMPANY

Director of NRR
December 6, 1982
Page 2

Due to this change in philosophy with respect to applicability of Appendix R, Section III.G.3 and III.L, the requirement of Section III.G.3 to install a fixed fire suppression system in the "...area, room, or zone under consideration" now applies. However, since such a system would clearly be detrimental to safe plant operation if installed in the control room, exemption from this requirement of Section III.G.3 has been routinely granted by the Commission in this specific case.

Therefore, Northern States Power Company requests exemption from the automatic suppression requirement of Section III.G.3 for the Control Room under the provisions of 10 CFR 50.48(c)(6) because of the redundant hot shutdown panels and NSP's commitment to source range monitoring remote from the Control Room/Cable Spreading Room.

The information and commitment presented above are provided by Northern States Power Company for the purpose of completing the review of the Prairie Island Appendix R report.


David Musolf
Manager - Nuclear Support Services

DMM/bd

cc: Secretary of the Commission (original & 2 copies)
Regional Director, Region III, NRC
NRR Project Manager, NRC
NRC Resident Inspector
G Charnoff

Attachment

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket No. 50-282
50-306

LETTER DATED DECEMBER 6, 1982
REQUEST FOR EXEMPTION FROM REQUIREMENTS OF 10 CFR PART 50,
APPENDIX R, SECTION III.G.3

Northern States Power Company, a Minnesota corporation, by this letter dated December 6, 1982 hereby submits a request for relief from the requirements of 10 CFR 50, Section III.G.3.

This submittal contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By /s/ David Musolf
David Musolf
Manager - Nuclear Support Services

On this 6 day of December, 1982 before me a notary public in and for said County, personally appeared David Musolf, 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.

/s/ Betty J. Dean
Betty J. Dean
Notary Public - Minnesota
Ramsey County
My Commission Expires Dec. 16, 1987