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February 3, 1984

Mr. J. G. Keppler
Regional Administrator, Region III
Office of Inspection and Enforcement
US 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 January 6, 1984 which transmitted Inspection Reports No. 50-282/83-19 (DPRP) and 50-306/83-20 (DPRP), the following information is provided.

Violation

Title 10 of the Code of Federal Regulation, Part 50, Appendix B, Criterion VI (10 CFR 50 Appendix B, Criterion VI) requires, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

Operational Quality Assurance Plan, Section 5, "Modification Control," states in part, "...Measures shall be established to assure that"...3. Plant documentation is updated...6. Plant procedures are reviewed and revised as appropriate."

Contrary to the above, the fill and vent procedure was not revised to reflect the existence of modification (DC 80Y111 and DC 80Y112) that installed the Reactor Coolant Wide Range Pressure Upgrade.

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

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Response

The procedure for filling and venting the reactor coolant system was reviewed concerning use of the pressure transmitters. The pressure taps were used as vents on Unit 2 only. Since several other locations for venting the reactor coolant system are available, the use of the Unit 2 taps as vent paths was stopped. The fill and vent procedure was revised December 12, 1983.

A revised plant modification system is being developed. The revised system will provide a multidisciplinary review of plant modifications to insure that all plant procedures affected are reviewed for necessary changes. The revised system will be in effect July 1, 1984.

Deviation

Your response to IE Bulletin No. 83-03, dated June 8, 1983, commits that Valve No. 2CL-42-1 Loop Cooling Header Turbine Building Check Valve would be tested at the next refueling outage.

Contrary to the above, the required test was not conducted during the Unit 2 refueling outage that began on August 28, 1983.

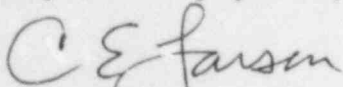
Response

A followup response to IE Bulletin 83-03 which discusses our failure to test valve 2CL-42-1 at the Unit 2 refueling was forwarded to your office November 7, 1983.

Valve CL-42-1 was successfully tested in December 1983 with Unit 1 in cold shutdown. An attempt was made to test valve 2CL-42-1 at the time of the Unit 1 shutdown but the test was not conclusive; it was determined that Unit 2 would have to be in cold shutdown to conduct a conclusive test.

We have since concluded that testing of these two valves places the plant in an undesirable condition. A request for relief from testing these valves under Section XI will be submitted for NRC review and approval with our next Section XI program revision.

Respectfully yours,



C. E. Larson

Director Nuclear Generation

CEL/sms

cc: J. Hard
G. Charnoff