

April 20, 2001

10 CFR 50.9

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

**50.9 Report – D6 NOED Compensatory Measures**

On April 18, 2001, Prairie Island notified NRC Region III staff, in accordance with 10CFR50.9, of a case where information supplied to the NRC was not complete and accurate in all material respects. Namely, certain compensatory measures, which we committed to in our April 16, 2001 Request for Notice of Enforcement Discretion, were not completed as we indicated they would be.

**Background – D6 Request for NOED**

By letter dated April 16, 2001, Prairie Island submitted Revision 1 to a request for Notice of Enforcement Discretion (NOED) for Prairie Island Technical Specification 3.7.B. Specifically, the letter requested enforcement discretion for having the D6 emergency diesel generator inoperable for up to three days longer than the Allowed Outage Time (AOT) of Technical Specification 3.7.B.1. In that letter (and in the phone call with the NRC where Prairie Island verbally requested the NOED) we committed to restrict access to a number of rooms in the plant by posting signs for the duration of the NOED. The purpose of restricting access was to minimize opportunities for personnel to accidentally affect any of the remaining sources (or potential sources) of power to the Unit 2 safeguards AC electrical systems while D6 was inoperable.

**Failure of Prairie Island to Meet Commitment**

Contrary to our commitment, Prairie Island failed to post some of the rooms we had specifically committed to (in particular, the D1 and D2 emergency diesel generator rooms and Unit 1 4KV safeguards bus 15 and 16 rooms). Our omission of these rooms

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from those we posted was identified to us by the NRC Senior Resident Inspector on April 17, 2001.

The organizational failure to properly manage the compensatory measures during the off-normal period of a NOED is considered by NMC to be a significant condition that warrants root cause evaluation and actions to prevent recurrence. The organization must have a high regard for these compensatory measures in order to ensure public, regulatory, and industry confidence. The organization must and will learn from this failure and take the appropriate corrective actions in order to regain that confidence.

### Action Taken

The following actions were taken in response to the missed compensatory measure:

- The missed compensatory action was corrected – the D1 and D2 rooms and the Bus 15 and Bus 16 rooms were posted – on April 17, 2001.
- A verification of all the other compensatory measures was completed on April 17, 2001.
- A stand-down with each of the operating crews was initiated on April 17, 2001 to discuss the NOED compensatory measures.
- A NOED Compensatory Measures checklist was developed to be performed twice per shift for the duration of the NOED.
- A Level 1 Condition Report (GEN 20013490) was entered to assess the organizational failure. Consistent with the Prairie Island Corrective Action Process, this assessment will include:
  - Documented Root Cause Analysis and Evaluation of the Extent of the Condition
  - Recommended Actions to Correct the Condition and Actions to Prevent Recurrence
  - Review by the Prairie Island Operations Committee

### Implication for Public Health and Safety of Missed Compensatory Measure

The specific compensatory measure that was missed (the failure to post the certain room doors) was one of several compensatory measures to which we committed in our request for NOED. Along with our Safety Assessment (which included our Risk Assessment), these compensatory measures provided our basis for concluding that the NOED would not have a potential adverse effect on the health and safety of the public. By itself, the missed compensatory measure did not have a significant impact on the health and safety of the public. In particular:

- This particular compensatory measure was put in place to minimize the potential that personnel in the room for non-essential purposes would accidentally affect the

ability to power the Unit 2 safeguards AC electrical busses from D1 or D2. This compensatory measure would only become risk-important in the event of a loss of offsite power concurrent with an independent failure of the D5 emergency diesel generator – neither of which occurred or was expected to occur during the period of the NOED.

- Failure to meet this compensatory measure did not result in the loss of our ability to cross-tie Unit 1 safeguards electrical AC busses to Unit 2. It is not expected that personnel in the affected rooms would affect the operability of D1, D2, or the ability to cross-tie. Plant personnel with unescorted access to these rooms are trained not to disturb plant equipment unnecessarily. No work occurred on the safeguards AC electrical equipment in these rooms because work was effectively controlled administratively.
- This compensatory measure was not credited for any purpose in the Risk Assessment that we presented in our request for NOED.

While the failure to post these signs does not have a significant implication for public health and safety, NMC views the organizational failure as a significant condition.

Note that the D6 emergency diesel generator was declared operable at approximately 11:30 pm on April 17, 2001, thus the compensatory actions of the NOED request were not needed after that.

In this letter we have made the following new Nuclear Regulatory Commission commitment: ***Prairie Island will complete the assessment of the Level 1 Condition Report for this issue by May 21, 2001.***

Please contact me (651-388-1121) if you have any questions related to this letter.



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