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March 1, 1993

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  
50-304 LIR-60

Response to Notice of Violation 92025  
Weakness in the Quality Assurance Program

Your letter of January 28, 1993, which transmitted Inspection Report No. 50-282/92025 (DRS) and 50-306/92025 (DRS), requested a response to the Notice of Violation. Attachment 1 is offered in response to that request. There are four items addressed in the Notice of Violation; we responded to each one separately.

In summary, we believe the actions taken and those proposed will ensure compliance with ANSI N45.2.6 - 1978, as modified by Regulatory Guide 1.58. This letter contains the following new NRC commitments:

A random verification of education requirements will be added to the certification process. This action will be completed by April 30, 1993.

Guidelines will be developed for the use of "related experience" including limitations on applying this experience. These guidelines will be included in Administrative Controls or the Certification Manual. The guidelines will be based on the requirements of ANSI N45.2.6 and a survey of practices in the nuclear industry. This will be completed by May 31, 1993.

Training on these guidelines will be conducted for individuals who certify Quality Control personnel. This training will be completed by June 30, 1993.

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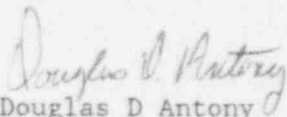
All active Quality Control certifications at Prairie Island will be re-evaluated using the newly developed guidelines. The impact of any certifications which do not meet the guidelines will be evaluated on a case-by-case basis. This will be completed by August 31, 1993.

All Level III personnel on site will be trained in the requirements and use of Form 1-3011. This will be complete by April 30, 1993.

Current evaluation forms will be included for all active certifications of all personnel at the Prairie Island site. This will be completed by April 30, 1993.

A Quality Assurance audit will be conducted on Material and Special Processes Administrative Procedure M&SP 6.1 by December 31, 1993.

These issues will be reviewed for applicability to Monticello also. Should you have any questions on this response, please contact Tom Parker at 612-337-2030.



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c: Regional Administrator, Region III, NRC  
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## ATTACHMENT 1

### Response to Notice of Violation 92025 Weakness in the Quality Assurance Program

#### Violation "a"

- a. The inspector certification program, described in Corporate Nuclear Administrative Control Directive NIACD 3.2 and Administrative Control Directive SACD 3.21, did not prescribe the changes to ANSI N45.2.6 which were required by Regulatory Guide 1.58. Regulatory Guide 1.58 requires a high school diploma or successful completion of general education equivalent (GED) testing for certified QC inspectors. These directives, which delineate the requirements for qualifying QC inspectors, do not include this education requirement (282/92025-01A(DRS); 306/92025-01A(DRS)).

#### Reason for the Violation

The Regulatory Guide 1.58 requirement for a high school diploma or GED was not included in corporate administrative controls or implementing procedures. Since the Operational Quality Assurance Plan commits NSP to comply with Regulatory Guide 1.58, administrative controls should have implemented this requirement. The omission of the requirement was an oversight.

In August 1981, our commitment to Regulatory Guide 1.58 included an exception to the above educational requirement. A subsequent submittal in 1986 inadvertently omitted the educational exception. At this time, we were committed to comply with the educational requirement. This change was not identified when the corporate administrative control documents were revised or during subsequent periodic reviews.

We are considering requesting an exception to this requirement in the near future.

#### Corrective Steps That Have Been Taken and Results Achieved

NIACD 3.2, SACD 3.21 and the Certification Manual have been revised to include the requirement for a high school education or GED.

All active certifications at Prairie Island meet this education requirement.

#### Corrective Actions That Will Be Taken to Avoid Further Violations

A random verification of education requirements will be added to the certification process. This action will be completed by April 30, 1993.

#### Date When Full Compliance will be Achieved

Full compliance has been achieved.

Violation "b"

- b. Certification records indicated that two QC inspectors were improperly certified since journeyman or craft experience was accepted to certify inspectors rather than limiting applicable experience to inspection, examination, and testing as required by Section 6.6 of 5ACD 3.21, "Qualification and Certification of Inspection, Examination, and Testing Personnel," Revision 1, and Attachment 4 to Chapter 1 of the Certification Manual, "Qualification and Certification of QC Inspection, Personnel," Revision 1 (282/92025-01B(DRS); 306/92025-01B(DRS)).

Reason for the Violation

We don't believe that these individuals were improperly certified, but our records are deficient in documenting the rationale used for applying journeyman experience as equivalent inspection, examination and testing experience.

ANSI N45.2.6 and NSP administrative control directives (N1ACD3.2 and 5ACD3.21) specify that the experience requirements shall be met by "related experience in equivalent inspection, examination and testing activities." Prairie Island has used Nuclear Navy and discipline related trade experience as related experience. No written guidelines on what constitutes related experience or the limitations on applying this experience were included in the certification procedures.

Corrective Steps That Have Been Taken and Results Achieved

The work performed by the two referenced Quality Control inspectors has been reviewed, with a sampling of the work being re-inspected. No safety-related problems were identified.

Certifications for all Quality Control personnel no longer at the Prairie Island site have been de-activated and, if these individuals return, they will be re-certified using the guidelines for experience which will be developed.

Corrective Actions That Will Be Taken to Avoid Further Violations

Guidelines will be developed for the use of "related experience" including limitations on applying this experience. These guidelines will be included in administrative controls or the Certification Manual. The guidelines will be based on the requirements of ANSI N45.2.6 and a survey of practices in the nuclear industry. This will be completed by May 31, 1993.

Training on these guidelines will be conducted for individuals who certify Quality Control personnel. This training will be completed by June 30, 1993.

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All active Quality Control certifications will be re-evaluated using the newly developed guidelines. The impact of any certifications which do not meet the guidelines will be evaluated on a case-by-case basis. This will be completed by August 31, 1993.

Date When Full Compliance will be Achieved

Full compliance has been achieved.

Violation "c"

- c. Qualification evaluation forms, Form 1-3011, were not used as required by Section 5.1.2 of Chapter 1 of the Certification Manual, "Qualification and Certification of QC Inspection Personnel," Revision 1. In some cases, the evaluation forms were not used, and in most cases, when the evaluation forms were included, the form did not actually indicate that an evaluation was performed but contained nondescriptive statements such as "see resume" (282/92025-01C(DRS); 306/92025-01C(DRS)).

Reason for the Violation

The reason for this violation is a lack of awareness of the requirement and inattention to detail. Evaluation forms were not always included in the certification files and, when they were, the evaluations were not documented well.

Corrective Steps That Have Been Taken and Results Achieved

Current evaluation forms 1-3011 have been included for all active certifications of personnel reporting to the Superintendent Quality Services. All Level III personnel reporting to the Superintendent Quality Services (i.e. those individuals who certify personnel) have been trained in the requirements and use of the 1-3011 form.

Corrective Actions That Will Be Taken to Avoid Further Violations

All Level III personnel on site will be trained in the requirements and use of Form 1-3011. This will be complete by April 30, 1993.

Current evaluation forms will be included for all active certifications of all personnel at the Prairie Island site. This will be completed by April 30, 1993.

Date When Full Compliance will be Achieved

Full compliance will be achieved by April 30, 1993.

Violation "d"

- d. Changes had been and were continuing to be made to the NSP Welding Manual by letter rather than using the revision methods specified by NLACD 2.2, "Document Review and Approval", Revision 5 (282/92025-01D(DRS); 306/92025-01D(DRS)).

Reason for the Violation

No formal system for controlling changes to the Welding Manual was in place.

Internal correspondence was used to communicate proper technical changes to welding requirements in lieu of changing the Welding Manual. These changes were job specific and management decided it was appropriate to issue internal correspondence to the personnel involved in the specific job. This was not consistent with the Quality Assurance Program.

This violation had been identified by NSP Quality Assurance personnel. However, corrective action had not been completed at the time of this inspection.

Corrective Steps That Have Been Taken and Results Achieved

All Welding Manual holders were sent a letter canceling all changes made to the Welding Manual requirements not in conformance with revision methods described in NLACD 2.2 "Documents Review and Approval" Revision 5.

Corrective Actions That Will Be Taken to Avoid Further Violations

Material and Special Processes Administrative Procedure M&SP 6.1 was written and distributed establishing the requirements for preparation, control and distribution of the Welding Manual.

A Quality Assurance audit will be conducted on Material and Special Processes Administrative Procedure M&SP 6.1 by December 31, 1993.

Date When Full Compliance will be Achieved

Full compliance has been achieved.