OCT 15 2004

L-PI-04-112
10 CFR 50.90

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

Application for Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump Flywheels Using the Consolidated Line Item Improvement Process

Pursuant to 10 CFR 50.90, the Nuclear Management Company, LLC (NMC) hereby requests an amendment to the Technical Specifications (TS) for the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2.

The proposed amendment will extend the reactor coolant pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval, to an interval not to exceed 20 years. The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the *Federal Register* on October 22, 2003 as part of the consolidated line item improvement process (CLIIP).

Exhibit A provides a description of the proposed change and confirmation of applicability. Exhibit B provides the existing TS page marked up to show the proposed change. Exhibit C provides the revised, clean TS page.

NMC requests approval of the proposed License Amendment by September 30, 2005, with the amendment being implemented within 90 days.

In accordance with 10 CFR 50.91, NMC is notifying the State of Minnesota of this LAR by transmitting a copy of this letter and attachments to the designated State Official.

Summary of Commitments

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

A001

I declare under penalty of perjury that the foregoing is true and correct.
Executed on OCT 15 2004

Joseph M. Solymossy
Site Vice President, Prairie Island Nuclear Generating Plant Units 1 and 2
Nuclear Management Company, LLC

CC Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
State of Minnesota

Exhibits:
A. Description and Assessment
B. Proposed Technical Specification Changes (markup)
C. Proposed Technical Specification Changes (retyped)

Exhibit A

DESCRIPTION AND ASSESSMENT

Application for Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump Flywheels Using the Consolidated Line Item Improvement Process

1. INTRODUCTION
2. DESCRIPTION OF PROPOSED AMENDMENT
3. BACKGROUND
4. REGULATORY REQUIREMENTS AND GUIDANCE
5. TECHNICAL ANALYSIS
5. REGULATORY ANALYSIS
7. NO SIGNIFICANT HAZARDS CONSIDERATION
8. ENVIRONMENTAL EVALUATION
9. PRECEDENT
10. REFERENCES

1.0 INTRODUCTION

The proposed license amendment changes Technical Specification (TS) 5.5.6, "Reactor Coolant Pump Flywheel Inspection Program". The changes are consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)." The availability of this TS improvement was announced in the *Federal Register* on October 22, 2003, as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved TSTF-421, the proposed TS change includes the following revision to TS 5.5.6:

> The examination interval for the RCP flywheels is changed from approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI to 20 year intervals.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment

published on June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination," and the related NRC safety evaluation (SE) dated May 5, 2003.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published on June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, and the related NRC SE.

5.0 TECHNICAL ANALYSIS

NMC has reviewed the model SE published on June 24, 2003 (68 FR 37590), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (including WCAP-15666 and the related SE dated May 5, 2003). NMC has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, and justify this amendment for the incorporation of the changes to the PINGP TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC notices related to the CLIIP, TSTF-421, topical report WCAP-15666, and the associated SE.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

NMC has reviewed the proposed no significant hazards consideration determination published in the Federal Register on June 24, 2003 (68 FR 37590) as part of the CLIIP. NMC has concluded that the proposed determination presented in the Federal Register notice is applicable to PINGP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

NMC has reviewed the environmental evaluation included in the model SE published on June 24, 2003 (68 FR 37590) as part of the CLIIP. NMC has concluded that the NRC staff's findings presented in that evaluation are applicable to PINGP and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. NMC is not proposing variations or deviations from the TS changes described in TSTF-421 or the NRC staff's model SE published on June 24, 2003 (68 FR 37590).

10.0 REFERENCES

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003 (68 FR 60422).

2. Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).

3. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, "Revision to RCP Flywheel Inspection Program (WCAP-15666)," Revision 0, November 2001.

4. WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination," July 2001.

5. NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG) transmitting Safety Evaluation of WCAP-15666.

Exhibit B

Proposed Technical Specification Changes (markup)
(Additions shaded, deletions strikethrough)

List of Changed Pages

5.0-11

1 page follows

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR, Section 4.1.4, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT or PT) of exposed surfaces of the removed flywheels may be conducted at ~~approximately~~ 2010 year intervals ~~coinciding with the Inservice Inspection schedule as required by ASME Section XI~~.

Exhibit C

Proposed Technical Specification Changes (retyped)

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5.0-11

1 page follows

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