

July 22, 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, UNIT 1 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING RELIEF REQUEST NO. 14 FOR THE  
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM  
(TAC NO. MB7975)

Dear Mr. Solymossy:

By letter dated March 6, 2003, the Nuclear Management Company, LLC (NMC), submitted Relief Request No. 14 in which NMC requested relief for limited examinations associated with the 10-year interval ISI program due to the impracticality of obtaining 100 percent examination coverage for the affected items at the Prairie Island Nuclear Generating Plant, Unit 1. 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 12, 2003. A phone call was held between J. Leveille and myself on July 10, 2003, to discuss the questions. Also, during the phone call, we established a mutually agreeable response date of October 31, 2003, for your response due to the upcoming refueling outage at Prairie Island, Unit 2. Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

**/RA/**

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

Docket No. 50-282

Enclosure: Request for Additional Information

cc w/encl: See next page

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DATE	07/22/03	07/16/03	07/22/03

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Prairie Island Nuclear Generating Plant,  
Units 1 and 2

cc:

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May 2003

REQUEST FOR ADDITIONAL INFORMATION

REGARDING RELIEF REQUEST NO. 14

PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1

DOCKET NO. 50-282

By letter dated March 6, 2003, the Nuclear Management Company, LLC (NMC), submitted Relief Request No. 14 to the Nuclear Regulatory Commission (NRC) in which NMC requests relief from certain requirements of the American Society of Mechanical Engineers *Boiler and Pressure Vessel Code* (ASME Code). Specifically, NMC requested relief for limited examinations associated with the 10-year interval ISI program due to the impracticality of obtaining 100 percent examination coverage for the affected items at the Prairie Island Nuclear Generating Plant, Unit 1. The extent of examinations for Class 1 and Class 2, Categories B-A, B-J, C-C, C-F-1, and C-F-2 welds, is permitted by 10 CFR 50.55a.

NMC submitted Relief Request No. 14 in accordance with 10 CFR 50.55a(g)(5)(iii) to address many components for which 100 percent coverage could not be obtained. The ASME Code requires that essentially 100 percent of the examination volumes in IWB-2500-1 be completed. "Essentially 100 percent," as clarified by ASME Code Case N-460, is greater than 90 percent coverage of the examination volume, or surface area, as applicable. Code Case N-460 has been adopted by NMC. The regulation at 10 CFR 50.55a(g)(5)(iii) states that when licensees determine that conformance with ASME Code requirements is impractical at their facility, they shall submit information to support this determination. The NRC staff will evaluate such requests based on impracticality, and may impose alternatives, giving due consideration to public safety and the burden imposed on the licensee.

The NRC staff has determined the information below is required to complete its evaluation of Relief Request No. 14.

1. NMC has requested relief in accordance with 10 CFR 50.55a(g)(5)(iii) based upon the argument that the ASME Code examinations are impractical at Prairie Island, Unit 1. However, NMC must present adequate information to support a determination that the required examinations are impractical (not simply inconvenient) to perform to the extent required by the ASME Code. Please provide arguments as to why the use of other methods would not reasonably increase the examination coverages.
2. Provide a technical basis for each component listed in Table 1 of the March 6, 2003, submittal. Describe, in detail, the examination limitation and discuss whether other examinations may be used to increase or supplement the limited examinations. The technical basis should include a cross-sectional sketch of the weld indicating ultrasonic coverage(s) and details of the weld and base metal materials. The technical basis should confirm, where applicable, that the examinations that were performed were also qualified under Appendix VIII of the ASME Code, Section XI.
3. Indicate what degradation mechanisms are most likely to occur in this weld and provide a technical basis for whether the achieved examination coverage could reasonably be expected to detect this degradation.

ENCLOSURE