



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East  
Welch, Minnesota 55089

September 22, 1994

10 CFR Part 50  
Section 50.73

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

Discovery That Certain Valves Should  
Be Subject to ASME Section XI Testing

A second supplemental Licensee Event Report for this occurrence is attached. The revised report is being supplemented because, in the process of developing an ASME Section XI Inservice Testing (IST) program basis document for the third interval IST program, it was discovered that certain valves within the program were previously submitted as having a safety function in the open direction when, in fact, they do not.

This revision to the Licensee Event Report responds to the concern as discussed in NRC Inspection Report Nos. 50-282/94005(DRS) and 50-306/94005(DRS). This letter contains no new NRC commitments.

Please contact us if you require additional information related to this event.

Roger O Anderson  
Director  
Licensing and Management Issues

c: Regional Administrator - Region III, NRC  
NRR Project Manager, NRC  
Senior Resident Inspector, NRC  
Kris Sanda, State of Minnesota

Attachment

9410030082 940922  
PDR ADDCK 05000282  
PDR

## LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

## FACILITY NAME (1)

Prairie Island Nuclear Generating Plant U1

## DOCKET NUMBER (2)

05000 282

## PAGE (3)

1 OF 8

## TITLE (4)

Discovery That Certain Valves Should Be Subject to ASME Section XI Testing

## EVENT DATE (5)

MONTH	DAY	YEAR
4	13	93

## LER NUMBER (6)

YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
93	-- 07 --	02

## REPORT DATE (7)

MONTH	DAY	YEAR
09	22	94

## OTHER FACILITIES INVOLVED (8)

FACILITY NAME	DOCKET NUMBER
Prairie Island U2	05000 306
FACILITY NAME	DOCKET NUMBER
	05000

## OPERATING MODE (9)

N

## POWER LEVEL (10)

100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

20.402(b)

20.405(c)

50.73(a)(2)(iv)

73.71(b)

20.405(a)(1)(i)

50.36(c)(1)

50.73(a)(2)(v)

73.71(c)

20.405(a)(1)(ii)

50.36(c)(2)

50.73(a)(2)(vii)

OTHER

20.405(a)(1)(iii)

X

50.73(a)(2)(i)

50.73(a)(2)(viii)(A)

(Specify in

20.405(a)(1)(iv)

50.73(a)(2)(ii)

50.73(a)(2)(viii)(B)

Abstract below

20.405(a)(1)(v)

50.73(a)(2)(iii)

50.73(a)(2)(x)

and in Text, NRC Form 366A)

## LICENSEE CONTACT FOR THIS LER (12)

## NAME

Arne A Hunstad

## TELEPHONE NUMBER (Include Area Code)

612-388-1121

## COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

## SUPPLEMENTAL REPORT EXPECTED (14)

YES

(If yes, complete EXPECTED SUBMISSION DATE).

X

NO

## EXPECTED SUBMISSION DATE (15)

MONTH

DAY

YEAR

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 13, 1993 both units were at 100% power. The Design Basis Reconstitution effort for the Feedwater System revealed that certain feedwater valves required to mitigate the consequences of an accident were not included in the Prairie Island ASME Section XI Inservice Inspection and Testing Program. These valves should be classified as ASME Code Class 2 valves.

Subsequently, during the current development of the 3rd 10-year Interval Inservice Testing Program, we took an aggressive approach to determine any weaknesses in the current program in order to strengthen the program for the future. We reviewed violations issued against other licensees, reviewed generic discussions of industry issues, and discussed some interpretation questions with cognizant NRC Staff. As a result of this approach, we identified other ASME Code Class MC valves and six additional valves which should have been in the current program but were not.

An evaluation of the available data for each of these valves has been made to determine their operability. The valves will all be tested per the requirements of ASME Section XI and have been included in the 3rd 10-year interval program.

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY GMB NO. 3150-0104 EXPIRES 5/31/95	
<b>LICENSEE EVENT REPORT (LER)</b> TEXT CONTINUATION				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.	
FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)	
Prairie Island Unit 1		05000 282		YEAR 93	SEQUENTIAL NUMBER -- 007 --
				REVISION NUMBER 02	PAGE (3)  2 OF 8

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

### EVENT DESCRIPTION

On April 13, 1993 both units were at 100% power. The Design Basis Reconstitution effort for the Feedwater System revealed that certain feedwater valves required to mitigate the consequences of an accident were not included in the Prairie Island ASME Section XI Inservice Inspection and Testing Program. These valves should be classified as ASME Code Class 2 valves. This omission is in violation of Technical Specification 4.2.A.2, which states:

In addition to other specified tests, inservice testing of ASME Code Class 1, Class 2, and Class 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55 (g), except where specific written relief has been granted by the NRC.

ASME Section XI requires periodic exercising of all valves required to mitigate the consequences of an accident. In this instance, four valves (two per Unit) were not included in the Section XI program as required.

Subsequently, during the current development of the 3rd Interval Inservice Testing Program, we took an aggressive approach to determine any weaknesses in the current program in order to strengthen the program for the future. We reviewed violations issued against other licensees, reviewed generic discussions of industry issues, and discussed some interpretation questions with cognizant NRC Staff. As a result of this approach, we identified other ASME Code Class MC valves which should have been in the current program but were not. On June 24, 1993 which was subsequent to the submittal of the 3rd Interval Inservice Testing Program, and based on review of a violation issued against another licensee, we determined that four additional valves were inappropriately omitted from our 2nd Interval Program and were not included in the recently submitted 3rd Interval Program. The valves which had been omitted from the program based on earlier erroneous interpretations are listed in the following table:

S Y S	U N I T #	Valve #	Valve Name	Accident Function	Testing Which Has Been Performed or Other Basis for Determining Functionality	When Testing Will Be Performed to the ASME Section XI Requirements
FW	1	32023	11 STEAM GENERATOR FEEDWATER ISOLATION	TO CLOSE NOTE 5	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
FW	2	32028	21 STEAM GENERATOR FEEDWATER ISOLATION	TO CLOSE NOTE 5	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
FW	1	32024	12 STEAM GENERATOR FEEDWATER ISOLATION	TO CLOSE NOTE 5	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

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S Y S	U N I T #	Valve #	Valve Name	Accident Function	Testing Which Has Been Performed or Other Basis for Determining Functionality	When Testing Will Be Performed to the ASME Section XI Requirements
PW	2	32029	22 STEAM GENERATOR FEEDWATER ISOLATION	TO CLOSE NOTE 5	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
CC	1	32085	11 EXCESS LETDOWN INLET HEAT EXCHANGER ISOLATION	TO REMAIN CLOSED NOTE 5	Stroked during Integrated Safety Injection Test	August 1, 1993
CC	2	32130	21 EXCESS LETDOWN OUTLET HEAT EXCHANGER ISOLATION	TO REMAIN CLOSED NOTE 5	Stroked during Integrated Safety Injection Test	August 1, 1993
CC	1	31252	11 EXCESS LETDOWN OUTLET HEAT EXCHANGER ISOLATION	TO REMAIN CLOSED	Stroked during Integrated Safety Injection Test	August 1, 1993
CC	2	31253	21 EXCESS LETDOWN OUTLET HEAT EXCHANGER ISOLATION	TO REMAIN CLOSED	Stroked during Integrated Safety Injection Test	August 1, 1993
CC	1	CC-23-1	11 EXCESS LETDOWN INLET HEAT EXCHANGER ISOLATION CHECK		Deleted from IST Program, valve serves no safety function	
CC	2	2CC-23-1	21 EXCESS LETDOWN OUTLET HEAT EXCHANGER ISOLATION CHECK		Deleted from IST Program, valve serves no safety function	
CC	1	32089	11 REACTOR COOLANT PUMP COMPONENT COOLING INLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	2	32124	21 REACTOR COOLANT PUMP COMPONENT COOLING INLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	1	32091	12 REACTOR COOLANT PUMP COMPONENT COOLING INLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	2	32126	22 REACTOR COOLANT PUMP COMPONENT COOLING INLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	1	CC-18-1	12 REACTOR COOLANT PUMP COMPONENT COOLING INLET CHECK	NOTE 1	Verified Open; NOTE 3	Next Unit Cold Shutdown
CC	2	2CC-18-1	22 REACTOR COOLANT PUMP COMPONENT COOLING INLET CHECK	NOTE 1	Verified Open; NOTE 3	Next Unit Cold Shutdown
CC	1	CC-18-2	11 REACTOR COOLANT PUMP COMPONENT COOLING INLET CHECK	NOTE 1	Verified Open; NOTE 3	Next Unit Cold Shutdown
CC	2	2CC-18-2	21 REACTOR COOLANT PUMP COMPONENT COOLING INLET CHECK	NOTE 1	Verified Open; NOTE 3	Next Unit Cold Shutdown



LICENSEE EVENT REPORT (LER)  
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

S Y S	U N I T #	Valve #	Valve Name	Accident Function	Testing Which Has Been Performed or Other Basis for Determining Functionality	When Testing Will Be Performed to the ASME Section XI Requirements
CC	1	32090	11 REACTOR COOLANT PUMP COMPONENT COOLING OUTLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	2	32125	21 REACTOR COOLANT PUMP COMPONENT COOLING OUTLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	1	32092	12 REACTOR COOLANT PUMP COMPONENT COOLING OUTLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
CC	2	32127	22 REACTOR COOLANT PUMP COMPONENT COOLING OUTLET	TO CHANGE POSITION NOTE 6	Stroked during Containment Integrated Leak Rate Test	Next Unit Cold Shutdown
SS	1	31402	11 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	2	31639	21 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	1	31637	11 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	2	31412	21 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	1	31403	12 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	2	31640	22 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	1	31638	12 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
SS	2	31413	22 STEAM GENERATOR BLOWDOWN SAMPLE ISOLATION	TO CLOSE	Stroked during Integrated Safety Injection Test	August 1, 1993
AF	1	32242	AUXILIARY FEEDWATER TO 11 STEAM GENERATOR ISOLATION	TO REMAIN OPEN; NOTE 4	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
AF	2	32248	AUXILIARY FEEDWATER TO 21 STEAM GENERATOR ISOLATION	TO REMAIN OPEN; NOTE 4	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
AF	1	32243	AUXILIARY FEEDWATER TO 12 STEAM GENERATOR ISOLATION	TO REMAIN OPEN; NOTE 4	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown
AF	2	32249	AUXILIARY FEEDWATER TO 22 STEAM GENERATOR ISOLATION	TO REMAIN OPEN; NOTE 4	Stroked during Integrated Safety Injection Test	Next Unit Cold Shutdown

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S Y S	U N I T #	Valve #	Valve Name	Accident Function	Testing Which Has Been Performed or Other Basis for Determining Functionality	When Testing Will Be Performed to the ASME Section XI Requirements
CL	1	CW-12-1	COOLING WATER TO 11 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Inspected June 1991	Next Unit Cold Shutdown
CL	2	2CL-12-1	COOLING WATER TO 21 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	1	CW-12-2	COOLING WATER TO 13 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Inspected June 1991	Next Unit Cold Shutdown
CL	2	2CL-12-2	COOLING WATER TO 23 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	1	CW-12-3	COOLING WATER TO 12 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	2	2CL-12-3	COOLING WATER TO 22 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	1	CW-12-4	COOLING WATER TO 14 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	2	2CL-12-4	COOLING WATER TO 24 FAN COIL UNIT ISOLATION CHECK	NOTE 2	Verified Open; NOTE 3	Next Unit Cold Shutdown
CL	1	31381	11 CC HEAT EXCHANGER CL OUT TCV	TO OPEN	Valve cycled to open position monthly for flushing (SP1617); no failures to open since placed in service in 1973	Next Unit Cold Shutdown
CL	1	31411	12 CC HEAT EXCHANGER CL OUT TCV	TO OPEN	Valve cycled to open position monthly for flushing (SP1617); no failures to open since placed in service in 1973	Next Unit Cold Shutdown
CL	2	31383	21 CC HEAT EXCHANGER CL OUT TCV	TO OPEN	Valve cycled to open position monthly for flushing (SP1617); no failures to open since placed in service in 1973	Next Unit Cold Shutdown
CL	2	31384	22 CC HEAT EXCHANGER CL OUT TCV	TO OPEN	Valve cycled to open position monthly for flushing (SP1617); no failures to open since placed in service in 1973	Next Unit Cold Shutdown
CL	1	CL-76-3	CV-31769 BYPASS	TO OPEN	Valve cycled open to verify operability (per WR-U3528-ZH)	Complete
CL	1	CL-76-4	CV-31785 BYPASS	TO OPEN	Valve cycled open to verify operability (per WR-U3528-ZH)	Complete
SI	1	32073	SAFETY INJECTION COOLING WATER ISOLATION	TO REMAIN OPEN NOTE 4	Stroked during Operating Procedure C1.3	Next Unit Cold Shutdown

LICENSEE EVENT REPORT (LER)  
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

S Y S	U N I T #	Valve #	Valve Name	Accident Function	Testing Which Has Been Performed or Other Basis for Determining Functionality	When Testing Will Be Performed to the ASME Section XI Requirements
SI	2	32176	SAFETY INJECTION COOLING WATER ISOLATION	TO REMAIN OPEN NOTE 4	Stroked during Operating Procedure C1.3	Next Unit Cold Shutdown

NOTE 1: Based upon system design Technical Specification Table 4.4-1 states the "--- cooling water and closed cooling water system (component cooling) valves [are] not relied upon to prevent containment leakage. The primary function of the cc check valves is to open to provide cooling to RCP and to the excess letdown heat exchanger.

NOTE 2: The cooling water supply lines to the fan coil units are provided with a check valve inside containment and a manual motor operated gate valve outside containment. Return lines are provided with a manual motor operated gate valve inside containment and a manual motor operated globe valve outside containment.

In the event of accident, the cooling water supply and return isolation valves position to full open to satisfy their safeguards function. In the event of a fan coil unit or associated piping rupture the containment manual isolation valves would be closed to prevent the entry of non-borated water into containment. Pressure against the closed isolation valves is maintained by 1/2-inch equalizing lines.

The check valves have no close function for accident mitigation or in taking the plant to safe shutdown. The open function of the check valve is verified as part of normal surveillance associated with the fan coil unit. Technical Specification TABLE TS.4.4.1 states the "--- cooling water and closed cooling water system (component cooling) valves [are] not relied upon to prevent containment leakage."

NOTE 3: (A) Our Operating Experience Assessment program data for industry operating experience leads to the conclusion that there is no reason to suspect any of the check valves are inoperable.

(B) The open function of the check valves is demonstrated as part of normal operation. A search of NPRDS data shows a failure to close frequency of  $1.5E-6$  failures/component-hr.

(C) Machine history shows two of eight cooling water to containment fan coil unit check valves were inspected in June 1991. Inspection results indicated that the valves are aging but operable. Plans are to inspect the remaining six valves based upon diagnostic testing.

(D) The closed cooling water system (component cooling) is a chemically inert environment and free of abrasives.

Based upon this information, there is reasonable assurance the non-tested or non-inspected check valves are operable.

NOTE 4: Each of these valves is locked in the open position by having the the motor control center supply breaker locked in the off position (TS.3.4.B.1.d), (TS.3.3.A.1.g).

NOTE 5: This MOV is included in our GL 89-10 MOV program.

NOTE 6: This valve is open during heat-up, cooldown, and power operation with its motor control center supply breaker in the off position. The valves are accessible locally at the handwheel for cycling.

CAUSE OF THE EVENT

The cause of this event was the failure to properly interpret and implement ASME Section XI requirements by plant engineering staff. It was erroneously thought that the valves which were classified as Code Class MC (metal containment) were not required to be additionally classified as Code Class 1, 2, or 3 and were thereby inadvertently left out of the ASME

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<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>				<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.</p>								
FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)								
Prairie Island Unit 1		05000 282		<table border="1"> <tr> <td>YEAR</td> <td>SEQUENTIAL NUMBER</td> <td>REVISION NUMBER</td> </tr> <tr> <td>93</td> <td>-- 007 --</td> <td>02</td> </tr> </table>	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	93	-- 007 --	02	PAGE (3) 7 OF 8	
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER										
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Section XI Inservice Testing program from the initial classification in 1976. This understanding was in error. We believe that the six valves added to the list in this supplemental report were excluded from the Section XI Program by erroneous interpretation of the code; they had been in the 1st Interval Program and were erroneously omitted from the 2nd Interval Program.

#### ANALYSIS OF THE EVENT

This event is reportable pursuant to 10CFR50.73(a)(2)(i)(B) since Technical Specification 4.2.A.2 was violated. The valves have been determined to be operable on the basis of testing, inspection, verification of desired position, and/or evaluation of historical data; this information is referenced in the above table. Since all components are believed to be operable there were no consequences to the health and safety of the public.

#### CORRECTIVE ACTION

An evaluation of the available data (as discussed in the table above) for each of these valves has been made to determine their operability.

The valves will all be tested per requirements of ASME Section XI per the schedule listed in the table.

All safety-related control valves were reviewed again following the June 24, 1993 discovery and it was concluded that the six identified (two of the six were manual bypass of control valves) were the only ones inappropriately excluded from the Program.

These valves have been included in the Prairie Island ASME Section XI 3rd 10-year program for future testing.

#### FAILED COMPONENT IDENTIFICATION

None.

#### PREVIOUS SIMILAR EVENTS

Unit 1 Licensee Event Report 90-018, Rev. 1 identified certain cooling water and chilled water valves which had not previously been identified as performing an active function to mitigate the consequences of a design basis event and therefore should have been evaluated for inclusion in the



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ASME Section XI Inservice Testing Program. The corrective action for that event ("Design Bases reconstitution will continue to ensure that other similar oversights, if they exist, will be discovered.") resulted in identification of the feedwater isolation valves reported in this event.