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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

August 31, 1979

Mr. James G. Keppler  
Director - Region III  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Dockets No. 50-282 and No. 50-306

In response to Item 2 of IE Bulletin 79-14, the following is offered:

The inspection directed to be done by IE Bulletin 79-14 is being conducted in two parts. These parts are first, physical, and second, analytical.

A. Physical Inspection

The physical inspection included the actual verification of as-built drawings by direct measurement and comparison. Inspection elements involved in the physical inspection were piping geometry, support/restraint design, support/restraint location, support/restraint function/clearances, valve and valve operator locations, and pipe attachment details. Teledyne Engineering Services (TES) Procedure P-3697-1 and TES personnel were utilized for the actual inspection.

As indicated in the 30-day response, drawing packages were developed to aid in the walkdown of the piping systems. TES personnel attached a summary sheet for each package completed listing the discrepancies (if any) which were found. Discrepancy report forms were then made out for each discrepancy reported by TES. These discrepancy report forms will be used to help track the resolution of the discrepancies and help provide input to Fluor Pioneer Services (FPS), the plant's A/E, analytical inspection.

B. Analytical Inspection

The analytical inspection portion involves the verification of the input information into the seismic analysis. The basic approach being used is to compare every walked-down isometric drawing and hanger drawing and compare them with the data used for the seismic analysis. Included in this review by FPS are the valve weights,

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any offset center of gravity concerns and materials of construction from the quality assurance records. This approach to the analytical inspection is being used to insure that even drawings which don't differ from the as-built configuration are reviewed.

## C. Extent of Inspection to Date

All accessible piping in the plant which falls under the scope of this Bulletin has been inspected physically. Also, the piping systems in the Unit 1 Containment Building have been inspected. The only area left to be inspected is in the Unit 2 Containment Building. The physical location of both systems in each set of redundant systems and non-redundant systems included in the scope have been completed.

The analytical inspections for these piping systems have not been completed but are in progress at the present time.

## D. Results of the Inspection

Through the conduct of the physical inspection, 270 piping packages were inspected. This resulted in the report of approximately 126 reports of discrepancies. Of these discrepancies, 10 non-conformances were identified of which one was determined to affect the operability of a system.

The non-conformance, which was identified as affecting the operability of a system, involved the Auxiliary Feedwater System (Licensee Event Report No. 79-25). A single rigid hanger assembly (Mk. No. AFWH-34) was found not to be attached to the pipe. Inspection of the area indicates that the hanger has never been attached. Immediate action was taken to repair the hanger. The work is complete.

The remaining nine non-conformances involve minor physical adjustment or modification to supports to make the supports agree with the as-built documentation.

The approximately 116 deviations require some drawing revision, but do not significantly deviate from the original design to require physical modifications.

Results of the analytical inspection are not available as yet. Additional discrepancies may result from this effort. Any new discrepancies will be handled in the manner used for the physical inspection.

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## E. Actions to be Taken as a Result of the Inspection

The non-conformance found which was determined to affect the operability of a system was immediately repaired.

The other non-conformances will be handled as normal repair work consistent with plant directives and completed on a priority basis.

Since many of the deviations will require drawing revisions, these documents will be revised to reflect the "as-built" conditions of the plant. This effort will most probably be accomplished after the analytical inspection is complete.

Very few deviations were noted as the result of modifications to the plant. All modifications to plant design are handled by the plant's Design Change process which requires the revising of prints and documents.

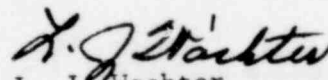
## F. Conclusions

The walkdown physical inspection of the piping systems, with the exception of Unit 2 Containment, is complete. While numerous deviations exist among the as-built documents, only one significant non-conformance was discovered. This result lends considerable credibility to the status of the as-built documents. Therefore, it is expected that very few additional problems will be uncovered as a result of the analytical inspection process.

By the time of the next response (120 day report), the entire inspection effort including the analytical inspection will be complete.

The Unit 2 containment inspection is still planned for the next refueling outage (January, 1980) or earlier if an unplanned outage of sufficient duration occurs.

Yours very truly,



L. J. Wachter  
Vice President  
Power Production and  
System Operation

cc: Mr. G. Charnoff  
Director - Office of Inspection and Enforcement  
Washington, D.C.  
Director - Division of Operating Reactors  
Washington, D.C.

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