

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

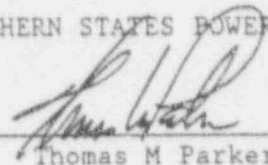
LICENSE AMENDMENT REQUEST DATED June 15, 1992

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 15th day of June 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.

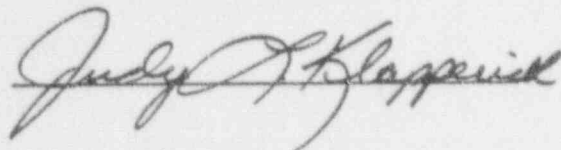


Exhibit A

Prairie Island Nuclear Generating Plant License Amendment Request Dated June 15, 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:

Background

Generic Letter 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements", provided guidance on improvements to Section 4.0 of the Standard Technical Specifications which could be voluntarily adopted by licensees. One of the improvements described in Generic Letter 87-09 revised Standard Technical Specification 4.0.3 to clarify when a missed surveillance constitutes a violation of the operability requirements of a Limiting Condition for Operation and to clarify the applicability of the action requirements and the time during which the limits apply.

This license amendment request proposes the incorporation of Standard Technical Specification Section 4.0.3, as modified by Generic Letter 87-09, into the Prairie Island Technical Specifications.

Proposed Changes and Reasons for Change

The proposed changes to the Prairie Island Technical Specifications being implemented in response to Generic Letter 87-09 are described below, and the specific wording changes to Technical Specifications are shown in Exhibits B and C.

A. Proposed changes to Technical Specification Table of Contents

The page number for "4.0 SURVEILLANCE REQUIREMENTS" is being changed from "4.1-1" to "4.0-1" to reflect the new Section 4.0 described below.

B. Proposed changes to Technical Specification Section 4.0

Section 4.0 has been relocated and reformatted to be consistent with Section 3.0, which was incorporated into the Prairie Island Technical Specifications by License Amendment Nos. 91 and 84. The requirements of the current Section 4.0 have been relocated to Specification 4.0.A and have been expanded to include a statement similar to Standard Technical Specification 4.0.2 which states that surveillance requirements shall be performed within the specified time intervals. The current Section 4.0 requirements have been incorporated, with only editorial changes, into the new Specification 4.0.A as exceptions to the requirement that surveillances shall be performed within the specified time interval. The proposed Specification 4.0.A will more clearly state the requirements for completion of surveillance requirements and the allowed exceptions to those requirements.

C. Proposed New Technical Specification Section 4.0.B

A new Specification 4.0.B is being incorporated into Section 4.0 to add Standard Technical Specification Section 4.0.3, as modified by Generic Letter 87-09, to the Prairie Island Technical Specifications. The incorporation of the proposed Specification 4.0.B will clarify when a missed surveillance constitutes a violation of the operability requirements of a limiting condition for operation and will clarify the applicability of action requirements and the time during which the limits apply.

Safety Evaluation

It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance has been missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance.

The NRC Staff concluded in Generic Letter 87-09, after taking several factors into account, that 24 hours would be an acceptable time limit for completing a missed surveillance when the allowed out of service times of the action requirements are less than this time limit or when shutdown action requirements apply. The NRC Staff concluded that the 24 hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed.

In agreement with the conclusions of the NRC Staff evaluation of the modified Standard Technical Specification 4.0.3, described in Generic Letter 87-09, Northern States Power believes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed Technical Specification changes.

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 to the current contents of Specification 4.0 are administrative in nature and therefore have no affect on accidents previously evaluated.

The proposed Specification 4.0.B conforms with the guidance provided in Generic Letter 87-09. It proposes a delay of up to 24 hours in the application of action requirements to permit the completion of a missed surveillance. The 24 hour time limit in the application of the action

statements, following the identification of a missed surveillance, balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. Therefore, the proposed Specification 4.0.B 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.

The proposed changes to the current contents of Specification 4.0 are administrative in nature and therefore will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed Specification 4.0.B only affects the performance of surveillance requirements. While it may result in the delay of operability verification following discovery of a missed surveillance, it does not involve any modification in operational limits. There are no new failure modes or mechanisms associated with the proposed Specification 4.0.B because the proposed changes will not affect what plant equipment is required to be operable or how that equipment is operated. 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 to the current contents of Specification 4.0 are administrative in nature and therefore will have no affect on the plant's margin of safety.

The 24 hour delay for completion of a missed surveillance test included in the proposed Specification 4.0.B conforms with the NRC Staff guidance provided by Generic Letter 87-09. The NRC Staff concluded in Generic Letter 87-09, after taking several factors into account, that 24 hours would be an acceptable time limit for completing a missed surveillance when the allowed out of service times of the action requirements are less than this time limit or when shutdown action requirements apply. The NRC Staff concluded that the 24 hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. Therefore, the proposed Specification 4.0.B 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

Northern States Power has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration,
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR Part 51 Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.