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

Notification of Change to Commitment Made in the Prairie Island Nuclear Generating Plant (PINGP) 30-Day Response to NRC Bulletin 2003-02

- Reference:
- 1) Letter from Nuclear Management Company, LLC (NMC) to NRC, "NUCLEAR REGULATORY COMMISSION BULLETIN 2003-02: LEAKAGE FROM REACTOR PRESSURE VESSEL LOWER HEAD PENETRATIONS AND REACTOR COOLANT PRESSURE BOUNDARY INTEGRITY – 30-DAY RESPONSE," dated September 19, 2003 (ADAMS Accession Number ML032690983).
 - 2) Letter from NRC to NMC, "PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1 - RESPONSE TO NRC BULLETIN 2003-02, "LEAKAGE FROM REACTOR PRESSURE VESSEL LOWER HEAD PENETRATIONS AND REACTOR COOLANT PRESSURE BOUNDARY INTEGRITY (TAC NO. MC0558)," dated July 7, 2005 (ADAMS Accession Number ML051790189).
 - 3) Letter from NMC to NRC, "50.59 EVALUATION SUMMARY REPORT," dated December 9, 2005 (ADAMS Accession Number ML053460300).

In Reference 1, the Nuclear Management Company, LLC (NMC) committed to perform a 100% bare-metal visual exam of the lower reactor pressure vessel (RPV) dome up to and including each bottom-mounted instrumentation (BMI) penetration to RPV junction each PINGP refueling outage. In Reference 2, the NRC reviewed Reference 1 and requested NMC notify the NRC staff in writing of any changes to this commitment prior to implementation.

On April 18, 2005, NMC approved a change to the subject commitment per the guidance of Nuclear Energy Institute (NEI) *Guidelines for Managing NRC Commitment Changes* (NEI 99-04). The proposed change was to add an allowance to perform the undervessel exam within one month of the actual refueling outage (should the

opportunity arise) and was implemented in 2005. Per the NEI 99-04 process, the result of the evaluation of the proposed commitment change was that the change was acceptable and that the NRC should be notified in the next once-per-cycle summary of commitment changes. The summary was provided to the NRC in Reference 3.

On November 8, 2006, NMC approved another change to the subject commitment. The proposed change was to extend the frequency of undervessel inspections to every other refueling outage and was implemented in 2006. Per the guidance of NEI 99-04, the proposed change was determined to be acceptable with NRC notification being required in the once-per-cycle summary report. The once-per-cycle report that will contain this notification will be submitted later this year.

Thus, NMC changed the subject commitment twice without prior written notification to the NRC. In the first case, NMC made the change before Reference 2 had been received and, thus, did not know the NRC wished to be notified prior to implementing a commitment change. In the second case, NMC staff simply overlooked the NRC request from Reference 2 for prior written notification prior to changing the commitments and relied solely on the results of the NEI 99-04 process. Even though the NRC-endorsed commitment change process of NEI 99-04 did not require prior written notification to the NRC, NMC would have provided the requested prior notification of changing this commitment had the NRC request been recognized.

After this oversight was recognized by NMC staff, the issue was entered into the PINGP corrective action process and NMC contacted the NRC. This letter is being submitted to document the changes to the subject commitment at the request of the NRC.

Summary of Commitments

This letter contains no new commitments and documents two changes to an existing commitment. Specifically, the commitment to perform a 100% bare-metal visual exam of the lower reactor pressure vessel (RPV) dome up to and including each bottom-mounted instrumentation (BMI) penetration to RPV junction each PINGP refueling outage has been changed to: (1) make an allowance to perform the undervessel exam within one month of the actual refueling outage (should the opportunity arise), and (2) extend the frequency of inspection to every other refueling outage.



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