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 May 7, 1992

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. Exhibits B and C are copies of the Prairie Island Technical Specifications incorporating the proposed changes.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By _____
Thomas M Parker
Manager
Nuclear Support Services

On this 7th day of May 1992 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.

_____

JUDY L. KLAPPERICK
NOTARY PUBLIC-MINNESOTA
ANOKA COUNTY
My Commission Expires Sept. 29, 1997

Exhibit A

Prairie Island Nuclear Generating Plant
License Amendment Request Dated May 7, 1992

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:

1. Relocation of Containment Penetration List

Background

This license amendment request proposes the relocation of the Prairie Island Technical Specification Containment Penetration List into plant procedures in accordance with the guidance provided in Generic Letter 91-08, "Removal of Component Lists From Technical Specifications".

The Containment Penetration List in the Prairie Island Technical Specification Section 4.4 will be relocated into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the Technical Specifications. The removal of the Containment Penetration List from Technical Specifications will permit administrative control of changes to this list without processing a license amendment. Any change to the Containment Penetration List once it is incorporated in the plant procedures will be subject to the requirements specified in the Administrative Controls Section of the Technical Specifications on changes to plant procedures. The change control provisions of the Technical Specifications will provide an adequate means to control changes to the Containment Penetration List.

The removal of the Containment Penetration List from the Prairie Island Technical Specifications per the guidance described in Generic Letter 91-08 provides an acceptable alternative to identifying every containment penetration by its plant identification number in the Technical Specification Containment Penetration List. The removal of the Containment Penetration List is acceptable because it does not alter existing Technical Specification requirements or those components to which they apply.

Proposed Changes and Reasons for Change

The proposed changes to the Prairie Island Technical Specifications being implemented in response to Generic Letter 91-08 are described below, and the specific wording changes to Technical Specifications are shown in Exhibits B and C.

A. Proposed changes to Technical Specification List of Tables

The reference to Table TS.4.4-1, "Unit 1 and Unit 2 Penetration Designation for Leakage Tests", is being deleted in response to the deletion of the table from the Technical Specifications.

B. Proposed changes to Technical Specification Section 1.0

Item 2 is being deleted from the definition of Containment Integrity in Section 1.0. The reference to Table TS.4.4-1 will no longer be appropriate following deletion of the table. The requirement for the installation of blind flanges required by Table TS.4.4-1 is being deleted because it is redundant to the requirement in Item 1.b of the Containment Integrity definition which states that all penetrations are either closed by manual valves, blind flanges or deactivated automatic valves.

C. Proposed changes to Technical Specification Section 3.6.C

The references to Table TS.4.4-1 being deleted from Sections 3.6.C.2 and 3.6.C.3 in response to the deletion of the table from the Technical Specifications.

D. Proposed changes to Technical Specification Section 4.4.A

The references to Table TS.4.4-1 being deleted from Sections 4.4.A.2, 4.4.A.4.a and 4.4.A.4.b in response to the deletion of the table from the Technical Specifications. The term "containment system integrity" is being changed to "CONTAINMENT INTEGRITY" in Section 4.4.A.2 to be consistent with the current terminology in Section 1.0 and the policy for capitalizing all defined terms. The acronym "ABSVZ" is being spelled out in Sections 4.4.A.4.a and 4.4.A.4.b for clarity and consistency with Sections 4.4.A.5 and 4.4.A.6.

D. Proposed Relocation of Technical Specification Table TS.4.4-1

As discussed above, per the guidance in Generic Letter 91-08, Table TS.4.4-1, "Unit 1 and Unit 2 Penetration Designation for Leakage Tests", is being relocated into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the Prairie Island Technical Specifications.

License Amendment No. 62, dated February 23, 1983 revised the Prairie Island Technical Specifications to conform to the requirements of Appendix J to 10 CFR Part 50. Notes 1, 2 and 5 of Table TS.4.4-1 were incorporated into the Prairie Island Technical Specifications by License Amendment No. 62 to provide clarifications and exemptions to the Type B and C testing requirements of Appendix J to 10 CFR Part 50.

Notes 1, 2 and 5 of Table TS.4.4-1 are being incorporated into Technical Specification Section 4.4.A.2 so that the applicability of the Appendix J testing requirements remains clearly defined in the Technical Specifications. While the reference of these notes to specific containment penetrations is being relocated out of the Technical Specifications with Table TS.4.4-1, we consider the specific clarifications and exemptions incorporated into Table TS.4.4-1 by License Amendment 62 still binding. The reference of Notes 1, 2 and 5 to the specific containment penetrations will be maintained in the Prairie Island Updated Safety Analysis Report.

Note 3 of Table TS.4.4-1, which defines terms utilized in Table TS.4.4-1, is not being retained in the Technical Specifications because it is an integral part of the Table and serves no useful purpose in the Technical Specifications once the table is relocated.

Note 4 of Table TS.4.4-1, which describes which penetrations have blank flanges, is not being retained in the Technical Specifications because of its reference to specific penetration numbers. The information provided by Note 4 will be relocated with Table TS.4.4-1 to the plant procedures and the Prairie Island Updated Safety Analysis Report.

Note 6 of Table TS 4.4-1 is being deleted, it provides information which is also provided by Section 3.6.D.2.b of the Technical Specifications.

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.

   Relocation of the Containment Penetration List to plant procedures is consistent with the guidance in Generic Letter 91-08, it does not alter existing Technical Specification requirements or those components to which they apply. Any change to the Containment Penetration List, once it is incorporated in the plant procedures, will be subject to the requirements specified in the Administrative Controls Section of the Technical Specifications on changes to plant procedures. The procedure change control provisions of the Technical Specifications will provide an adequate means to control changes to the Containment Penetration List.

Therefore, because the removal of the Containment Penetration List from the Prairie Island Technical Specifications does not alter existing Technical Specification requirements and because changes to the Containment Penetration List will be controlled per the Administrative Controls Section of the Technical Specifications, the proposed changes will not significantly affect 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.

There are no new failure modes or mechanisms associated with the proposed changes. The proposed changes do not involve any modification in operational limits. Only the list of containment penetrations is being removed from Technical Specifications.

The proposed changes are consistent with the NRC Staff guidance provided by Generic Letter 91-08, "Removal of Component Lists From Technical Specifications". The NRC Staff concluded in Generic Letter 90-09, that the removal of component lists from the Technical Specifications per the guidance described in Generic Letter 91-08 provides an acceptable alternative to identifying every component by its plant identification number in the Technical Specifications because the removal of the lists does not alter existing Technical Specification requirements or those components to which they apply.

Since the proposed changes conform with the guidance in Generic Letter 91-08, and because the removal of the Containment Penetration List from the Prairie Island Technical Specifications does not alter existing Technical Specification requirements or those components to which they apply, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated, and the accident analyses presented in the Updated Safety Analysis Report will remain bounding.

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

Relocation of the Containment Penetration List to plant procedures is consistent with the guidance in Generic Letter 91-08, it does not alter existing Technical Specification requirements or those components to which they apply. Any change to the Containment Penetration List, once it is incorporated in the plant procedures, will be subject to the requirements specified in the Administrative Controls Section of the Technical Specifications on changes to plant procedures. The procedure change control provisions of the Technical Specifications will provide an adequate means to control changes to the Containment Penetration List.

Therefore, because the removal of the Containment Penetration List from the Prairie Island Technical Specifications does not alter existing Technical Specification requirements and because changes to the Containment Penetration List will be controlled per the Administrative Controls Section of the Technical Specifications, the proposed changes will not result in any reduction in the plant's margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of the Prairie Island Nuclear Generating Plant in accordance with the proposed license amendment request does not involve any significant hazards considerations as defined by NRC regulations in 10 CFR Part 50, Section 50.92.

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.

2. Non-Automatic Containment Isolation Valve Applicability

Background

This license amendment request proposes changes to Prairie Island Technical Specification Section 3.6.C which will clarify when the non-automatic containment isolation valves are required to be operable and what actions are to be taken in response to the inoperability of a non-automatic containment isolation valve.

Proposed Changes and Reasons for Change

The existing wording in Technical Specification Section 3.6.C.1 does not specify when the non-automatic containment isolation vaives are required to be operable and does not specifically refer to the containment isolation valve action statements in Section 3.6.C.3. It is not clear per the existing wording in Sections 3.6.C.1 and 3.6.C.3 that the action statements in Section 3.6.C.3 apply to the non-automatic containment isolation valves.

Section 3.6.C.1 is being revised, as shown in Exhibit B, to specify that the non-automatic containment isolation valves be operable whenever containment integrity is required and to refer to the action statements in Section 3.6.C.3. The changes made to Section 3.6.C.3 in response to removal of Table TS.4.4-1 make it clear that the specified action statements apply to all containment isolation valves, both automatic and non-automatic.

The proposed changes will clearly define when the non-automatic containment isolation valves are required to be operable and what actions are to be taken if they are found to be inoperable. They will aid in the compliance with Technical Specification requirements and will thus enhance plant safety.

The specific wording changes to the Prairie Island Technical Specifications proposed by this License Amendment Request are shown in Exhibits B and C.

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 proposed changes clearly define when the non-automatic containment isolation valves are required to be operable and clarify that the action statements in Section 3.6.C also apply to non-automatic containment isolation valves. The clarification of Section 3.6.C applicability will ensure that the non-automatic containment isolation valves are maintained operable when required to maintain plant safety.

The clarification that the action statements in Section 3.6.C.3 are applicable to non-automatic containment isolation valves will ensure that appropriate action is taken in response to the inoperability of a non-automatic containment isolation valve. The actual actions, specified by the Technical Specifications, to be taken in response to an inoperable containment isolation valve, either non-automatic or automatic are not affected by the proposed changes.

Therefore, the proposed changes will not significantly affect 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.

There are no new failure modes or mechanisms associated with the proposed changes. The proposed changes do not involve any modification in operational limits. The proposed changes only clarify that the action statements in Section 3.6.C also apply to non-automatic containment isolation valves. The actual actions to be taken in response to an inoperable containment isolation valve, either non-automatic or automatic are not affected by the proposed changes.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated, and the accident analyses presented in the Updated Safety Analysis Report will remain bounding.

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

The proposed changes clearly define when the non-automatic containment isolation valves are required to be operable and clarify that the action statements in Section 3.6.C also apply to non-automatic containment isolation valves. The clarification of Section 3.6.C applicability will ensure that the non-automatic containment isolation valves are maintained operable when required to maintain plant safety.

The clarification that the action statements in Section 3.6.C.3 are applicable to non-automatic containment isolation valves will reduce the chances that inappropriate action is taken in response to the inoperability of a non-automatic containment isolation valve. The actual actions, specified by the Technical Specifications, to be taken in response to an inoperable containment isolation valve, either non-automatic or automatic are not affected by the proposed changes.

The proposed changes more clearly define when the non-automatic containment isolation valves are required to be operable and what actions are to be taken if they are found to be inoperable and will aid in the compliance with Technical Specification requirements and will thus increase the plant's margin to safety. Therefore, the proposed changes will not result in any reduction in the plant's margin of safety.

Based on the evaluation described above and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of the Prairie Island Nuclear Generating Plant in accordance with the proposed license amendment request does not involve any significant hazards considerations as defined by NRC regulations in 10 CFR Part 50, Section 50.92.

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.

3. Deletion Of Condensate Supply Cross Connect Valve

Background

Specification 3.4.B.1.g currently specifies that condensate cross connect valves C-41-1 and C-41-2 be blocked and tagged open. A reliability study of the Prairie Island auxiliary feedwater system was completed in April 1986. That reliability study concluded that the reliability of the auxiliary feedwater system could be improved if valve C-41-1 was removed from the condensate supply to the auxiliary feedwater pumps and replaced with a spool piece (see Figure 1).

Valve C-41-1 was subsequently removed and replaced with a spool piece. However, due to an oversight, the valve was removed and replaced with a spool piece before it was removed from the Technical Specifications. Valve C-41-1 was originally included in the Technical Specifications to protect against inadvertent closure of the valve which would adversely affect the condensate supply to the auxiliary feedwater pumps. When it was identified that the valve had been removed without modifying the Technical Specifications, it was concluded that the spool piece performed the same function as a blocked and tagged open valve and that the use of the spool piece met the intent of the Technical Specification 3.4.b.1.g. Based on the reliability study discussed above, the use of the spool piece in place of the blocked and tagged valve improves the reliability of the auxiliary feedwater system and results in a plant configuration with a larger margin of safety than is provided by the current Technical Specification requirements in Section 3.4.B.1.g.

Proposed Changes and Reasons for Change

This license amendment request proposes the deletion of condensate cross connect valve C-41-1 from Prairie Island Technical Specification Section 3.4.B.1.g. The proposed changes are being made to bring the Prairie Island Technical Specifications into agreement with the actual plant configuration. The specific wording changes to the Prairie Island Technical Specifications proposed by this License Amendment Request are shown in Exhibits B and C.

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 spool piece which replaced valve C-41-1 performs the same function as a blocked and tagged open valve and meets the intent of the Technical Specification 3.4.B.1.g. Based on the auxiliary feedwater system reliability study, discussed above, the use of the spool piece in place of the blocked and tagged valve C-41-1 results in a plant

configuration with less chance of the condensate supply to the auxiliary feedwater pumps being blocked by the inadvertent closing of a valve and thus improves the reliability of the auxiliary feedwater system.

Therefore, because the proposed changes improve the reliability of the auxiliary feedwater system and do not change the intent of the current Technical Specifications, there is no 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.

There are no new failure modes or mechanisms associated with the proposed changes. The replacement of a blocked and tagged open valve with a spool piece actually eliminates a possible failure mechanism which could adversely affect auxiliary feedwater system operation. The proposed changes do not involve any modification in operational limits.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated, and the accident analyses presented in the Updated Safety Analysis Report will remain bounding.

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

The spool piece which replaced valve C-41-1 performs the same function as a blocked and tagged open valve. The use of the spool piece meets the intent of the Technical Specification 3.4.B.1.g. Based on the auxiliary feedwater system reliability study discussed above, the use of the spool piece in place of the blocked and tagged valve C-41-1 results in a plant configuration with less chance of the condensate supply to the auxiliary feedwater pumps being blocked by the inadvertent closing of a valve and thus improves the reliability of the auxiliary feedwater system and increases the plants margin of safety.

Therefore, the proposed changes will not result in any reduction in the plant's margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, Northern States Power Company has determined that operation of the Prairie Island Nuclear Generating Plant in accordance with the proposed license amendment request does not involve any significant hazards considerations as defined by NRC regulations in 10 CFR Part 50, Section 50.92.

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.

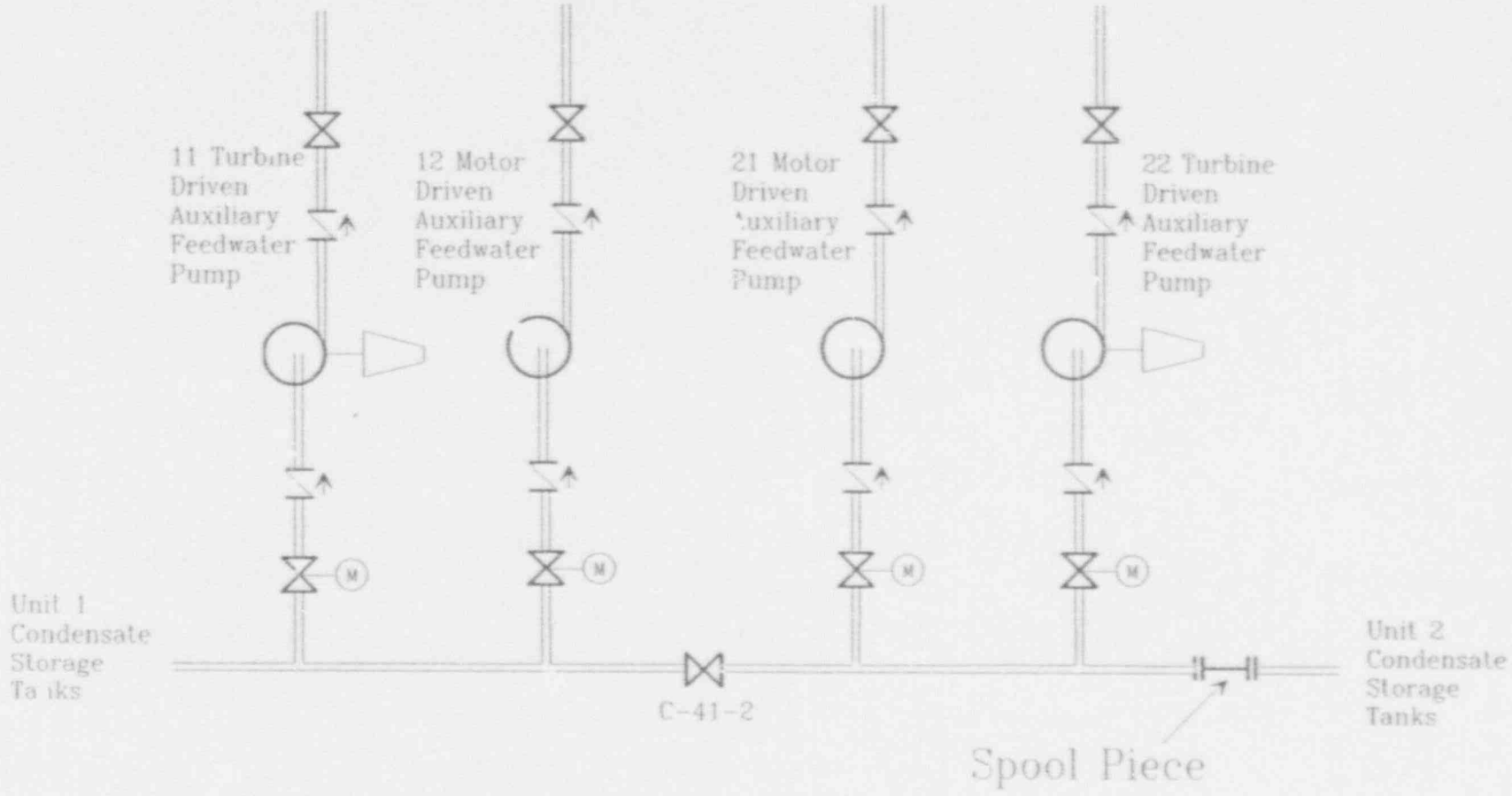

FIGURE 1

Auxiliary Feedwater System
Condensate Supply