

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

DOCKET NOS. 50-282  
50-306

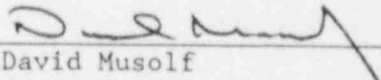
REQUEST FOR AMENDMENT TO  
OPERATING LICENSES DPR-42 AND DPR-60

REVISION NO. 2 TO LICENSE AMENDMENT REQUEST DATED AUGUST 14, 1987

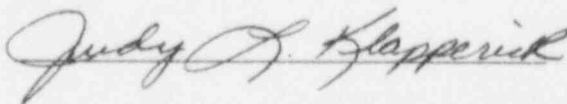
Northern States Power Company, a Minnesota corporation, requests authorization for changes to Appendix A of the Prairie Island Operating Licenses as shown on the attachments labeled Exhibits A, B, and C. Exhibit A describes the proposed changes, describes the reasons for the changes, and contains a significant hazards evaluation. Exhibits B and C are copies of the Prairie Island Technical Specifications incorporating the proposed changes.

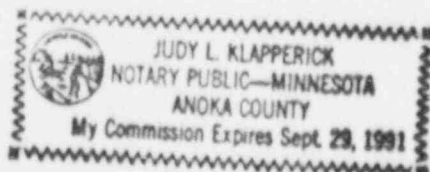
This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By   
David Musolf  
Manager-Nuclear Support Services

On this 4th day of January 1988 before me a notary public in and for said County, personally appeared David Musolf, 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.





8801130202 880104  
PDR ADDCK 05000282  
P PDR

## Exhibit A

Prairie Island Nuclear Generating Plant  
Revision No. 2 to License Amendment Request Dated August 14, 1987

### Description and Evaluation of Proposed Change to Appendix A of Operating Licenses DPR-42 and DPR-60

Pursuant to 10 CFR Part 50, Section 50.90, the holders of Operating Licenses DPR-42 and DPR-60 hereby propose the following changes to Appendix A, Technical Specifications:

#### 1. Changes in Plant Organization, Figure TS.6.1-2

##### Proposed Changes

- a. Delete Plant Superintendent Operations & Maintenance. Transfer responsibility for implementation of the fire protection program to the Plant Manager.
- b. Change Superintendent of Maintenance to General Superintendent of Plant Maintenance.
- c. Change Superintendent of Operations of General Superintendent Plant Operations.
- d. Change Plant Superintendent Engineering & Radiation Protection to General Superintendent Plant Engineering & Radiation Protection.
- e. Add a new position of General Superintendent Planning and Services. Remove Supervisor of Security and Services from the organization diagram.
- f. Add a new position of Assistant to the Plant Manager.
- g. Add the new positions of Shift Manager under the General Superintendent Plant Operations.

Refer to Exhibit B, Figure TS.6.1-2 for the proposed changes.

##### Reason for Changes

The position of Plant Superintendent Operations & Maintenance has been eliminated and the positions of Superintendent of Maintenance and Superintendent of Operations have been upgraded to General Superintendents reporting directly to the Plant Manager. This change will provide direct access to the plant manager in

EXHIBIT A

- 2 -

the critical areas of plant maintenance and operations. In accordance with our Operational Quality Assurance Program, Appendix C, the Plant Manager is the appropriate individual to designate as responsible for the fire protection program.

The title change to General Superintendent Plant Engineering & Radiation Protection has been made to be consistent with the upgrade in the title of the maintenance and operations superintendents.

A new position of General Superintendent Planning and Services has been created that reports directly to the Plant Manager. This new position will provide improved management control in the areas of planning, administration, security, and general house-keeping.

A new position of Assistant to the Plant Manager has been created to provide support to the Plant Manager for special projects.

The new position of Shift Manager has been created to implement the Commission Policy Statement on Engineering Expertise on Shift. Refer to our letter dated May 9, 1986 which describes actions being taken to phase in this new position which will fill the dual role of licensed Senior Reactor Operator and Shift Technical Advisor.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to Appendix A of 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 evaluation 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 amendment would revise the Technical Specifications to reflect a number of improvements in the plant organization and changes in title of plant supervisors. As such, these changes do not affect existing plant systems or procedures and they cannot affect previously analyzed accidents.

EXHIBIT A

- 3 -

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification changes relate to the structure of the plant organization. As noted above, no changes are made in plant systems or procedures. These purely administrative changes cannot create a new or different kind of accident from any previously evaluated.

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

The proposed Technical Specification wording changes do not, as stated above, affect anything other than the organization structure of the plant. Therefore, there can be no impact on any existing margin of safety.

The Commission has provided guidance concerning the application of the Standards for determining whether a significant hazards consideration exists by providing certain examples of amendments that are considered not likely to involve significant hazards considerations. These examples were published in the Federal Register on March 6, 1986.

Changes proposed in this License Amendment Request are representative of example (i) since they are administrative changes.

## 2. Requirements for Senior Reactor Operator Licenses

### Proposed Changes

- a. Delete the "(LSO)" notation for the General Superintendent Plant Engineering and Radiation Protection in Figure 6.1-2.
- b. Change the "(LSO)" for the General Superintendent Plant Operations to "(FLSO)" in Figure 6.1-2.
- c. Add a footnote to define "(FLSO)" at the bottom of Figure 6.1-2 as follows:

FLSO    Formerly Licensed Senior Operator or Licensed Senior Operator

EXHIBIT A

- 4 -

e. Add a "#" to the General Superintendent of operations and add a footnote to Table 6.1.2 as follows:

# The Operations Group will have at least one management individual who holds a senior license who is not assigned to a rotating shift.

f. Revise Specification 6.5.G to read, "...may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License."

Refer to Exhibit B, Figure TS.6.1-2 and page TS.6.5-4, for the proposed changes.

Reason for Changes

Changes (a) through (e) would revise the Technical Specifications to change the requirements for Senior Reactor Operator (SRO) Licenses for plant management to be consistent with the requirements of the NRC Standard Technical Specifications.

Change (f) revises the SRO license requirements for management personnel who may authorize temporary procedure changes. This change is also consistent with the NRC Standard Technical Specifications.

In the past, Northern States Power Company (NSP) has encouraged plant management and technical support staff personnel to obtain and maintain current SRO licenses. Recent changes to 10 CFR Part 55, and related NRC Staff guidance, have significantly upgraded SRO requalification program requirements. While these changes will provide added assurance that all licensed personnel are competent in control room operations, the amount of time and effort required to maintain a current SRO license has become prohibitive for plant management and support personnel not directly involved in operations.

NSP will provide alternative training for plant management and support personnel in lieu of maintaining an SRO license and participating in license requalification training. This Program will maintain a high level of knowledge of nuclear fundamentals, reactor theory, and plant operations in management and support personnel. Most plant management and support personnel not directly involved in operations will participate in this program in lieu of maintaining a current NRC SRO license. Most utilities operating nuclear generating facilities have similar programs.

EXHIBIT A

- 5 -

The changes we have proposed would revise the SRO requirements for management personnel specified in the Prairie Island Technical Specifications to be equivalent to the SRO requirements specified in the Standard Technical Specifications, NUREG-0452. This would reduce the number of SRO licenses required for management personnel.

Safety Evaluation and Determination of Significant Hazards Considerations

The proposed changes to Appendix A of 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 evaluation 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 amendment would revise the Technical Specifications to eliminate certain excessive requirements for licensing of plant management personnel. It would also revise the approvals needed for temporary procedure changes from two licensed members of management to one licensed and one unlicensed member of management. License requirements for plant operations staff, including the Shift Managers and Shift Supervisors (both are SRO licensed management personnel), would not change. Alternative training will be provided for management and support personnel. Because there are no changes being proposed in the license requirements for individuals controlling the reactor and other plant systems, there will be no impact on the quality of plant operations. The proposed changes cannot, therefore, result in a degradation in the quality of plant operations which would increase the probability of an accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification changes relate to the requirements for plant management personnel to hold active SRO licenses. No changes are proposed in the license requirements for personnel actually operating the reactor and other plant systems or their supervisors. The changes, therefore, cannot

EXHIBIT A

- 6 -

result in a degradation in the quality of plant operation or an increase in the probability of operator error resulting in a new or different kind of accident from any accident previously evaluated.

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

The proposed Technical Specification wording changes do not, for the reasons stated above, affect the quality of plant operations. Therefore, there can be no impact on any existing margin of safety.

The Commission has provided guidance concerning the application of the Standards for determining whether a significant hazards consideration exists by providing certain examples of amendments that are considered not likely to involve significant hazards considerations. These examples were published in the Federal Register on March 6, 1986.

Changes proposed in this License Amendment Request are representative of example (i) since they are administrative changes.