

From: Mahesh Chawla
To: dALE.VINCENT@nmcco.com
Date: 09/18/2007 11:17:13 AM
Subject: Prairie Island ECCS LAR (MD4209)

Dale,

In reference to the above LAR, the staff would like to discuss the following with you. Please provide me your window of availability to do the teleconference. Thanks

1. In your application, you stated that the proposed change (addition of a note) will allow the required SI pump to be rendered incapable of injecting into the Reactor Coolant System (RCS) during low temperature (MODE 4) operations due to a single action or automatic signal. Was there any other (unstated) purpose for your application?
2. During shutdown / cooldown, at what reactor coolant temperature must SI pumps be placed in pull-to-lock to satisfy the low temperature overpressure protection TS? What is the nominal cooldown rate at this temperature? Based on this cooldown rate and the difference between this temperature and 350F, how much time do the operators have to place pumps in pull-to-lock?
3. What TS requirement currently prevents operators from placing SI pumps in pull-to-lock upon entry into MODE 4 as RCS temperature drops below 350F? (e.g. What APPLICABLE SR is not met, thus causing entry into an ACTION STATEMENT, as a consequence of operators placing pumps in pull-to-lock below 350F?)
4. Your proposed TS LCO 3.5.3 note states: "An SI train may be considered OPERABLE when capable of being manually aligned for ECCS injection." As indicated in your application, the NRC previously established that placing one or more SI pumps in pull-to-lock does not render ECCS INOPERABLE in MODE 4 when both RCS cold leg temperatures are > SI pump disable temperature specified in PTLR. Indeed, in this mode, there is no SR to verify that ECCS pumps are capable of starting automatically, as is the case in Modes 1, 2, and 3. There are, however, SR's that require specific SI train valve alignments and these do apply in MODE 4. What would prevent operators from interpreting the proposed note to permit SI train valve manipulations that would contradict applicable SR's? Is it your intent to permit SI train valve alignments that might invalidate applicable SR's?

CC: Carl S Schulten; Kulin Desai; Ross Telson

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