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**From:** Kuntz, Robert  
**Sent:** Wednesday, November 10, 2021 9:13 AM  
**To:** Kivi, Jeffrey L.  
**Cc:** Scott, Sara  
**Subject:** Request for Additional Information: RE: Prairie Island 24-Month Cycle Amendment Request (EPID: L-2021-LLA-0146)

By letter dated August 6, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML21218A093), Northern States Power Company, a Minnesota corporation (NSPM), doing business as Xcel Energy, submitted a license amendment for Prairie Island Nuclear Generating Plant, Units 1 and 2 to change the Technical Specifications (TSs) in support of a proposed change in the maximum surveillance intervals from 24 months to 30 months. The NRC staff has determined that additional information is required to complete its review. The NRC staff's request for additional information is included. During a clarification call held on November 9, 2021, a 30-day response was agreed upon. Therefore, the NRC staff anticipates a response by December 10, 2021. If NSPM requires additional time to respond contact me to discuss.

Robert Kuntz  
Senior Project Manager  
NRC/NRR/DORL/LPL3  
(301) 415-3733

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REQUESTS FOR ADDITIONAL INFORMATION  
24-MONTH CYCLE AMENDMENT  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-282 AND 50-306

**Regulatory Basis**

Title 10 of the Code of Federal Regulations (10 CFR) Part 50 "Domestic Licensing of Production and Utilization Facilities," Section 50.36, "Technical specifications," paragraph (a)(1), states in part, "Each applicant for a license authorizing operation of a production or utilization facility shall include in his application proposed technical specifications (TSs) in accordance with the requirements of this section."

10 CFR Part 50.36(c)(1)(ii)(A) of 10 CFR, states that limiting safety system settings (LSSS) are settings for automatic protective devices related to those variables having significant safety functions. This clause requires, in part, that where a LSSS is specified for a variable on which a safety limit has been placed, the setting be chosen so that automatic protective action will correct the abnormal situation before a safety limit is exceeded.

10 CFR 50.36(c)(3) states that, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

Additionally, 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, Criterion III, Design Criteria requires, in part, that "... The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program."

In addition, Regulatory Guide (RG) 1.105, Revision 3, "Setpoints for Safety-Related Instrumentation," dated December 1999 (ADAMS Accession No. ML993560062), describes a method acceptable to the NRC staff for complying with the NRC's regulations for ensuring that setpoints for safety-related instrumentation are initially within and remain within the technical specification limits. This RG provides guidance on methods used to perform these calculations. Additionally, Branch Technical Position, 7-12, "Guidance on Establishing and Maintaining Instrument Setpoints" within Chapter 7, "Instrumentation and Controls" of the Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: Light Water Reactor Edition, NUREG 0800, provides guidance for the use of RG 1.105 when evaluating setpoints for safety-related instrumentation.

### **Background**

Northern States Power Company (NSPM), a Minnesota corporation, submitted a LAR for changes to the Prairie Island Nuclear Generating Plant, Units 1 and 2 (Prairie Island), licensing bases to implement a 24-month operating cycle and corresponding changes to the Prairie Island TSs.

The LAR made multiple references to a "Summary Technical Specification Trip Setpoint Calculation." The LAR stated that "The Summary Technical Specification Trip Setpoint Calculation also assessed the availability of margin between the actual plant setting and Nominal Trip Setpoint as well as ensuring that the existing as-found setting tolerance specified in Surveillance Procedures does not challenge the Allowable Value from Technical Specifications."

Additionally, Enclosure 3 of the LAR provided a summary of the process undertaken by the licensee to determine the viability of maintaining or altering the affected devices setpoints to accommodate a 30-month calibration cycle. However, no summary of the actual implementation of the referenced process and resultant summary results for the impacted devices was provided in the LAR.

### **Request for Additional Information**

Based upon a review of the information in the LAR, the summary calculations for the impacted instrumentation were not included. Therefore, provide a summary of the calculations that demonstrate and support the extension of the calibration periodicity.