

## NRR-PMDAPEm Resource

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**From:** Carlson, Glenn A. [Glenn.Carlson@xenuclear.com]  
**Sent:** Friday, April 10, 2015 4:06 PM  
**To:** Beltz, Terry  
**Cc:** Vincent, Dale M.; Hammargren, Benjamin J.  
**Subject:** RE: Prairie Island Nuclear Generating Plant, Units 1 and 2 - Requests 1-RR-5-7 and 2-RR-5-7 re: the Fifth 10-Year Interval for the ISI Program (TAC Nos. MF4843 and MF4844)

Good day, Terry.

We acknowledge your 4/1/2015 email below notifying us that the NRC staff will review the subject relief requests under 10 CFR 50.55a(a)(3)(i) ("acceptable level of quality and safety") and not 50.55a(a)(3)(ii) ("hardship or unusual difficulty") as proposed in the request.

We believe that 50.55a(a)(3)(i) is an acceptable basis for authorizing the relief we request.

Thank you and regards,

Glenn

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**From:** Beltz, Terry  
**Sent:** Wednesday, April 01, 2015 9:45 AM  
**To:** Carlson, Glenn A. ([Glenn.Carlson@xenuclear.com](mailto:Glenn.Carlson@xenuclear.com))  
**Cc:** Vincent, Dale M.; Alley, David; Vitto, Steven  
**Subject:** Prairie Island Nuclear Generating Plant, Units 1 and 2 - Requests 1-RR-5-7 and 2-RR-5-7 re: the Fifth 10-Year Interval for the ISI Program (TAC Nos. MF4843 and MF4844)

Dear Mr. Carlson:

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3), proposed alternatives to the requirements of 10 CFR 50.55a(g), may be used when authorized by the U.S. Nuclear Regulatory Commission (NRC) if the licensee demonstrates that (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

In the Subject request dated September 15, 2014, NSPM referenced a precedent for Arkansas Nuclear One, Unit 1 (ANO-1). The NRC staff authorized this alternative pursuant to 10 CFR 50.55a(a)(3)(i), in that the licensee requested to use the proposed alternative to the examination frequency requirements of ASME Code Case N-729-1 for the reactor vessel closure head at ANO-1 on the basis that the proposed alternative provided an acceptable level of quality and safety.

In the Subject request, NSPM is seeking NRC authorization in accordance with 10 CFR 50.55a(a)(3)(ii), based on hardship or unusual difficulty without a compensating increase in the level of quality or safety.

Based on other recent precedent, including the aforementioned ANO-1 request, the NRC staff is informing you that it will be reviewing the Subject relief requests under 10 CFR 50.55a(a)(3)(i), and not the section proposed in the request.

Finally, please be mindful (and to be noted for future submittals) that the NRC staff will be including the following paragraph in its safety evaluation to avoid any confusion regarding the changing of section numbers in 10 CFR 50.55a:

The paragraph headings in 10 CFR 50.55a were changed by *Federal Register* notice dated November 5, 2014 (79 FR 65776), which became effective on December 5, 2014 (e.g., 10 CFR 50.55a(a)(3)(i) is now 50.55a(z)(1), and 50.55a(a)(3)(ii) is now 50.55a(z)(2)). See the cross reference tables, which are cited in the notice, at ADAMS Accession No. ML14015A191 and ADAMS Package Accession No. ML14211A050.

Please let me know if you have any specific questions or concerns regarding this matter. Thanks.

Sincerely,

TERRY A. BELTZ, SENIOR PROJECT MANAGER  
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**From:** Carlson, Glenn A.

**Created By:** Glenn.Carlson@xenuclear.com

**Recipients:**

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"Hammargren, Benjamin J." <Benjamin.Hammargren@xenuclear.com>

Tracking Status: None

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