



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Weich, Minnesota 55089

November 6, 1996

10 CFR Part 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

Reply to Notice of Violation (Inspection Report 96008),
Regarding Failure to Immediately Retest a Cooling Water System Valve

Your letter of October 7, 1996, which transmitted Inspection Report No. 96008, required a response to a Notice of Violation. Our response to the violation is contained in the attachment to this letter.

In this letter we have made one new Nuclear Regulatory Commission commitment, indicated as the statement in italics.

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

Michael D Wadley

Michael D Wadley
Plant Manager
Prairie Island Nuclear Generating Plant

c: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg

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Attachment: RESPONSE TO NOTICE OF VIOLATION

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RESPONSE TO NOTICE OF VIOLATION

VIOLATIONS

- A. 10 CFR 50, Appendix B, Criteria XVI, required, in part, that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.
1. Prairie Island Surveillance Procedure SP 1106A, "12 Diesel Cooling Water Pump Test," revision 48, for quarterly ASME testing of the pump's jacket water heat exchanger control valve CV-31423, step 1.5.1, required that if a valve cycle time falls outside the acceptance range and less than the maximum time, then the valve shall be immediately retested.

Contrary to the above, on July 25, 1996, the cycle time for valve CV-31423 fell outside the acceptance band during performance of the surveillance. This condition adverse to quality was not promptly identified in that the failure was not discovered for over 24 hours. Thus the valve was not immediately retested as required.

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

2. A. Prairie Island Administrative Work Instruction 5AWI 3.6.0, revision 4, step 6.8.1, required that if an event is determined to be a reportable event, Licensing Management Issues department personnel shall complete Form 264, "Report Identification," which assures assignment of an individual(s) to prepare an investigative report.
- B. 5AWI 3.6.1, revision 5, step 6.1.2, required that the content of investigative reports shall be prepared in accordance with the guidance provided in the attached Table 2 which included, as Section 9, corrective action taken to prevent repetition of the event and of similar events.

Contrary to the above, on July 26, 1996, the licensee determined that a reportable event had occurred because two redundant systems had been made inoperable at the same time. The licensee failed to complete Form 264 assigning an individual to prepare an investigative report, and the investigative report was not prepared to include corrective action to prevent repetition of the event. Action was not taken until prompted by the inspector 30 days later.

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

- B. 10 CFR 50.73(a)(2)(i)(B) stated that the licensee shall report, within 30 days after discovery, any operation or condition prohibited by the plant's Technical Specifications.

Contrary to the above, a condition prohibited by Technical Specifications involving the cooling water pumps was identified by the licensee on July 26, 1996, but was not reported in accordance with 10 CFR 50.73 within 30 days.

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

RESPONSE TO VIOLATION A.1

Reason for the Violation:

The failure to recognize that the cycle time for valve CV-31423 fell outside the acceptance band (the valve stroke too fast) during the performance of the surveillance was due to the lack of attention to detail by operations personnel during the performance and review of the test results. Additionally, the engineer reviewing the test results recognized that the results were outside the acceptance band and needed to be retested but did not realize that it was already technically inoperable (because it was not immediately retested) by ASME Section XI rules (if it had been immediately retested, even with the same results, it would not have been considered inoperable during the period of engineering evaluation - 96 hours are allowed for this evaluation).

Corrective Steps Taken and Results Achieved

The system engineer reviewing the completed surveillance procedure noted that the valve stroke time was outside the acceptable range (the valve stroke too fast) and reported it to the Superintendent of Systems Engineering.

The Superintendent of Systems Engineering informed the Day Shift Manager of the potential inoperability of 12 Diesel Driven Cooling Water Pump due to failure to immediately retest CV-31423. The discussion addressed the resultant apparent simultaneous inoperability of 12 and 22 Diesel Driven Cooling Water Pumps during the performance of SP 1106b earlier the same date. A determination was made that the plant had entered Technical Specification 3.0.C (the specification that applies when a Limiting Condition for Operation is not met and the required action is not specified) due to a failure to meet the requirements of TS 3.3.D.2.a, specifying minimum number of

operable cooling water pumps, during the 10 minute cooldown period of SP 1106b for 22 Diesel Driven Cooling Water Pump. 121 Motor Driven Cooling Water Pump had not been aligned as a safeguards pump during this time.

The safety significance was minor because the stroke time was conservative (that is, it was too fast) and did not render the diesel driven cooling water pump non-functional. Subsequent testing demonstrated that the valve was operable.

Corrective Steps That Will Be Taken To Avoid Further Violations:

The operations personnel involved in this event have been counseled on the need for attention to detail. In addition, a letter has been sent to all operations personnel reminding them of the need for full attention to detail.

The diesel driven cooling water pumps surveillance test procedures were reviewed against the plant's Writers Guide to verify that it is well-written from a human-factors perspective; as a result the procedure was rewritten, subsequently performed, and evaluated; the recommendations from the evaluation are being incorporated into the next revision which is currently being processed.

An E-mail message outlining the ASME Section XI operability requirements as they pertain to this event has been routed to the mechanical systems engineers.

The Date When Full Compliance Will be Achieved:

Full compliance has been achieved.

RESPONSE TO VIOLATIONS A.2 and B

Reason for the Violation:

The site licensing group is responsible for notification of appropriate personnel of reportable events, tracking of the event to ensure an investigation is performed, and ensuring that a report is made to the NRC within the required time period.

However, plant procedures have not addressed the notification of licensing personnel when a reportable event has occurred, if the event did not involve an ENS notification. In the past, the person responsible for notification and tracking also reviewed the operators log and would be aware of events that had been identified. When the responsibility for notification and tracking was recently shifted to the site licensing

group, a formal means to communicate identified events to the licensing group was not instituted.

Corrective Steps Taken and Results Achieved

An investigation was performed and the event was reported to the NRC as Unit 1 LER 96-14 on September 5, 1996.

Corrective Steps That Will Be Taken To Avoid Further Violations:

By December 31, 1996, the plant administrative procedure will be revised to require formal notification of the site licensing group when a reportable event is identified.

The Date When Full Compliance Will be Achieved:

Full compliance has been achieved.