

July 2, 2003

Mr. Joseph M. Solymossy  
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 - REQUEST  
FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST NO. 15 TO  
USE VT-1 VISUAL EXAMINATION IN LIEU OF SURFACE EXAMINATION OF  
REACTOR VESSEL HEAD CLOSURE NUTS (TAC NOS. MB8027 AND MB8028)

Dear Mr. Solymossy:

By letter dated March 14, 2003, the Nuclear Management Company, LLC (NMC), submitted Relief Request No. 15 in which NMC proposed to use a VT-1 visual examination in lieu of a surface examination of reactor vessel head closure nuts for the Prairie Island Generating Plant, Units 1 and 2. The Nuclear Regulatory Commission (NRC) staff finds that the additional information identified in the enclosure is needed.

A draft of the request for additional information was e-mailed to Mr. J. Leveille (NMC) on June 17, 2003. A phone call was held between Mr. Leveille and myself on June 27, 2003, to discuss the questions. Also, the phone call established a mutually agreeable response date of 15 days from the date of this letter.

Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

***/RA by J. Stang for/***

John G. Lamb, Project Manager, Section 1  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Request for Additional Information

cc w/encl: See next page

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Units 1 and 2

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March 2003

REQUEST FOR ADDITIONAL INFORMATION  
REGARDING RELIEF REQUEST NO. 15 TO USE VT-1 VISUAL EXAMINATION  
IN LIEU OF SURFACE EXAMINATION OF REACTOR VESSEL HEAD CLOSURE NUTS  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-282 AND 50-306

1. SCOPE

By letter dated March 14, 2003, the Nuclear Management Company, LLC (the licensee), submitted Relief Request No. 15 proposing an alternative to the requirements of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code*, Section XI, for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2. Relief Request No. 15 is for the third 10-year inservice inspection (ISI) interval in which PINGP Units 1 and 2 adopted the 1989 edition of ASME Code, Section XI, as the Code of Record.

In accordance with 10 CFR 50.55a(a)(3), the licensee has submitted Relief Request No. 15 to propose alternative visual VT-1 examinations in lieu of the Code-required surface examinations for reactor pressure vessel (RPV) closure head nuts. Proposed alternatives to ASME Code, Section XI, requirements may be authorized by the Nuclear Regulatory Commission (NRC) staff when the applicant demonstrates that (i) the proposed alternative will provide an acceptable level of quality and safety, or (ii) compliance with the requirements would result in hardship or an unusual difficulty without a compensating increase in the level of quality and safety.

The NRC staff has determined the information below is required to complete its evaluation of Relief Request No. 15.

2. REQUEST FOR ADDITIONAL INFORMATION

2.1 Relief Request No. 15, Examination Category B-G-1, Item B6.10, Reactor Vessel Closure Head Nuts:

The licensee's proposal is unclear on the approach it wishes to pursue regarding its alternative for examination of reactor pressure vessel closure head nuts. Two different parts of 10 CFR 50.55a have been cited, each with a different set of supporting requirements and conditions for use. Please provide detailed information to clarify the following issues:

- 1) The licensee has requested an alternative in accordance with 10 CFR 50.55a(a)(3)(i). The alternative is to use a visual VT-1 examination in lieu of the surface examination required by the 1989 edition of ASME Code, Section XI. However, the licensee has failed to demonstrate that, by using this alternative, an acceptable level of quality and safety will be provided. The licensee states:

ENCLOSURE

“The proposed alternative provides a comprehensive assessment of the condition of the reactor vessel closure head nuts without the need for continual cleaning, re-examination, and handling required by the surface examination method.”

This statement is not supported by a technical argument. Instead, the licensee has included an excerpt from a previous NRC safety evaluation for a different licensee's request in which the alternative to use Code Case N-627 was found acceptable by the NRC staff (PINGP Units 1 and 2 cannot use this Code Case as it has recently been annulled). A technical argument based simply on the fact that a similar proposal for a different licensee has been approved by the NRC staff is insufficient to support this evaluation. The licensee's alternative must be evaluated as a “stand alone” proposal and be supported by a technical argument that demonstrates a basis for an acceptable level of quality and safety. Please provide this basis.

- 2) As part of the aforementioned alternative, the licensee proposes to apply a later version of Code (1998 edition with 2000 addenda) to conduct the VT-1 visual examinations, and references 10 CFR 50.55a(g)(4)(iv) as the basis for this application. This portion of the regulations is used when licensee's wish to update their inservice inspection (ISI) programs to later Editions of the Code that have been incorporated by reference into paragraph 10 CFR 50.55a(b), subject to limitations and modifications, and subject to NRC approval.

If the licensee elects to update the ISI program as it applies to Examination Category B-G-1, the licensee may submit a proposal to this effect for evaluation by the NRC staff. It should be noted that all related requirements of the later Code edition and addenda must be met, including but not limited to, all requirements listed in Examination Category B-G-1 for all Examination Items, acceptance criteria, repair and replacement for the subject components, qualification of equipment, personnel, and procedures, etc. It is the responsibility of the licensee to list all related requirements that will be included within the scope of the application of the later Code edition/addenda.

For the licensee's current proposal listed in Item 1 above, please include a technical basis to demonstrate that the alternative will provide an acceptable level of quality and safety. The VT-1 visual examination should conform to the requirements set forth in the third interval Code of Record. Please describe the acceptance criteria that will be used and indicate whether all RPV closure head nuts will be examined by the end of the current interval.

Alternatively, if the licensee wishes to seek approval for a later Code edition, as described in Item 2 above, please list all related requirements that will be met for the use of the later Code.