October 2, 2003

Mr. Joseph M. Solymossy
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1[1] - EVALUATION OF RELIEF REQUEST ASSOCIATED WITH EXTENDING UNIT 1 IST/ISI INTERVAL TO ALIGN THE FOURTH 10-YEAR INTERVAL WITH UNIT 2 (TAC NOS. MB7564 AND MB7565)

Dear Mr. Solymossy:

By letter dated January 24, 2003, the Nuclear Management Company, LLC (NMC), submitted a Relief Request concerning the fourth and successive inservice inspection (ISI) and inservice testing (IST) program intervals for the Prairie Island Nuclear Generating Plant, Unit 1. Specifically, NMC proposed extending the third IST/ISI program intervals for Unit 1 so that the fourth IST/ISI program intervals would begin on December 21, 2004, which is the same start date as the fourth IST/ISI program intervals for Unit 2.

The enclosure provides the U. S. Nuclear Regulatory Commission (NRC) staff's safety evaluation (SE) for this request. As noted in the SE, the NRC staff concludes that NMC's proposed start date of December 21, 2004, for the Unit 1 fourth IST/ISI program intervals provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the NRC staff authorizes NMC's proposed change in the Unit 1 fourth and successive IST/ISI program interval start dates.

Sincerely,

/RA/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-282

Enclosure: Safety Evaluation

cc w/encl: See next page

[1]In its January 24, 2003, letter, NMC referenced the docket and license numbers for both Prairie Island Unit 1 and Unit 2. However, relief was requested only for Unit 1.

October 2, 2003

Mr. Joseph M. Solymossy
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1[2] - EVALUATION OF RELIEF REQUEST ASSOCIATED WITH EXTENDING UNIT 1 IST/ISI INTERVAL TO ALIGN THE FOURTH 10-YEAR INTERVAL WITH UNIT 2 (TAC NOS. MB7564 AND MB7565)

Dear Mr. Solymossy:

By letter dated January 24, 2003, the Nuclear Management Company, LLC (NMC), submitted a Relief Request concerning the fourth and successive inservice inspection (ISI) and inservice testing (IST) program intervals for the Prairie Island Nuclear Generating Plant, Unit 1. Specifically, NMC proposed extending the third IST/ISI program intervals for Unit 1 so that the fourth IST/ISI program intervals would begin on December 21, 2004, which is the same start date as the fourth IST/ISI program intervals for Unit 2.

The enclosure provides the U. S. Nuclear Regulatory Commission (NRC) staff's safety evaluation (SE) for this request. As noted in the SE, the NRC staff concludes that NMC's proposed start date of December 21, 2004, for the Unit 1 fourth IST/ISI program intervals provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the NRC staff authorizes NMC's proposed change in the Unit 1 fourth and successive IST/ISI program interval start dates.

Sincerely,
/RA/
L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-282

Enclosure: Safety Evaluation

cc w/encl: See next page

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[1]In its January 24, 2003, letter, NMC referenced the docket and license numbers for both Prairie Island Unit 1 and Unit 2. However, relief was requested only for Unit 1.

Prairie Island Nuclear Generating Plant,
Units 1 and 2

cc:

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO PROPOSED ALTERNATIVE TO ALIGN UNIT 1 AND UNIT 2 IST/ISI PROGRAMS

NUCLEAR MANAGEMENT COMPANY, LLC

PRAIRIE ISLAND NUCLEAR GENERATION PLANT, UNIT 1

DOCKET NO. 50-282

1.0 INTRODUCTION

By letter dated January 24, 2003, the Nuclear Management Company, LLC (the licensee), submitted a Relief Request concerning the fourth and successive inservice inspection (ISI) and inservice testing (IST) program intervals for the Prairie Island Nuclear Generating Plant (PINGP), Unit 1. Specifically, NMC proposed extending the third IST/ISI program intervals for Unit 1 so that the fourth IST/ISI program intervals would begin on December 21, 2004, which is the same start date as the fourth IST/ISI program intervals for Unit 2.

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a, requires that IST of certain American Society of Mechanical Engineers (ASME) "Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 pumps and valves and ISI of certain ASME Code Class 1, 2, and 3 components (including supports) be performed at 120-month (10-year) IST/ISI program intervals. This is in accordance with the ASME *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code) and ASME Code, Section XI, *Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components*, and applicable addenda, except where alternatives have been proposed or relief has been requested by the licensee and authorized or granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii),or (f)(6)(i) of 10 CFR 50.55a. In accordance with 10 CFR 50.55a(f)(4)(ii) and 10 CFR 50.55a(g)(4)(ii), licensees are required to comply with the requirements of the latest edition and addenda of the ASME Code incorporated by reference in the regulations 12 months prior to the start of each 10-year IST/ISI program interval. In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for the facility. The regulation at 10 CFR 50.55a allows the Commission to authorize alternatives to and grant relief from ASME Code requirements upon making necessary findings. Nuclear Regulatory Commission (NRC) guidance contained in Generic Letter (GL) 89-04, “Guidance on Developing Acceptable Inservice Testing Programs,” provides alternatives to Code requirements which are acceptable. Further guidance is given in GL 89-04, Supplement 1, and NUREG-1482, “Guidance for Inservice Testing at Nuclear Power Plants.”

ENCLOSURE

3.0 TECHNICAL EVALUATION

3.1 Code Requirements

The licensee proposed alternatives to the IST/ISI program update frequency and interval requirements of 10 CFR 50.55a(f)(4)(ii), 10 CFR 50.55a(g)(4)(ii), ASME Code, Section XI, paragraph IWA-2430(b), and ASME Code, Section XI, paragraph IWA-2432.

3.2 Licensee's Basis for Proposed Alternative (as stated)

> 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 Program 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 and 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.

3.3 Licensee's Proposed Alternative to Code Requirements

The licensee proposes adjusting the Unit 1 fourth 10-year IST/ISI program interval start dates to December 21, 2004, to coincide with the Unit 2 fourth 10-year IST/ISI program interval start dates.

3.4 NRC Staff Evaluation

The regulation at 10 CFR 50.55a(f)(4)(ii) and 10 CFR 50.55a(g)(4)(ii) requires that IST of ASME Code Class 1, 2, and 3 pumps and valves and ISI of certain ASME Code Class 1, 2, and 3 components (including supports) conducted during successive 10-year program intervals comply with the requirements of the latest edition and addenda of the ASME Code prior to the start of the 10-year IST/ISI program interval. Furthermore, the ASME Code, Section XI, paragraph IWA-2432, requires that successive program intervals be 10 years after the previous inspection interval. The licensee proposed an alternative to updating the IST/ISI programs on the timetable required by the ASME Code, Section XI. The licensee proposed that the start date for the Unit 1 fourth 10-year IST/ISI program intervals be aligned with the Unit 2 fourth 10-year IST/ISI program intervals, scheduled to commence on December 21, 2004.

The ASME Code, Section XI, paragraph IWA-2430, allows inspection intervals to be extended or decreased by as much as 1 year (365 days). Invoking the 1-year extension allowed by the ASME Code would result in a 5-day difference between the Code-allowed start date for the Unit 1 fourth 10-year IST/ISI program intervals, and the start date requested by the licensee. With the proposed alternative schedule for Unit 1, the required third 10-year IST/ISI program intervals, (and following) tests and examinations will be completed. There would be no reduction in the number of IST/ISI tests or examinations as a result of extending the Unit 1 fourth 10-year IST/ISI program interval date and the licensee will be using the latest applicable ASME Code edition for both unit's fourth 10-year IST/ISI program intervals.

As noted in the licensee's basis for the proposed alternative, the editions of the ASME Code for the IST/ISI programs are not the same and are approximately 1 year apart (370 days) due to the different commercial operating dates. This results in a significant amount of work on the part of the licensee and having both units on the same edition of the ASME Code and schedule has distinct advantages. There are fewer procedures to maintain, and the licensee's procedures will meet the requirements of one edition of the Code. Also, the IST/ISI programs will be written as one document covering both units reducing the chance of the licensee applying the wrong IST/ISI requirements. Finally, maintaining one set of procedures and documents reduces the administrative burden in complying with IST/ISI requirements and does not reduce the quality of the IST/ISI programs.

Based on the above, the NRC staff concludes that the licensee's proposed alternative provides an acceptable level of quality and safety

3.5 Conclusion

Based on the licensee's proposed alternative providing an acceptable level of quality and safety, the NRC staff authorizes the proposed alternative to align the Unit 1 IST/ISI program intervals with the Unit 2 IST/ISI program intervals, pursuant to 10 CFR 50.55a(a)(3)(i).

Principal Contributor: W. Poertner

Date: October 2, 2003