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Section 50.90

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Supplement to License Amendment Request Dated January 10, 1995
Post Accident Monitoring Technical
Specifications Conformance to Standard Technical Specifications

Pursuant to discussions with your staff regarding the subject license amendment request, Northern states Power Company by this supplement makes the following modifications to the subject license amendment request: 1) The action statement references for Reactor Coolant System (RCS) Pressure, and Containment Sump Water Level have been revised; 2) Containment Isolation Valve Position has been retitled, the required channels reworded, and the associated footnotes have been reworded; 3) Hydrogen Monitors action statement reference was revised to a new action statement inserted in the table; 4) Pressurizer Level has been added to the table with appropriate required channels and action statements, and 5) a paragraph has been added to the Bases to clarify the applicability of the Action Statements. Also, supplemental information is provided in support of the proposed specifications for RCS Hot Leg Temperature and RCS Cold Leg Temperature.

Attachment 1 to this letter contains Prairie Island Technical Specification Table TS.3.15-1, Pages 1 and 2, and Bases page B.3.15-1 marked up to implement this license amendment request as modified by this letter. Attachment 2 contains Prairie Island Technical Specification Table TS.3.15-1, Pages 1 and 2 , and Bases page B.3.15-1 revised to implement this modified license amendment request.

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The action statements for RCS Pressure and Containment Sump Water Level have been revised in Table TS.3.15-1 to 1,2 which will require the plant to go to MODE 3 if two required channels are inoperable for 7 days.

The word, "Automatic", was added to the title of Containment Isolation Valve Position to further clarify the group of plant valves to which this Specification applies. The words, "flow path", were added to the Required Channels for consistency with Revision 1 to NUREG-1431, Standard Technical Specifications, Westinghouse Plants (STS). The phrase, "check valve with flow through the valve secured", was deleted from footnote (b) since the only means by which flow through a check valve can be secured is through closing another valve or blind flanging the penetration. Since these methods have already been allowed by the footnote, this provision is extraneous. Footnote (c) has been revised to include, "channel", and, "flow paths", for consistency with STS.

The Hydrogen Monitors action statement was revised to reference a new item 4 which was inserted in Table TS.3.15-1 to require the plant to go to MODE 3 if two required channels are inoperable for 72 hours.

A paragraph has been added to the previously submitted Bases to clarify the applicability of the action statements for penetration flow paths that have one valve with position indication. This configuration has been justified on the basis that another mechanism is provided to assure containment integrity is maintained. In the event the position indication fails on the one valve which has position indication, the justification for the penetration flow path to have a single valve with position indication is assumed to remain valid. Since another mechanism continues to provide containment integrity, Action Statement 1 applies and the plant has 30 days to repair the position indication or submit a report to the NRC.

These changes and the addition of Pressurizer Level to Table TS.3.15-1 more closely align the proposed Technical Specifications with STS, are more conservative than originally proposed and therefore are bounded by the Safety Evaluation, Significant Hazards Determination and Environmental Assessment considerations originally presented in the January 10, 1995 submittal.

Standard Technical Specifications indicate that RCS Hot Leg Temperature, T_{hot}, and Cold Leg Temperature, T_{cold}, have two channels per loop. Prairie Island was built with one T_{hot} instrumentation channel in each RCS loop and likewise one T_{cold} instrumentation channel in each RCS loop. These temperature channels are not presently in the Prairie Island Technical Specifications. The subject January 10, 1995 submittal proposed to include T_{hot} and T_{cold} in Table TS.3.15-1 with the Standard Technical Specification action statements applied to the two channels on the RCS acting together, that is, if one channel is inoperable 30 days are allowed to restore the channel and with two channels inoperable 7 days are allowed to restore one channel.

This is justifiable due to alternative indications for these functions which will guide operator actions in post accident operations. Attached Table I and Table II to this letter summarize the post accident functions for which these instruments provide indication and the alternative instruments for each function. The Core Exit Thermocouples (CETs) provide alternative indication for all of the post accident functions. In many instances T_{cold} provides alternative indication for T_{hot} and likewise T_{hot} provides alternative indication for T_{cold}. These alternative indications are Technical Specification Post Accident Monitoring instruments. Since T_{hot} and T_{cold} are not presently in the Technical Specifications, the single channel on each loop is the plant design basis, and there are alternative means of determining when to take the actions these instruments would indicate, NSP believes the proposed Technical Specifications provide acceptable control of the facility.

If you have any questions related to this modified license amendment request please contact myself or Dale Vincent at 612-388-6758 X4107.

M D Wadley

M. D. Wadley
Plant Manager,
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Table I
Table II
Attachment 1: Marked Up Technical Specification Pages
Attachment 2: Revised Technical Specification Pages

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Senior Resident Inspector, NRC
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Attn: Kris Sanda
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TABLE I

T_{hot} Post Accident Function and Alternative Indication

Post Accident Function	**Alternate Indication**
Verify RCS Natural Circulation Established	Core Exit Thermocouples T_{cold} Steam Generator Pressure
Avoid N_2 Injection from SI Accumulators	Core Exit Thermocouples
Stop SI Pumps and Initiate RCS Depressurization	Core Exit Thermocouples
Temperature Indication to Place RHR in Service	Core Exit Thermocouples
Verify Subcooling (Avoid Spurious SI)	Core Exit Thermocouples
Cooldown and Depressurize RCS (preclude void formation)	Core Exit Thermocouples T_{cold}

TABLE II

T_{cold} Post Accident Function and Alternative Indication

Post Accident Function	**Alternate Indication**
Verify RCS Natural Circulation Established	Core Exit Thermocouples T_{hot} Steam Generator Pressure
Limit RCS Cooldown Rate	Core Exit Thermocouples T_{hot} Steam Generator Pressure
Place Over Pressure Protection System in Service	Core Exit Thermocouples T_{hot}

SUPPLEMENT to LICENSE AMENDMENT REQUEST Dated January 10, 1995

Post Accident Monitoring Technical
Specification Conformance to Standard Technical Specifications

ATTACHMENT 1

Appendix A, Technical Specification Marked Up Pages

new TABLE TS.3.15-1 Page 1
new TABLE TS.3.15-1 Page 2
B.3.15-1