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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

Supplemental Reply to a Notice of Deviation
NRC Inspection Report Nos. 282/92008 and 306/92008
Final Safety Analysis Report Commitment for
Inservice Examination of High Energy Line Piping

- References:
- 1) Letter from W D Shafer, U S NRC Region III, to L R Eliason, NSP, dated June 11, 1992 containing the Inspection Reports Nos. 50-282/92008(DRP) and 50-306/92008(DRP)
 - 2) Letter from L R Eliason, NSP, to U S NRC, dated July 10, 1992, titled "Reply to a Notice of Deviation NRC Inspection Report Nos. 282/92008 and 306/92008 Final Safety Analysis Report Commitment for Inservice Examination of High Energy Line Piping"
 - 3) Letter from W D Shafer, U S NRC Region III, to L R Eliason, NSP, dated July 29, 1992, titled "Notice of Deviation (NRC Inspection Report No. 50-282/92008; 50-306/92008(DRP))"

Pursuant to the provisions of 10 CFR Part 2, Appendix C, the following is submitted as an additional response to the notice of deviation contained in your letter of June 11, 1992 (Reference 1).

In our original response (Reference 2) to the deviation, as part of our corrective action, we had committed to the following:

During the two unit outage, scheduled for Fall, 1992, the normal Inservice Inspection program for welds in high energy piping in the Auxiliary Building will be augmented to include additional weld inspections in the main steam and feedwater lines. Selection of the welds for inspection will be based on stress levels calculated in the Plant Design Stress Analysis Reports. Those areas of highest stress, which are not encapsulated, will be inspected.

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Following the original response, we held discussions with the Senior Resident Inspector for Prairie Island regarding the welds to be selected. We received your letter (Reference 3) which documented those discussions:

Concerning corrective action, you stated you would select additional welds in areas of highest stress for supplementary inspection during the fall, 1992, outage. Based on further clarifications made during discussions between our respective staffs, it is our understanding that the supplementary inspection shall apply for at least one additional weld in each major piping size, such that not less than five additional steam piping welds nor less than five additional feedwater piping welds shall be examined.

Subsequent to these discussions and letters, we determined that it would be more informative to examine welds selected from lines which experienced full time operation rather than selecting welds on bypass or shut down lines. This was in conflict with the commitment as discussed above. Therefore, we held further discussions with Region III staff, prior to performing the examinations, to explain our revised plans and our rationale. This letter documents the change in plans and provides the list of welds that we examined.

The following list of welds were inspected during the Fall 1992 outage:

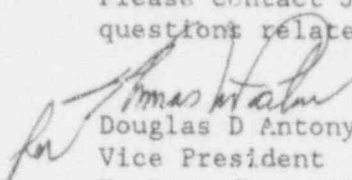
| System | Weld # | Stress (psi) | High Operating Stress within This System (psi) |
|--------------------|--------|-----------------|---|
| Main Steam, Unit 1 | MS-11 | 14347 | 24107 |
| | MS-28 | 11898 | |
| | MS-38 | 16556 | |
| | MS-81 | 10985 | |
| | MS-82 | 9245 | |
| Main Steam, Unit 2 | MS-21 | 14355 | 17018 |
| | MS-49 | 11710 | |
| | MS-50 | 11052 | |
| | MS-81 | 17018 | |
| | MS-160 | 15085 | |

| System | Weld # | Stress (psi) | High Operating Stress within This System (psi) |
|-------------------|-----------------|-----------------|---|
| Feedwater, Unit 1 | FW-53 | 13800 | 18365 |
| | FW-95 (94) | 18365 | |
| | FW-144 | 11045 | |
| | FW-145 | 12829 | |
| | FW-221 (146) | 12644 | |
| Feedwater, Unit 2 | FW-1 | 18960 | 27848 |
| | FW-2 | 16004 | |
| | FW-108 | 13125 | |
| | FW-114 | 15069 | |
| | FW-115 | 17004 | |

The welds examined were the highest stressed welds that were accessible. Some high stress welds were inaccessible due to encapsulation or restraints. One high stress weld was rendered inaccessible due to the difficulty of installing an asbestos removal containment structure in a high traffic area. Examination results were satisfactory (i.e., there was no evidence of service induced degradation).

In summary, we have modified our commitment regarding the additional weld examinations scheduled for the Fall 1992 outage: from one additional weld of high stress in each major pipe size, for each main steam and feedwater train per unit, to the five highest stressed accessible welds which experience full time operation, for each main steam and feedwater train per unit (all five could be in the same pipe size). The one incomplete commitment (revising the Updated Safety Analysis Report) from our original response (reference to) will be completed by June 30, 1993, as discussed in Reference 2.

Please contact Jack Leveille (612-388-1121, Ext. 4662) if you have any questions related to this letter.


Douglas D. Antony
Vice President
Nuclear Generation

c: Regional Administrator - Region III, NRC
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J E Silberg