



MAY 15 2006

L-PI-06-039
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

Supplement to License Amendment Request (LAR) to Clarify Technical Specification (TS) Requirements For Surveillance Requirements (SRs) For Installed Spare Components and Miscellaneous Corrections

Reference 1) License Amendment Request (LAR) to Clarify Technical Specification (TS) Requirements For Surveillance Requirements (SRs) For Installed Spare Components and Miscellaneous Corrections, dated November 9, 2005

By letter dated November 9, 2005, Nuclear Management Company (NMC) submitted the referenced LAR to clarify which TS SRs shall be met for TS systems which include more components (installed spare components) than are required to satisfy the TS Limiting Conditions for Operation (LCO). This letter supplements the referenced LAR to address January 12, January 17 and April 13, 2006 discussions with the Nuclear Regulatory Commission (NRC) Staff regarding the referenced LAR. NMC is submitting this supplement in accordance with the provisions of 10 CFR 50.90.

NMC withdraws changes proposed in the referenced LAR to TS 3.3.3, "Event Monitoring (EM) Instrumentation", and TS 3.3.5, "Containment Ventilation Isolation Instrumentation". Enclosure 1 provides TS 3.8.1, "AC Sources-Operating", page 3.8.1-1 and Bases page B 3.8.1-6 marked up to add "required" to Condition A to be consistent with the guidance of NUREG-1431, "Standard Technical Specifications, Westinghouse Plants", Revision 3.0. Enclosure 2 provides the final (retyped) TS 3.8.1 page 3.8.1-1. Enclosure 3 provides a complete list of the marked up TS and Bases pages, and final TS pages associated with the referenced LAR accounting for the changes proposed in this supplement.

The supplemental information provided in this letter and enclosures does not impact the conclusions of the Determination of No Significant Hazards Consideration and Environmental Assessment presented in the November 9, 2005 submittal.

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

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

MAY 15 2006



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

Enclosures (3)

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

Enclosure 1

Technical Specification page (marked up)

3.8.1-1

Bases page (marked up)
(for information only)

B 3.8.1-6

2 pages follow

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources-Operating

LCO 3.8.1 The following AC electrical sources shall be OPERABLE:

- a. Two paths between the offsite transmission grid and the onsite 4 kV Safeguards Distribution System; and
- b. Two diesel generators (DGs) capable of supplying the onsite 4 kV Safeguards Distribution System.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

-----NOTE-----
LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One <u>required path</u> inoperable.	A.1 Perform SR 3.8.1.1 for the OPERABLE path. <u>AND</u>	1 hour <u>AND</u> Once per 8 hours thereafter

BASES (continued)

ACTIONS

A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provision of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

A.1

To ensure a highly reliable power source remains with one path inoperable, it is necessary to verify the OPERABILITY of the remaining required path on a more frequent basis. Since the Required Action only specifies “perform,” a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if the second path fails SR 3.8.1.1, there are no OPERABLE paths, and Condition C, for two paths inoperable, is entered.

A.2

Operation may continue in Condition A for a period that should not exceed 7 days. With one path inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the unit safety systems. In this Condition, however, the remaining OPERABLE path and DGs are adequate to supply electrical power to the onsite Safeguards Distribution System.

The 7 day Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action A.2 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous

Enclosure 2

Technical Specification page (final)

3.8.1-1

1 page follows

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources-Operating

LCO 3.8.1 The following AC electrical sources shall be OPERABLE:

- a. Two paths between the offsite transmission grid and the onsite 4 kV Safeguards Distribution System; and
- b. Two diesel generators (DGs) capable of supplying the onsite 4 kV Safeguards Distribution System.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

-----NOTE-----
LCO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required path inoperable.	A.1 Perform SR 3.8.1.1 for the OPERABLE path. <u>AND</u>	1 hour <u>AND</u> Once per 8 hours thereafter

Enclosure 3

Technical Specification and Bases marked up pages associated with the LAR to Clarify Technical Specification (TS) Requirements For Surveillance Requirements (SRs) For Installed Spare Components and Miscellaneous Corrections, dated November 9, 2005 as supplemented.

Technical Specification pages

3.7.8-4
3.7.8-5
3.8.1-1
3.8.1-6
3.8.1-7
3.9.3-3

Bases pages

B 3.7.8-13
B 3.7.8-14
B 3.7.8-16
B 3.8.1-6
B 3.8.1-15
B 3.9.3-4
B 3.9.3-5

Technical Specification final (retyped) pages associated with the LAR to Clarify Technical Specification (TS) Requirements For Surveillance Requirements (SRs) For Installed Spare Components and Miscellaneous Corrections, dated November 9, 2005 as supplemented.

Technical Specification pages

3.7.8-4
3.7.8-5
3.8.1-1
3.8.1-6
3.8.1-7
3.9.3-3