



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

November 12, 1996

10 CFR Part 50
Section 50.73

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

**Missed Surveillance of Low Pressure Auto-Start of
Component Cooling Pumps Due to Inadequate Procedure**

The Licensee Event Report for this occurrence is attached. In the report, we made one new NRC commitment indicated as the statement in italics in the Corrective Action section.

Please contact us if you require additional information related to this event.

Michael D Wadley
Plant Manager
Prairie Island Nuclear Generating Plant

c: Regional Administrator - Region III, NRC
NRR Project Manager, NRC
Senior Resident Inspector, NRC
Kris Sanda, State of Minnesota

IE221

Attachment

9611210006 961112
PDR ADOCK 05000285
S PDR

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION
COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO
THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING
BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33),
U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE
POWERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET,
WASHINGTON, DC 20503.

FACILITY NAME (1)

Prairie Island Nuclear Generating Plant Unit 1

DOCKET NUMBER (2)

05000 282

PAGE (3)

1 OF 4

TITLE (4)

Missed Surveillance of Low Pressure Start of Component Cooling Pumps Due to Inadequate
Procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
10	10	96	96	-- 18 --	0	11	12	96	Prairie Island Unit 2	05000 306	
									FACILITY NAME	DOCKET NUMBER	
										05000	
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
			20.2201(b)			20.2203(a)(2)(v)			X	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		100	20.2203(a)(1)			20.2203(a)(3)(i)				50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)				50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)				50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)				50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)				50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME

Jack Leveille

TELEPHONE NUMBER (Include Area Code)

612-388-1121

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPPDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO	EXPECTED SUBMISSION	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 10, 1996, both Units were operating at 100% power. As part of investigations underway per Generic Letter 96-01, we determined that the "low pressure" auto-start of the component cooling pumps is required to be surveillance tested by Technical Specifications but was not.

The low pressure auto-start function had not been formally tested due to oversight during the original surveillance development. This oversight was discovered during the review being performed in response to Generic Letter 96-01, Testing of Safety-Related Logic Circuits. At the time of discovery, the low pressure auto-start function of all CC pumps had been verified (by some means) within their required surveillance interval.

The testing requirements are being incorporated into existing surveillance procedures.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
Prairie Island Nuclear Generating Plant Unit 1	05000 282	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		96	-- 18 --	0	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION

On October 10, 1996, both Units were operating at 100% power. As part of investigations underway per Generic Letter 96-01, we determined that the "low pressure" auto-start of the component cooling pumps¹ is required to be surveillance tested by Technical Specifications but was not.

At about 0730 it was determined that the low pressure start of the component cooling (CC) pumps was probably not tested by any surveillance procedure. An investigation was conducted to determine if this test was required and, if so, has the function been tested or otherwise performed. Investigation showed:

Regarding requirements -

- USAR 4.3.3.2.3 takes credit for auto-start of CC pumps after a loss of offsite power to prevent loss of reactor coolant pump seals. The only auto-start in this situation is the low pressure start.
- TS 4.5.A.4.a says: "System tests shall be performed during each reactor refueling shutdown. Operation of the system will be initiated by tripping the actuation instrumentation."

Regarding demonstration of functionality (whether planned or not) -

- SP 1642 [2642] tests the low pressure switch actuation of the 63X aux. relay in the CC pump breaker circuit. They were last performed on 11/28/95
- The breaker test tripping procedures verify breaker closure from aux. relay actuation. The last performances were:
 - 11 CC Pump 6/1/94;
 - 12 CC Pump 1/21/96;
 - 21 CC Pump 11/15/93,
 - 22 CC Pump 5/28/95.
- By combined performance of SP 1642[2642] and the test trip procedures, 12 and 22 CC Pump auto-start on low CC pressure was adequately tested within the required surveillance interval.

¹ (EIS System Identifier: CC; EIS Component Identifier: P)

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)	PAGE (3)						
Prairie Island Nuclear Generating Plant Unit 1	05000 282	<table border="1"><tr><th data-bbox="1023 234 1088 266">YEAR</th><th data-bbox="1088 234 1258 266">SEQUENTIAL NUMBER</th><th data-bbox="1258 234 1339 266">REVISION NUMBER</th></tr><tr><td data-bbox="1023 287 1088 308">96</td><td data-bbox="1088 287 1258 308">-- 18 --</td><td data-bbox="1258 287 1339 308">0</td></tr></table>	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	96	-- 18 --	0	3 OF 4
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER							
96	-- 18 --	0							

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

- On 9/7/96, 11 CC Pump was inadvertently auto-started on low pressure (Unit 1 LER 96-16). This functionally verified that 11 CC Pump would auto-start on low pressure.
- At about 1300 it was apparent that 21 CC Pump had probably not been tested. (We considered it prudent at this point to test the low pressure start of 21 CC Pump. At 1415 it was logged out of service and the limiting condition for operation action statement was entered. The low pressure start was tested and the pump was declared operable at 1516.)
- It was subsequently shown that 21 CC Pump auto-started during the Loss of Offsite Power event of June 29, 1996 (Unit 1 LER 96-12). Since the only mechanism for this start is the low pressure start all the pumps were functional at and since that date.

CAUSE OF THE EVENT

The low pressure auto-start function had not been formally tested due to oversight during the original surveillance development. This oversight was discovered during the review being performed in response to Generic Letter 96-01, Testing of Safety-Related Logic Circuits.

ANALYSIS OF THE EVENT

At the time of discovery, the low pressure auto-start function of all CC pumps had been verified within their required surveillance interval.

Since the low pressure auto-start function was demonstrated functional for all four pumps, there is no reason to believe that it would have been non-functional for any of the pumps during the periods when the function was not tested by the surveillance program. Therefore, health and safety of the public were unaffected.

The auto-start of the component cooling pumps upon low pressure has not been tested at refueling intervals as required, this is a violation of Technical Specifications and thus is reportable under 10 CFR 50.73(a)(2)(i)(B).

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTION

Procedures will be revised, by February 15, 1997 (which is prior to the next required performance of this surveillance), to test the low pressure auto-start of the component cooling pumps.

As stated in our response to Generic Letter 96-01, we have committed to complete the Unit 2 surveillance reviews and necessary procedure revisions prior to the end of the next Unit 2 refueling outage (presently scheduled to end March 5, 1997) and to complete the Unit 1 surveillance reviews and necessary procedure revisions prior to the end of the next Unit 1 refueling outage (presently scheduled to end November 17, 1997).

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

Prairie Island has previously reported three instances where required components were not included in the surveillance program documents: Unit 1 LERs 92-010, 92-011, and 93-007.