



MAY 10 2007

L-PI-07-028
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

Application for Technical Specification Change TSTF-491, "Removal of the Main Steam and Main Feedwater Valve Isolation Time From Technical Specifications" Using Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90, the Nuclear Management Company, LLC (NMC) is submitting a request for an amendment to the Technical Specifications (TS) for the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2.

The proposed amendment would modify the TS by removing the specific isolation time for the main steam isolation valves from the associated TS Surveillance Requirements (SRs).

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS and Bases pages marked up to show the proposed changes. Enclosure 3 provides revised (clean) TS pages.

NMC requests approval of the proposed license amendment within one calendar year of the submittal date, with the amendment being implemented within 90 days. In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated State of Minnesota Official.

Please address any comments or questions regarding this license amendment request to Mr. Dale Vincent, P.E., at 1-651-388-1121.

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 10 2007**



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

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

Enclosures:

1. Description and Assessment
2. Proposed Technical Specification and Bases Changes (markup)
3. Revised Technical Specification Pages (retyped)

Enclosure 1

Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) by removing the specific isolation time for the main steam isolation valves from the associated TS Surveillance Requirements (SRs).

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) TSTF-491, "Removal of the Main Steam and Main Feedwater Valve Isolation Time from Technical Specifications", Revision 2. The availability of this TS improvement was published in the Federal Register on December 29, 2006 as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-491, and Published Safety Evaluation

The Nuclear Management Company, LLC (NMC) has reviewed TSTF-491 (Reference 1), and the NRC model safety evaluation (SE) (Reference 2) as part of the CLIIP. NMC has concluded that the information in TSTF-491, as well as the SE prepared by the NRC staff are applicable to the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 and justify this amendment for the incorporation of the changes to PINGP TS.

2.2 Optional Changes and Variations

NMC is not proposing any variations or deviations from the NRC staff's model safety evaluation dated October 5, 2006. NMC proposes to deviate from TSTF-491 in that the PINGP TS 3.7.3 and associated SRs do not include valve closure times, and thus TSTF-491 changes to TS 3.7.3 are not applicable to the PINGP TS and are not adopted.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

NMC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. NMC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to

PINGP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on December 29, 2006 for this TS improvement, plant-specific verifications were performed as follows: NMC has reviewed the safety evaluation (SE) published on October 5, 2006 (71 FR 193) as part of the CLIIP Notice for Comment. This included the NRC staff's SE and the supporting information provided to support TSTF-491. NMC has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to PINGP, Units 1 and 2, and justify this amendment for the incorporation of the changes to PINGP TS 3.7.2. The TSTF-491 changes to TS 3.7.3 do not apply to the PINGP TS and are not proposed for adoption.

In addition, NMC has proposed TS Bases consistent with TSTF-491 which provide guidance and details on how to implement the new requirements. Finally, NMC has a Bases Control Program consistent with Section 5.5 of the Standard Technical Specifications (STS).

4.0 ENVIRONMENTAL EVALUATION

The amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment adopting TSTF-491, Rev 2, involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that TSTF-491, Rev 2, involves no significant hazards considerations, and there has been no public comment on the finding in Federal Register Notice 71 FR 193, October 5, 2006. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 REFERENCES

1. TSTF-491, Revision 2, "Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications."
2. NRC Model Safety Evaluation Report.

Enclosure 2

Proposed Technical Specification and Bases Changes (markup)

Technical Specification Page

3.7.2-2

Bases Pages

B 3.7.2-6

B 3.7.2-7

3 pages follow

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3.	6 hours
	AND D.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 -----NOTE----- Only required to be performed in MODES 1 and 2. -----</p> <p>Verify the isolation time of each MSIV is <u>within limits</u> < 5 seconds.</p>	In accordance with the Inservice Testing Program
<p>SR 3.7.2.2 -----NOTE----- Only required to be performed in MODES 1 and 2. -----</p> <p>Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.</p>	24 months

BASES

ACTIONS
(continued)D.1 and D.2

If the MSIVs cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTSSR 3.7.2.1

~~This SR verifies that the MSIV closure time of each MSIV is \leq 5 seconds. The MSIV isolation time is within the limit given in Reference 5 and is within that assumed in the accident and containment analyses. This SR also verifies the valve closure time is in accordance with the Inservice Testing Program. This SR surveillance is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be tested at power, since even a part stroke exercise increases the risk of valve closure when the unit is generating power. As the MSIVs are not tested at power, they are deferred from the ASME Code (Ref. 65) requirements during operation in MODE 1 or 2.~~

The Frequency is in accordance with the Inservice Testing Program.

This test is conducted in MODE 3 with the unit at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.2.2

This SR verifies each MSIV can close on an actual or simulated main steam isolation signal. This Surveillance is normally performed upon returning the plant to operation following a refueling outage.

The Frequency of MSIV testing is every 24 months. The 24 month Frequency for testing is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed. Therefore, the Frequency is acceptable from a reliability standpoint.

REFERENCES

1. USAR, Section 11.7.
 2. USAR, Section 14.5.
 3. License Amendment 133/125, issued November 18, 1997, "Voltage-based Steam Generator Tube Repair Criteria."
 4. 10 CFR 100.11.
 5. Technical Requirements Manual.
 6. ASME, Boiler and Pressure Vessel Code, Section XI.
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Enclosure 3

Proposed Technical Specification Changes (cleanup)

Technical Specification Page

3.7.2-2

1 page follows

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3.	6 hours
	AND D.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.2.1 -----NOTE----- Only required to be performed in MODES 1 and 2. ----- Verify the isolation time of each MSIV is within limits.	In accordance with the Inservice Testing Program
SR 3.7.2.2 -----NOTE----- Only required to be performed in MODES 1 and 2. ----- Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.	24 months