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May 2, 1994

10 CFR Part 2
Appendix C

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

Response to Notice of Violation
NRC Inspection Report Nos. 282/94004(DRS) and 306/94004(DRS)
Fire Protection Program

Your letter of April 1, 1994, which transmitted Inspection Report Nos. 282/94004(DRS) and 306/94004(DRS), requested a response to a violation. Our response to Violation 1 is included as an attachment to this letter. No response was required for Violation 2.

In this letter, we have made the following new NRC commitments:

Regarding the power supply cable (Violation 1.a.) -

- The cable will have a barrier installed at such time that the industry testing program develops an application guide for Thermo-Lag 330-1 that meets the NRC test criteria, or another fire barrier material has satisfied the testing acceptance criteria.
- The compensatory actions (the hourly fire watch) will remain in place until such time that all fire barriers are deemed operable.

Regarding the update of the Fire Hazards Analysis (Violation 1.b.) -

- A procedure requiring review of planned modifications for fire loading will be in place by June 1, 1994.
- The FHA update work has been ongoing since 1992 and will be completed by June 1, 1994.

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Please contact Jack Leveille (612-388-1121, Ext. 4662) if you have any questions related to our response to the subject inspection report.



Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg

Attachment: Response to Notice of Violation

RESPONSE TO NOTICE OF VIOLATION

STATEMENT OF VIOLATION 1

10 CFR 50, Appendix B, Criterion XVI, "Corrective Action," states, in part, that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action to preclude repetition.

Contrary to the above:

- a. From January 1993 to March 16, 1994, conditions adverse to quality were not promptly identified and corrected for ensuring that a fire barrier for the safety injection pump was replaced or that this condition be assigned as an impairment requiring compensatory measures (50-282/306/94004-01A(DRS)).
- b. From April 1988 to March 16, 1994, conditions adverse to quality have existed where the Fire Hazards Analysis (FHA) had not been updated and the modification process was not changed to ensure that fire loading changes are included in the FHA (50-282/306/94004-01B(DRS)).

These violations represent a Severity Level IV Problem (Supplement I).

Response to 1.a.

Background

NRC Bulletin 92-01, Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Tray and Small Conduits Free from Fire Damage, called into question the operability of Thermo-Lag insulation on cable trays and conduits. In response to that Bulletin, on June 25, 1992 an hourly fire watch was instituted as a compensatory measure for those areas of the plant where Thermo-Lag insulation is used. Industry efforts have not yet identified an approved fire barrier insulating material.

In January 1993, a power supply cable for No. 22 Safety Injection Pump was rerouted to support the interface connection from the new station blackout emergency power supply through the reconfigured Unit 2 safeguards electrical system. A decision was made to not wrap the rerouted cable because:

- The fire barrier insulating materials available are currently being evaluated for acceptability.
- The existing hourly fire watch included the area of the rerouted cable.

Reason for the Violation

Since the compensatory measures were already in place and there is a question regarding the operability of all available fire barrier materials, the decision was made to not protect this cable with a fire barrier material until such time that there is an acceptable fire barrier material available. Had a Thermo-Lag 330-1 fire barrier been installed, the compensatory measures for inoperable fire barriers would still have had to be implemented since Thermo-Lag 330-1 barrier qualifications are still considered indeterminate.

Corrective Actions Taken and Results Achieved

Compensatory measures (the hourly fire watch) have remained in place during the entire period since the cable has been uncovered.

Corrective Steps to Avoid Further Violations

The cable will have a barrier installed at such time that the industry testing program develops an application guide for Thermo-Lag 330-1 that meets the NRC test criteria, or another fire barrier material has satisfied the testing acceptance criteria.

Date When Full Compliance will be Achieved

Full compliance has been achieved. The compensatory actions will remain in place until such time that all fire barriers are deemed operable.

Response to I.B.

Background

The Fire Hazards Analysis (FHA) update is done to account for significant changes in combustible material loading resulting from plant modifications. The fact that the FHA update was not timely was pointed out in a QA audit finding in May 1991. Plant management decided that the FHA update could be delayed until the station blackout/electrical safeguards upgrade project was complete for the following reasons:

1. Fire loading data related to modifications for the period April 1988 through February 1991 would have to be reconstructed since it had been destroyed.
2. The impending station blackout/electrical safeguards upgrade project would have a significant effect on the document.
3. A large margin of safety is built into the combustible material loading calculations. The plant maintains 3-hour fire barriers and penetrations around fire areas; calculations indicate that only 3 safety-related fire

areas have fire loading calculations in excess of 30 minutes, and in no case is the fire loading over 2 hours. Automatic fire suppression systems are in place in those 3 areas. All safety-related areas are checked 4 times a day by Operations and weekly by Site Safety to assure that combustible material loading is minimized.

4. Modifications done since the last FHA update were reviewed to assure that no significant changes to combustible material loading were made.

We believe that the health and safety of the public were unaffected by that decision.

Reason for the Violation

Failure to update the FHA in a timely manner was caused by inadequate administrative procedures. The deficiency was self-identified in a QA audit and corrective actions were scheduled. A conscious decision was made to delay completion of the update until the SSO/ESU project was complete. We believe that health and safety of the public were unaffected by that decision.

Corrective Actions Taken and Results Achieved

All modifications since the last FHA update were reviewed and it has been confirmed that there were no significant changes to combustible material loading or any challenge to the capabilities of the walls, floors or barriers of areas related to the safe shutdown of the facility.

Corrective Steps to Avoid Further Violations

The FHA update process has been changed to allow improved timeliness of updates. Computers will now be used to allow immediate calculations of combustible material loading and to generate fire area drawings.

A procedure requiring review of planned modifications for fire loading will be in place by June 1, 1994.

The FHA update work has been ongoing since 1992 and will be completed by June 1, 1994.

Date When Full Compliance will be Achieved

Full compliance has been achieved.