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

OPERATING I CENSE CHANGES

Northern States Power Company, a Minnesota corporation, requests authorization for changes to the Prairie Island Operating License as shown in the attachments labeled Exhibits A, B, and C. Exhibit A contains a description of the proposed changes, the reason for requesting the changes, and the supporting safety evaluation and significant hazards determination. Exhibit B contains current Prairie Island Operating License pages marked-up to show the proposed changes. Exhibit C contains the revised Operating License pages.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

Joel P. Sorensen

Site General Manager

Prairie Island Nuclear Generating Plant

On this 19 day of March 1990 before me a notary public in and for said County, personally appeared Joel P. Sorensen, Site General Manager, Prairie Island Nuclear Generating Plant, 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.

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Exhibit A

Prairie Island Nuclear Generating Plant License Amendment Request Dated March 19, 1999

Evaluation of Proposed Changes to the Operating License of Operating License DPR-42 and DPR-60

Pursuant to 10 CFR Part 50, Section 50.59 and 50.90, the holders of Operating Licenses DPR-42 and DPR-60 hereby propose the following changes to the Facility Licenses:

Background and Reasons for Changes

Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements", issued April 24, 1986, requested that licensees incorporate the NRC approved Fire Protection Program in their Final Safety Analysis Reports (FSAR). The FSAR update would include the incorporation of the Fire Protection Program, including the fire hazards analysis and major commitments that form the basis for the Fire Protection Program. GL 86-10 also encouraged licensees to apply for an amendment to their Operating License (1) to replace the current Operating Licenses regarding fire protection with a new standard condition, and (2) to remove unnecessary fire protection Technical Specifications (TS). GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications", issued August 2, 1988, provided additional guidance for the preparation of a license amendment request to implement GL 86-10.

Hence, NSP, as part of a letter to the NRC, dated July 11, 1994, requested an amendment to the Operating License of each unit to remove fire protection requirements from Technical Specifications. Included in this submittal was a revision to section 2.C.4 of each Operating License, in accordance with the guidance from GL 86-10. The revised section listed NRC Safety Evaluation Reports (SER's) dated September 6, 1979, April 4, 1980 and December 29, 1980 which represent the initial SER for fire protection and two associated supplements. A blank was provided for the insertion, by the NRC, for the approval of the amendment. Per a subsequent NSP letter, dated April 18, 1995, the dates of additional SER's (February 14, 1978, July 28, 1981, September 12, 1984, June 25, 1985 and October 27, 1989) were provided to the NRC as clarifications. In a letter dated October 6, 1995, the NRC issued Amendment No. 120 to Facility Operating License No. DPR-42 and Amendment No. 113 to the Facility Operating License No. DPR-60 for the Prairie Island Nuclear Generating Plant, Unit No.'s 1 and 2, respectively. This amendment approved the changes proposed to Section 2.C.4 of the Operating Licenses.

This amendment request removes two of the SER's listed in Section 2.C.4 of each Operating License as described below and fixes a typographical error in a third. The remaining documents represent the initial SER and associated supplements for fire

protection, SER's that made substantial changes to the PINGP fire protection program, as well as the change to the Operating License pursuant to the requirements stated in GL 86-10.

A review of the Facility Operating Licenses DPR-42 and DPR-60 before and after the fire protection Technical Specifications were removed, determined that two of the SER's listed may be removed from the Operating License, Section 2.C.4 of each unit. In all, 15 SER's that affected the fire protection program or Technical Specification pages that describe(d) portions of the fire protection program were reviewed. This review checked for SER's that should be removed as references and SER's that should be added as references to Section 2.C.4 of the Operating License.

The review determined that section 2.C.4 of the Operating License should not refer to the SER dated September 12, 1984 because the associated license amendment merely fixed a number of typographical errors. These include changing "Hydant" to "Hydrant" and changing "house" to "House." The review further determined that section 2.C.4 of the Operating License should not refer to the SER dated June 25, 1985 because the associated license amendment changed only certain reporting requirements in order to make them consistent with Generic Letter 83-43.

NSP proposes to remove the SER's dated September 12, 1984 and June 25, 1985 from Section 2.C.4 of the Facility Operating Licenses DPR-42 and DPR-60, since each has no bearing on the approved fire protection program. NSP also proposes to correct the date of the SER currently dated April 4, 1980 to April 21, 1980, since a review of historical licensing documents indicates April 21, 1980 is the correct date. The remaining documents represent the initial SER and associated supplements for fire protection as was intended by GL 86-10. In addition, the elements of GL 88-12, as discussed in the SER dated October 6, 1995 remain unaffected by this proposed change.

Proposed Changes

The proposed changes to the Prairie Island Operating License related to Fire Protection are described below, and the specific changes to the Operating License are shown in Exhibit B.

Operating License section 2.C.(4) of each Operating License is modified, as shown in Exhibit B, to remove reference to two SER's that are no longer applicable to the Prairie Island fire protection program and to correct the date of one SER.

Safety Evaluation and Justification of Changes

All of the proposed changes are administrative in nature. They represent the removal of superfluous details from section 2.C.4 of the Operating License. Information to be removed includes reference to two Safety Evaluation Reports (SER's). Section 2.C.4 describes the referenced SER's as those that approved the PINGP fire protection program. The SER's to be removed as references to section 2.C.4 do not describe any significant portion of the fire protection program.

The information to be removed is not required for safe operation of either Unit 1 or Unit 2 of the Prairie Island Nuclear Generating Plant (PINGP). Northern States Power concludes there is reasonable assurance that the health and safety of the public will not be adversely affected by the proposed Technical Specification change.

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 accident previously evaluated.

The proposed changes are administrative in nature. The proposed changes clarify section 2.C.4 of the PINGP Unit 1 and Unit 2 Operating Licenses as to which CER's approved the PINGP fire protection program. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment that is used to mitigate the consequences of an accident, nor do they affect any assumptions or conditions in any of the accident analyses. Since the accident analyses remain bounding, their radiological consequences are not adversely affected.

Therefore, the proposed changes will not involve a significant 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 evaluated.

The proposed changes are administrative in nature. The proposed changes clarify section 2.C.4 of the PINGP Unit 1 and Unit 2 Operating Licenses as to which SER's approved the PINGP fire protection program. The proposed

changes do not involve any changes to the configuration or method of operation of any plant equipment.

Therefore, the proposed changes will not create the possibility of a new or different kind of accident.

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

The requested changes are administrative in nature. The proposed changes clarify section 2.C.4 of the PINGP Unit 1 and Unit 2 Operating Licenses as to which SER's approved the PINGP fire protection program.

Therefore, the proposed changes will not involve a significant reduction in the 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 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.

Environment Assessment

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

- 1. The changes do not involve any hazards consideration,
- The changes do not involve any change in the types or increase in the amounts of any effluents that may be released offsite, or
- 3. The changes do not involve any 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 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.