



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 98 AND 91 TO
FACILITY OPERATING LICENSE NOS. DPR-42 AND DPR-60
NORTHERN STATES POWER COMPANY
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-282 AND 50-306

1.0 INTRODUCTION

By letter dated January 10, 1992, Northern States Power Company (NSP or the licensee) requested amendments to the Technical Specifications (TS) appended to Facility Operating License Nos. DPR-42 and DPR-60 for the Prairie Island Nuclear Generating Plant, Unit Nos. 1 and 2. The proposed amendments revise the TS, Section 4.13, in response to Generic Letter (GL) 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions," which provides an alternate schedule for visual inspection of snubbers. The current snubber visual inspection schedule in TS Section 4.13.A is being replaced with a reference to a new TS Table TS 4.13-1 and the current snubber visual inspection acceptance criteria in TS Section 4.13.B are being revised per the guidance in GL 90-09.

The amendments also revise TS Section 4.13.C and associated Bases to remove the requirement that functional testing of snubbers be done during cold shutdown.

2.0 EVALUATION

The current schedule for visual inspection is based on the number of inoperable snubbers found during the previous visual inspection. Because the current schedule is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements.

To alleviate this situation, the staff developed an alternate schedule for visual inspection in GL 90-09, that maintains the same confidence level as the existing schedule and generally will allow the snubber visual inspections and corrective actions to be performed during plant outages. In addition, the implementation of the proposed alternative schedule will allow for less frequent snubber inspections, provided the results of ongoing inspections

are favorable. The alternate inspection schedule is based on the number of unacceptable snubbers found during the previous inspection, the total snubber category size, and the previous inspection interval.

Because this line-item TS improvement will reduce future occupational radiation exposure and is highly cost-effective, the alternate inspection schedule is consistent with the Commission's policy statement on TS improvements.

The proposed changes to the Prairie Island TS are being implemented in response to GL 90-09 and are consistent with the guidance in GL 90-09. We, therefore, find the changes to TS Section 4.13 Objectives, 4.13.A and 4.13.B acceptable.

Current requirements in TS Section 4.13.C specify that functional testing of snubbers shall be conducted at least once per 18 months during cold shutdown. The proposed changes to Section 4.13.C and associated Bases delete the requirement that functional testing be performed only during cold shutdown and thereby provide additional flexibility in the functional testing of snubbers. Plant conditions for the performance of a specific snubber functional test should be established by the operability requirements for the supported systems. It may be in the best interest of ALARA and plant safety to test snubbers at conditions above cold shutdown or even at power, as long as the operability of the supported system is maintained or the action requirements in Section 3 of the TS are properly implemented. Under some circumstances, the removal of a snubber from service for functional testing may result in the voluntary entrance into TS action statements.

Prairie Island has implemented administrative controls for the voluntary entrance into a TS action statement for the purpose of performing maintenance activities. Those same controls would be implemented if the functional testing of a snubber results in the voluntary entrance into a TS action statement. The administrative controls specify that voluntary entrance into a TS action statement should be based on the premise that it will increase plant safety and require that it be authorized by plant management. The controls include recommendations intended to minimize the length of downtime and to maintain operability of redundant equipment.

The use of the administrative controls described above will provide adequate assurance that the removal of snubbers from service for functional testing will be properly evaluated and controlled, such that plant safety will not be adversely affected. We, therefore, find the changes to TS Section 4.13.C acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Minnesota State Official was notified of the proposed issuance of these amendments. The State Official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change to the surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (57 FR 4490). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: A. Masciantonio

Date: May 8, 1992