



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

September 2, 2014

Mr. Kevin Davison
Site Vice President
Prairie Island Nuclear Generating Plant
Northern States Power Company, Minnesota
1717 Wakonade Drive East
Welch, MN 55089

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR PRAIRIE ISLAND NUCLEAR
GENERATING PLANT, UNITS 1 AND 2**

Dear Mr. Davison:

On August 6, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of Prairie Island Nuclear Generating Plant, Units 1 and 2. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from July 1, 2013 through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, Prairie Island Nuclear Generating Plant, Unit 1 operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Prairie Island Nuclear Generating Plant, Unit 1 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC determined the performance at Prairie Island Nuclear Generating Plant, Unit 2 during the most recent quarter was within the Regulatory Response Column of the NRC's ROP Action Matrix because of one low-to-moderate safety significant (White) PI for Emergency Alternating Current Power Systems in the Mitigating Systems Performance Index.

On April 24, 2014, your staff notified the NRC of your readiness for it to conduct a supplemental inspection to review the actions taken to address the performance issues. Therefore, in addition to ROP baseline inspections, the NRC commenced a supplemental inspection in accordance with Inspection Procedure 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area," on August 25, 2014. The NRC also plans to conduct Temporary Inspection Procedure 2515-189 "Inspection to Determine Compliance of Dynamic Restraint (Snubber) Program with 10 CFR 50.55a."

"The NRC identifies substantive cross-cutting issues (SCCIs) to communicate a concern with the licensee's performance in a cross-cutting area and to encourage the licensee to take

appropriate actions before more significant performance issues emerge. The NRC identified a cross-cutting theme in the Human Performance, Documentation aspect (H.7). Specifically, four inspection findings for the current 12-month assessment period were assigned a cross-cutting aspect of H.7, "the organization creates and maintains complete, accurate and up-to-date documentation." The NRC determined that an SCCI exists because the NRC has a concern with your staff's scope of effort and progress in addressing the cross-cutting theme associated with H.7.

To address the SCCIs, your staff initiated a corrective action document in July 18, 2014, with an assignment to perform an evaluation of the issue by the end of August 2014. Although each specific issue was addressed, there were no interim corrective actions taken to address this trend. The NRC is concerned that the apparent lack of urgency to address this SCCI was symptomatic of the overall weakness in your corrective action program. Specifically, NRC inspections of the corrective action program conducted in 2012 and 2014 (ML12269A253 and ML14218A268) identified numerous challenges to its efficacy, resulting a significant backlog of issues that remained uncorrected. The NRC also noted that minimal corrective actions had been taken to address these challenges between the 2012 and 2014 inspections. Therefore, the NRC was not confident that your staff would effectively address the SCCI prior to the end of the current assessment period, given the lack of any specific interim actions and the overall poor performance of the corrective action program.

This human performance SCCI will remain open until the number of findings with a cross-cutting aspect of H.7 is reduced, the corrective actions taken to mitigate the cross-cutting theme prove effective, and sustained performance improvement is observed in the H.7 aspect of the human performance area. The NRC will monitor your staff's effort and progress in addressing the SCCI by evaluating your corrective action program, any evaluations for the SCCI, and performance improvement initiatives.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and

maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site is being coordinated with your staff. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact Kenneth Riemer at 630-829-9628 with any questions you have regarding this letter.

Sincerely,

/RA/

Anne T. Boland, Division Director
Division of Reactor Projects

Docket Nos. 50-282, 50-306 and 72-010
License Nos. DPR-42, DPR-60 and SNM-2506

Enclosure:
Prairie Island Nuclear Generating Plant
Inspection/Activity Plan

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Letter to Kevin Davison from Anne Boland dated September 2, 2014.

SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR PRAIRIE ISLAND NUCLEAR
GENERATING PLANT, UNITS 1 AND 2

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Prairie Island
 Inspection / Activity Plan
 09/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			BI ISI - INSERVICE INSPECTION UNIT 1 & SNUBBER TI		2
1, 2	10/08/2014	11/22/2014	IP 2515/189	Inspection to Determine Compliance of Dynamic Restraint (Snubber) Program with 10 CFR 50.55a	
2	10/08/2014	11/22/2014	IP 7111108P	Inservice Inspection Activities - PWR	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	11/03/2014	11/07/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
			ISFSI - ISFSI OPERATION AT A SITE INSPECTION		2
1	04/01/2015	05/31/2015	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
			BI ISI - ISI UNIT 2 INSPECTION		1
2	09/18/2015	10/23/2015	IP 7111108P	Inservice Inspection Activities - PWR	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	04/13/2015	04/17/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	05/18/2015	05/22/2015	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
			BI EPR - EP ROUTINE INSPECTION / PI VERIFICATION		2
1	07/13/2015	07/17/2015	IP 7111402	Alert and Notification System Testing	
1	07/13/2015	07/17/2015	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	07/13/2015	07/17/2015	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	07/13/2015	07/17/2015	IP 71151	Performance Indicator Verification	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	07/13/2015	07/17/2015	IP 71124.07	Radiological Environmental Monitoring Program	
1	07/13/2015	07/17/2015	IP 71151-BI01		
1	07/13/2015	07/17/2015	IP 71151-OR01		
1	07/13/2015	07/17/2015	IP 71151-PR01		
			BI ENG - COMPONENT DESIGN BASIS INSPECTION		6
1, 2	08/03/2015	09/04/2015	IP 7111121	Component Design Bases Inspection	
			BI OLRQ - BIENNIAL REQUAL PROGRAM INSPECTION		2
1, 2	09/21/2015	09/25/2015	IP 7111111B	Licensed Operator Requalification Program	
			BI RP - RADIATION PROTECTION BASELINE INSPECTION		1
1	10/26/2015	10/30/2015	IP 71124.02	Occupational ALARA Planning and Controls	

This report does not include INPO and OUTAGE activities.
 This report shows only on-site and announced inspection procedures.