

# NSP

## NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

May 31, 1979

Mr. R. I. Heishman, Chief  
Reactor Operations and Nuclear Support Branch  
Region III  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

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

In further response to your letter of February 15, 1979, which transmitted Inspection Reports 50-282/79-01 and 50-306/79-01, the following is offered:

#### Infraction

Criterion XVI of Appendix B to 10 CFR 50 requires that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment and nonconformances are promptly identified and corrected."

Contrary to the above, measures were not sufficient to assure prompt corrective action identified as required by your Occurrence Report No. P-RO-77-33, dated September 2, 1977.

#### Supplemental Response

A general review of methods used to assure completion of corrective actions associated with conditions adverse to quality shows that improvements are justified. Corrective Action Reports, procurement deficiencies, nonconformances, etc., are controlled by the QA Group to assure correction. Procedure changes, procedure deviations, Reportable Occurrence recommended actions, etc., are controlled by the Operations Committee review process. Other corrective actions, such as those required by citations, IE Bulletins, IE Circulars, etc., need a better system for assuring corrections are taken and a new tracking method has been implemented. This system will include the documentation of the review process.

As additional conditions are identified requiring control measures to assure prompt identification and correction, they will be included as part of this system.

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Criterion X of Appendix B to 10 CFR 50 states in part, "A program for inspection of activities affecting quality shall be established and executed. . . ."

NSP's letter of March 8, 1978, to the Director of NRR regarding "Operational Quality Assurance Plan Implementation" indicates ACD's would be reviewed and revised in 1978 and the implementation of the revised Directives would be verified in the 1979 Audit Program.

Contrary to the above, while some inspection requirements; i.e., in-service inspection, weld inspection, and vendor inspection, have been previously identified and implemented, all of the requirements and commitments of Section 12.0, Inspection, of NSP's Operational Quality Assurance Plan have not been incorporated into specific General Office Directives, Prairie Island Directives, and Administrative Work Instructions.

## Supplemental Response

The specific Prairie Island Directives and Work Instructions presently utilized to implement inspection activities are defined below:

### 5ACD 3.2, Rev. 7 - Work Request (WR) and Work Request Authorization (WRA)

This Directive establishes responsibilities and requirements to ensure inspection activities are properly addressed, reviewed, and implemented. The WRA Coordinator, in his review, ensures inspection instructions are on WRA's and that provisions for documentation of work performed, materials and parts used, instruments used, testing, and inspection performed are made. System Engineers are responsible to identify inspection requirements on WRA's and ensure their completion. SWI-PERP-2, Rev. 0, Work Request Authorization Instruction, addresses hold points and independent inspection. Test Supervisors or assigned engineers are directed to sign the WRA form when inspections are specified.

### 5ACD 7.1, Rev. 3, Procurement Process

Receipt and inspection requirements and responsibilities are defined in this Directive for material procured for use at Prairie Island.

### 5ACD 9.2, Rev. 0, Control of Electrical Penetrations/Openings and Cable Runs

This Directive describes the requirements and responsibilities for visual inspection of penetration seals. SP-1192, Safeguards Electrical & Mechanical Penetration Inspection, addresses the routine inspection requirements. Special requirements are specified in 5ACD 9.2.

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## 5ACD 10.1, Rev. 0, Control of Radioactivity

This Directive describes the necessary independent verification required by the Shift Supervisor and the Superintendent - Radiation Protection for gaseous and liquid releases.

## 5ACD 12.1, Rev. 0, Nuclear Fuel Control

This Directive describes the necessary independent verification requirement conducted by the QA Group, Shift Supervisor or Nuclear Engineer of the completed core pattern after a fuel shuffle.

## 5ACD 13.1, Rev. 0, Radioactive Material Packaging

This Directive describes the verification required by the Superintendent - Radiation Protection on all shipments of radioactive material from Prairie Island.

Several other directives and instructions address inspection requirements associated with special processes. They include:

5ACD 14.1, Rev. 0, Welding Procedure Control  
5ACD 14.3, Rev. 0, Nondestructive Examination  
5ACD 14.4, Rev. 0, Welding Inspection  
SWI-PERP-9, Rev. 0, Preparation of Welding Instructions

Other inspection and/or verification activities presently conducted at Prairie Island are not properly addressed in the Plant Directives. A review of the directives is required, and it is anticipated that the following directives need attention:

5ACD 1.4, Rev. 4, Plant Operation Manual  
5ACD 3.9, Rev. 3, Bypass Control  
5ACD 3.10, Rev. 2, Equipment Control Procedures  
5ACD 3.12, Rev. 0, Preventive Maintenance  
5ACD 6.1, Rev. 5, Design Change Control  
5ACD 6.2, Rev. 3, Design Change Installation Procedures  
5ACD 6.3, Rev. 3, Design Change Implementation  
5ACD 6.4, Rev. 2, Design Change Preoperational/Operational Testing  
5ACD 8.1, Rev. 2, Receiving Process  
5ACD 9.3, Rev. 0, Electrical Preventative Maintenance

Additional inspection and/or verification implementing requirements may need to be addressed in Section Work Instructions.

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The review will require a considerable manpower expenditure. This is expected to be completed with revisions by September 30, 1979.

Also, a Power Production Directive addressing Inspection is expected to be implemented soon. The plant may require a reevaluation of its inspection program when this ACD is issued.

Yours very truly,



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

cc: Mr. G. Charnoff

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