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May 22, 1984

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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 in Support of the Request for Exemption
from the Requirement of Section III.0 of Appendix R to
10 CFR Part 50 Dated April 5, 1984

Reference (a) Letter from D M Musolf to Director of NRR Dated April 5, 1984 "Information in Support of Exemption Requests Submitted January 23, 1984 and Request for Exemption from the Requirements of Section III.0 of Appendix R to 10 CFR Part 50"

Pursuant to the Staff's review of Attachment 1 to Reference (a) a question was raised as to the seismic design classification of the piping which would carry the lube oil from Sump A to the aerated sump tank, the first vented closed container. This letter is intended to confirm the response as given in numerous telephone conversations between NSP and the Staff.

The piping from the Sump A pumps, including the pump, to the first valve (WL-29-17, WL-29-18, 2WL-29-17 and 2WL-29-18) is Seismic Category III. The runs are approximately 6½ feet long. The piping from the first valve, up to and including containment isolation valves (SV-33632, SV-33633, SV-33756 and SV-33757) is Seismic Category I. The remaining portion of the piping in the Auxiliary Building is Seismic Category III.

Those portions of the piping which have been designed to Seismic Category III have been reviewed against the requirements of Reg. Guide 1.29, Paragraph C-2 and it has been concluded that if failure of those portions of this piping which were designed to Seismic Category III were to occur during a seismic event the functions of the plant features described in Paragraph C-1 (a thru q) of Reg. Guide 1.29 would not be affected and the plant could be brought to cold shutdown.

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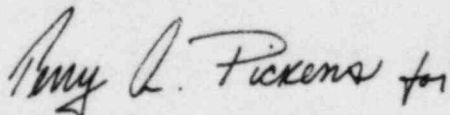
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Dir, NRR
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These conclusions are supported by the facts that of the subject piping inside containment only approximately 6½ feet is not Seismic Category I. That 6½ feet contains only approximately 2½ feet of horizontal piping. Any failure of the piping in this area would lead to the lube oil returning to the sump area. As was stated in Reference (a) there is no safe shutdown equipment in the sump area. The Seismic Category III piping in the Auxiliary Building is located adjacent to the hold-up tank valve gallery and is separated from any safe shutdown equipment by concrete walls.

Please contact us if you have any questions or if additional information is required.



David Musolf
Manager-Nuclear Support Services

DMM/TAP/dab

cc: Sec of the Commission (Original and 2 copies)
Regional Administrator-III
NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff