



Northern States Power Company

Prairie Island Nuclear Generating Plant

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U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

**Response to Generic Letter 99-02, "Laboratory
Testing of Nuclear-Grade Activated Charcoal"**

Generic Letter 92-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal" requests that our charcoal filter testing be performed to the requirements of ASTM D3803-1989 or justify an alternative. We have been testing to this ASTM standard since 1989 although our Technical Specifications (TS) require an earlier test protocol. We, therefore, perform two tests - to the TS requirements and to ASTM D3803-1989. We require the charcoal to pass both tests to be acceptable. The TS requirements include the test parameters of 130°C and 95% relative humidity and acceptance criteria of 90% efficiency. Thus, we meet the intent of the Generic Letter to test to ASTM D3803-1989, we meet our TS requirements, and there are no operability concerns.

Also, the Generic Letter requests a License Amendment Request (LAR) be submitted to change TS to require testing to ASTM D3803-1989 and that penetration (efficiency) acceptance criteria be determined from the accident analyses. Since we already meet the requirements that would be in the revised TS, we plan to change our TS to meet these two requests. However, we prefer to wait to submit an LAR because of ongoing evaluations which will change the filter penetration acceptance criteria. We have recently performed two re-analyses ("Loss of Coolant" and "Main Steam Line Break Outside Containment") related to 10CFR50, App A, Criterion 19 limits for Control Room doses. (The re-analyses show that the current penetration acceptance criteria are conservative, resulting in a safety factor of greater than 2.) These analyses need to be submitted to the NRC for review because of the use of methodology not approved for

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use at Prairie Island. These analyses were re-done because of discovery that measured control room in-leakage rates were greater than those assumed in the previous analyses (this problem has been reported in LER 1-98-02). In addition, we are currently evaluating the consequences of implementing the alternate source term per the proposed 10CFR50.67. It is expected that using the alternate source term will result in a reduction in the need for crediting charcoal filtration. For these reasons, a License Amendment Request now would be incomplete and would need to be followed by another License Amendment Request when these issues have been resolved. Therefore, we commit to continue testing, using our current practices (i.e., to the requirements of current TS and ASTM D3803-1999), until a TS change has been approved, and to submit a License Amendment Request to change the TS after the dose analyses have been finalized.

We understand that the NRC may choose to incorporate this commitment in a license condition.

Please contact Jack Leveille (651-388-1121, Ext. 4142) if you have any questions related to this letter.



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