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Response to  
Generic Letter 90-04

June 28, 1990

Director of Nuclear Reactor Regulation  
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 Generic Letter 90-04  
Generic Safety Issues Implementation Status

Generic Letter 90-04, "Request for Information on the Status of Licensee Implementation of Generic Safety Issues Resolved With Imposition of Requirements or Corrective Actions", requested that we provide documentation of the current implementation status of all generic safety issues for Prairie Island. This letter is provided in response to Generic Letter 90-04.

Attachment 1 is a completed copy of Enclosure 1 from Generic Letter 90-04 which shows the status of each Generic Safety Issue at Prairie Island. Attachment 2 contains comments on the status of the Generic Safety Issues that are referenced in Attachment 1.

Please contact us if further information on the status of the implementation of the Generic Safety Issues at Prairie Island is required.

Thomas M Parker  
Manager  
Nuclear Support Services

c: Regional Administrator - Region III, NRC  
Senior Resident Inspector, NRC  
NRR Project Manager, NRC  
G Charnoff

Attachments:

Attachment 1 - Status of Licensee Implementation of Generic Safety Issues  
Resolved With Imposition of Requirements or Corrective Actions

Attachment 2 - Comments on Status of Generic Safety Issues

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ATTACHMENT 1

FACILITY NAME: Prairie Island Units 1 and 2  
 DOCKET NO.: 50-282 and 50-306  
 LICENSEE: Northern States Power

STATUS OF LICENSEE IMPLEMENTATION OF GENERIC SAFETY ISSUES  
 RESOLVED WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
40 (B065)	Safety Concerns Associated With Pipe Breaks In The BWR Scram System	All BWRs	NA	
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	NA	
43 (B107)	Reliability Of Air Systems	All Plants	I	See Attachment 2
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I	See Attachment 2
67.3.3 (A017)	Improved Accident Monitoring	All Plants	C	See Attachment 2
75 (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	C	See Attachment 2
75 *B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	C	See Attachment 2

\*Status for both units unless otherwise noted:

C = Submittal of information and/or changes were necessary and such submittals  
 were made or changes are complete.

I = Changes are necessary but such changes are not yet fully implemented.

NA = Not applicable

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	See Attachment 2
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	I	See Attachment 2
75 (B078)	Items 3.1.1 & 3.1.2 - Post - Maintenance Testing (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B079)	Item 3.1.3 - Post-Maintenance Testing-Changes to Test Requirements (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C	See Attachment 2
75 (B088)	Item 3.2.3 - Post-Maintenance Testing-Changes to Test Requirements (All Other Safety-Related Components)	All Plants	C	See Attachment 2
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	C	See Attachment 2



<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability-Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	C	See Attachment 2
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation Of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	C	See Attachment 2
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W & B&W Plants	C	See Attachment 2
75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	NA	

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability-Diverse Trip Features (System Functional Testing)	All Plants	C	See Attachment 2
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C	See Attachment 2
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All BWRs	NA	
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	C	See Attachment 2
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	Unit 1: C Unit 2: I	See Attachment 2
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3 Ft. Calhoun	C	See Attachment 2
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	C	See Attachment 2

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	C	See Attachment 2
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP-1	NA	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	C	See Attachment 2
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	NA	
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 4/1/80	NA	
B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants	C	See Attachment 2



## Attachment 2

### Comments on Status of Generic Safety Issues

#### GSI-43. Reliability of Air Systems

NRC Generic Letter 88-14, issued by the NRC on August 8, 1988, requested licensees to review NUREG-1275 Volume 2 and perform a design and operations verification of their plants instrument air supply. NSP responded to Generic Letter 88-14 by letter dated February 20, 1989. An NRC letter dated December 4, 1989 found the Prairie Island response to Generic Letter 88-14 to be acceptable. The February 20, 1989 response committed to several further actions. Of the committed actions only the modification to provide continuous monitoring of dew point at the discharge of the air dryers has not been completed. That modification is in progress and is projected to be complete by August 1990.

#### GSI-51. Improving the Reliability of Open-Cycle Service Water Systems

Generic Letter 89-13, issued by the NRC on July 18, 1989, requested licensees to advise the NRC staff whether they have established programs to implement the actions resulting from the resolution of GSI No. 51. NSP responded to Generic Letter 89-13 by letter dated January 29, 1990. NRC letter dated March 15, 1990 acknowledged the committed actions and actions taken in response to Generic Letter 89-13 and stated that the Prairie Island response fulfilled the requirements for the first response required by the Generic Letter. Per the requirements of Generic Letter 89-13, a second response will be submitted to the NRC within 30 days of the completion of all the actions implemented in response to the Generic Letter. Actions to be implemented in response to Generic Letter 89-13 will be complete by the end of the next Unit 1 refueling outage, presented scheduled for May 1991.

#### GSI-67.3.3. Improved Accident Monitoring

NSP was required by Generic Letter 82-33, dated December 17, 1982, to provide a report describing how the post-accident monitoring instrumentation meeting Regulatory Guide 1.97, Revision 2 guidance was applied to emergency response facilities. NSP's response for Prairie Island was provided in letters dated April 15, 1983 and September 15, 1983. Based on our response to Generic Letter 82-33, an NRC confirmatory order was issued by letter dated June 14, 1984. Additional information related to Prairie Island's conformance with Regulatory Guide 1.97 was provided by NSP letters dated January 18, 1985, June 6, 1985 and March 6, 1989. Prairie Island's conformance to Regulatory Guide 1.97 Rev. 2 was documented by an NRC Safety Evaluation Report dated October 18, 1985. By letter dated November 27, 1985, NSP requested NRC review of a deviation to a modification that was previously agreed to as described in the October 18, 1985 NRC safety evaluation. The requested deviations were found acceptable by NRC letter dated June 1, 1987. All modifications implemented in response to Regulatory Guide 1.97 and Generic Letter 82-33 were complete by June 30, 1987.

GSI-75 Item 1.1.1. Post-Trip Review (Program Description and Procedure)

NSP letters dated November 4, 1983 and June 27, 1985 responded to Generic Letter 83-28, Item 1.1. An NRC Safety Evaluation Report dated August 5, 1985 found the Prairie Island response to Generic Letter 83-28 Item 1.1 to be acceptable. NSP letter dated June 2, 1986 reported this item complete in August, 1985.

GSI-75 Item 1.2. Post-Trip Review (Data and Information Capability)

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Item 1.2. An NRC Safety Evaluation Report dated May 27, 1986 found the Prairie Island response to Generic Letter 83-28 Item 1.2 to be acceptable. The final modifications implemented in response to Generic Letter 83-28 Item 1.2 were completed during the February 1990 Unit 1 refueling outage.

GSI-75 Item 2.1. Equipment Classification and Vendor Interface

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Item 2.1 Parts 1 and 2. No changes to plant procedures or programs were required. An NRC Safety Evaluation Report dated July 11, 1986 found the Prairie Island response to Generic Letter 83-28 Item 2.1 Part 1 to be acceptable. An NRC Safety Evaluation Report dated December 30, 1986 found the Prairie Island response to Generic Letter 83-28 Item 2.1 Part 2 to be acceptable.

GSI-75 Item 2.2.1. Equipment Classification for Safety Related Components

NSP letters dated November 4, 1983 and March 31, 1977 responded to Generic Letter 83-28, Item 2.2.1. An NRC Safety Evaluation Report dated October 24, 1989 found the Prairie Island response to Generic Letter 83-28 Item 2.2.1 to be acceptable. NSP letter dated June 2, 1986 reported that no further NSP action was required on this item.

GSI 75 Item 2.2.2. Vendor Interface for Safety-Related Components

NSP letters dated November 4, 1983 and June 10, 1988 responded to Generic Letter 83-28, Item 2.2.2. This item remains open and is being addressed by Generic Letter 90-03 issued March 20, 1990. A response to GL 90-03 will be submitted within the time requirements specified in the Generic Letter.



GSI-75 Items 3.1.1 and 3.1.2. Post-Maintenance Testing

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Items 3.1.1 and 3.1.2. An NRC Safety Evaluation Report dated May 13, 1985 found the Prairie Island response to Generic Letter 83-28 Items 3.1.1 and 3.1.2 to be acceptable. NSP letter dated June 2, 1986 reported these items complete in May, 1985.

GSI-75 Item 3.1.3. Post-Maintenance Testing - Changes to Test Requirements

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Item 3.1.3. An NRC Safety Evaluation Report dated October 18, 1985 found the Prairie Island response to Generic Letter 83-28 Item 3.1.3 to be acceptable. NSP letter dated June 2, 1986 reported this item complete in October, 1985.

GSI-75 Items 3.2.1 and 3.2.2. Post-Maintenance Testing

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Items 3.2.1 and 3.2.2. An NRC Safety Evaluation Report dated May 13, 1985 found the Prairie Island response to Generic Letter 83-28 Items 3.2.1 and 3.2.2 to be acceptable. NSP letter dated June 2, 1986 reported these items complete in May, 1985.

GSI-75 Item 3.2.3. Post-Maintenance Testing - Changes to Test Requirements

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Item 3.2.3. An NRC Safety Evaluation Report dated October 18, 1985 found the Prairie Island response to Generic Letter 83-28 Item 3.2.3 to be acceptable. NSP letter dated June 2, 1986 reported this item complete in October, 1985.

GSI-75 Item 4.1. Reactor Trip System Reliability

NSP letters dated November 4, 1983 and January 31, 1984 responded to Generic Letter 83-28, Item 4.1. An NRC Safety Evaluation Report dated May 13, 1985 found the Prairie Island response to Generic Letter 83-28 Item 4.1 to be acceptable. NSP letter dated June 2, 1986 reported this item complete in May, 1985.

GSI-75 Items, 4.2.1 and 4.2.2, Reactor Trip System Reliability - Maintenance and Testing

NSP letter dated November 4, 1983 provided the initial response to Generic Letter 83-28, Items 4.2.1 and 4.2.2. NRC letter dated December 4, 1984 requested additional information with regard to the Prairie Island response to Items 4.2.1 and 4.2.2. NSP letter dated January 4, 1985 provided the additional information requested by the December 4, 1984 NRC letter. An NRC Safety Evaluation Report dated October 17, 1985 found the Prairie Island response to Generic Letter 83-28 Items 4.2.1 and 4.2.2 to be acceptable. NSP letter dated June 2, 1986 reported these items complete in October, 1985.

GSI-75 Item 4.3, Reactor Trip System Reliability - Design Modifications

In response to Generic Letter 83-28, Item 4.3, NSP participated in the work done by the Westinghouse Owners Group to establish a generic design for automatic actuation of the shunt trip attachment of the reactor trip breakers. An NRC Safety Evaluation Report dated August 10, 1983 found the proposed generic design to be acceptable.

NSP letter dated November 4, 1983 provided the initial Prairie Island response to Generic Letter 83-28, Item 4.3. NSP letter dated July 6, 1984 provided the shunt trip attachment modification design report and the NSP response to the NRC Generic Safety Evaluation Report questions from the August 10, 1983 NRC letter. An NRC Safety Evaluation Report dated February 21, 1985 found the proposed shunt trip modification acceptable. The shunt trip modifications were completed by December 1985.

GSI-75 Item 4.3, Reactor Trip System Reliability - Technical Specification Changes

NSP letter dated December 10, 1984 provided preliminary draft Technical Specification changes incorporating the shunt trip and manual reactor trip requirements requested by the August 10, 1983 NRC Generic Safety Evaluation Report for the Westinghouse Shunt Trip Modification. NRC letter dated February 21, 1985 found the proposed technical specifications to be acceptable with the modifications noted in the attached Safety Evaluation Report. The February 21, 1985 NRC letter requested that a technical specification change be submitted. A License Amendment Request incorporating the shunt trip technical specification changes was submitted by NSP letter dated April 5, 1985. The License Amendment Request was approved by NRC letter dated June 26, 1985.

GSI-75 Item 4.5.1. Reactor Trip System Reliability - Diverse Trip Features

NSP letter dated November 4, 1983 responded to Generic Letter 83-28, Item 4.5.1. An NRC Safety Evaluation Report dated May 13, 1985 found the Prairie Island response to Generic Letter 83-28 Item 4.5.1 to be acceptable. NSP letter dated June 2, 1986 reported this item complete in May, 1985.

GSI-75 Items 4.5.2 and 4.5.3, Reactor Trip System Reliability - Test Alternatives and Intervals

NSP letters dated November 4, 1983, January 31, 1984 and July 6, 1984 responded to Generic Letter 83-28, Items 4.5.2 and 4.5.3. No changes to plant equipment, procedures or programs were required. An NRC Safety Evaluation Report dated March 30, 1987 found the Prairie Island response to Generic Letter 83-28 Item 4.5.2 to be acceptable. An NRC Safety Evaluation Report dated June 7, 1989 found the Prairie Island response to Generic Letter 83-28 Item 4.5.3 to be acceptable.

GSI-93. Steam Binding of Auxiliary Feedwater Pumps

IE Bulletin 85-01, issued October 29, 1985, requested that certain licensees implement procedures for monitoring the auxiliary feedwater piping temperatures for indications of possible back-leakage and for restoring the pumps to operable status if steam binding were to occur. NSP's response to IE Bulletin 85-01 was provided by letter dated February 21, 1986. In that response NSP reported that procedures for recognizing steam binding and for restoring the auxiliary feedwater system to operable status were developed and implemented on January 27, 1986 and that training on the procedures was completed on February 17, 1986. Generic Letter 88-03, issued February 17, 1988, stated that the plants that received Bulletin 85-01 should continue following the Bulletin's recommendations. NSP's response to Generic Letter 88-03 was provided by letter dated May, 13, 1988. In that response NSP described the actions implemented in response to Bulletin 85-01 and stated that those actions would be maintained in effect. NRC letter dated August 25, 1988 found the NSP response to Generic Letter 88-03 to be satisfactory. IE Bulletin 85-01 was closed out for Prairie Island by NUREG/CR-5298, published February 1990.

GSI-99. RCS/RHR Suction Line Valve Interlock on PWRs

Generic Letter 87-12, issued July 9, 1987, requested information to assess safe operation of pressurized water reactors when the reactor coolant system water level is below the top of the reactor vessel. NSP's response to Generic Letter 87-12 was provided by letter dated September 17, 1987. Generic Letter 88-17, issued October 17, 1988, superseded Generic Letter 87-12 and requested responses regarding licensee plans with respect to operation on shutdown



cooling. NSP's response to Generic Letter 88-17 was provided by letter dated January 6, 1989. NRC letter dated June 12, 1989 found that the NSP response to Generic Letter 88-17 on expeditious actions met the intent of the Generic Letter but lacked some detail. Several observations were provided for NSP's consideration, no response was required. NRC letter dated May 14, 1990 reported that the NRC staff had completed its review of all licensee responses regarding programmed enhancements as defined in Generic Letter 88-17. The May 14, 1990 letter reiterated NSP's schedule for completion of the hardware and programmed enhancements. The programmed enhancements implemented in response to Generic Letter 88-17 were completed in March 1990. The Unit 1 hardware changes were completed in March 1990. The Unit 2 hardware changes will be completed during the next Unit 2 refueling outage, presently scheduled for September 1990.

#### GSI-124. Auxiliary Feedwater System Reliability

In response to the analysis presented in NUREG-0611 (January 1980), which indicated that the Prairie Island Auxiliary Feedwater system fell into a low reliability range, NSP performed a PRA based reliability study to determine if the Prairie Island design was deficient in any way. That reliability study was transmitted to the NRC by letter dated April 24, 1986. NRC letter dated

November 26, 1986 found that based on an internal NRC Staff review and their review of the NSP reliability study, the Prairie Island Auxiliary Feedwater systems were adequately designed. This conclusion was predicated on implementation of several recommendations discussed in the NRC safety evaluation included in the November 26, 1986 letter. All of the recommendations identified in the NRC November 26, 1986 letter were implemented by March 1988 and the recommendations were incorporated into the Prairie Island Updated Safety Analysis Report in June 1989.

#### GSI A-13. Snubber Operability Assurance - Hydraulic and Mechanical Snubbers

NRC letter dated July 11, 1975 provided model snubber technical specifications and requested that a license amendment request be submitted to incorporate them into the Prairie Island technical specifications. A license amendment request was submitted by NSP letter dated September 12, 1975 to incorporate the model technical specification provided by the July 11, 1975 letter.

NRC letter dated December 17, 1975 provided revised model snubber technical specifications and requested that a license amendment request be submitted to incorporate them into the Prairie Island technical specifications. A license amendment request was submitted by NSP letter dated April 30, 1976 to incorporate the revised model technical specification provided by the December 17, 1975 letter. The April 30, 1976 License Amendment Request replaced the September 12, 1975 amendment request in its entirety. The April 30, 1976 license amendment request was approved by NRC letter dated August 11, 1976.

NRC letter dated November 20, 1980 provided Revision 1 of the In-service Surveillance Requirements for snubbers under the Standard Technical Specifications and requested that a license amendment request be submitted to incorporate them into the Prairie Island technical specifications. A license amendment request was submitted by NSP letter dated August 14, 1981 to incorporate the changes requested by the November 20, 1980 letter. The August 14, 1981 license amendment request was approved by NRC letter dated October 28, 1981.

#### GSI A-35. Adequacy of Offsite Power Systems

In response to a July 1976 degraded grid voltage event at Millstone Unit 2 the NRC issued a letter dated August 13, 1976 which required an analysis of the degraded voltage issue as it affected Prairie Island. Responses to the August 13, 1976 NRC letter were provided by NSP letters dated September 20, 1976 and March 2, 1977.

NRC letter dated June 3, 1977 requested installation of degraded voltage relays designed to separate the safety buses from offsite power whenever a degraded voltage condition existed for a specified period of time. Licensees were also requested to propose Technical Specifications for those relays and associated instrumentation. Response to the June 3, 1977 NRC letter was provided by NSP letters dated July 25, 1977, October 14, 1977 and May 4, 1978. NRC letter dated July 30, 1979 requested additional information with regard to the Prairie Island response to the June 3, 1977 letter. NSP letter dated October 12, 1979 provided the additional information requested by the July 30, 1979 NRC letter and reported that the modifications required in response to the June 3, 1977 NRC letter had been completed. A License Amendment Request was submitted on May 16, 1980 to incorporate the modifications implemented in response to the June 3, 1977 NRC letter into the Prairie Island Technical Specifications. That license amendment request was approved by NRC letter dated July 28, 1981.

NRC letter dated August 8, 1979 requested licensees to reanalyze their plants to ensure that safety-related equipment was not subjected to voltages outside design limitations when grid voltage was at its maximum and minimum levels. Licensees were also requested to perform tests to measure station voltages at various locations in the plant to verify the accuracy of the calculations. Responses to the August 8, 1979 NRC letter were provided by NSP letters dated October 26, 1979, November 17, 1980 and July 17, 1981. The reanalysis requested by the August 8, 1979 NRC letter was submitted to the NRC by the July 17, 1981 letter. NSP letters dated November 20, 1981, April 13, 1982 and August 17, 1982 responded to NRC requests for additional information on the analysis transmitted by the July 17, 1981 NSP letter. NRC letter dated October 29, 1982 concluded that the Prairie Island design was acceptable with respect to the adequacy of station electric distribution system voltages. This acceptability was contingent upon the completion of modifications described in the safety evaluation attached to the October 29, 1982 letter.

NSP letter dated March 16, 1984 reported that all modifications described in the July 17, 1982 NSP letter and accepted by the NRC Staff in their October 29, 1982 safety evaluation had been completed with the exception of a modification to the station air compressors. The air compressor modifications were completed in August 1984.

GSI B-63, Isolation of Low Pressure Systems Connected to the Reactor Coolant  
System Pressure Boundary

An NRC Generic Letter entitled "LWR Primary Coolant System Pressure Isolation Valves", dated February 23, 1980, requested a response from all licensees specifying whether their facilities contained Event V pressure isolation valve configurations. The NSP response to the February 23, 1980 Generic Letter for Prairie Island was dated March 17, 1980. The March 17, 1980 response reported that Prairie Island did have Event V isolation valve configurations. The response described the valve configuration and the testing performed to ensure integrity and concluded that no plant procedure revision or equipment modification was required to increase reliability.

NRC letter dated April 20, 1981 transmitted an order for Modification of License. This order imposed Technical Specifications addressing surveillance and limiting conditions of operation for the Event V pressure isolation valves.