

L-PI-04-089

JUL 16 2004

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

Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

NRC Staff Consideration for Prairie Island Station Piloting Development and Implementation of RITS Initiative 4b

By this letter, NMC requests NRC Staff consideration for Prairie Island Nuclear Generating Station piloting development and implementation of risk-informed Technical Specifications (RITS) for "Flexible Allowable Outage Times (AOT)", RITS Initiative 4b. In this effort we will work with the Westinghouse Owners Group and Nuclear Energy Institute (NEI) to assure that our efforts are compatible with the approaches already underway. We request that NRC reviews of our submittals, including any required reviews of our Probabilistic Risk Analysis (PRA) Models necessary to support our application, be granted a fee waiver pursuant to the provisions of 10 CFR 170.11, specifically:

1. The request is to assist in developing a NRC regulatory guide (to provide/endorse the risk management process) in accordance with 10 CFR 170.11(a)(1)(ii).
2. The request is to support NRC generic regulatory improvements (risk management technical specifications), in accordance with 10 CFR 170.11(a)(1)(iii).

NMC is planning on completing work supporting a License Amendment submittal prior to 2006.

Please inform us of your decision on our request for a fee waiver as soon as practical. If you have any questions, please contact Gabe Salamon, Prairie Island Regulatory Affairs Manager, at (651) 388-1121, extension 5284.

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

A handwritten signature in black ink, appearing to read "Craig Lambert". The signature is fluid and cursive, with the first name "Craig" and last name "Lambert" clearly distinguishable.

Craig Lambert
Vice President - Engineering

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