

July 16, 2003

L-PI-03-057
10 CFR 50.90

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
DOCKETS 50-282 AND 50-306
LICENSE Nos. DPR-42 AND DPR-60

SUPPLEMENT TO LICENSE AMENDMENT REQUEST (LAR) DATED
MARCH 11, 2003, ADDITION OF LIMITING CONDITION FOR OPERATION (LCO)
NOTE ALLOWING ONE HOUR SOAK TIME IN SPECIFICATIONS 3.1.4 AND 3.1.7

By letter dated March 11, 2003, the Nuclear Management Company, LLC (NMC) submitted an LAR titled, "Addition of Limiting Condition for Operation (LCO) Note Allowing One Hour Soak Time in Specifications 3.1.4 and 3.1.7" which proposes addition of an LCO Note to Technical Specifications (TS) 3.1.4 and 3.1.7 which will allow one hour soak time prior to entry into the applicable Required Actions.

The Nuclear Regulatory Commission (NRC) Staff, in a meeting and a telephone call, has requested additional information in support of the subject LAR. This letter provides the requested supplemental information. NMC submits this supplement in accordance with the provisions of 10 CFR 50.90.

The addition of a one hour soak time before entering LCO Action Statements will not delay the plant response to an actual misaligned rod, stuck rod, or inoperable rod position indication (RPI). There is sufficient procedural guidance in the plant operating procedures to differentiate between an actual malfunction of the rod control or RPI system, and RPI differences from demand position indication attributed to thermal instabilities during rod movement. Plant procedures provide guidance on diagnosing the symptoms of an actual equipment malfunction, which will continue to remain valid after the TS change. Operators will continue to operate and diagnose the equipment using these procedures.

This proposed TS change is designed to reduce the operator burden of entering LCO action statements when it is clear that the deviation is related to thermal transient effects following rod movement. If an actual malfunction has occurred, plant procedures

will direct the operators to the correct response and entry into the appropriate TS Required Actions.

Upon implementation of the proposed TS change, the existing procedures will be supplemented to provide additional guidance on when it is appropriate to invoke the one hour soak time.

Existing plant procedures provide assurance that actual equipment malfunctions will not be ignored under the proposed TS changes as follows:

1. The alarm response procedures for the Unit 1 and Unit 2 annunciators labeled, "Computer Alarm Rod Deviation/Sequencing"

If an alarm occurs during Mode 1 or 2, these procedures require performance of the rod position verification surveillance procedure. These alarm response procedure requirements to perform the rod position verification surveillance procedure will not change due to implementation of the proposed TS changes.

2. The system procedure for the Control Rod and Rod Position Indication Systems

Throughout this procedure, when control rods are manually withdrawn or inserted, steps are included that require the operators to verify and/or sign-off that they have verified the control rod bank step counters indicate the withdrawal/insertion. The operators are also required to verify and/or sign-off that the control rods in the bank are moving on the RPI System indicators. These operator verifications and sign-off will not change due to implementation of the proposed TS changes.

3. The system abnormal operating procedure for a misaligned rod, stuck rod or RPI failure and/or drift.

This procedure lists symptoms of a misaligned rod, stuck rod or RPI failure or drift and the required operator responses for each condition. This symptom list and required operator responses will not change due to implementation of the proposed TS changes.

This supplement does not change the schedule requirements presented in the March 11, 2003 letter for this LAR. The supplemental information provided in this letter does not impact the conclusions of the Determination of No Significant Hazards Consideration and Environmental Assessment presented in the original March 11, 2003 submittal.

This letter contains no new commitments and no revisions to existing commitments.

In accordance with 10 CFR 50.91, NMC is notifying the State of Minnesota of this LAR supplement by transmitting a copy of this letter and attachments to the designated State Official.

Please address any comments or questions regarding this LAR supplement to Mr. Dale Vincent at 1-651-388-1121.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on July 16, 2003.



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