



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

August 19, 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. 282/94008(DRS) and 306/94008(DRS)
Failure to Initiate a Modification Request for
Configuration Changes to a Piping Support

Your letter of July 22, 1994, which transmitted Inspection Report Nos. 282/94008(DRS) and 306/94008(DRS), requested response to a violation. The following provides our response.

Statement of Violation

During an NRC inspection conducted on June 13 through July 1, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1994), the violation is listed below:

Criterion V of 10 CFR Part 50, Appendix B, and Section 4.1.1 of the Northern States Power Operational Quality Assurance Plan requires that activities affecting quality be prescribed by documented instructions or procedures and that those activities be accomplished in accordance with the instructions or procedures.

NLAWI 5.1.1, "Nuclear Plant Modification General Instructions," Revision 5, Paragraph 6.1.1 defines a modification as any physical change to a component, system, or structure as defined by drawings, specifications, codes, standards, or other documents establishing requirements applicable to that component, system, or structure.

NLAWI 5.1.2, "Modification Initiation," Revision 5, requires that a modification request be processed for all modifications.

9408300021 940819
PDR ADDOCK 05000282
Q PDR

JE01/0

Contrary to the above, Work Request No. U6981-ZC-Q reduced weld sizes, changed weld configurations, and physically removed part of the structural components of Hanger No. 2-RHCH-36 without processing a request for modification (306/94008-01).

This is a Severity Level IV violation (Supplement I).

Background

A Nonconforming Item Report (NIR) was issued for an existing safety-related hanger because of several discrepancies between the hanger and the drawing for that hanger. Among other items, the drawing specified a horizontal box structure made up of two angles stitch-welded together. The upper of the two angles was actually made of two angles, each stitch-welded to the lower of the "two" angles; however, the upper angles were not welded to one another. In addition, there were several welds of the hanger structure which were undersized. In response to the NIR, engineering evaluated whether or not the hanger could perform its function with the discrepancies. The structure could not be made to conform to the drawing specifications because some of the welds could not physically be made as large as called for and in order to fully comply with the drawing would require replacement of the upper angles of the box structure with one angle. A decision was made to remove the upper angles of the box structure, accept the existing undersized welds, and change the drawing accordingly since the engineering evaluation showed that the original design load requirements would be met in that configuration.

A modification was not initiated for these changes from the original design drawing because the original design loads were unchanged and the nonconformance process allows for "repair" as one of the options to resolve the nonconformance. "Repair" in this context is defined as: "The process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safely is unimpaired even though that item still may not conform to the original drawings."

Reason for the Violation

The primary reason for the violation was that the nonconformance process appeared to allow "repair" as defined above within the process itself, that is, without resorting to the modification process, particularly in this case where the design loads were met and therefore not modified (both for the as-found and as-left configurations of the hanger). The nonconformance process does not allow modifications to be made outside of the modification process but the requirement to utilize the modification process in order to resolve the nonconformance can be more clearly specified.

US NRC
August 19, 1994
Page 3

NORTHERN STATES POWER COMPANY

Corrective Actions Taken and Results Achieved

A modification request has been initiated to document the changes to the hanger.

The original nonconformance activities report has been revised to acknowledge this violation and reference the modification that will close out the nonconformance.

Corrective Steps to Avoid Further Violations

As part of the re-engineering of the Prairie Island nonconformance process, the Nonconforming Item Report will be changed to refer to the modification process in the "repair" option for resolving a nonconformance.

Guidance will be developed and provided to the engineering organization to specifically address the appropriate processes to be utilized to resolve discrepancies found in as-installed configurations, by January 1, 1995.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved when the modification for the hanger re-work has been completed, by November 30, 1994.

New commitments to the NRC are indicated by italics above.

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

Jack Leveille for

Roger O Anderson
Director
Licensing and Management Issues

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