



1717 Wakonade Drive  
Welch, MN 55089

January 2, 2024

L-PI-23-034  
10 CFR 50.90

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant, Units 1 and 2  
Docket Nos. 50-282 and 50-306  
Renewed Facility Operating License Nos. DPR-42 and DPR-60

Response to Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System, Prairie Island Nuclear Generating Plant, Units 1 and 2, Docket Nos. 50-282 and 50-306 (EPID L-2023-LLA-0095)

- References:
- 1) Letter L-PI-23-006, "License Amendment Request to Revise Technical Specification 3.7.8 Required Actions," dated June 22, 2023. (NRC ADAMS Accession No. ML23173A069)
  - 2) NRC email: "Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System, Prairie Island Nuclear Generating Plant, Units 1 and 2, Docket Nos. 50-282 and 50-306 (EPID L-2023-LLA-0095)," dated December 1, 2023.

In Reference 1, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), submitted a license amendment request (LAR) proposing changes to the Technical Specifications (TS) for the Prairie Island Nuclear Generating Plant (PINGP). The proposed change would revise the Required Actions of TS 3.7.8, Condition B, with respect to which CL pumps are to be verified operable in the event of an inoperable CL header.

In Reference 2, the NRC determined additional information is needed. Enclosure 1 to this letter provides NSPM's response to Reference 2. Enclosure 2 provides revised TS markups and Enclosure 3 provides revised TS clean pages to replace Attachments 1 and 2, respectively, of the Enclosure provided with Reference 1.

The information provided with this letter does not alter the evaluations performed in accordance with 10 CFR 50.92 in Reference 1. In accordance with 10 CFR 50.91(b)(1), a copy of this application, with the enclosure, is being provided to the designated Minnesota official.

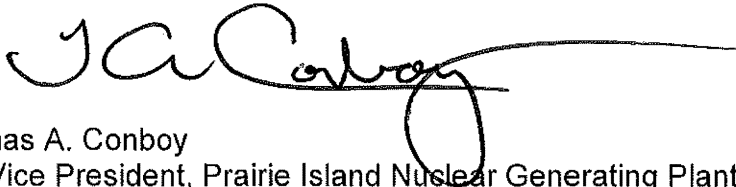
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If there are any questions or if additional information is required, please contact Mr. Jeff Kivi at (612) 330-5788.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

I declare under penalty of perjury, that the foregoing is true and correct.  
Executed on January 2, 2024.

A handwritten signature in black ink, appearing to read 'JA Conboy', with a long horizontal line extending to the right and a large loop at the end.

Thomas A. Conboy  
Site Vice President, Prairie Island Nuclear Generating Plant  
Northern States Power Company – Minnesota

Enclosures

cc: Administrator, Region III, USNRC  
Project Manager, Prairie Island, USNRC  
Resident Inspector, Prairie Island, USNRC  
State of Minnesota

## ENCLOSURE 1

### PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

#### Response to NRC Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System

##### NRC Request for Additional Information (RAI)

*The proposed RA B.1 states:*

*“Verify opposite train CL pump OPERABLE.”*

*Section 2.4, “Description of the proposed change,” of the LAR states in part:*

*“...Specifically, NSPM proposes to combine TS 3.7.8 Required Actions B.1 and B.2 into a single Required Action B.1 to verify operability of a **safeguards** pump on the opposite train...”*

*The current RA A.1 states:*

*“Restore one safeguards CL pump to OPERABLE status.”*

*The proposed RA B.1 is not clear on which CL pumps are required to be operable as there are safeguards and non-safeguards CL pumps. Please address the discrepancy between Section 2.4 of the LAR and the proposed RA B.1 with respect to the CL pump. If either a safeguards or non-safeguards pump can be verified operable for proposed RA B.1, provide justification that a non-safeguards pump would satisfy the system’s specified safety function with one supply header inoperable.*

[Reference 2]

##### NSPM Response to RAI

In response to the RAI, NSPM proposes to change the TS 3.7.8 Required Action (RA) B.1 to the following:

*“Verify opposite train safeguards CL pump OPERABLE.”*

Revised TS markups and clean pages are provided in Enclosures 2 and 3, respectively. These replace those previously provided in Attachments 1 and 2 to the Enclosure of Reference 1.

References

1. Letter L-PI-23-006, "License Amendment Request to Revise Technical Specification 3.7.8 Required Actions," dated June 22, 2023. (NRC ADAMS Accession No. ML23173A069)
2. NRC email re: Request for Additional Information Regarding License Amendment Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System, Prairie Island Nuclear Generating Plant, Units 1 and 2, Docket Nos. 50-282 and 50-306, dated December 1, 2023.

**ENCLOSURE 2**

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Response to NRC Request for Additional Information Regarding License Amendment  
Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System

**TECHNICAL SPECIFICATION PAGES (Marked-Up)**

(2 pages follow)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.1 Restore one safeguards CL pump to OPERABLE status.	7 days  <u>OR</u>  In accordance with the Risk Informed Completion Time Program
B. One CL supply header inoperable.	<p>-----NOTES-----</p> <p>1. Unit 1 enter applicable Conditions and Required Actions of LCO 3.8.1, “AC Sources-MODES 1, 2, 3, and 4,” for emergency diesel generator made inoperable by CL System.</p> <p>2. Both units enter applicable Conditions and Required Actions of LCO 3.4.6, “RCS Loops-MODE 4,” for residual heat removal loops made inoperable by CL System.</p> <p>-----</p> <p>B.1 <del>Verify vertical motor driven CL pump OPERABLE.</del></p> <p><u>AND</u></p>	4 hours*

-----NOTE-----  
 Opposite train diesel driven CL pump may be verified to be OPERABLE by administrative means.  
 -----  
 Verify opposite train safeguards CL pump OPERABLE.

~~\* As a contingency and if needed to support an adequate isolation boundary, the vertical motor driven CL pump is allowed to remain inoperable for up to 36 hours to support blind flange installation and for up to 36 hours to support the blind flange removal during the time frame of 11/28/2021 through 12/28/2021 to Support the A and B train CL Supply Header piping replacement project.~~

ACTIONS (~~continued~~)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	<p><del>B.2 Verify opposite train diesel driven CL pump OPERABLE.</del></p> <p><u>AND</u></p> <p><del>B.3</del> Restore CL supply header to OPERABLE status.</p>	<p><del>4 hours</del></p> <p>72 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
C. Required Action and associated Completion Time not met.	<p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>
<p>D. -----NOTE----- Separate Condition entry is allowed for each stored diesel driven CL pump fuel oil supply. -----</p> <p>One or both stored diesel driven CL pump fuel oil supply(s) &lt; 7 days and ≥ 6 days.</p>	<p>D.1 Restore fuel oil supply to ≥ 7 days.</p>	<p>48 hours</p>

B.2



**ENCLOSURE 3**

**PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2**

Response to NRC Request for Additional Information Regarding License Amendment  
Request to Revise Technical Specification 3.7.8, Cooling Water (CL) System

**TECHNICAL SPECIFICATION PAGES (Re-typed)**

(3 pages follow)



ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.1 Restore one safeguards CL pump to OPERABLE status.	7 days  <u>OR</u>  In accordance with the Risk Informed Completion Time Program
B. One CL supply header inoperable.	<p>-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Unit 1 enter applicable Conditions and Required Actions of LCO 3.8.1, “AC Sources-MODES 1, 2, 3, and 4,” for emergency diesel generator made inoperable by CL System.</li> <li>2. Both units enter applicable Conditions and Required Actions of LCO 3.4.6, “RCS Loops-MODE 4,” for residual heat removal loops made inoperable by CL System.</li> </ol> <p>-----</p>	

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	<p>B.1 -----NOTE----- Opposite train diesel driven CL pump may be verified to be OPERABLE by administrative means. -----  Verify opposite train safeguards CL pump OPERABLE.</p> <p><u>AND</u></p> <p>B.2 Restore CL supply header to OPERABLE status.</p>	<p>4 hours</p> <p>72 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
C. Required Action and associated Completion Time not met.	<p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. -----NOTE----- Separate Condition entry is allowed for each stored diesel driven CL pump fuel oil supply. -----</p> <p>One or both stored diesel driven CL pump fuel oil supply(s) &lt; 7 days and ≥ 6 days.</p>	<p>D.1 Restore fuel oil supply to ≥ 7 days.</p>	<p>48 hours</p>
<p>E. -----NOTE----- Separate Condition entry is allowed for each stored diesel driven CL pump fuel oil supply. -----</p> <p>One or both stored diesel driven CL pump fuel oil supply(s) &lt; 6 days.</p> <p><u>OR</u></p> <p>Required Action and associated Completion Time of Condition D not met.</p>	<p>E.1 Declare associated diesel driven CL pump inoperable.</p>	<p>Immediately</p>