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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

Monticello Nuclear Generating Plant
Docket 50-263
Renewed Facility Operating License
No. DPR-22

Clarification of Discrepancies in Safety Evaluations for Revision to Emergency Plan Staff Augmentation Response Times Amendments for the Prairie Island Nuclear Generating Plant and Monticello Nuclear Generating Plant

- References:
- 1) Letter from NSPM to the NRC, "Prairie Island Nuclear Generating Plant, Units 1 and 2 License Amendment Request: Revision to Emergency Plan Staff Augmentation Response Times", dated February 23, 2017. (ADAMS Accession No. ML17055C359)
 - 2) Letter from NSPM to the NRC, "Monticello Nuclear Generating Plant License Amendment Request: Revision to Emergency Plan Staff Augmentation Response Times", dated March 24, 2017. (ADAMS Accession No. ML17083A083)
 - 3) Letter from NSPM to the NRC, "Response to Request for Additional Information Regarding License Amendment Request to Revise Emergency Plan Staff Augmentation Response Times (CAC Nos. MF9345 and MF9346)", dated September 20, 2017. (ADAMS Accession No. ML17263A433)
 - 4) Letter from NSPM to the NRC, "Response to Request for Additional Information Regarding License Amendment Request to Revise Emergency Plan Staff Augmentation Response Times (CAC No. MF9467)", dated September 20, 2017. (ADAMS Accession No. ML17263B194)

- 5) Letter from NRC to NSPM, "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Issuance of Amendment Re: Revision to the Prairie Island Nuclear Generating Plant, Units 1 and 2 Emergency Plan (CAC Nos. MF9345 and MF9346; EPID L-2017-LLA-0175)", dated March 5, 2018. (ADAMS Accession No. ML17362A202)
- 6) Letter from NRC to NSPM, "Monticello Nuclear Generating Plant – Issuance of Amendment Re: Revision to the Monticello Nuclear Generating Plant Emergency Plan (CAC No. MF9467, EPID L-2017-LLA-0179)", dated March 5, 2018. (ADAMS Accession No. ML17349A916)

Northern States Power Company, a Minnesota Corporation, doing business as Xcel Energy (hereafter "NSPM"), hereby submits a letter to clarify discrepancies identified between NSPM's docketed correspondence associated with the Prairie Island Nuclear Generating Plant (PINGP) and Monticello Nuclear Generating Plant (MNGP) license amendment requests (LARs) (References 1-4) and the corresponding NRC safety evaluations (SEs) documenting the NRC decision to issue amendments to NSPM on March 5, 2018 (References 5 and 6). NSPM recognizes that SEs do not establish licensing bases information. NSPM is identifying these discrepancies to avoid future confusion associated with the licensing basis information following issuance of the licensing action because of the potentially different meaning documented by the NRC staff in the SEs than the meaning contained in NSPM's docketed correspondence and the PINGP and MNGP licensing bases.

The first discrepancy is located in sub-section "Offsite Dose Assessment and PARs" of section 3.2.4, "Radiological Accident Assessment and Support of Operational Accident Assessment/Protective Actions (In-Plant)" of both the PINGP and MNGP SEs. The final summary paragraph to that subsection states (emphasis added):

Based on Xcel Energy's current dose assessment capability and the use of a dedicated on-shift position to perform dose assessment, the NRC staff concludes that there is no loss of function or impact on performing dose assessment.

The concern is with the term "dedicated", used to describe the on-shift position, which was not used by NSPM in the docketed correspondence. Rather, in item c of subsection "Offsite Dose Assessment Major Task", section 3.2.4, "Radiological Accident Assessment and Support of Operational Accident Assessment Function", of both the PINGP and MNGP LARs, it was stated (in part):

...the augmentation time for the [Radiological Emergency Coordinator (REC)] is extended from 30 minutes to 60 minutes. This change would result in the performance of the dose assessment function by the on-shift Chemistry Technician for an additional 30 minutes.

Further detail is contained in the PINGP Emergency Plan (reference the markup supplied with the PINGP LAR, Enclosure 1, Attachment 1 to Reference 1), section 5.3.3, "Plant Shift Organization", subsection H, "Chemistry Technician", which states (in part):

One Chemistry Technician is onsite at all times. The Chemistry Technician is responsible for chemistry, radiochemistry, dose assessments, and offsite dose projections. The Chemistry Technician is also cross-trained to support the Radiation Protection Specialist functions...

Correspondingly, the MNGP Emergency Plan, (reference the markup supplied with the MNGP LAR, Enclosure 1, Attachment 1 to Reference 2) section 5.3.1.4, "Radiological Assessment and Protective Actions", states:

The shift Chemistry Technician is responsible for initial chemistry sampling, sample analysis, and off-site dose projection operation if required.

As the NRC based part of the conclusion in the SEs upon "use of a dedicated on-shift position to perform dose assessment", NSPM notes the term "dedicated" was not used in any of the submittals in regards to performance of the dose assessment function. Contrary to this, as specified in both the PINGP and MNGP Emergency Plans, the Chemistry Technician is responsible for more than performance of the dose assessment function until the arrival of the REC. Therefore, NSPM clarifies that the shift Chemistry Technician is not solely dedicated to performance of dose assessment.

The second discrepancy is also located in section 3.2.4 of the MNGP SE. Both the MNGP and PINGP SEs state:

Manual dose calculation capability is maintained as a backup to the URI system.

However, while NSPM does utilize manual dose calculation as a backup at PINGP, the backup to URI at MNGP is as described in section 3.1.2.2, "Current on-shift dose assessment", of the MNGP LAR, which states:

Manual release rate determination methodology is maintained for use with independent battery powered laptop computers in emergency facilities equipped with the URI system.

As such, the backup to the URI system is not the same at PINGP and MNGP. This specific phrasing documented by the NRC in the SE was neither specified nor implied in the submittals when describing the MNGP backup to URI.

As stated above, NSPM understands that the SE does not establish the licensing basis; therefore, NSPM is not requesting a formal response or revision to the SEs associated with these clarifications.

Summary of Commitments

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



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