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

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

Withdrawal of Request for Reliefs 21 and 22 - Request to Use ASME Code Case N-700, Alternative Rules for Selection of Classes 1,2 and 3 Vessel Welded Attachments for Examination.

Reference: 1.NMC letter to NRC L-HU-05-028, American Society of Mechanical Engineers (ASME) Section XI, Inservice Inspection (ISI)- Request for Relief 21 and 22 - Request to Use ASME Code Case N-700, Alternative Rules for Selection of Classes 1,2 and 3 Vessel Welded Attachments for Examination, dated December 19, 2005

On December 19, 2005, Nuclear Management Company, LLC (NMC) submitted a relief request (Reference 1), for Prairie Island Nuclear Plant Units 1 and 2 (PINGP), from certain in-service inspection requirements in Section XI of the ASME Boiler and Pressure Vessel Code, specifically NMC requested the adoption of ASME Code Case N-700, as an alternative to the rules for the selection of integrally welded attachments to their Reactor Vessel.

NMC believes that the proposed relief request is no longer necessary and is withdrawing the request. The following provides the basis for the withdrawal:

At PINGP, ASME Code Case N-509 was adopted during the third ten-year ISI interval. Table 2500-1 of ASME Code Case N-509 has note (3) applied to the Extent of Examination, which is applicable to Pressure Vessel Integrally Welded Attachments. This note states that selected samples of integrally welded attachments shall be examined each inspection interval. There is no further discussion of an acceptable number of integrally welded attachments to be inspected except for multiple vessels of similar design, as stated in note (4) of the table. With only one Reactor Vessel per unit, note (4) does not apply.

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ASME Code Case N-509 was accepted for use under Regulatory Guide (RG) 1.147, revision 12. With this acceptance, a stipulation that a minimum 10% sample of integrally welded attachments for each item in each code class per interval should be examined was added.

At PINGP, there are 5 integrally welded attachments on the Reactor Vessel of each unit. One integrally welded attachment of each Reactor Vessel has been inspected. Therefore, 20% of the welded attachments have been inspected in the interval. This exceeds the minimum 10% stipulated in RG 1.147, revision 12, and therefore, the requirements of ASME Code Case N-509 have been met. ASME Code Case N-509 was approved for use with stipulations, under RG 1.147, revision 12. The stipulations of RG 1.147 were met.

Therefore, there is no need for relief request.

#### Summary of Commitments

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



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Nuclear Management Company, LLC

cc: Regional Administrator, Region III, USNRC  
Project Manager, Prairie Island Nuclear Plant, USNRC  
Resident Inspector, Prairie Island Nuclear Plant, USNRC  
Chief Boiler Inspector, State of Minnesota