

August 6, 2008

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 - AUDIT  
OF THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS  
(TAC NOS. MD8892 AND MD8893)

Dear Mr. Wadley:

An audit of the Nuclear Management Company commitment management program was performed at the Prairie Island Nuclear Generating Plant (PINGP) site during the period of June 23 through 26, 2008. Based on the audit, the U.S. Nuclear Regulatory Commission (NRC) staff concludes that: (1) PINGP has implemented NRC commitments on a timely basis, and (2) PINGP has implemented an effective program for managing NRC commitment changes. The audit observations and suggestions were discussed with the licensee during the exit meeting on June 26, 2008. Details of the audit are set forth in the enclosed audit report.

The NRC staff appreciates the resources that were made available by your staff for performing the audit. If you have any questions, I may be reached at (301) 415-8371.

Sincerely,

**/RA/**

Mahesh 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

Enclosure:  
Audit Report

cc w/encl: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION (NRR)

AUDIT OF NUCLEAR MANAGEMENT COMPANY (NMC) MANAGEMENT OF

REGULATORY COMMITMENTS

MADE BY NMC TO THE NUCLEAR REGULATORY COMMISSION (NRC)

PRAIRIE ISLAND NUCLEAR GENERATING PLANT (PINGP), UNIT 1 AND 2

DOCKET NOS. 50-282 AND 50-306

1.0 INTRODUCTION AND BACKGROUND

In SECY-00-045, Acceptance of [Nuclear Energy Institute] NEI 99-04, "Guidelines for Managing NRC Commitments," the Nuclear Regulatory Commission (NRC) staff informed the Commission that it had found NEI 99-04 contains acceptable guidance for controlling regulatory commitments made to the NRC staff by licensees for commercial nuclear reactors and the Commission endorsed NEI 99-04 (see Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000). The commitments will be controlled in accordance with the licensee's Commitment Management Program (CMP) in accordance with NEI 99-04. Any change to the regulatory commitments is subject to licensee management approval and subject to the procedural controls established at the plant for commitment management in accordance with NEI 99-04, which include appropriate notification of the NRC. In accordance with NEI 99-04, the NRC is informed of any regulatory commitment change that has safety or regulatory significance.

On September 7, 2004, NRR Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," was issued. LIC-105 is consistent with NEI 99-04 guidance, and it further provides the NRC staff guidance for handling regulatory commitments made by licensees of commercial nuclear reactors to the NRC staff. According to LIC-105, which cites the definition from NEI 99-04, that a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by a licensee, and submitted in writing on the docket to the NRC. LIC-105 further directs the NRC staff to "audit the licensee's CMP by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.)." LIC-105 recommends that the audit be performed every 3 years. The last audit of the PINGP regulatory commitment program was conducted from May 17 to May 19, 2005 (See Agencywide Documents Access and Management System (ADAMS) Accession No. ML051790027).

2.0 AUDIT SCOPE AND RESULTS

2.1 Audit Scope

The audit was performed at the PINGP site from June 23 through 26, 2008. LIC-105 limits the audit of commitments to those made in writing to the NRC as a result of past licensing

actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Prior to the audit, in order to generate a list of items for the audit, the NRC staff performed Public, Web-Based ADAMS search for commitments listed in licensing action and licensing activity submittals dated in the last 3 years. From this list, the NRC staff selected a representative sample of regulatory commitments to audit. The selection of the sample list covered a variety of systems, disciplines and licensing actions important to NRC staff's decision-making process. This list also included commitment changes. The licensee was also asked to provide a list of regulatory commitments related to licensing actions from its commitment management system. The NRC staff again ensured that the sample selected related to the licensee's licensing action and licensing activity submittals, and asked the licensee to provide documentation to support the audit.

The licensee provided the list and the documentation to support the NRC staff's audit in each of the sample areas discussed above. The licensee's documentation included summary sheets providing the status of the commitment and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The attached table lists the commitments selected for this audit.

## 2.2 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit was to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments that had not yet been implemented, the NRC staff aimed to ascertain that they have been captured in an effective program for future implementation.

The licensee's CMP is described in the licensee procedures "Control of NRC Commitments," 5AWI 1.7.0, Revision 7, dated October 16, 2007, and "Regulatory Commitment Management," FG-R-CM-01, Rev. 0, dated May 8, 2008. The licensee enters commitments made to the NRC into a commitment database called "Passport." This database is used to track all commitments, including the regulatory commitments. However, neither procedure has any requirement to send a reminder to the responsible department as the completion date approaches. Procedure FG-R-CM-01, Section 5.2.1 states, "Individual assigned for completing a NRC Commitment is responsible for ensuring that a commitment is adequately implemented prior to approving closure of the assignment." The NRC staff found that the licensee's procedures 5AWI 1.7.0 and FG-R-CM-01 are consistent with the guidance provided in NEI 99-04.

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table, that are categorized as Commitment Changes, Relief Requests, and PINGP Amendments, to assess the implementation of the licensee's procedures 5AWI 1.7.0 and FG-R-CM-01, including the status of their completion. For the sample of commitments selected for the audit, the NRC staff found that the licensee's commitment tracking program had captured all of the regulatory commitments, and "Passport" reflected their status consistent with the program. However, the NRC staff noted that implementation of the program had some minor inconsistencies. These observations are described Section 2.4.

## 2.3 Verification of the Licensee's Program for Managing NRC Commitment Changes

### 2.3.1 Change Control Procedure Verification

The NRC staff reviewed the licensee's procedures 5AWI 1.7.0 and FG-R-CM-01 against NEI 99-04, Revision 0. Although these procedures follow the NEI guidance, they do not take any credit for it. Regulatory Commitment Changes are processed and tracked by Regulatory Affairs Department (Site Licensing) and are approved by the Site Management. Regulatory Commitment Change Request Form (QF-0729) is used to document the evaluation of the commitment change.

The NRC staff found that the licensee's procedure for handling the commitment change is generally, consistent with the guidance in NEI 99-04. Some minor inconsistencies found in the implementation of the program have been listed in Section 2.4.

### 2.3.2 Procedure Implementation Assessment

#### 2.3.2.1 Commitment Changes Reported to the NRC

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table that are categorized as Commitment Change. The NRC staff found that, with a few minor inconsistencies, the licensee had properly addressed each regulatory commitment change selected for this audit and that the licensee had implemented an effective program to manage commitment changes. The NRC staff observations and suggestions are described in Section 2.4.

#### 2.3.2.2 Commitment Changes Not Reported to the NRC

The licensee indicated that if a change to a commitment is needed, then the change is evaluated in accordance with procedure. The procedure directs the individual to determine if the change requires prior NRC notification. If prior NRC notification is not required, then the change is documented in the commitment and the "Passport" database is updated.

#### 2.3.2.3 Notifications to the NRC of Commitment Changes

Changes in audit sample were reviewed and the staff determined that the proper notification process was followed.

#### 2.3.2.4 Traceability of Commitments

Although not specifically stated in the guidance from NEI 99-04, according to LIC-105, traceability of the commitments is advantageous for the licensee's Control of NRC Commitments. The licensee's procedure, 5AWI 1.7.0, defines the process for ensuring that NRC Commitments are completed as stated and in accordance with the established schedule. Commitments are promptly entered in "Passport" with all the pertinent details.

Section 5.1 of 5AWI 1.7.0 states, "Site Licensing shall be responsible for tracking and maintaining the NRC commitments using the action tracking process FP-PA-ARP-03, Non-CAP Action Request Process."

Procedural steps modified due to NRC commitments show letter "N" in the left column. The reference section further provides the commitment number corresponding to "N." In case of multiple commitments in the same procedure, they are listed as "N1," "N2" etc. This provides

traceability of the commitments to the procedures and vice versa. The NRC staff found that the licensee's commitments, with a few minor inconsistencies, were traceable. These inconsistencies are described in Section 2.4.

## 2.4 Audit Observations and Suggestions

As stated above, the licensee's Control of NRC Commitments in accordance with the procedure 5AWI 1.7.0 is consistent with the NEI Guidance, NEI 99-04. However, the NRC staff has made the following observations during the audit and believes that implementation of suggestions would enhance the process and add consistency to the implementation process:

1. The action request software (Passport Action Tracking) does not give automatic reminders of upcoming due dates the way the previous software did.
2. Several examples of procedures where associated commitments were not identified as references or the N-code was not used in the procedure step that implemented the commitment.
3. There is a Priority field for actions (in Passport Action Tracking) that is not used for commitments (type COMM), although some older commitments have a value in the data field. NEI 99-04 recommends prioritizing commitments.
4. There is a "Due Date" field, but no NRC Date field that might prevent changing a committed-to due date outside of the commitment change process.
5. One example of a committed-to due date being changed outside of the process was identified, however, the committed-to action was completed before the committed-to date. The particular case was as part of Passport implementation where all action due dates were moved out of the Passport implementation window. This was done on the authority of the PARB, but the necessity to process as a commitment change was missed. The licensee entered the issue in their corrective action process (refer to CAP01142216).
6. The commitments associated with the Delta bubble suits were closed without being captured in any implementing procedures. Two years elapsed before this inappropriate closure was identified and the commitment was re-opened. The licensee entered the issue in their corrective action process (refer to CAP01126826).
7. The commitment procedure gives no guidance on third party commitments (e.g., commitments made by NEI on NMC's behalf, such as the cyber security commitments). These commitments have been addressed properly by the site staff.
8. The commitment change process is not used for every commitment change. For example, the commitment date to submit an amendment to implement TSTF-448 (control room habitability) has been changed several times without completing a commitment change. The licensee entered the issue in their corrective action process (refer to CAP01142216). There are number of changes made to this particular commitment date. However, this is not a regulatory concern since TSTF-448 provides relaxation of requirements, and the licensee continues to operate PINGP under more restrictive requirements.
9. There is no current procedural guidance tying any required procedure changes, etc, to commitment closure, however, there is a corrective action from a recent root cause

evaluation to institute a challenge board for commitment closure. The licensee entered the issue in their corrective action process (refer to CAPR01137564-06).

10. NEI 99-04 recommends considering a sunset clause for commitments, but the NMC commitment procedure does not address this topic. Where sunset clauses are required, they are written into the commitment (e.g., a commitment to conduct fire watches until the motor-operated valve hot-shorts issue is resolved).
11. Some open commitments do not have Regulatory Affairs as the owed-to (or otherwise part of closure review for the commitment). The licensee has taken this as an action item to be resolved by the challenge board action discussed above.
12. NMC staff noticed a discrepancy in the NEI 99-04 guidance document (the flowchart provided does not match the sample form provided) and fixed this when developing the fleet form QF-0729.
13. The commitment identification and verification project will fix a number of identified issues with commitments (e.g., there are about 155 identified procedure change requests to capture commitments in procedures).
14. The current commitment change form (QF-0729) does not incorporate notification of the resident inspectors when commitments are changed. Also, the NEI 99-04 process does not require any notification. However, it is recommended the region and the residents shall be informed of any commitment changes requiring follow up inspection activities.

### 3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) NMC has established an effective CMP, (2) NMC has implemented NRC commitments on a timely basis, and (3) with some minor inconsistencies, which were discussed with the licensee during the exit meeting on June 26, 2008, NMC has implemented an effective program for managing NRC commitment changes.

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Jeff Kivi, Senior Compliance Engineer

NRC Principal Contributor: M. Chawla

Date: August 6, 2008

AUDIT OF NUCLEAR MANAGEMENT COMPANY, LLC (NMC)

REGULATORY COMMITMENTS

AT PRAIRIE ISLAND NUCLEAR GENERATING PLANT (PINGP), UNITS 1 AND 2

PERFORMED DURING JUNE 24 THROUGH JUNE 26, 2008

LIST OF COMMITMENTS INCLUDED IN THE AUDIT

<b>Item No.</b>	<b>Category</b>	<b>Commitment Number</b>	<b>Commitment Letter/Date</b>	<b>Description of Commitment</b>	<b>Status</b>
1	Radiation Protection	864300-01	10/20/05 Request for Approval of Use of Delta Protection Respiratory Equipment L-HU-05-010	By letter L-HU-05-010, NMC is requesting authorization to use Delta Bubble Suits with a protection factor of 5000. As part of the request, NMC is making the following commitments: 1. The Mururoa V4 F1 and V4 MTH2 suits will be integrated into NMC's respiratory protection program ..... 2. Lesson plans will be revised to train workers on Mururoa's features.... 3. Provisions of the manufacturer's "Instructions for Use" will be incorporated into procedures in the respiratory protection programs. 4. Radiation Protection personnel will be provided additional training ... 5. NMC will use its Corrective Action Program (CAP) to document any unexpected problems..... Authorization is being requested by Fall 2005.	Open



<b>Item No.</b>	<b>Category</b>	<b>Commitment Number</b>	<b>Commitment Letter/Date</b>	<b>Description of Commitment</b>	<b>Status</b>
2	Bulletin 2005-02	00870293-06	L-HU-05-018, 8/15/05	In our 30-Day Response to NRC Bulletin 2005-02, PINGP made the following commitment:"1. The PINGP Emergency Plan and EAL set will be updated to reflect the information provided in BL 2005-02, Attachment 2, by January 20, 2006."	Closed
3	Bulletin 2005-02	00870293-04	8/15/05 30-day response to Bull 2005-02 Letter L-HU-05-018	In our 30-Day Response to NRC Bulletin 2005-02, PINGP made the following commitment:"3. Onsite protective actions will be evaluated using criteria and examples listed in Attachment 4 of BL 2005-02, and procedures will be modified, as appropriate, by January 20, 2006, to accomplish the onsite protective measures."	Closed
4	Bulletin 2005-02	00870293-03	8/15/05 30-day response to Bull 2005-02 Letter L-HU-05-018	In our 30-Day Response to NRC Bulletin 2005-02, PINGP made the following commitment:"2. Procedural guidance will be developed to establish an accelerated call to the NRC following discovery of an imminent threat or attack against the station in accordance with BL 2005-02, Attachment 3, by October 18, 2005."	Closed
5	Generic Letter 2004-02	879869	8/31/05 response to GL 2004-02	In the second response to NRC Generic Letter 2004-02 (dated 8/31/05), NMC made the following commitment: 1. NMC will evaluate and modify as appropriate the Prairie Island Unit 1 and Unit 2 Emergency Core Cooling (ECCS) systems to support long-term decay heat removal and resolve the issues identified in GL 2004-02 by December 31, 2007.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
6	Generic Letter 2004-02	879872	8/31/05 response to GL 2004-02	In the second response to NRC Generic Letter 2004-02, NMC made the following commitment: 2. NMC will complete verification of downstream components for long-term wear by December 31, 2005. This response will be amended if the conclusions from the downstream effects analyses or the final design deviate significantly from the information provided in this response.	Closed
7	Generic Letter 2004-02	879875	8/31/05	In the second response to NRC Generic Letter 2004-02, NMC made the following commitment: 3. NMC will submit a license amendment request to change the Technical Specification Surveillance Requirement 3.5.2.8 to reflect the new design by December 31, 2005.	Closed
8	Generic Letter 2004-02	879878	8/31/05	In the second response to NRC Generic Letter 2004-02, NMC made the following commitment: 4. NMC will perform measurements to estimate the amount of latent dirt and dust inside containment every other refueling outage in the respective Prairie Island Nuclear Generating Plant Units 1 and 2. Measurements were completed during the last Unit 1 and Unit 2 outages (Cycle 23, for each unit). The next measurements for each unit will be performed during their respective Cycle 25 refueling outages. Assuming the results indicate that the housekeeping practices provide an adequate level of cleanliness, NMC may choose to relax this frequency.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
9	Amendment	1009292-1, 2, 3, 4, 5	L-PI-06-031, 06/16/06	<p>Procedures shall be established to assure that the following provisions are invoked when an emergency diesel generator (EDG) is inoperable for an extended Completion Time in TS 3.8.1 Condition B (see letter for complete commitment):</p> <ul style="list-style-type: none"> <li>- The condition of the offsite power supply and switchyard will be evaluated prior to entering extended completion time...</li> <li>- No elective maintenance will be scheduled in the switchyard...no elective maintenance will be scheduled on the main, aux or startup transformers...</li> <li>- The system dispatcher will be contacted once per day...</li> <li>- The LCO requirements of 3.8.1 and 3.8.9 will be met on the opposite unit (regardless of Mode) during extended completion time...</li> <li>- The TDAFWP on the associated unit will not be removed from service for planned maintenance...</li> <li>- Operating crews will be briefed...</li> <li>- Weather conditions will be evaluated...</li> <li>- 12/22 CLPs will be operable and 121 CLP will be available and aligned to operable EDG...</li> <li>- Assess overall impact on risk using Config Risk Mgmt Program...</li> <li>- Verify safeguards bus x-ties are available...</li> </ul> <p>[Action-02 superseded Action -01 and Action -03 superseded Action -02.]</p>	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
10	B.5.b	1014652-2	L-HU-06-007, 2/14/06	B.5.b Phase 2 Letter 60-day Resp - NMC will provide a description of the strategies, plans and schedules for having these strategies in place, including procedures or guidelines and associated training, within 60 days of NRC approval of the industry proposed approach.	Closed
11	B.5.b	1015336-10	L-HU-06-008, 2/27/06	Provide all ERO members training related to B.5.b type scenarios and their responsibilities in such an event. This training is an NRC commitment resulting from the NRC B.5.b phase 1 inspection report.	Closed
12	B.5.b	1015336-9	L-HU-06-008, 2/27/06	Revise SFP procedures to maximize the downcomer effect in the large pool, to the extent possible as permitted by TS	Closed
13	Bulletin 2005-02	1015336-4	L-HU-05-018, 8/15/05	Confirm the existing emergency plan will effectively address mass casualty situations. Revise the EMGs to other site procedures as necessary. Designated triage location(s) need to be included.	Closed
14	Bulletin 2005-02	1015336-2	L-HU-05-018, 8/15/05	Revise PI Imminent aircraft threat procedure to disperse all personnel (including fire brigade and all but min CR staffing per TS) to a location greater than 100 yds from plant	Closed
15	Bulletin 2004-01	1074932-03	L-PI-07-024, 3/14/07	Until all Alloy 600/82/182 Pressurizer butt welds are either mitigated or replaced, all Alloy 600/82/182 Pressurizer butt welds will be examined every other refueling cycle.	Open

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
16	Bulletin 2004-01	1074932-02	L-HU-07-003, 1/30/07	Until all Alloy 600/82/182 Pressurizer butt welds are either mitigated or replaced, reports of future inspection results will be submitted to the NRC within 60 days of the end of the station refueling outage during which the inspection was performed.	Open
17	Bulletin 2004-01	1074932-01	L-HU-07-003, 1/30/07	Until all Alloy 600/82/182 Pressurizer butt welds are either mitigated or replaced, all Alloy 600/82/182 Pressurizer butt welds will be examined per the industry guidance on Alloy 600/82/182 butt welds (MRP-139).	Open
18	Security B.5.b Phase 2 and 3	1075150-06	L-PI-07-016, 2/26/07	PINGP will conduct training on the mitigation strategy procedures/guidelines. Training on the procedures will be commensurate with the level of training provided for Severe Accident Management Guidelines (SAMGs).	Open
19	Change	05-01	30 day response to BL 2003-02	<p><u>Description of Original Commitment:</u> NMC will perform a 100% bare-metal visual exam of the lower RPV dome up to and including each bottom-mounted instrumentation (BMI) penetration to RPV junction. This examination will be completed on each unit during refueling outages subsequent to the current Unit 2 refueling outage.</p> <p><u>Description of the commitment change:</u> Add to the commitment an allowance to perform the exam within one month of the actual refueling outage (should the opportunity arise).</p>	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
20	Change	05-03	L-PI-07-074, 12/10/07	Change the RHR suction venting time from every one hour to every 6 hours. Original commitment was made to ensure air did not build up in the RHR pump suction. Experience has shown that very little air builds up in an hour and that extending the venting frequency is acceptable.	Closed
21	Change	06-01	L-PI-07-074, 12/10/07	Nuclear Management Company, LLC (NMC) Committed to the Joint Owners Group (JOG) MPR-18-07 guidance for MOV testing. JOG guidance would have MOVs: MV-32133, MV-32139, MV-32142, MV-32379, and MV-32380 tested on a frequency not to exceed 10 years. The 10-year frequency expires on 2/12 and 2/13/06 for these MOVs. Currently, testing at power is not desirable due to the risk of pressure locking. This change would be a one time extension of the 10-year test frequency of these MOVs testing completed in May 2006 Unit 1 refueling outage.	Closed
22	Change	06-32	L-PI-07-074, 12/10/07	Original commitment (from response to NRC Bulletin 2003-02) was 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. This examination will be completed on each unit during refueling outages subsequent to the current Unit 2 refueling outage. This commitment was revised to change the frequency to every other refueling outage. The change in frequency is warranted based on site and industry experience during BMV inspections and reduction in radiation dose.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
23	Change	08-01	Letter dated 11/02/92	Most chemical analysis produce some form of computer or analyzer printout.... Where regulatory requirements mandate analytical results and supporting documentation be maintained as permanent records, the documentation (liquid and gaseous effluent releases; instrument calibrations; NPDES Permit data) will be retained as part of our official records."	Closed
24	Change	08-03	11/16/82	Original Commitment: "...Northern States Power will establish the following policy: (1) Overtime will be limited for all nuclear plant staff personnel so that total work time does not exceed 16 hours in any 24 hour period...  Revised Commitment Description: ..." Northern States Power will establish the following policy: (1) Overtime will be limited for all nuclear plant staff personnel who perform safety related functions...	Closed

Prairie Island Nuclear Generating Plant,  
Units 1 and 2

cc:

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