

April 8, 2010

L-PI-10-003 10 CFR 50.73

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

Prairie Island Nuclear Generating Plant Units 1 and 2 Dockets 50-282 and 50-306 License Nos. DPR-42 and DPR-60

LER 1-09-06, Unanalyzed Condition Due to Potential Safety System Susceptibility to Turbine Building Flooding Due to a Postulated High Energy Line Break, Supplement 1

Reference:

"LER 1-09-06, Unanalyzed Condition Due to Potential Safety System Susceptibility to Turbine Building Flooding Due to a Postulated High

Energy Line Break", dated December 17, 2009 (ADAMS

Accession ML093510917)

Northern States Power Company, a Minnesota corporation (NSPM) herewith encloses Supplement 1 to Licensee Event Report (LER) 1-09-06. The engineering analysis for the reported condition is in progress and will be incorporated into a causal analysis. A supplement to the LER will provide additional information from these analyses.

This event was previously reported on December 17, 2009 (Reference).

Summary of Commitments

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

Mark A. Schimmel

Site Vice President

Prairie Island Nuclear Generating Plant

Northern States Power Company - Minnesota

Enclosure

Document Control Desk Page 2

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 1-09-06

Supplement 1

NDC FORM	000		NUCLE	AD DECLU A	TORY	COMMISSIO	- N	ADDD	N/ED D	V OMP NO 3150	0104		VDIDES: 0	19/21/2010
(9-2007)							APPROVED BY OMB NO. 3150-0104 EXPIRES: 08/31/2010							
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)							Estimated burden per response to comply with this mandatory collection request: 80 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.							
1. FACILITY NAME							respond to, the information collection. 2. DOCKET NUMBER 3. PAGE							
Prairie Island Nuclear Generating Plant Unit 1						05000282					1 (of 3		
4. TITLE Unanalyzed Condition Due to Potential Safety System Susceptibility to Turbine Building Flooding Due to a Postulated High Energy Line Break, Supplement 1														
5. EVEN	NT DAT	E	6.	LER NUMBER	7. REPORT		DATE 8		8. OTHER I	ACILITIES	INVOLVE	D		
MONTH D	AY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MONTH	DAY	Y Y	'EAR	FACILITY NAME Prairie Island Unit 2			050	KET NUMBER 100306
10 2	20	2009	2009	- 006 -	- 01	04	08	3 2	010	FACILITY NAME DOCKET NU				KET NUMBER
9. OPERAT	ING M	ODE		11. THIS F	REPORT	IS SUBMITT	ED PUI	RSUAN	то тн	IE REQUIREMEN	TS OF 10 C	FR §: (Che	ck all that a	apply)
Mode 5			□ 20.2201(b) □ 20.2203 □ 20.2201(d) □ 20.2203 □ 20.2203(a)(1) □ 20.2203 □ 20.2203(a)(2)(i) □ 50.36(c				.2203(a	a)(3)(ii) a)(4)	(ii) \square 50.73(a)(2)(ii)(A) \square 50.73(a)(2)(viii)(A) \square 50.73(a)(2)(viii)(B) \square 50.73(a)(2)(viii)(B)					(2)(viii)(A) (2)(viii)(B)
10. POWER	LEVE	EL	20.2203(a)(2)(ii) 50.36(c)(1)(ii)(A)	i)(A)					(2)(x)		
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			20.2203(a)(2)(v)			☐ 50.	50.73(a)(2)(i)(A)		50.73(a)(2)(v)(C) OTHER					
				20.2203(a)(2	(vi)	<u> </u>	.73(a)(2)(i)(B)		50.73(a)(2)(v)(D)		Specify in A NRC Form	Abstract below or in 366A
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NAME TELEPHONE NUMBER (Include Area Code) Kathryn Mews 651.388.1121														
		13	. COMPL					IENT F	AILUR	E DESCRIBED	IN THIS R			DEDODIANIE
CAUSE	s	YSTEM	MANU- COMPONENT FACTURER			REPORTABLE TO EPIX		CAUSE		SYSTEM COMPONE			MANU- CTURER	REPORTABLE TO EPIX
	-	14. SU	PPLEME	NTAL REPO	RT EXF	PECTED				15. EXPE	CTED	MONTH	DAY	YEAR
	•	-		XPECTED SUBMISSION DA			•)	SUBMISS DATE		07	09	2010
ABSTRACT	(Limit t	o 1400 sp	oaces, i.e	., approximat	ely 15 s	ingle-spaced	d typei	written l	ines)					
On October 20, 2009, Prairie Island Nuclear Generating Plant (PINGP) Unit 1 was in Mode 5 during a refueling outage. Unit 2 was in Mode 1 operating at full power. PINGP staff determined that in the event of flooding in the turbine building, due to a postulated high energy line break (HELB), operability of the Unit 1 Emergency Diesel Generators (D1 and D2) may not be assured.														
The as-found condition was an original design issue that was determined to be reportable during preparation of an analysis of flooding due to a postulated HELB in the turbine building. Physical and procedural changes have been made to minimize challenges to plant equipment and personnel in combating potential flooding events. The results and corrective actions of the ongoing evaluation of turbine building flooding due to a potential HELB will be provided in a supplemental LER.														

NRC FORM 366A (9-2007)	LICENSEE EVE	U.S. NUCLEAR REGULATORY COMMISSION						
CONTINUATION SHEET								
	1. FACILITY NAME	2. DOCKET NUMBER		6. LER NUMBER		3. PAGE		
Prairie Island Nucl	ear Generating Plant Unit 1	05000282	YEAR 2009	SEQUENTIAL NUMBER - 006	REV NO - 01	2 of 3		

EVENT DESCRIPTION

A high energy line break (HELB) in the turbine building can result in flooding due to release of condensate/feedwater from the break. Additionally, the broken high energy pipe can cause consequential failure of adjacent piping such as cooling water or fire protection (which have unlimited sources of water). These water sources might eventually fill the turbine building to the point where operability of certain equipment in emergency diesel generator¹, auxiliary feedwater (AFW)², cooling water³, safety injection⁴, station air⁵, safeguards power⁶, and DC electrical power⁷ systems could be adversely affected. The staff determined that, within the previous three years, this condition had resulted in the plant being in an unanalyzed condition that significantly degraded plant safety and a postulated condition that could have prevented fulfillment of a safety function.

PINGP staff have been evaluating the potential effects of a postulated HELB in the turbine building, including the impact of flooding due to a HELB. On October 20, 2009, Prairie Island Nuclear Generating Plant (PINGP) Unit 1 was in Mode 5 during a refueling outage. As part of the evaluation of postulated HELB flooding, PINGP staff determined that in the event of flooding in the turbine building due to a HELB, operability of the Unit 1 Emergency Diesel Generators (D1 and D2) may not be assured. Due to being in Mode 5 (which does not have the potential for a HELB), at the time of discovery Unit 1 was not in a condition that significantly degraded plant safety.

EVENT ANALYSIS

This condition was a susceptibility of equipment to a consequential failure from a postulated turbine building HELB. The event is being reported under 10 CFR 50.73(a)(2)(ii)(B) as an unanalyzed condition and 10 CFR 50.73(a)(2)(v)(A) as a condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to shut down the reactor and maintain it in a safe shutdown condition. The event represents a safety system functional failure for both Units 1 and 2.

Evaluation of potential flooding from a postulated HELB in the turbine building is ongoing. Additional information from the evaluation will be submitted to the NRC via a supplement to this LER.

SAFETY SIGNIFICANCE

This LER is not associated with an event resulting in actual flooding of any portion of the plant. There were no actual consequences to the health and safety of the public as a result of this condition. The evaluation of risk significance of the as-found condition is ongoing and results will be included in a supplement to this LER.

¹ EIIS System Code: EK

² EIIS System Code: BA

³ EIIS System Code: BI

⁴ EIIS System Code: BP

⁵ EIIS System Code: LE

⁶ EIIS System Code: EB

['] EIIS System Code: EJ

NRC FORM 366A (9-2007) LICENSE	LICENSEE EVENT REPORT (LER)							
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Prairie Island Nuclear Generating Plant Unit	05000282	YEAR 2009	SEQUENTIAL NUMBER - 006	REV NO - 01	3 of 3			

CAUSE & CORRECTIVE ACTION

A causal analysis for this issue will be performed based on the results of the engineering analysis. Northern States Power Company, a Minnesota corporation, will provide a supplement to this LER once the cause and corrective actions have been determined.

Corrective actions that have been implemented or are currently in progress are:

- 1. A design and licensing basis for internal flooding is being compiled.
- 2. Rollup doors on the exterior of the turbine building have been opened and potential obstacles removed to allow floodwater to drain unimpeded.
- 3. Gaps around battery room doors have been decreased.
- 4. Access covers in the AFW pump room trench cover plates have been fastened down.
- 5. Flood barriers have been installed to reduce impact upon D1, D2, and the Unit 2 Emergency Diesel Generators (D5 and D6).

PREVIOUS SIMILAR EVENTS

LER 2-08-01, Unanalyzed Condition Due to Both Trains of Component Cooling Being Susceptible to a Postulated High Energy Line Break, Supplement 1, was submitted January 19, 2009. This LER described a condition where both trains of the component cooling water system were susceptible to a single failure caused by a postulated HELB in the turbine building.