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October 5, 1992

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

Technical Specification Requirements for Surveillance  
Testing of 4kV Safeguards Bus Undervoltage Logic Circuitry

We are writing this letter to document our discussion of October 1, 1992 with NRC staff regarding our conclusion that it would not be prudent to proceed with surveillance testing of safeguards bus 16 undervoltage restoration scheme during the current Unit 1 maintenance outage.

On July 27, 1992, we determined that Unit 1 safeguards bus 16 had exceeded the Technical Specification (TS) interval for surveillance testing of a portion of its undervoltage logic circuitry. We also determined that Unit 2 would exceed its TS surveillance interval for safeguards bus 26 on August 5, 1992. We then requested a Temporary Waiver of Compliance from TS Surveillance Requirement 4.6.A.3.b.1 for Units 1 and 2. Our request included a discussion of the circumstances leading to the request, safety significance, and compensatory actions. A Waiver of Compliance was verbally granted by NRC staff on July 27, 1992. By letter dated July 29, 1992, we provided written confirmation of the information provided during the verbal request for a temporary waiver.

By letter dated August 3, 1992, we requested an Emergency Change to the Technical Specifications to delay the performance of the incomplete portion of the surveillance testing on buses 16 and 26 until completion of the electrical system upgrade modifications of the station blackout project during the two unit outage scheduled to begin in October 1992.

In our request for delay we stated that we would take the following compensatory actions on an interim basis:

1. The relays associated with the 4160V safeguards bus undervoltage restoration scheme will be visually inspected monthly.
2. If either Unit 1 or Unit 2 should be taken to the cold shutdown condition, the incomplete portions of the testing required by

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October 5, 1992

Page 2 of 3

Specification 4.6.A.3.b.1 will be completed on the affected unit prior to returning that unit to power operation.

That, in consideration of those compensatory actions, we had determined that the second commitment was appropriate on the basis that 1) Technical Specification 3.7 allows bus 16 to be out-of-service (which is necessary to perform the surveillance testing) while at cold shutdown and 2) prompt completion of the TS surveillance requirement is desirable.

Unit 1 is presently at cold shutdown for repair of a steam generator tube and eddy current inspection of other tubes in the same steam generator. When it became apparent that we would be shutting the unit down, cognizant engineers began preparations to perform the surveillance test on bus 16 in the expected plant outage conditions. As part of the outage planning, the Outage Planning Committee was consulted to determine the appropriate conditions for the test. The committee concluded that it would be taking an inappropriate risk to perform the test in any of the plant conditions planned for this short maintenance outage. Having the refueling cavity flooded would provide an acceptable plant condition for the performance of this test with the current undervoltage restoration scheme.

The Outage Planning Committee reached this conclusion on the basis that we should maintain two methods of decay heat removal when we are in the shutdown condition. When the unit is in cold shutdown without the refueling cavity flooded, the potentially available sources of decay heat removal are two operable residual heat removal (RHR) trains and two operable steam generators. When bus 16 is removed from service, #12 RHR pump is made inoperable. In addition, the Unit 1 motor-driven auxiliary feedwater (AFW) pump is made inoperable, and since the turbine-driven AFW pump is inoperable below 350 f, both steam generators are made inoperable. There is the option of utilizing the Unit 2 motor-driven AFW pump but this would involve making it unavailable for Unit 2 and thereby entering a Unit 2 Limiting Condition for Operation Action Statement. Contingency plans to restore a decay heat removal path (e.g., mid-test restoration of bus 16 and the associated RHR train) were evaluated but reliance on any one of these as the primary backup was judged inappropriate.

A key factor in the decision is the short time interval remaining prior to the Unit 1 and 2 outages - there will be less than three weeks left prior to the shutdown of both units. If there were significantly more time between the startup of Unit 1 (scheduled for October 7, 1992) and the scheduled two unit outage (October 24, 1992), performing the test would provide more benefit. The relation between the risk of performing the test in less than desirable conditions and the benefit associated with presently demonstrating the operability of all portions of the undervoltage restoration scheme shifts the decision toward delaying the testing as the time to the next outage decreases.

We therefore do not believe that it is prudent to perform this test while the unit is in the current cold shutdown conditions.

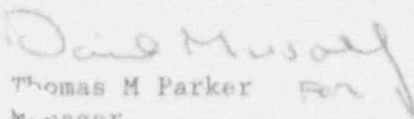
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October 5, 1992

Page 3 of 3

Please contact us if you have any questions related to this letter.



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