



Northern States Power Company

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April 4, 1983

Mr J G Keppler, Regional Administrator
Region III
Office of Inspection and Enforcement
U S Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr Keppler:

Prairie Island Nuclear Generating Plants
Docket No. 50-282 License No. DPR-42 and
Docket No. 50-306, License No. DPR-60.

In response to your letter dated March 9, 1983, which transmitted Special Safety Inspection Report No. 50-282/83-01 (DPRP); 50-306/83-01 (DPRP), the following information is provided.

Violation No. 1

10 CFR 50 Appendix B, Criterion V states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Section 7.3 of the Nuclear Analysis Department procedure NAP 5.001 (Computer Program Control Procedure) Revision 1, dated June 3, 1982, requires the Nuclear Analysis Department to maintain a log of the Nuclear Analysis Program Version Abstracts for each version of a computer code.

Contrary to the above, the Nuclear Analysis Department has not maintained such a log for the computer program DYNODE-P.

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

Response to Violation No. 1

1. Corrective Action Taken and Results Achieved

The log of abstracts for the DYNODE-P program has been created and is being maintained as required by procedure NAP5.001, Revision 1, dated June 3, 1982.

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2. Corrective Action Taken to Avoid Further Non-Compliance

All Nuclear Analysis Department personnel have been instructed as to the requirements of procedure NAP5.001.

3. Date When Full Compliance Will be Achieved

Full compliance was achieved on February 1, 1983.

Violation No. 2

10 CFR 50 Appendix B, Criterion II states, "The applicant shall establish . . . a quality assurance program . . . This program shall be documented by written policies, procedures, or instruction and shall be carried out . . . in accordance with those . . . instructions."

The Northern States Power Operational QA Plan, Revision 7, dated February 15, 1982, commits to ANSI Standard N45.2.11-1974 as endorsed by Regulatory Guide 1.64, Revision 2, and states that management directives and departmental instructions and procedures shall provide for compliance.

Contrary to the above, the Nuclear Analysis Department instructions and procedures do not provide for compliance with the following sections of ANSI N45.2.11-1974: Section 5. - Interface Control; Section 7. - Document Control; Section 9. - Corrective Action; and Section 10. - Records.

Response to Violation No. 2

1. Corrective Action Taken and Results Achieved

Nuclear Analysis Department procedure NAP1.001, Revision 0, dated 1 January 1983 governs the following: Section 6.4 Corrective Action; Section 6.5 Interface Control; Section 6.6 Document Control, and Section 6.7 Records Management.

Section 6.4, Corrective Action, will be rewritten to include a requirement for instituting changes in the design process and quality assurance program to prevent deficiencies or errors from recurring.

Section 6.5, Interface Control, will be rewritten to require that internal department procedures be written to control flow of information between Nuclear Analysis Department sections. Northern States Power is currently redoing the formal process used for controlling design modifications. Instructions governing the flow of nuclear core design information between effected NSP departments will be issued as a part of this effort, this will be issued as an Administrative Work Instruction (AWI).

Section 6.6, Document Control, does require that a procedure for document control be created that is consistent with the document control requirements established by the Operational Quality Assurance program in 1ACD4.1, Document Control. A document control procedure has been written, numbered NAP6.001A, and is currently out for review.

Section 6.7, Records Management, does require that a procedure for records management be created that is consistent with the Operational Quality Assurance program 1ACD4.3, Nuclear Plant Records. A records management procedure has been written, numbered NAP6.002A, and is currently out for review.

2. Corrective Action Taken to Avoid Further Non-Compliance.

Training will be provided to appropriate personnel for the implementation of these procedures.

3. Date When Full Compliance Will Be Achieved

Full compliance will be achieved on the following schedule.

- Section 6.1 of procedure NAP1.001 will be rewritten to clarify the corrective action process by 1 May 1983.
- Interface Control
 - The Nuclear Analysis Department internal interface procedures will be issued by 1 May 1983
 - The Administrative Work Instruction (AWI) will be issued 1 June 1983.
- Document control procedure NAP6.002A will be issued 1 May 1983
- Records management procedure will be issued 1 May 1983.

Training will be provided within thirty days of issuance of these procedures.

Violation No. 3

3. 10 CFR Part 21 requires the following:

- a. Section 21.6(a) - Each individual, partnership, corporation or other entity subject to the regulations in this part, shall post current copies of the following documents in a conspicuous position on any premises, within the United States where the activities subject to this part are conducted: (1) the regulations in this part, (2) Section 206 of the Energy Reorganization Act of 1974, and (3) procedures adopted pursuant to the regulations in this part.

- b. Section 21.31 - Each individual, corporation, partnership or other entity subject to the regulations in this part shall assure that each procurement document for a facility, or a basic component issued by him, her, or it on or after January 6, 1978, specifies, when applicable, that the provisions of 10 CFR Part 21 apply.

Contrary to the above, the documents listed under Section 21.6(a) were not posted in a conspicuous position in or near the Nuclear Analysis Department and Purchase Order No. A81131MS, dated July 27, 1982, for procurement of a version of the DYNODE-P computer program did not specify that the provisions of 10 CFR Part 21 apply.

This is a Severity Level V violation (Supplement VII).

Response To Violation No. 3

1. Corrective Action Taken and the Results Achieved
 - a. The documents listed under Section 21.6(a) have been posted in a conspicuous place in the Nuclear Analysis Department.
 - b. The vendor (Utility Associates International) for purchase order A81131MS, dated July 27, 1982, has been informed of the discrepancy in the purchase order. They have assured us that all development work on the DYNODE-P program has been done under the provisions of 10CFR part 21. They will confirm this in writing and this letter will be attached to the purchase order.
2. Corrective Action to be Taken to Avoid Further Non-Compliance
 - a. No further action required.
 - b. Northern States Power Company Operational Quality Assurance procedures already require that a form specifying the provisions of 10 CFR Part 21 accompany all safety related purchase orders. Individuals responsible for processing safety related purchase orders have been reinstructed as to the requirements of these procedures. All other Nuclear Analysis Department purchase orders have been reviewed and were found to be in compliance.
3. Date When Full Compliance Will Be Achieved
 - a. The documents listed under Section 21.6(a) were posted 1 February 1983.
 - b. Utility Associates International letter confirming compliance with 10CFR part 21 will be attached to purchase order by 1 May 1983.

Open Items 282/83-01-01 Thru 05

Section 6.2 (Design Calculation Verification) of NAP1.001 needs clarification regarding the method of documenting identified errors i.e., indicating correct value and noting effect on final result. (Open Item 282/83-01-01)

Section 6.5 (Interface Control) of NAP 1.001 needs clarification regarding the external organizational listings under subsection 6.5.1 (i.e., are the presently listed organizations examples or are they the only organizations affected?). (Open Item 282/83-01-02)

Sections 7.1 and 8.3 of NAP 5.001 state: "... calculations adequately correlate with ...". Both of these sections need clarification regarding the meaning of "adequately correlate" (i.e., specific acceptance limits should be stated). (Open Item 282/83-01-03)

Section 8.2 (Project Design) of NAP 5.001 needs clarification regarding the method of documenting the software design specification. (Open Item 282/83-01-04)

Section 7.2 (Nuclear Analysis Program Verification Package Checklist) of NAP 5.001 needs clarification regarding the location of information (appendix contents) to document verification. (Open Item 282/83-01-05)

Response To Open Items 282/83-01-01 Thru 05

Procedures NAP1.001, Revision 0, January 1, 1983 and NAP 5.001 have been revised to clarify each of these open items. Both procedures are currently in draft form for review, both revised procedures will be issued 1 May 1983.

Open Items 282/83-01-06 Thru 07

NAD Policy and Procedure NAP1.001 (Policy Directive) Revision 0, effective January 1, 1983, requires the following:

Model building guidelines be established to show the general flow of calculational data, non-computerized and computerized, that is required to build a computer program model (Section 6.1.6). (Open Item 282/83-01-06)

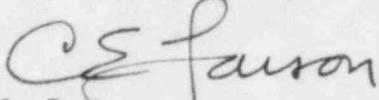
Each section within the Nuclear Analysis Department will establish a procedure for numbering calculational files consistent with this directive (Section 6.1.3.c). (Open Item 282/83-01-07)

Response To Open Items 282/83-01-06 Thru 07

The model building guidelines have been written and are currently out for review in draft form. They will be issued 1 May 1983.

The calculational file numbering system procedures have been written and are currently out for review in draft form. They will be issued by 1 May 1983.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "C. E. Larson".

C. E. Larson
Director Nuclear Generation

cc: C Feierabend
G Charnoff