



August 1, 2007

L-PI-07-053
10 CFR 50.73

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Unit 1
Docket 50-282
License No. DPR-42

LER 1-07-02, Unanalyzed Condition due to Manual Actions that do not Comply with
10 CFR 50 Appendix R

Licensee Event Report (LER) 1-07-02 is enclosed. The LER describes an issue identified with Appendix R manual actions that was identified as part of the project to transition to National Fire Protection Association (NFPA) standard NFPA-805. This event was previously reported in accordance with 10 CFR 50.72 on June 4, 2007.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

Michael D. Wadley
Site Vice President, Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
Department of Commerce, State of Minnesota

ENCLOSURE

LICENSEE EVENT REPORT 1-07-02

3 Pages Follow

NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION <small>(6-2004)</small>	APPROVED BY OMB NO. 3150-0104	EXPIRES 6-30-2007
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="margin: 5px 0 0 40px;">(See reverse for required number of digits/characters for each block)</p>		
Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0066), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.		

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TITLE (4)
Unanalyzed Condition due to Manual Actions that do not Comply with 10 CFR 50 Appendix R

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
6	4	07	07	-- 02 --	0	8	1	07	Prairie Island Unit 2	05000306	
			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR : (Check all that apply) (11)								
OPERATING MODE (9)			20.2201(b)		20.2203(a)(3)(ii)		<input checked="" type="checkbox"/>		50.73(a)(2)(ii)(B)		50.73(a)(2)(ix)(A)
POWER LEVEL (10)			20.2201(d)		20.2203(a)(4)				50.73(a)(2)(iii)		50.73(a)(2)(x)
			20.2203(a)(1)		50.36(c)(1)(i)(A)				50.73(a)(2)(iv)(A)		73.71(a)(4)
			20.2203(a)(2)(i)		50.36(c)(1)(ii)(A)				50.73(a)(2)(v)(A)		73.71(a)(5)
			20.2203(a)(2)(ii)		50.36(c)(2)				50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iii)		50.46(a)(3)(ii)				50.73(a)(2)(v)(C)		
			20.2203(a)(2)(iv)		50.73(a)(2)(i)(A)				50.73(a)(2)(v)(D)		
			20.2203(a)(2)(v)		50.73(a)(2)(i)(B)				50.73(a)(2)(vii)		
			20.2203(a)(2)(vi)		50.73(a)(2)(i)(C)				50.73(a)(2)(viii)(A)		
			20.2203(a)(3)(i)		50.73(a)(2)(ii)(A)				50.73(a)(2)(viii)(B)		

LICENSEE CONTACT FOR THIS LER (12)

NAME Jeff Kivi	TELEPHONE NUMBER (Include Area Code) 651.388.1121
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EIPX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EIPX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> X	NO					

ABSTRACT

On June 4, 2007, Nuclear Management Company, LLC (NMC) staff working on the transition to National Fire Protection Association (NFPA) standard NFPA-805 discovered non-compliant manual operator actions were credited to achieve safe shutdown in Fire Area 29. Subsequent review for extent of condition identified a number of additional fire areas with non-compliant manual operator actions that were credited for safe shutdown. NRC Regulatory Information Summary (RIS) 2006-10 provided clarification of the regulatory expectations associated with the use of manual operator actions in 10 CFR 50 Appendix R III.G.1 and III.G.2 fire areas. The non-compliant manual operator actions are considered equivalent to a missing fire barrier, thus, this event is being reported in accordance with 10 CFR 50.73.(a)(2)(ii) as an unanalyzed condition.

Compensatory measures have been taken in all affected fire areas and this issue is slated to be resolved as part of implementation of NFPA-805.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

EVENT DESCRIPTION

On June 4, 2007, Nuclear Management Company, LLC (NMC) staff working on the Prairie Island Nuclear Generating Plant (PINGP) transition to National Fire Protection Association (NFPA) standard NFPA-805 discovered non-compliant manual operator actions were credited to achieve safe shutdown in Fire Area 29. Subsequent review for extent of condition identified a number of additional fire areas with non-compliant manual operator actions that were credited for safe shutdown.

EVENT ANALYSIS

NRC Regulatory Information Summary (RIS) 2006-10 provided clarification of the regulatory expectations associated with the use of manual operator actions in 10 CFR 50 Appendix R III.G.1 and III.G.2 fire areas. The non-compliant manual operator actions are considered equivalent to a missing fire barrier, thus, this event is being reported in accordance with 10 CFR 50.73(a)(2)(ii) as an unanalyzed condition.

Impact on Safety System Functional Failure Performance Indicator

No actual loss of function occurred as a result of the as-found condition. Consequently, this event is not reportable per 10CFR 50.73(a)(2)(v).

SAFETY SIGNIFICANCE

This event did not result in a loss of function. In the event of a fire in one of the affected fire areas, the manual operator actions that were credited, while not compliant with regulation, would have effectively allowed safe shutdown of the unit. Thus, this event did not affect the health and safety of the public and the safety significance of this event is considered minimal.

CAUSE

The cause of the event is an industry misinterpretation of the regulation. The PINGP Appendix R safe shutdown analysis credited manual operator actions to achieve hot standby, in part, because the regulation did not expressly prohibit manual operator actions. NRC RIS 2006-10 states that operator manual actions for the credited train of equipment may not be credited to achieve hot shutdown.

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

Compensatory measures have been taken in all affected fire areas and this issue is slated to be resolved as part of implementation of NFPA-805. The PINGP Fire Protection Program requires establishment of an hourly fire patrol for an inoperable fire barrier (specifically an inoperable fire barrier penetration) or an alternate compensatory measure that is more effective than an hourly fire patrol. If utilized as a compensatory measure, the noncompliant operator manual actions can provide a more effective compensatory measure than performance of hourly fire patrols. Operator manual actions are allowed to be used as compensatory measures provided the stipulated actions are feasible and reliable. The operator manual actions identified in the procedures for the respective fire areas have been determined to be feasible and reliable. While not acceptable as a compliance strategy for Appendix R, the noncompliant operator manual actions for the respective fire areas are preferable, as an alternate compensatory measure, to the hourly fire patrols that are stipulated by the PINGP Fire Protection Program.

PINGP is transitioning the fire protection license basis to NFPA 805 which will redefine the licensing basis for fire protection thereby precluding recurrence of this event.

PREVIOUS SIMILAR EVENTS

Review of Licensee Event Reports for Unit 1 and Unit 2 since 2004 found no previous similar events related to non-compliant manual operator actions.