



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

October 17, 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. 282/94014(DRP) and 306/94014(DRP)
Routine Safety Inspection (Security and ESF Actuation)

Your letter of September 16, 1994, which transmitted Inspection Report Nos. 282/94014(DRP) and 306/94014(DRP), requested a response to two violations. Our response to Violation A and to Violation B is included as an attachment to this letter.

There are no new NRC commitments in this letter.

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

Michael O. Waddy 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

Attachment: Response to Notice of Violation

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RESPONSE TO NOTICE OF VIOLATION

Statement of Violation A

Section 2.C.3 of Amendment No. 85 to License No. DPR-42 and Amendment No. 78 to License No. CPR-60 require the licensee to fully implement and maintain in effect all provisions of the Commission-approved physical security plan including amendments made pursuant to the provisions of 10CFR50.54(p).

Section 8.3.3 of revision 29A of the licensee's security plan states that the ratio of visitors to escort may be up to 5 to 1 in vital areas. This section of the plan also states that under "unique conditions" larger ratios may be authorized by the General Manager Prairie Island/designee.

Contrary to the above, between February 1 and April 28, 1994, there were 41 occasions where exemptions to the 5 to 1 visitor to escort ratio within a vital area were granted for other than unique conditions.

This is a Security Level IV Violation (Supplement III).

Response to Violation A

Reason for the Violation

Exemptions to the visitor to escort ratio of 5 to 1 were authorized on a case-by-case basis to accommodate the dramatic increase in requests for plant tours that was experienced during the period. The increase was a result of public interest in the dry cask spent fuel storage issue, which was being debated in the state legislature. NSP management viewed the increased number of tours as a temporary situation and believed it constituted a unique condition. NRC inspectors took issue with that viewpoint, and further discussions with NRC representatives led to the conclusion that the large number of tours did not constitute a unique condition.

Corrective Steps Taken and Results Achieved, and Corrective Steps to Avoid Further Violations

Authorization of exemptions to the visitor to escort ratio of 5 to 1 for plant tours was stopped. Security procedures were revised to state that plant tours, by themselves, do not constitute unique conditions.

Date when Full Compliance will be Achieved

Full compliance has been achieved.

Statement of Violation B

Title 10 of the Code of Federal Regulations Part 50.72(b)(2)(ii), requires that the licensee shall notify the NRC as soon as practical and in all cases, within four hours of any event or condition that results in a manual or

automatic actuation of any engineered safety feature, unless the actuation meets specific exception criteria.

Contrary to the above, at approximately 8:59 p.m. (CDT) on September 6, 1994, an actuation of an engineered safety feature occurred (closure of a Unit 1 containment isolation valve) and the NRC was not notified within four hours.

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

Response to Violation B

Background

On July 15, 1994 the operating charging pump for Unit 1 tripped. Since it was the only charging pump operating at the time, trip of the pump caused letdown isolation; the open letdown orifice isolation valve closed. Letdown orifice isolation valves also function as containment isolation valves. The unplanned closure of the letdown orifice isolation valve was a non-ESF actuation of dual-function equipment. The event (non-ESF actuation of a single containment isolation valve) was considered to be not reportable pursuant to plant reporting procedures that were in effect at the time. On July 21, 1993, after discussion with Region III staff, the resident inspectors concluded the event was reportable. (The event is discussed in Inspection Report 93010.) Revisions to reporting procedures were planned to reflect the reportability determination, but timely revisions were not made. As a result, when the event recurred on September 6, 1994, proper notification was not made since reporting procedures were inadequate.

Reason for the Violation

Reason for the violation was failure to make timely revisions to reporting procedures.

Corrective Steps Taken and Results Achieved

Reporting procedures were revised and the substance of the revisions have been added to the licensed operator requalification training program.

The violation has been discussed with those responsible for revision to the reporting procedures.

Corrective Steps to Avoid Further Violations

NRC Inspection Reports were added to the Operating Experience Assessment Program in order to formalize the review of Inspection Reports to help keep track of items requiring action.

Date when Full Compliance will be Achieved

Full compliance has been achieved.