

April 19, 2001

10 CFR Part 2

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

PRAIRIE ISLAND NUCLEAR GENERATING PLANT

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

Supplemental Response to Notice of Violation, Inspection Report No. 00-13 (DRS)

Your letter of February 20, 2001, which transmitted Inspection Report No. 50-282/00-13 (DRS); 50-306/00-13 (DRS), required a response to a Notice of Violation. We originally responded with a letter dated March 22, 2001. This letter supplements the March 22nd letter with additional information regarding the causes of the violation and corrective actions that are being taken.

The violation was issued for inadequate design control because a support system for the safeguards cooling water system (referred to at most plants as "essential service water system") was inappropriately reclassified as non-safety related and subsequently modified in a manner to degrade its safeguards functionality. The letter of March 22 discussed the cause of the violation as an inadequate safety evaluation process in place in 1977 and mentioned several opportunities since that time which failed to discover the inappropriate safety classification of the safeguards support system.

The internal evaluations of cause and subsequent second level reviews of those evaluations have identified the need for further investigations. An evaluation has been initiated which is investigating the management practices, related to conservative decision making and questioning attitude, which contributed to the inappropriate classification of the support system. This evaluation will be completed by June 1, 2001. It should be noted that initiatives to address concerns with management practices were underway prior to the discovery of the cooling water system design control issues.

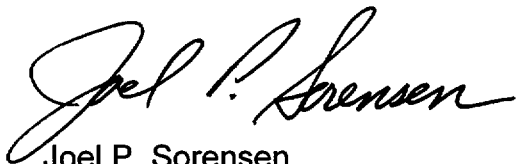
In addition, the efforts to determine the extent of condition have been refined as we have progressed in the investigations being performed. ***Our initial investigation focused on safety evaluations which might have downgraded structures, systems, and components (SSCs). This is being done for non-modification safety***

IEDI

evaluations as well as for safety evaluations associated with plant modifications. Based upon initial findings, we have expanded this investigation to include an evaluation to determine proper safety classifications for lines of pipe and components for safety related piping systems and their support systems, because management practices may have led to inappropriate safety classifications. This evaluation will provide a broader check of safety classifications as it evaluates the appropriateness of the current safety classification, as opposed to just looking at those which were downgraded.

Another refinement was the identification of a risk significant system for a vertical slice evaluation of its design basis. We had previously committed to perform a vertical slice and have subsequently chosen the auxiliary feedwater system to evaluate and have established October 31, 2001 as the completion date.

We are modifying commitments previously made. Specifically, we commit to a June 1, 2001 completion date for the evaluation of management practices contributing to the inappropriate safety classification and an October 31, 2001 completion date for the vertical slice evaluation of the auxiliary feedwater system. Our commitment to review downgrades is changed (see bolded italics above) to encompass a broader evaluation of safety classifications. Please contact Jack Leveille (651-388-1121, Ext. 4142) if you have any questions related to this letter.



Joel P. Sorensen
Site Vice President
Prairie Island Nuclear Generating Plant

- c: Regional Administrator -- Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg
James Bernstein, State of Minnesota