



**Nuclear Management Company, LLC**  
Prairie Island Nuclear Generating Plant  
1717 Wakonade Dr. East • Welch MN 55089

March 7, 2003

L-PI-03-024  
10CFR50.55a(a)(3)(i)

U S Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

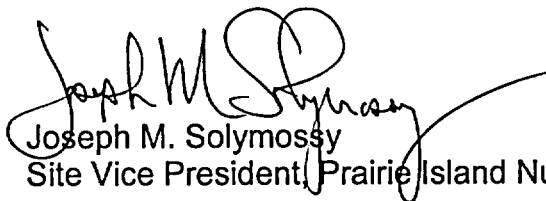
PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
DOCKET NOS. 50-282 AND 50-306  
LICENSE NOS. DPR-42 AND DPR-60  
RELIEF REQUEST TO PERFORM A VT-1 IN LIEU OF A VT-3 VISUAL EXAMINATION  
AS REQUIRED BY IWA-5250(a)(2)

The purpose of this letter is to request Nuclear Regulatory Commission (NRC) authorization to perform VT-1 visual examinations in lieu of VT-3 visual examinations as required by American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME B&PV) Code, Section XI, IWA-5250(a)(2) during the Prairie Island Unit 1 and 2 Third-Ten Year Inservice Inspection Intervals. We are requesting relief pursuant to 10 CFR Part 50, Section 50.55a(a)(3)(i) because the proposed alternatives would provide an acceptable level of quality and safety.

The details of the 10 CFR 50.55a(a)(3)(i) request are enclosed in the attached relief request for Prairie Island Unit 1 and Unit 2 (contained in one document). Prairie Island requests approval by September 1, 2003 to support the refueling outage on Unit 2. The proposed alternative was approved for the H.B. Robinson Plant by NRC on September 26, 2002.

Please contact Jack Leveille (651-388-1121, Ext. 4142) if you have any questions related to this letter.

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



Joseph M. Solymossy  
Site Vice President, Prairie Island Nuclear Generating Plant

cc: (see next page)

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USNRC  
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**NUCLEAR MANAGEMENT COMPANY, LLC**

cc: Regional Administrator, USNRC, Region III  
Project Manager, Prairie Island Nuclear Generating Plant, USNRC, NRR  
NRC Resident Inspector – Prairie Island Nuclear Generating Plant

Attachment: (one document, 2 pages)

Prairie Island Unit 1 – RELIEF REQUEST NUMBER: 16 (Rev. 0)  
Prairie Island Unit 2 – RELIEF REQUEST NUMBER: 17 (Rev. 0)

**Prairie Island Unit 1 - RELIEF REQUEST NUMBER: 16 (Rev. 0)**  
**Prairie Island Unit 2 - RELIEF REQUEST NUMBER: 17 (Rev. 0)**

**VT-1 Examination of Bolting**

**SYSTEM/COMPONENT(S) FOR WHICH RELIEF REQUEST WILL BE USED**

Code Class: Class 1, 2, and 3  
Reference: ASME, Section XI, 1989 Edition with no Addenda  
Examination Category: B-P  
Item Number: B15.10, B15.20, B15.30, B15.40, B15.50, B15.60, B15.70  
Description: Pressure Retaining Bolting at Bolted Connections  
Component Numbers: All

**CODE REQUIREMENTS:**

ASME B&PV Code, Section XI, 1989 Edition Subparagraph, IWA-5250(a)(2), requires a VT-3 examination of bolting following detection of leakage.

**PROPOSED ALTERNATIVE:**

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested to perform a VT-1, visual examination in lieu of the required VT-3, visual examination. As discussed below, this will provide an acceptable level of quality and safety.

**BASIS FOR RELIEF REQUEST:**

Prairie Island requests relief from the ASME B&PV Code, Section XI, 1989 Edition Subparagraph, IWA-5250(a)(2), regarding the actions to be taken when leakage occurs at a bolted connection on other than a gaseous system during the conduct of a system pressure test. Specifically, removal and examination of bolting would be by VT-1 visual examination in lieu of the Code-required VT-3 visual examination.

The ASME B&PV Code, Section XI, Table IWB-2500, Code Categories B-G-1 and B-G-2 require a VT-1 visual examination for Class 1 pressure retaining bolting, establishing its appropriateness. Guidance for performing VT-1 visual examinations of bolting are already incorporated within Prairie Island's examination procedures. The VT-1 examination criteria are more stringent than the simple corrosion evaluation described in IWA 5250. Thus, the use of a VT-1 visual examination in lieu of the Code-required VT-3 visual examination will provide a reasonable level of quality and safety. A similar request was approved for the H. B. Robinson Plant in 2002.

**IMPLEMENTATION SCHEDULE:**

The proposed alternative is requested for remainder of the 3<sup>rd</sup> 10 Year Interval of the Inservice Inspection Program for Prairie Island Unit 1 and Unit 2.

**REFERENCE:**

Unit Name: H.B. ROBINSON 2

Submittal Dates: 08/17/2001 04/05/2002 05/14/2002 09/20/2002

Approval Date: 09/26/2002

Accession Number: 012330092