

October 31, 2001

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 Response to Notice of Violation, Inspection Report No. 00-13 (DRS)**

References:

1. Joel P. Sorensen, Site Vice President, PINGP to US Nuclear Regulatory Commission, "Supplemental Response to Notice of Violation, Inspection Report No. 00-13 (DRS)" (April 19, 2001)
2. Joel P. Sorensen, Site Vice President, PINGP to US Nuclear Regulatory Commission, "LER 1-00-04, Revision 1, Inoperability of Safeguards Cooling Water (Essential Service Water) Pumps Caused by Unqualified Lubricating Water Supply to the Pump Shaft Bearings" (March 22, 2001)
3. John A. Grobe, Director, Division of Reactor Safety, to J. Sorensen, Site Vice President, PINGP, "Final Significance Determination for a White Finding and Notice of Violation (NRC Inspection Report 50-282/00-13 (DRS); 50-306/00-13 (DRS))" (February 20, 2001)

In November 2000, during an NRC inspection (a baseline safety system design and performance capability inspection of the safeguards cooling water system) it was concluded that the safeguards cooling water pumps were inoperable. They were determined to be inoperable due to sub-system modifications which did not maintain all their safety functions. These modifications were allowed because the subsystem had been inappropriately downgraded from a safety to a non-safety classification.

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This condition was reported via a Licensee Event Report (LER) (Reference 2). In this LER we made certain commitments, including:

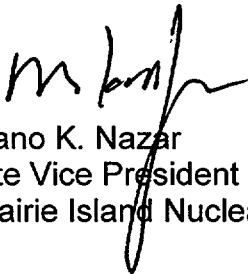
"A project has been initiated to continue determining the extent of condition by choosing risk significant systems and performing vertical slice assessments of those systems, in order to determine if additional unrecognized vulnerabilities exist."

Per a supplemental response (Reference 1) to an associated notice of violation (Reference 3) we changed the commitment to identify the auxiliary feedwater system as the system to be evaluated and established October 31, 2001 as the completion date.

In addition, we committed to re-reviewing earlier safety evaluations to determine if any downgrades were inappropriate. As work progressed we developed more inclusive methods to determine if there is any safety related equipment incorrectly designated as non safety related. Subsequently, we developed a Project Plan, dated June 20, 2001, for system and component downgrade review based on these methods. (Note that this Plan was presented to NRC inspectors during a follow-up inspection during the week of June 25, 2001.)

The implementation of this Plan will determine the extent of condition for all of the evaluated systems, including the auxiliary feedwater system, thus making the vertical slice assessment unnecessary. For this reason, we are withdrawing the commitment to perform a vertical slice of the auxiliary feedwater system.

Please contact Jack Leveille at (651-388-1121, ext. 4142) if you require additional information.



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