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10 CFR 50.90

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

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

By letter dated May 10, 2005, the Nuclear Regulatory Commission issued Amendment No. 169 to Facility Operating License No. DPR-42 and Amendment No. 159 to Facility Operating License No. DPR-60 for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2 respectively. The Nuclear Management Company, LLC (NMC) has reviewed these License Amendments and the supporting Safety Evaluation and offers the following comments and clarifications.

The subject LAR discussed preliminary cooling water (CL) system hydraulic analysis results and stated, "In order to reduce the demand on the CL pumps to within the manufacturer's recommendations for continuous operation, operator action would be taken in accordance with current established procedures."

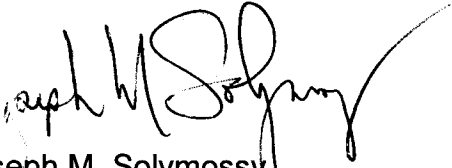
The NRC Staff, in a request for additional information dated January 31, 2005, requested information on specific operator actions being relied upon for postulated pipe break conditions. NMC replied, by letter dated February 4, 2005, that, "Preliminary hydraulic analyses of the CL system using the requested methodology have been performed that indicate operator actions may not be required to provide sufficient flow . . ." and concluded that, "If the finalized analyses indicate that operator actions are necessary, these actions will be identified and evaluated in accordance with 10 CFR 50.59."

The NRC Staff Safety Evaluation (SE) dated May 10, 2005, acknowledged that the effects on operator actions from the cooling water (CL) seismic analysis methodology were unknown at the time of the License Amendment issuance. However, the SE discussion of operator actions stated that NMC will need to obtain NRC "follow-on approval" for changes in required operator actions.

In phone discussions on May 18, 2005, NMC and the NRC Staff discussed review of operator action changes under the provisions of 10 CFR 50.59. The NRC Staff concurred that 10 CFR 50.59 is the appropriate regulatory basis for evaluating changes in operator actions that may result from use of the CL hydraulic methodology approved by PINGP License Amendments 169 and 159. Thus, if operator actions change due to use of the CL methodology, NMC will evaluate these changes in accordance with the requirements of 10 CFR 50.59. NMC will seek NRC review and approval of operator action changes when the 10 CFR 50.59 evaluations indicate that NRC review and approval is required.

Summary of Commitments

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



Joseph M. Solymossy
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