SEP 19 2006

L-PI-06-075
10 CFR 50.55a

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant, Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

Extension of Relief Requests 2 and 3 for the Fourth 10-Year Inservice Testing (IST) Program Interval

References:

1. Letter dated July 25, 2005 from NRC to J.M. Solymossy (NMC), "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Issuance of Safety Evaluation for the Fourth 10-Year Inservice Testing (IST) Program Interval (TAC NOs. NC4509 and MC4510)."

2. Letter dated June 28, 2004 from J.M. Solymossy (NMC) to NRC Document Control Desk, "Submittal of the 4th Interval Inservice Testing Plan – Units 1& 2."

This letter requests extension of the interim relief granted to the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, by letter dated July 25, 2005 (reference 1). The interim relief applies to PINGP Relief Requests 2 and 3 for the 12 and 22 Diesel Driven Cooling Water Pumps (DDCWPs) and the 121 Motor Driven Cooling Water Pump (MDCWP), respectively. Interim relief was granted until September 30, 2006, pursuant to 10 CFR 50.55a(f)(6)(i), on the basis that compliance with the Code requirements is impractical and that the alternative provides reasonable assurance of the operational readiness of the pumps for the interim period. In reference 1, the NRC requested NMC to respond prior to September 30, 2006, to inform the staff of the actions taken and submit a revised relief request if necessary.

Code section ISTB-3550 requires a rate or quantity meter be installed in the pump test circuit. If a meter does not indicate the flow rate directly, the record shall include the method used to reduce the data.

The design of the DDCWP has an unmetered bypass line that feeds a DDCWP jacket cooler and gear oil cooler. Isolation of this flow in not possible since cooling is required during DDCWP operation. Additionally, unmetered flow also feeds the chemical treatment and filtered water system. These flows are small and the lines are continually in service. The design of the MDCWP has an unmetered bypass line that also feeds the chemical treatment and filter water flows. These flows are also small and are continually in service.

NMC proposed in the original Relief Requests 2 and 3 (reference 2) to perform pump tests using the non-instrumented bypass lines stating that pump metered flow and pressure readings that are taken during regular testing can be trended per the Code requirements and would give adequate indication should pump degradation occur. The NRC safety evaluation (reference 1) granted interim approval of Relief Requests 2 and 3 noting that the current test method would identify any significant degrading trends for the interim period, thus providing an adequate level of assurance of the operational readiness of the pumps.

NMC has subsequently determined that a modification is necessary to comply with ISTB-3550. Implementation of the modification was originally planned such that the requirements of the ISTB-3550 could be met prior to the expiration of the interim relief period. However, it was recently identified that some components received for the modification do not reflect parameters assumed in the modification design and therefore, portions of the modification require reanalysis. The reanalysis has delayed modification installation. Due to the delay, the requirements of ISTB-3550 will not be met for the subject pumps after September 30, 2006. Additionally, the onset of colder weather following September 30, 2006 will decrease the plant cooling water loads, thus making it more difficult to achieve adequate flows for the required pump tests. Therefore, NMC requests extension of interim Relief Requests 2 and 3 until May 30, 2007, to allow NMC to complete the modification installation and test during a period of higher cooling water loads. The current test method will continue to identify any significant degrading trends for the extension period, again providing an adequate level of assurance of the operational readiness of the pumps.

NMC requests verbal authorization of the extension of interim relief prior to September 30, 2006. The request for verbal authorization is based on the expiration date of Relief Requests 2 and 3.

Summary of Commitments

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

Thomas Palmisano
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Nuclear Management Company, LLC

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
Chief Boiler Inspector, State of Minnesota