October 30, 2014

Mr. James E. Lynch Senior Vice President Prairie Island Nuclear Generating Plant Northern States Power Company - Minnesota 1717 Wakonade Drive East Welch, MN 55089

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PROPOSED AMENDMENT TO SPECIAL NUCLEAR MATERIALS LICENSE NO. 2506

Dear Mr. Lynch:

By letter dated May 23, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14143A202), Northern States Power Company submitted to the U.S. Nuclear Regulatory Commission (NRC) an amendment request to the Special Nuclear Materials (SNM) license number SNM-2506 technical specifications (TS) for the Prairie Island Independent Spent Fuel Storage Installation. The proposed amendment request seeks to revise the cask cavity pressurization requirements and their technical bases for the spent fuel storage casks.

NRC staff has determined that additional information is required to complete its technical review of your application. The request for additional information is identified in the enclosure to this letter. We request that you provide the information by November 28, 2014. This request for additional information was discussed with your staff in an October 30, 2014, conference call.

If you have any questions regarding this matter, please contact me at (301) 287-9225.

Sincerely,

/RA/

Chris Allen, Project Manager Spent Fuel Licensing Branch Division of Spent Fuel Management Office of Nuclear Material Safety and Safeguards

Docket No.: 72-10 License No.: SNM-2506

TAC No.: L24929

Enclosure: Request for Additional Information

cc: Prairie Island Service List

Mr. James E. Lynch Senior Vice President Prairie Island Nuclear Generating Plant Northern States Power Company - Minnesota 1717 Wakonade Drive East Welch, MN 55089

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Prairie Island Nuclear Generating Plant, Units 1 and 2

CC:

Manager, Regulatory Affairs Prairie Island Nuclear Generating Plant Northern States Power Co. - Minnesota 1717 Wakonade Drive East Welch, MN 55089

Manager - Environmental Protection Division Minnesota Attorney General's Office 445 Minnesota St., Suite 900 St. Paul, MN 55101-2127

U.S. Nuclear Regulatory Commission Resident Inspector's Office 1719 Wakonade Drive East Welch, MN 55089-9642

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, IL 60532-4351

Administrator Goodhue County Courthouse Box 408 Red Wing, MN 55066-0408

Commissioner Minnesota Department of Commerce 121 Seventh Place East Suite 200 St. Paul, MN 55101-2145

Tribal Council Prairie Island Indian Community ATTN: Environmental Department 5636 Sturgeon Lake Road Welch, MN 55089

Martin Murphy Director of Licensing and Regulatory Affairs Northern States Power Co. - Minnesota 414 Nicollet Mall - MP4, Minneapolis, MN 55401 Timothy O'Connor Senior Vice President and Chief Nuclear Officer Northern States Power Co. – Minnesota 414 Nicollet Mall – MP4 Minneapolis, MN 55401

James E. Lynch Acting Site Vice President Prairie Island Nuclear Generating Plant Northern States Power Co. - Minnesota 1717 Wakonade Drive East Welch, MN 55089-9642

Request for Additional Information Northern States Power Company Docket No. 72-10 Proposed Amendment to Special Nuclear Materials License No. SNM-2506

By letter dated May 23, 2014 (ADAMS Accession No. ML14143A202), Northern States Power Company submitted to the NRC an amendment request to SNM license number SNM-2506 TS for the Prairie Island Independent Spent Fuel Storage Installation. The proposed amendment request seeks to revise the cask cavity pressurization requirements and their technical bases for the spent fuel storage casks.

Request for Additional Information

1. Justify that positive internal pressurization is no longer required to prevent in-leakage of air.

The FSAR states the following:

A positive cask cavity pressure is described in the SAR as a barrier "to prevent inleakage of air" (Section 3.2.5.3.3/A3.2.5.3.3) and as a "precaution against the inleakage of air" (Section 3.3.1 /A3.3.1). However, in-leakage is prevented by the welded containment vessel and double 0-ring seals on all mechanical connections. The seal interspace is pressurized and monitored with a low pressure alarm for each cask, as explained in the Containment Integrity discussion later in this Evaluation.

A thorough and detailed justification of the confinement integrity including base material, welds, and seal regions was provided to the staff as justification for elimination of the internal pressure requirement. That justification however appears to be unchanged from the original licensing basis, and as such, does not explain the necessity of the original requirement for internal pressurization to prevent against air in-leakage. If the confinement integrity, which limited the escape of pressurized helium to an unacceptable level was sufficient in the original licensing basis, it is unclear how air-in-leakage could physically occur, regardless of pressurization within the canister at the values under consideration. It appears that the feature of pressurization was initially coupled with the overall confinement integrity and therefore cannot merely be discarded without a more thorough explanation of its purpose and relative importance to overall confinement than what was originally provided in the amendment request.

This information is needed to ensure compliance with 10 CFR 72.120(d) and 72.122(h)(1).