



MAR 28 2005

L-PI-05-022
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

Supplement To License Amendment Request (LAR) Dated May 3, 2004,
for Resolution of Unresolved Items Related to Methods for Evaluation of Cooling Water
System (TAC Nos. MC3043 and MC3044)

By letter dated May 3, 2004, the Nuclear Management Company, LLC (NMC) submitted an LAR titled, "Resolution of Unresolved Items Related to Methods for Evaluation of Cooling Water System," which proposed a hydraulic analysis methodology for demonstrating functionality of the cooling water (CL) system following a design basis seismic event and to define acceptance criteria from the American Society of Mechanical Engineers (ASME) Section III Code, Subsection ND, for stress analysis of the CL system non-Class I piping with design basis seismic loads. This letter supplements the subject LAR. NMC submits this supplement in accordance with the provisions of 10 CFR 50.90.

The subject LAR includes the provision to change the "worst case location" of assumed pipe rupture to a smaller, less limiting, location through performance of stress analysis of currently unanalyzed non-seismic CL branch line piping. By phone call on March 8, 2005, the Nuclear Regulatory Commission (NRC) Staff requested clarification on how long term piping integrity will be assured following application of this provision. In order to provide assurance that the piping is not significantly degrading with time, NMC will include piping that is analyzed in accordance with this provision in the scope of the Prairie Island Nuclear Generating Plant (PINGP) Generic Letter 89-13 program. In accordance with the Generic Letter 89-13 program, pipe wall thinning inspections are currently performed for safety related piping in the CL System.

The proposed changes in this supplement do not impact the conclusions of the Determination of No Significant Hazards Consideration and Environmental Assessment presented in the original May 3, 2004 submittal.

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

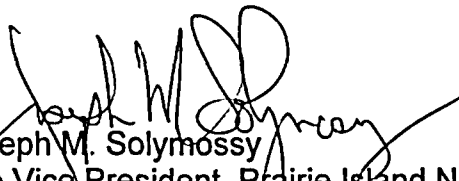
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Summary of Commitments

In this letter NMC has made the following commitment: NMC will include in the scope of the PINGP Generic Letter 89-13 program CL non-seismic piping on which stress analysis are performed to change the assumed pipe rupture location as proposed in the LAR dated May 3, 2004. NMC has not revised any Nuclear Regulatory Commission commitments.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed on **MAR 28 2005**



Joseph M. Solymosy
Site Vice President, Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
Minnesota Department of Commerce