

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

November 15, 2023

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

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 -SUPPLEMENTAL INFORMATION NEEDED FOR ACCEPTANCE OF REQUESTED LICENSING ACTION RE: AMENDMENT REQUEST TO REVISE SURVEILLANCE REQUIREMENT 3.8.1.2 NOTE 3 (EPID L-2023-LLA-0135)

Dear Mr. Conboy:

By letter dated September 28, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23271A205), Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), doing business as Xcel Energy, submitted a license amendment request for the Prairie Island Nuclear Generating Plant, Units 1 and 2 (Prairie Island). The proposed amendment would revise Technical Specification (TS) 3.8.1, "AC Sources – Operating," Surveillance Requirement (SR) 3.8.1.2, Note 3, to remove details describing a modified start and reference to manufacturer's recommendations. The purpose of this letter is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), an application for an amendment to a license (including the TSs) must fully describe the changes requested and, following as far as applicable, the form prescribed for original applications. 10 CFR, section 50.34, addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that the information delineated in the enclosure to this letter is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

In order to make the application complete, the NRC staff requests that NSPM supplement the application to address the information requested in the enclosure by December 8, 2023, as this will enable the NRC staff to begin its detailed technical review. If the information responsive to

the NRC staff's request is not received by the above date, the application will not be accepted for review pursuant to 10 CFR, section 2.101, and the NRC will cease its activities associated with the application. If the application is subsequently accepted for review, you will be advised of any further information needed to support the staff's detailed technical review by separate correspondence.

The information requested and associated time frame in this letter were discussed with Ms. Sara Scott, Mr. Michael Miller, and Mr. Jeff Kivi of your staff on November 15, 2023.

If you have any questions, please contact me at 301-415-0680 or via e-mail at <u>Brent.Ballard@nrc.gov</u>.

Sincerely,

/**RA**/

Brent T. Ballard, Project Manager Plant Licensing Branch III Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Supplemental Information Needed

cc: Listserv

SUPPLEMENTAL INFORMATION NEEDED

LICENSE AMENDMENT REQUEST TO REVISE

SURVEILLANCE REQUIREMENT 3.8.1.2, NOTE 3

NORTHERN STATES POWER COMPANY

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

DOCKET NOS. 50-282 AND 50-306

By letter dated September 28, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23271A205), Northern States Power Company, a Minnesota Corporation (NSPM, the licensee), doing business as Xcel Energy submitted a license amendment request for the Prairie Island Nuclear Generating Plant, Units 1 and 2 (Prairie Island). The proposed amendment would revise technical specification (TS) 3.8.1, "AC Sources – Operating," surveillance requirement (SR) 3.8.1.2, Note 3, to remove details describing a modified start and reference to manufacturer's recommendations.

The NRC staff has reviewed your application and concluded more information is necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements for the protection of public health and safety and the environment.

Prairie Island TS SR 3.8.1.2, Note 3 states, "A modified DG [diesel generator] start involving idling and gradual acceleration to synchronous speed may be used for this SR in consideration of manufacturer's recommendations. When modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.6 must be met."

The purpose for the modified DG start in SR 3.8.1.2 Note 3 is to reduce long-term stress and wear on diesel engines, and it is recommended by the DG's manufacturers.

The LAR proposed to delete, "involving idling and gradual acceleration to synchronous speed," and, "in consideration of manufacturer's recommendations," from the SR 3.8.1.2 Note 3, but does not provide information on the modified DG start. NSPM's purpose of removal of operability details from SR 3.8.1.2 Note 3 is achieved with those edits, but now there is confusion about what is meant by a "modified DG start."

Please provide the following so the staff may determine if the requested licensing action is acceptable for detailed review:

- 1. An overview of the procedure for the modified DG start.
- 2. How NSPM will ensure that the modified DG start (1) remains applicable to the Prairie Island DGs considering the diverse inputs that inform its procedure including vendor requirements, and (2) achieves the purpose of the modified DG start test.
- 3. Where the licensee intends to maintain the details of the modified start procedure considering LAR Section 2.3 "Reason for Proposed Changes", states, in part, that the details for performing required actions and surveillances...are more appropriately specified in TS Bases, USAR, or other licensee-controlled documents that are subject to 10 CFR 50.59 or a TS requirement.

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ADAMS Accession No. ML23304A163

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