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April 22, 1993

US 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

Revised Response to Violation "b"
of 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. Our response was provided on March 1, 1993. Following discussions with Al Walker and Mark Ring of Region III staff, our response to Violation "b" has been revised (note sidebarred area of Attachment 1). Attachment 2 contains draft guidelines for determining equivalency of related experience for certification of QC inspectors, discussed in the corrective actions for violation "b".

This letter contains no new NRC commitments.

Should you have any questions on this response, please contact Tom Parker at 612-337-2030.

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Vice President
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cc: Regional Administrator - III, NRC
NRR Project Manager, NRC
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ATTACHMENT 1

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

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 agree that one of the two QC inspectors was improperly certified. This QC inspector did not meet the educational requirements for certification. We do believe both QC inspectors have the necessary work experience for certification. 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 on 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.

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.

Guidelines for Related Experience

The purpose of this attachment is to provide a standard basis for evaluating the equivalency of related experience. Work experience needs to be related to the discipline's technical topics and involve aspects of inspection, examination, or testing activities. These guidelines are intended to initiate a logical assessment of previous work experience and is to be used along with the candidate's familiarity with the technical topics and the results of any proficiency testing as a basis for certification.

For the purposes of these guidelines, experience will first be classified as under a QA program, or not under a QA program. In addition, experience will be classified as Inspector, Same Discipline; Inspector, Related Discipline; or Other Related Experience. Credit for experience should be given in accordance with the following table and may be documented on the attached WORK EXPERIENCE SUMMARY form.

Type of Experience	Under a QA Program		Not Under a QA Program	
	Factor	Max Credit (%)	Factor	Max Credit (%)
Inspector, Same Discipline	1:1	100	1:2	50
Inspector, Related Discipline	1:1	100	1:4	50 *
Other Related Experience	1:2	100	1:4	50 *

- * The combination of Inspector, Related Discipline (Not under a QA Program), and Other Related Experience (Not Under a QA Program) should not exceed 50% total

Refer to the attached for examples of related disciplines and other related experience.

NOTE: The credited, related work experiences must have a documented relationship to the technical topics lists (example: electrician experience involves cable terminations). If the resume is not explicit to the activities performed during the related experience, these activities must be documented in the Level III's evaluation of the experience.

DRAFT
FOR COMMENT ONLY

Experience Criteria

Description of Experience	Start Date	End Date	Duration of Experience (Months)	Under a QAP		Type of Experience			Months Allowed
				Yes	No	Inspector Same Discipline	Inspector Related Discipline	Other Related	

	Factor	Max Credit (%)	Factor	Max Credit (%)
Inspector, Same Discipline	1:1	100	1:2	50
Inspector, Related Discipline	1:1	100	1:4	50 *
Other Related Experience	1:2	100	1:4	50 *

Remarks

Evaluated by	Date
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* Total of the two not to exceed 50%

EXAMPLES

CIVIL/STRUCTURAL

Related Inspection Disciplines:

- General Inspection
- Nuclear Coatings

Other Related Experience:

- Civil Testing Lab or Commercial Testing Facility
- Military Service Construction Battalions or similar ratings (after completion of basic training)
- Civil Construction Engineer (post BS degree)

ELECTRICAL

Related Inspection Disciplines:

- General Inspector
- Instrumentation and Control

Other Related Experience:

- Journeyman Electrician (heavy industry only)
- Nuclear Navy - Electricians Mate, I&C Technician (after completion of basic training)
- I&C Technician
- Electrical or I&C Systems Engineer (post BS degree)

GENERAL INSPECTION

Related Inspection Disciplines:

- Civil/Structural
- Electrical
- Instrumentation and Control
- Mechanical
- Nuclear Coatings
- Operations
- Radiation Protection/Chemistry

Other Related Experience:

- QA Auditor or Surveillor
- Nuclear Navy (after completing basic training)
- Journeyman Craft Experience
- Systems Engineer (post BS degree)

INSTRUMENTATION AND CONTROLS

Related Inspection Disciplines:

- Electrical
- General Inspection

Other Related Experience:

I&C Technician
Nuclear Navy - Electricians Mate, I&C Technician (after
completion of basic training)
I&C or Electrical Systems Engineer (post BS degree)

MECHANICAL

Related Inspection Disciplines:

General Inspection
Welding
NDE (MT,PT,RT)

Other Related Experience:

Nuclear Navy - Machinist Mate, Engineman or similar
rating (after completion of basic training)
Journeyman Boilermaker, Steamfitter, Pipefitter or
other similar crafts (heavy industry only)
Commercial Welding when involved in fitup or other
inspection sequences
Mechanical Systems Engineering (post BS only)

NUCLEAR COATINGS

Related Inspection Disciplines:

Civil/Structural
General Inspection

Other Related Experience:

Journeyman Painter with nuclear background

OPERATIONS

Related Inspection Disciplines:

General Inspection

Other Related Experience:

Nuclear Navy reactor operator (after completing basic
training)
Operator - Nuclear power plant (post apprenticeship)
Operator Trainer - Nuclear power plant
Systems Engineer with a SRO or SRO certified (post
BS and post SRO)

RADIATION PROTECTION/CHEMISTRY

Related Inspection Disciplines:

General Inspection

Other Related Experience:

Nuclear Navy - ELT or other similar ratings (after

completion of basic training)
Industrial Chemistry or Health Physics Technician
Chemist or Health Physicist (post BS degree)

RECEIPT AND MATERIAL CONTROL

Related Inspection Disciplines:

- Civil/Structural
- Electrical
- General Inspection
- Instrumentation and Control
- Mechanical
- Nuclear Coatings
- Operations
- Radiation Protection/Chemistry
- Welding
- NDE (MT,PT,RT)

Other Related Experience:

Any experience that required an individual to locate acceptance criteria documents and then determine that an object met the requirements of those documents such as work under a military purchasing program (MIL SPEC'S) or in Receiving, Vendor Auditing or purchasing