



Mano K. Nazar
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Dr. East • Welch MN 55089

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L-PI-03-009
10 CFR Part 50
Section 50.55a

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

PRAIRIE ISLAND NUCLEAR GENERATION PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Proposed Alternative to
Align Unit 1 & Unit 2 Ten Year Inspection and Testing Interval Dates

Licenses are required to revise and update their Inservice Inspection (ISI) and Inservice Testing (IST) Programs every 120 months to the latest edition and addenda of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code referenced in 10 CFR 50.55a as of 12 months prior to the start of a new inspection interval. Currently, the effective date for commencing the 4th Ten-Year ISI and IST Interval for Prairie Island Nuclear Generating Plant (PINGP) Unit 1 is December 16, 2003 and, for Unit 2, December 21, 2004.

Pursuant to 10CFR50.55a(a)(3)(i) and (a)(3)(ii), PINGP requests use of an alternative to the requirements of 10CFR50.55a(f)(4)(ii), 10CFR50.55a(g)(4)(ii) and ASME Section XI, Subparagraph IWA-2430(b). The attached proposed alternative for ISI and IST proposes extending the 3rd Ten-Year Interval for Unit 1 and aligning the date for commencing the 4th Ten-Year Interval with Unit 2. Altering the start date of the interval for Unit 1 will allow our ISI and IST processes and procedures for both units to meet the same requirements of the applicable edition and addenda of ASME Section XI and ASME OM Code.

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NUCLEAR MANAGEMENT COMPANY, LLC

In this letter NMC has not made any new nor revised any existing NRC commitments. Please address any comments or questions regarding this proposed alternative to Jack Leveille at (651) 388-1121, extension 4142.



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Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company

cc: Regional Administrator-Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC

Attachment: Proposed Alternative to Align Unit 1 & Unit 2 Ten Year Inspection and Testing Interval Dates

**Proposed Alternative to
Align Unit 1 & Unit 2 Ten Year Inspection and Testing Interval Dates**

Relief Requested:

Pursuant to the requirements of 10CFR50.55a(a)(3)(i) and (a)(3)(ii), Prairie Island Nuclear Generating Plant (PINGP) requests use of a proposed alternative to the requirements of 10CFR50.55a(f)(4)(ii), 10CFR50.55a(g)(4)(ii) and ASME Section XI, Subparagraph IWA-2430(b) from updating the Inservice Inspection (ISI) and Inservice Testing (IST) programs on a frequency required by ASME Section XI and the Code of Federal Regulations. PINGP requests that the start date for Unit 1 4th Ten-Year Interval for the ISI and IST programs be aligned to Unit 2 to commence on December 21, 2004.

Basis for Relief:

PINGP Units 1 and 2 commenced commercial operation on December 16, 1973, and December 21, 1974, respectively. These dates are approximately one year apart (370 days). Since the ISI and IST Programs interval dates are dictated by the commercial operating dates, the Editions of ASME Section XI and OM Codes effective during the 370 days between the unit updates will be different. When the next update becomes effective, PINGP Unit 1 will be using the latest ASME Section XI Edition and OM Code referenced in 10 CFR 50.55a (1998 Edition with 2000 Addenda), while PINGP Unit 2 will still be using the 1989 Edition. Updating an ISI or IST program to a new Code edition requires a significant amount of work on the part of many personnel to ensure compliance, and requires the updating of numerous documents, procedures and processes including training.

Having both units on the same edition of the ASME Codes and schedule has distinct advantages without a reduction in the level of quality or safety.

1. Site procedures will be meeting the requirements of one edition of the Code, instead of two different editions.
2. The ISI and IST Programs can be written as one document covering both units.
3. A reduction in the probability of applying a wrong inspection and/or test requirement.
4. Having one set of procedures and documents reduces the administrative burden of complying with the ISI and IST requirements without a reduction in the level of quality of the ISI and IST Programs.

With the proposed alternative schedule for Unit 1, the required 3rd Ten-Year Interval (and following) examinations and tests will be completed. There will be no reduction in the number of ISI examinations or IST testing as a result of the date change.

**Proposed Alternative to
Align Unit 1 & Unit 2 Ten Year Inspection and Testing Interval Dates**

Alternative Requirement:

The 4th Ten-Year Interval for both PINGP Units 1 and 2 will commence on December 21, 2004.

Justification of Relief:

Altering the fourth interval so both PINGP Unit 1 and Unit 2 begin on the same date reduces the administrative costs and burden of complying with two different editions of the ASME ISI and IST codes. The possibility of working to the wrong procedures or documents (both NDE and administrative) is reduced, as both units would be governed by the same edition of the ASME codes.

The proposed action does not result in a reduction of examinations or tests and provides an acceptable level of safety and quality.

Implementation Schedule:

The ISI and IST Programs for PINGP Units 1 and 2 will be updated and become effective on December 21, 2004. The new interval schedule will remain in effect for the Fourth and subsequent Ten-Year Intervals.