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

Response to An Apparent Violation In Inspection Report 05000282/2006013;
05000306/2006013; EA-06-162

References:

- (1) Letter from U.S. Nuclear Regulatory Commission (NRC) to Nuclear Management Company, LLC (NMC) dated February 3, 2006, "Prairie Island Nuclear Generating Plant, Units 1 and 2 NRC Integrated Inspection Report 05000282/2005011; 05000306/2005011; Preliminary White Finding"
- (2) Letter from U.S. NRC to NMC dated July 18, 2006, "Prairie Island Nuclear Generating Plant Inspection Report 05000282/2006013; 05000306/2006013 and Investigation Report No. 3-2006-004"

This letter submits NMC's written response to an apparent violation of 10 CFR 50.9, "Completeness and Accuracy of Information," as identified in Reference 2. The apparent violation of 10 CFR 50.9 occurred on July 20, 2005, when NMC provided to NRC Form 398, "Personal Qualification Statement – Licensee," for each of two initial operator licensed candidates, signed by the site vice president, affirming that all training and documentation was complete with respect to the initial operator licensing training program. The NRC later determined by inspection and interviews that not all simulator documentation had been retained as required by 10 CFR 55.46.

The enclosure to this letter provides NMC's response to the apparent violation and includes the following information:

- (1) the reason for the apparent violation,
- (2) the corrective steps that have been taken and the results achieved,
- (3) the corrective steps that will be taken to avoid further violation, and
- (4) the date when full compliance was achieved.

Summary of Commitments

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



Thomas J. Palmisano
Site Vice President, Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island

ENCLOSURE 1

Response to An Apparent Violation in Inspection Report No. 05000282/2006013; 05000306/2006013; EA-06-162

The U. S. Nuclear Regulatory Commission (NRC) completed an inspection at the Prairie Island Nuclear Generating Plant (PINGP) on June 29, 2006. The purpose of the inspection was to complete inspection activities concerning Unresolved Item (URI) 05000282/2005011-01; 05000306/2005011-01, "Use of Plant Simulator for Initial License Training." The URI involved the adequacy of the PINGP simulation facility (simulator) test documentation relative to the requirements of 10 CFR 55.46, "Simulation Facilities." This inspection also considered the results of an Office of Investigations (OI) investigation (Report No. 03-2006-004) issued in April 2006 associated with the URI.

The inspection report identified an apparent violation of 10 CFR 50.9, "Completeness and Accuracy of Information," when on July 20, 2005, the licensee provided to the NRC an NRC Form 398, "Personal Qualification Statement - Licensee," for each of two initial operator license candidates, signed by the site vice president, affirming that all training and documentation was complete with respect to the initial operator licensing training program. The NRC later determined by inspection and interviews that not all simulator documentation had been retained as required by 10 CFR 55.46.

1) Reason for the Apparent Violation

Two license applications were submitted on July 20, 2005, which credited January 18, 2005 control manipulations on the simulator as part of the experience requirements. Title 10 CFR 55.46 requires that if a simulator is used to meet the experience requirements, simulator fidelity must have been demonstrated with performance tests that are retained for four years or until superseded by updated test results. Since the existence of performance test records could not be verified for the January 2005 control manipulations, the applications were inaccurate.

NMC has completed a root cause investigation and confirmed that two license applications submitted on July 20, 2005 credited simulator control manipulations in January 2005 as part of the experience requirements. However, the D30 (Reactor Physics Testing) documentation was not maintained from testing that was performed in November 2004.

The root cause for this violation was:

- Lack of a robust process which would ensure that the test documentation to support use of the simulator for control manipulations was adequately maintained.

Since the performance test records were not documented in January 2005 when the control manipulations for experience requirement took place, the applications using the control manipulations on the simulator were inaccurate. This situation arose due to an inadequate process for documenting and retaining the results of performance tests used for control manipulations.

2) Corrective Steps That Have Been Taken and the Results Achieved

Review of available data determined that the D30 (Reactor Physics Testing) documentation was not maintained from the November 2004 testing. This testing was performed satisfactorily and was attested to by simulator testing personnel, and observed by the training manager. Additional testing was completed in October 2005, which reaffirmed that the November 2004 results were accurate. Additionally, simulator support personnel verified that no changes were made to the core, subsequent to the November 2004 test, that would affect core performance.

A self assessment completed on July 29, 2005, (SA039989), determined that the D30 (Reactor Physics Testing) supporting documentation for Transient Performance Test 2.1.4, Core Performance Testing, was not available and that Transient Performance Test 2.2.9, Main Steam Line Break, was not complete. Corrective action program (CAP) document CAP043655 (Passport CAP00871333) was written to document this situation. Corrective actions of this CAP were:

- Have the simulator group complete and file all certification paperwork, and
- Provide a response to document compliance with 10CFR 55.46, (use of the simulator to meet experience requirements).

The completed corrective actions concluded that the core adequately modeled the plant, and all testing had been completed satisfactorily, but the D30 (Reactor Physics Testing) documentation could not be located or recovered. The D30 procedure was re-performed in October 2005. The results replicated the results of the D30 procedure performance as it was attested to have been completed in November 2004. A review of changes to the core model between November 2004 and October 2005 revealed that there were no changes to the core that would affect core performance. The November 2004 testing demonstrated that the simulator core model matched the plant and the October 2005 testing reaffirmed this result.

On August 1, 2006, NMC Fleet Procedure FP-T-SAT-81, Simulator Testing and Documentation, was implemented. This procedure requires core performance testing using the appropriate plant procedure. Section 5.3.7 provides direction on what parameters that need to be tested after each refueling outage. This procedure specifies maintenance of simulator test documentation for the life of the plant and also implements oversight through a simulator testing review board (STRB) chaired by the Operations Manager (or designee), which reviews simulator testing results for the annual and quadrennial tests and documents review and approval on a Simulator Testing Review Form, QF-1081-02.

3) Corrective Steps That Will Be Taken To Avoid Further Violations

A root cause investigation, RCE 01038128, has been completed. Corrective actions from the root cause investigation include:

- Revise FP-T-SAT-74, NRC Operator Licensing Requirements, to include a checklist that verifies items on that checklist support the requirements for license applications prior to submittal.
- Revise FP-T-SAT-81, Simulator Testing Documentation, to strengthen the specific testing and documentation instructions.

These corrective actions to prevent recurrence are expected to be completed by the end of 2006.

4) Date When Full Compliance Was Or Will Be Achieved

Full compliance was achieved on October 1, 2005, when documented core performance testing confirmed that the simulator model testing performed in November 2004 was acceptable for use in licensed operator requalification training.