Prairie Island

24-Month Operating Cycle License Amendment Request

May 6, 2021

Agenda

- Opening Remarks
- Background
- Approach
- Precedents
- Schedule

Opening Remarks

Purpose:

Discuss proposed license amendment to use the deterministic guidance of GL 91-04 to adopt a 24-month operating cycle in lieu of using the Prairie Island (PI) TS Surveillance Frequency Control Program (SFCP)

Background

- A limitation was incorporated into TS SR 3.0.2 during transition to ITS in 2002 allowing NSPM (the licensee) to replace the custom PI TS SR Frequency of “Each Refueling Shutdown” to a value of 24-months
- Analysis demonstrated that an SR Frequency of up to 24-months was acceptable for this subset of SRs

Background (continued)

- NSPM implemented TSTF-425 (SFCP) at PI
  - Relocated most SRs to licensee control under SFCP defined by TS
  - Relocated the previous TS SR 3.0.2 limitation on grace to the Surveillance Test Interval (STI) document

2.0 TABLES

2.1 Unless noted otherwise, TS SR 3.0.2 does not apply to the SRs in Table 2.1 that have a Frequency of 24 months. That is, unless the Test Frequency column of Table 2.1 notes otherwise, the specified Frequency is met for each SR with a specified Frequency of 24 months if the SR is performed within 24 months, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

Background (continued)

- SRs that require an outage and have 24-month Frequency with no allowance for grace have resulted in refueling outages starting earlier with each successive outage
- Adding grace to SR’s with 24-month Frequency in the STI document will allow scheduling of outage start dates that are consistent each year

Approach

Submit a LAR to use the deterministic guidance of GL 91-04 to adopt a 24-month operating cycle, which will include:

- A summary of the methodology and assumptions used in the PI instrument drift analysis
- A summary of evaluations that confirm confidence for a calibration interval of 30 months for affected instruments
- Confirmation of values of drift used in setpoint calculations
- A list of applicable instruments and channels by TS section
- A confirmation that conditions/assumptions of the setpoint and safety analyses are reflected in PI surveillance procedures
- A summary description of the monitoring program

Approach (continued)

Proposed TS Markups

5.5.17 Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.

b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

c. The one-time 24 Month Fuel Cycle related Surveillance Requirement Frequency changes approved by the NRC in Units 1 and 2 License Amendments XXX/YYY are not subject to this provision. Subsequent changes are subject to the Surveillance Frequency Control Program.

ed. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

Precedents

- Fermi
- Robinson

Schedule

- NSPM plans to submit the LAR in early August in support of implementing the amendment before the 1R33 refueling outage that starts in the fall of 2022
- NSPM will be requesting a 12-month review following acceptance of the LAR


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