

consequences of a rod misalignment event as follows. The analyses show that a single dropped rod event, without any operator intervention, does not result in any fuel pin failure, therefore the rod drop event is not time dependent and an additional hour with the misalignment undetected and unmitigated does not increase the consequences of the event. Multiple rod drop events cause the reactor to trip and therefore an additional hour would not have any impact on this event.

In the static misalignment event, one or more control rods are assumed to be statically misplaced from the allowed position. This situation might occur if a rod were left behind when inserting or withdrawing banks, or if a single rod were to be withdrawn. The analysis of this event is bounded by modeling the most limiting configuration which is the control banks at the full power insertion limit except for a single control rod fully withdrawn. The analyses show that, without any operator intervention, a single fully withdrawn rod event does not result in any fuel pin failure, therefore the static rod misalignment event is not time dependent and an additional hour with the misalignment undetected and unmitigated does not increase the consequences of the event. Multiple rod misalignment events are bounded by the single rod misalignment analyses and therefore an additional hour would not have any impact on this event.

Therefore this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

This proposed change does not alter the design, function, or operation of any plant component and does not install any new or different equipment. The malfunction of safety related equipment, assumed to be operable in the accident analyses, would not be caused as a result of the proposed technical specification change. No new failure mode has been created and no new equipment performance burdens are imposed. Therefore the possibility of a new or different kind of accident from those previously analyzed has not been created.

3. The proposed amendment will not involve a significant reduction in the margin of safety.

This license amendment request proposes to allow up to one hour of soak time following substantial rod movement during which time the rod position indication may be outside its limits. This would allow an additional hour for rod position indication instrumentation to be inoperable or a control rod to be misaligned prior to entry into a Technical Specification LCO Condition and Required Actions.

The rod position indication system is an instrumentation system that provides indication to the operators that a control rod may be misaligned. Inoperable individual rod position indication instrumentation does not by itself in any way harm or impact reactor operation. Inoperable rod position indication

instrumentation may impair the ability of the operators to detect a misaligned rod. The impact of inoperable rod position indication instrumentation may be offset by availability of other indications that a rod is misaligned such as nuclear instrumentation indication that reactor power has shifted to one side of the core or thermocouple indication that the core temperatures increased in one region of the core and/or decreased in another region of the core.

The Prairie Island staff is not aware of a misaligned control rod in more than 50 reactor-years of plant operation. The likelihood of a misaligned rod at Prairie Island is small and the likelihood of a misaligned rod coincident with inoperable rod position indication during the allowed one-hour extension is smaller.

The addition of one hour soak time for the rod position indication instrumentation will allow the operators and engineers to focus on monitoring the reactor performance without unnecessary entry into LCO Conditions and Required Actions with the concomitant administrative activities. Thus, these changes may enhance plant safety and reliability of equipment.

In conclusion, the proposed addition of an LCO Note in LCO 3.1.4 and 3.1.7 does not involve a significant reduction in the margin of safety because rod position indication instrumentation inoperability by itself does not impact plant safety, rod misalignment is unlikely, there may be other indications of rod misalignment, rod misalignment coincident with rod position indication instrumentation inoperability within the one hour extension is unlikely, and plant safety may be enhanced by avoiding unnecessary LCO Condition entry.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment requests involve no significant hazards consideration.

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*Nuclear Management Company, LLC, Docket Nos. 50-282 and 50-306, Prairie Island Nuclear Generating Plant, Units 1 and 2, Goodhue County, Minnesota*

*Date of amendment request:* March 19, 2003.

*Description of amendment request:* The proposed amendments would revise the Technical Specification (TS) 5.3, "Plant Staff Qualifications." The proposed amendments would revise requirements that have been superseded based on licensed operator training programs being accredited by the National Academy for Nuclear Training (NANT) and promulgation of the revised 10 CFR part 55, "Operators' Licenses,"

which became effective on May 26, 1987.

*Basis for proposed no significant hazards consideration determination:* As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

*Response:* No.

The proposed Technical Specification change is an administrative change to clarify the current requirements for licensed operator qualifications and the licensed operator training program. With this change, the Technical Specifications continue to meet the current requirements of 10 CFR [Part] 55.

Although licensed operator qualifications and training may have an indirect impact on accidents previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised 10 CFR [Part] 55 rule, concluded that this impact remains acceptable as long as the licensed operator training programs are certified to be accredited and are based on a systems approach to training. The Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training and is based on a systems approach to training. The proposed Technical Specification change takes credit for the National Academy for Nuclear Training accreditation of the licensed operator training program. The Technical Specification requirements for all other plant staff qualifications remain unchanged.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

*Response:* No.

The proposed Technical Specification change is an administrative change to clarify the current requirements for licensed operator qualifications and the licensed operator training program and to conform to the revised 10 CFR [Part] 55.

As discussed above, although licensed operator qualifications and training may have an indirect impact on the possibility of a new or different kind of accident from any accident previously evaluated, the NRC considered this impact during the rulemaking process, and by promulgation of the revised rule, concluded that this impact remains acceptable as long as licensed operator training programs are certified to be accredited and based on a systems approach to training. As previously noted, the Prairie Island Nuclear Generating Plant licensed operator training program is accredited by the National Academy for Nuclear Training and is based on a systems approach to training. The proposed Technical