

December 16, 2004

Mr. Joseph 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
NRC EVALUATIONS OF CHANGES, TESTS OR EXPERIMENTS, AND
PERMANENT PLANT MODIFICATIONS INSPECTION
REPORT 05000282/2004012(DRS); 05000306/2004012(DRS)

Dear Mr. Solymossy:

On December 10, 2004, the US Nuclear Regulatory Commission (NRC) completed combined baseline inspection of Evaluation of Changes, Tests, or Experiments, and Permanent Plant Modifications at the Prairie Island Nuclear Generating Plant, Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on December 10, 2004, with Mr. L. Clewett and other members of your staff at the completion of the inspection.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

On the basis of the results of the inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (The Public Electronic Reading Room).

Sincerely,

/RA/

David E. Hills, Chief
Materials Engineering Branch
Division of Reactor Safety

Docket Nos. 50-282; 50-306
License Nos. DPR-42; DPR-60

Enclosure: Inspection Report 05000282/2004012(DRS);
05000306/2004012(DRS)

See Attached Distribution

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J. Cowan, Executive Vice President and Chief Nuclear Officer
Regulatory Affairs Manager
J. Rogoff, Vice President, Counsel & Secretary
Nuclear Asset Manager
Tribal Council, Prairie Island Indian Community
Administrator, Goodhue County Courthouse
Commissioner, Minnesota Department
of Commerce
Manager, Environmental Protection Division
Office of the Attorney General of Minnesota

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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-282; 50-306
License Nos: NPF-42; NPF-60

Report No: 05000282/2004012(DRS); 05000306/2004012(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Prairie Island Nuclear Generating Plant, Units 1 and 2

Location: 1717 Wakonade Drive East
Welch, Mn 55089

Dates: December 6 through 10, 2004

Inspectors: Z. Falevits, Senior Reactor Inspector, Lead
A. Dunlop, Senior Reactor Inspector, Lead
A. Klett, Reactor Inspector
G. O'Dwyer, Reactor Inspector
R. Ruiz, Reactor Inspector

Observer: J. Jandovitz, Reactor Inspector

Approved by: D. E. Hills, Chief
Materials Engineering Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000282/2004012(DRS); 05000306/2004012(DRS); 12/06/2004 - 12/10/2004; Prairie Island Nuclear Generating Plant, Units 1 and 2; Evaluation of Changes, Tests, or Experiments (10 CFR 50.59) and Permanent Plant Modifications.

This report covers a one-week announced baseline inspection on evaluations of changes, tests, or experiments, and permanent plant modifications. The inspection was conducted by five Region III inspectors and one observer. No findings of significance were identified.

The NRC's Program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

No findings of significance were identified.

B. Licensee-Identified Violations

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

.1 Review of 10 CFR 50.59 Evaluations and Screenings

a. Inspection Scope

From December 6 through 10, 2004, the inspectors reviewed six evaluations performed pursuant to 10 CFR 50.59. The evaluations related to permanent plant modifications, setpoint changes, procedure changes, conditions adverse to quality, and changes to the updated final safety analysis report. The inspectors reviewed the evaluations to verify that the evaluations were thorough and that prior NRC approval was obtained as appropriate. The inspectors also reviewed 13 screenings where the licensee had determined that a 10 CFR 50.59 evaluation was not necessary. In regard to the changes reviewed where no 10 CFR 50.59 evaluation was performed, the inspectors verified that the changes did not meet the threshold to require a 10 CFR 50.59 evaluation. These evaluations and screenings were chosen based on risk significance of samples from the different cornerstones. The list of documents reviewed by the inspectors is included as an attachment to this report.

The inspectors used, in part, Nuclear Energy Institute (NEI) 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, to determine acceptability of the completed evaluations and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000. The inspectors also consulted Part 9900 of the NRC Inspection Manual, "10 CFR Guidance for 10 CFR 50.59, Changes, Tests, and Experiments."

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17B)

a. Inspection Scope

From December 6 through 10, 2004, the inspectors reviewed 11 permanent plant modifications that had been installed in the plant during the last two years. The modifications were chosen based upon their effect on systems that had high probabilistic risk analysis (PRA) significance in the licensee's Individual Plant Evaluation (IPE) or high maintenance rule safety significance. The inspectors reviewed the modifications to verify that the completed design changes were in accordance with the specified design requirements and the licensing bases and to confirm that the changes

did not affect any systems' safety function. Design and post-modification testing aspects were verified to ensure the functionality of the modification, its associated system, and any support systems. The inspectors also verified that the modifications performed did not place the plant in an increased risk configuration.

The inspectors also used applicable industry standards to evaluate acceptability of the modifications. The list of documents reviewed by the inspectors is included as an attachment to this report.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Identification and Resolution of Problems

.1 Routine Review of Condition Reports

a. Inspection Scope

From December 6 through 10, 2004, the inspectors reviewed 10 condition reports that were written by licensee personnel to enter the issues in the corrective action program. The inspectors reviewed these findings to verify an appropriate threshold for identifying issues and to evaluate the effectiveness of corrective actions related to the permanent plant design and evaluations for Changes, Tests, or Experiments issues. In addition, two condition reports, written on issues identified during the inspection, were reviewed to verify adequate problem identification and incorporation of the problems into the corrective action system. The specific corrective action documents that were sampled and reviewed by the team are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting

The inspectors presented the inspection results to Mr. L. Clewett and other members of licensee management on December 10, 2004. The licensee acknowledged the inspection results presented. Licensee personnel were asked to identify any documents, materials, or information provided during the inspection that were considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

J. Solymossy, Site Vice President
L. Clewett, Plant Manager
D. Anderson, Engineering Design Manager
C. Mundt, Engineering Plant and Systems Manager
T. Silverberg, Site Engineering Director
J. Kivi, Senior Regulatory Compliance Engineer
T. Verbout, EIC Design Supervisor

Nuclear Regulatory Commission

J. Adams, Senior Resident Inspector
D. Karjala, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None.

Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

Corrective Action Program (CAPs) Documents Initiated as a Result of the Inspection

CAP 040161; Documentation for Scaffold in Plant Screenhouse; dated December 9, 2004

CAP 040510; Number of Attention to Detail Issues Noted by the NRC; dated December 8, 2004

Corrective Action Program (CAPs) Documents Reviewed

CAP 024590; Cooling Water System on the Site Top 10 Equipment Issues List; dated August 8, 2002

CAP 028137; 50.59 Screening 1667 Is Not Complete; dated February 7, 2003

CAP 028201; CAP Screening Committee Does Not Use Hot Buttons Consistently; dated February 10, 2003

CAP 028248; Weakness Identified in Screening #1623; dated February 12, 2003

CAP 028569; 50.59 Screening SES 1735 for Calculation PI-S-02 Revision 0 Is Incomplete; dated February 26, 2003

CAP 032164; 50.59 Summary Report Not Submitted to NRC Within Required Interval; dated September 2, 2003

CAP 036727; Weaknesses in Screening #1897 Mechanical Bypass for Instrument Air System; dated May 15, 2004

CAP 039068; TCN Processed Without Special Review Being Completed; dated October 6, 2004

CAP 033804; Commercial Grade Dedication Process Deficiencies; dated October 30, 2004

CAP 036725; Screening #1785, FCU Performance Testing; dated May 17, 2004

Modifications (Design Changes)

DCP 02CL01; Additional Bearing Water Source to Safeguard CL Pumps; Revision 0

03ZH01; Remove Temperature Controller from RHR Pit; dated September 8, 2003

Commercial Grade Evaluation PI-0402; Fulflo V-Series Bypass Relief Valve - Model vs-3R/HS/AS; Revision 1

Substitute Part/Component Equivalency Evaluation ME-0588; Foxboro Replacement Model 2801 for Model 1801 Flow Transmitter; dated January 24, 2003

Design Change Package 01RH01; RHR Discharge Pressure Loop 1E/Non-1E Separation; Revision 1

EEC 1074; MV-32335/6 Anti-Hammering Wiring Change; dated April 13, 2002

EEC 1161; Replacement of CT11&12 Bus Bar Insulation; dated October 31, 2002

EEC 1168; D2 Pressure Switch Replacement; Revision 0

EEC 1205; Replace Pilot Light Units With Resistor Type Units; Revision 0

EEC 1296; 11 SI PMP Time Delay Relay; Revision 0

EEC 1405; Component Cooling HX Endbell Replacement; dated April 8, 2004

Procedures

5AWI (Administrative Work Instruction) 7.1.3; Commercial Grade Procurement; Revision 8

50.59 Evaluations

Evaluation 1005; MV-32335/6 Anti-Hammering Wiring Change; dated April 15, 2002

Evaluation No. 1006; Shutdown Without 2RX; Revision 1

Evaluation No. 1016; Dynamic Rod Worth Measurement Technique; Revision 0

Evaluation 1019; Generic Letter 96-06; Containment Fan Coil Unit Two Phase Flow; Revision 0

Evaluation 1022; Consequence Analysis for Reactor Vessel Head and Upper Internals Drop on Open Fueled Reactor; Revision 0

Evaluation 1025; D104.1 Zebra Mussel Treatment; Circulation Water System; dated July 22, 2004

10 CFR 50.59 Screenings

Screening No. 1576; 2C20.4-2 - 2 Generator Transformer Backfeed; Revision 0

Screening No. 1634; Provide Guidance When Using 4kV Bus Ties 12 RXBT and 12RYBT; Revision 0

Screening No. 1762; Reference File Nos. 2485, 2486, 2487, 2488, 2489, 2490, and 2491; Revision 0

Screening No. 1786; Temporary Modification 98T059, Modification 03ZH01; dated July 21, 2003

Screening No. 1801; WO-0302106, SP-1035C; Revision 0

Screening No. 1815; Procedure Changes for Increase of Well Water Pressure Regulator to 70 - 80 psig; dated May 15, 2003

Screening No. 1858; PCR 2003-0162 Changes to 2C20.5 Unit 2 4kV System; Revision 0

Screening No. 1897; Repair Air Leaks on Unit 2 INSTR AIR HDR and Associated Bypass; Revision 2

Screening No. 1951; Update Q-List Data for Cooling Water Header Instrumentation; dated January 5, 2004

Screening No. 2081; ENG-ME-571; Water Volume Used by the AFWPS Following a Seismic Event or Tornado; Revision 0

Screening No. 2185; Replacing Carbon Steel Bolts with Boron Resistant Stainless Steel Bolts by EEC-1505, R0 and Associated Calculation ENG-ME-553 R3; Revision 0

Screening No. 2215; SP 1001D, Unit 1 Control Room Log - Mode 4 and Associated TCN; Revision 0

Screening No. 2216; Procedure Changes to Install Heater System to Ensure the CL Dump to Grade Line Does Not Become Blocked by Ice; Revision 0

Miscellaneous Documents

DBD SYS-15; Residual Heat Removal System Design Basis Document; Revision 4

DBD SYS-18A; Safety Injection System Design Basis Document; Revision 4

Work Order (WO) 0113782; Remove Interlock and Pre-op 1P-628 and MV32207; dated June 5, 2003

Work Order (WO) 0113783; Remove Interlock and Pre-op 1P-629 and MV32206; dated July 25, 2003

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
CAP	Corrective Action Program
DBD	Design Base Document
DRS	Division of Reactor Safety
EEC	Equivalent Engineering Change
IP	Inspection Procedure
IPE	Individual Plant Evaluation
IR	Inspection Report
NEI	Nuclear Energy Institute
NMC	Nuclear Management Company
NRC	United States Nuclear Regulatory Commission
PRA	Probabilistic Risk Analysis
SDP	Significance Determination Process
TCN	Temporary Change Notice
WO	Work Order