

Operated by Nuclear Management Company, LLC

FEB 0 2 2006

L-PI-06-006 10 CFR 50.90

U S Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

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

Withdrawal of License Amendment Request (LAR) to Incorporate Revisions to Small Break Loss of Coolant Accident Methodology into the Prairie Island Nuclear Generating Plant Licensing Basis

By letter dated February 28, 2005, the Nuclear Management Company, LLC (NMC) submitted an LAR titled, "License Amendment Request (LAR) to Incorporate Revisions to Small Break Loss of Coolant Accident Methodology into the Prairie Island Nuclear Generating Plant Licensing Basis," (SBLOCA LAR) that would allow the use, for the Prairie Island Nuclear Generating Plant (PINGP), of the small break loss of coolant accident (SBLOCA) methodology described in Westinghouse WCAP-10054-P-A.

Based on the information available in February 2005, NMC determined that an LAR would be required to adopt the SBLOCA methodology in WCAP-10054-P-A for PINGP. Pursuant to telephone discussions with the NRC Staff, NMC has performed evaluations which demonstrate that a significant margin exists between the large break loss of coolant accident peak clad temperature (PCT) and the SBLOCA PCT. Enclosure 1 summarizes the evaluation results. In telephone discussions on January 24, 2006, NMC and the NRC Staff agreed that the SBLOCA LAR can be withdrawn based on these evaluations. Therefore, by this letter, NMC withdraws the Small Break Loss of Coolant Accident LAR dated February 28, 2005.

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 enclosure to the designated State Official.

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Summary of Commitments

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

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

Executed on

FEB 0 2 2006

Thomas J. Palmisano

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

Enclosure (1)

cc: Administrator, Region III, USNRC

Project Manager, Prairie Island, USNRC Resident Inspector, Prairie Island, USNRC

State of Minnesota

Enclosure 1

Three issues were evaluated for their impact on peak clad temperature (PCT) to provide the basis for withdrawal of the small break loss of coolant accident (SB LOCA) license amendment request: 1) effects of non-integer break sizes; 2) impact of the improved condensation model (COSI); and 3) prevention of loop seal clearing in the intact loop.

Effects Of Non-Integer Break Sizes

The non-integer break size issue adds less than 100 degrees F to the PCT for SB LOCA for the Prairie Island Nuclear Generating Plant (PINGP). Based on specific calculations performed by Westinghouse for a subset of plants, the impact is quite small for plants with a SB LOCA PCT less than 1700 degrees F, such as PINGP. However, since the maximum penalty found for any plant was calculated to be 85 degrees F, a penalty of 100 degrees F is assumed for this consideration.

Impact Of The Improved Condensation Model (COSI)

A Westinghouse advisory letter recommended a generic impact of 150 degrees F to account for the improved condensation model. A sensitivity study for PINGP performed in 1998 demonstrated that eliminating COSI had virtually no effect on PCT for a 6 inch break. Thus, based on Westinghouse recommendations, a conservative penalty of 150 degree F is included in these considerations for SB LOCA license amendment request withdrawal.

Prevention of Loop Seal Clearing In The Intact Loop

Prevention of loop seal clearing in the intact loop does not need an adjustment since the PINGP specific analysis results reported to the NRC were calculated with the loop seal clearing prevented in the intact loop.

Results

The total assumed penalty for these three issues is 250 degrees F. The most recent PINGP SB LOCA PCT is compared to the most recent large break loss of coolant accident (LB LOCA) PCT in Table 1.

Table 1
PINGP LOCA PCTs

LOCA	Unit 1 PCT (°F)	Unit 2 PCT (°F)	NMC letter date	Accession No.
LB	2039	2017	8/30/2005	ML052430398
SB	1409	1177	12/29/2005	ML053630313

The minimum margin between the limiting LB LOCA PCT and the SB LOCA PCT is 630 degrees F on Unit 1. Thus, even with a penalty of 250 degrees F applied to the SB LOCA PCT, the LB LOCA is the limiting transient by a significant margin.