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December 7, 1992

Technical Specifications
TS 3.14.A and TS 3.14.G.2

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

Report of Plans for Alternate Provisions for
Inoperable Fire Detection Instruments and Fire Barriers

This letter is provided in accordance with Section 3.14.A and 3.14.G of the Prairie Island Technical Specifications which require that Fire Detection Instrumentation and Fire Protection Penetrations be OPERABLE whenever equipment they are protecting is required to be operable.

INOPERABLE FIRE DETECTION INSTRUMENTATION

Technical Specification 3.14.A states that:

Fire Detection Instrumentation

1. The minimum fire detection instrumentation for each fire detection zone shown in Table 3.14-1 shall be OPERABLE whenever equipment in that fire detection zone is required to be OPERABLE (except as specified in 3.14.A.2). Fire detection instruments located within containment are not required to be OPERABLE during the performance of Type A containment leakage rate tests.
2. If specification 3.14.A.1 cannot be met:
 - a. Within one hour, establish a fire watch patrol to inspect the zone with the inoperable instruments at least once per hour. Fire zones located inside primary containment are exempt from this requirement when CONTAINMENT INTEGRITY is required.

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- b. Restore the inoperable instruments to operable status within 14 days or submit a special report to the Commission within 30 days outlining the cause of the malfunction and the plans for restoring the instruments to OPERABLE status.

On October 30, 1992, during a dual unit outage, work began on the replacement of the cooling water pipe. The large amount of cutting and grinding that took place from that time forward required the detection instrumentation in some fire zones to be bypassed to avoid frequent alarms. Within an hour of the zone being bypassed, either a continuous or a roving fire watch was posted, depending on Technical Specification requirements. In addition, separate fire watches were posted for each ignition source activity, per plant directives. The zones will remain in bypass with the required fire watches posted until construction activity is complete and in any case will be restored prior to either Unit 1 or 2 resuming power operation. Since the detection instruments were not restored to OPERABLE status within the 14 days required by Technical Specification 3.14.A.2.b, a written report is required which this submittal satisfies.

INOPERABLE PENETRATION FIRE BARRIERS

Technical Specification 3.14.G states that:

Penetration Fire Barriers

1. All penetration fire barriers in fire area boundaries protecting equipment required to be OPERABLE shall be OPERABLE (except as specified in 3.14.G.2 below).
2. If Specification 3.14.G.1 cannot be met within one hour:
 - a) establish a continuous fire watch on at least one side of the affected penetration(s), or
 - b) verify the OPERABILITY of the fire detectors on at least one side of the inoperable barrier and establish an hourly fire watch.

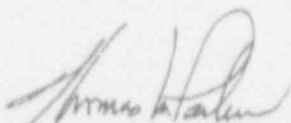
Restore the inoperable penetration fire barriers to OPERABLE status within 7 days or submit a special report to the Commission within 30 days outlining the cause of the inoperability and the plans and schedule for restoring the barriers to OPERABLE status.

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On October 30, 1992 a number of fire penetrations were breached to remove and install the new cooling water pipe. The penetrations to fire areas that protect safety related equipment were subsequently covered by either continuous or roving fire watches as required by Technical Specifications. These penetrations will remain open until the cooling water project is complete and will be restored prior to Unit 1 or 2 resuming power operation. The open penetrations also included the Unit 1 door to the control room which was open from November 6 to November 14, 1992 to allow cable to pass through for a control board modification. During the time the door was open a fire watch was posted. Since the fire penetrations were not restored to OPERABLE status within the 7 days requirement of Technical Specification 3.14.G.2, a written report is required which this submittal satisfies.

Please contact us if you require additional information.



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