

November 3, 2006

MEMORANDUM TO: L. Raghavan, Chief  
Plant Licensing Branch E  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Timothy J. Kobetz, Chief */RA/*  
Technical Specifications Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT (PINGP) UNITS 1  
AND 2 SAFETY EVALUATION FOR ADMINISTRATIVE CHANGES TO  
THE TECHNICAL SPECIFICATIONS

By the letter dated February 13, 2006, the Nuclear Management Company, LLC (NMC), the licensee, submitted a License Amendment Request to revise the technical specifications (TS) of the Prairie Island Nuclear Generating Plant, Units 1 and 2. The licensee is requesting to revise the page header and capitalizations in TS 3.0, "Surveillance Requirement (SR) Applicability;" and revise format and titles in TS 5.0, "Administrative Controls." The attached Safety Evaluation (SE) addresses the proposed administrative TS changes. Our SE concludes the licensee's administrative TS revisions are acceptable.

Enclosure:  
As stated

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# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## RELATED TO AMENDMENTS TO FACILITY OPERATING LICENSE

### PRAIRIE ISLAND NUCLEAR POWER PLANTS, UNITS 1 AND 2

DOCKET NOS. 50-282 AND 50-306

#### 1. INTRODUCTION

Pursuant to 10 CFR 50.90, on February 13, 2006, the Nuclear Management Company, the licensee, submitted a License Amendment Request (LAR) to amend the Prairie Island Nuclear Generation Plant (PINGP), Units 1 License. The LAR proposes to revise the PINGP Technical Specifications (TS) to change the wording in TS 3.0 "Surveillance Requirement (SR) Applicability" and change format and titles in Chapter 5.0, "Administrative Controls." The proposed changes improve the TS usability, conformance with the industry standard, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 3.0 and accuracy.

#### 2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act (Act) requires applicants for nuclear power plant operating licenses to include technical specifications as part of the license. These technical specifications are derived from the plant safety analyses.

The staff reviewed the proposed changes for compliance with 10 CFR 50.36 and agreement with the precedent as established in NUREG-1431. In general, licensees cannot justify technical specification changes solely on the basis of adopting the model STS. To ensure this, the staff makes a determination that proposed changes maintain adequate safety. Changes that result in relaxation (less restrictive condition) of current TS requirements require detailed justification.

In general, there are two classes of changes to technical specifications: (1) changes needed to reflect contents of the design basis (technical specifications are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of technical specifications over time. This amendment deals with the second class of change; namely, administrative changes that reflect the current configuration of the plant.

Licensees may revise the technical specifications to adopt improved standard technical specification format and content provided that plant-specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative or provides clarification (i.e., no requirements are materially altered), (2) the change is more restrictive than the licensee's current requirement, or (3) the change is less restrictive than the licensee's current requirement, but nonetheless still affords adequate assurance of safety when judged against current regulatory standards. The detailed application of this general framework, and additional specialized guidance, are discussed in Section 3.0 in the context of specific proposed changes.

Enclosure

### 3.0 TECHNICAL EVALUATION

The Licensee's TS revision proposes to make changes that are editorial, administrative or provide clarification. In order for these changes to be acceptable the staff must determine that the editorial, administrative and clarification changes do not alter the TS requirements.

The licensee proposes to revise the following PINGP TS:

#### 3.1 TS 3.0, "Surveillance Requirement (SR) Applicability"

The current page header for TS 3.0, "Surveillance Requirement (SR) Applicability" is "LCO [Limiting Condition for Operation] Applicability." This header is not consistent with the contents of this TS section and is not consistent with the format guidance of NUREG-1431. The LAR proposes to replace the current page header with "SR Applicability."

In the last paragraph of Section 3.0.4, "MODES," which is a TS defined term, is incorrectly spelled with a lower case "s." This is not consistent with the format guidance of NUREG-1431 which capitalizes defined terms. These changes are acceptable since they are administrative and conform with the guidance of NUREG-1431.

#### 3.2 TS 5.0, "Administrative Controls" Sections 5.5 and 5.6

The LAR proposes to delete the underline under "(continued)" on page 5.0-10. Furthermore, in TS 5.6.5, "P" is deleted from the number for reference 1 which becomes "NSPNAD-8101-A"; "-P-A" is added to number for reference 9 which becomes "WCAP-13677-P-A," and an extra space is removed prior to the document number for references 24 and 26. These changes are acceptable because they are administrative and improve the accuracy of the TS.

### 4.0 Conclusion

The licensee's proposed changes in this LAR are editorial in nature, reflect the current configuration of the plant and do not change the TS requirements. The staff finds the proposed changes are technically justified, comply with 10 CFR 50.36 and are consistent with the standard technical specifications. On this basis, the NRC staff concludes that the proposed changes to the TS of the Perry Nuclear Power Plant are acceptable.

The Commission has concluded, on the basis of considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and, (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.