

December 3, 2007

Mr. Michael D.
Wadley Site Vice
President
Prairie Island Nuclear Generating
Plant Nuclear Management Company,
LLC 1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
RE: CLARIFICATION LETTER FOR USE OF GOTHIC (TAC NOS. MC4245
AND MC4246)

Dear Mr. Wadley:

On September 1, 2004, the Nuclear Management Company (NMC, the licensee) submitted a license amendment request (LAR) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML042570289) requesting approval to use the GOTHIC methodology for Prairie Island Nuclear Generating Plant (PINGP) analyses. The Nuclear Regulatory Commission (NRC) approved the LAR by a safety evaluation (SE) dated August 12, 2005 (ADAMS Accession No. ML052000046), which had the following statement in the conclusion:

“The mass and energy releases and the initial and boundary conditions used in future PINGP license applications using GOTHIC 7 will be reviewed by the staff to assure that the analyses are performed consistent with the guidance in the SRPs and the description presented in WCAP-16219-P.”

However, your staff has expressed concern with the above statement in the SE. In an e-mail dated October 30, 2007 (ADAMS Accession No. ML073310572), NMC stated that according to its interpretation, each use (application) of GOTHIC would require the submittal of an LAR. It further stated that requiring an LAR for each use would not be consistent with the industry use of approved topical reports, such as WCAP-16219-P, and would preclude the use of Section 50.59 of Part 50 to Title 10 of the *Code of Federal Regulations* (10 CFR 50.59) for determining whether prior NRC approval is required. Thus, NMC requested that the NRC withdraw this SE statement or provide clarification.

The NRC staff does not agree with NMC's interpretation of the SE statement. The following interpretation is provided by the staff.

The NRC staff notes that 10 CFR 50.59 is the controlling regulation in determining whether GOTHIC analyses must receive prior NRC review and approval. The intent of the staff's statement is that *when* an LAR is submitted, the staff will review the mass and energy release calculations, not that every GOTHIC analysis *must* be submitted.

M. Wadley

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I hope this provides the necessary clarification requested by NMC. If you have any further questions, please contact me at 301-415-8371.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch III-1 Division of
Operating Reactor Licensing Office of
Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

cc: See next page

M. Wadley

- 2 -

I hope this provides the necessary clarification requested by NMC. If you have any further questions, please contact me at 301-415-8371.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch III-1 Division of
Operating Reactor Licensing Office of
Nuclear Reactor Regulation

Docket Nos. 50-282 and

50-306 cc: See next page

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ADAMS Accession No.: ML073240244

OFFICE	NRR/LPL3-1/PM	NRR/LPL3-1/LA	NRR/DSS/SCVB/BC	NRR/LPL3-1/(A)BC
NAME	MChawla	THarris	RDennig RL for	CMunson PDM for
DATE	11/21/07	11/29/07	11/30/07	12/3/07

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Prairie Island Nuclear Generating Plant,
Units 1 and 2

cc:

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July 2006