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L-PI-16-010
10 CFR 2.201

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

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

Reply to Notice of Violation; VIO 05000306/2015008-01

Pursuant to the provisions of 10 CFR 2.201, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), hereby submits a written statement in reply to the Notice of Violation included with NRC Inspection Report 2015-008 for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, dated January 5, 2016 (Agency wide Documents Access and Management System (ADAMS) Accession No. ML16005A567). NSPM does not contest this violation.

This violation was cited because Prairie Island Nuclear Generating Plant, Unit 2, failed to restore compliance and failed to have objective plans to restore compliance in a reasonable time period following the NRC identification of an associated Non-Cited Violation (NCV) on June 30, 2011. The associated NCV was documented in Inspection Report (IR) 05000282/2011003; 05000306/2011003.

The enclosure to this letter provides the following information required by 10 CFR 2.201 and requested in the Notice of Violation:

- (1) The reason for the violation
- (2) The corrective steps that have been taken and the results achieved
- (3) The corrective steps that will be taken
- (4) The date when full compliance will be achieved

If there are any questions or if additional information is needed, please contact Marc Pearson, Regulatory Affairs Manager, at 651-267-7309.

Summary of Commitments

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

A handwritten signature in cursive script, appearing to read "Kevin Davison".

Kevin Davison
Site Vice President
Prairie Island Nuclear Generating Plant
Northern States Power Company-Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Resident Inspector, PINGP, USNRC

Enclosure

Cited Violation:

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted from October 5 through November 24, 2015, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10, *Code of Federal Regulations* (CFR), Part 50, Appendix B, Criterion XVI, "Corrective Action," states, in part, that measures shall be established to assure that conditions adverse to quality (CAQs), such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances, are promptly identified and corrected.

Contrary to the above, from April 11, 2011, to at least October 22, 2015, the licensee failed to correct a CAQ. Specifically, on April 11, 2011, the NRC identified that the licensee was not monitoring five safety-related gas susceptible locations within the emergency core cooling system considered to be inaccessible and the licensee captured this CAQ in their Corrective Action Program. However, on October 22, 2015, the inspectors identified that the licensee had not corrected this CAQ for two of these locations and did not have objective plans to restore compliance.

The inspectors identified a finding of very low safety significance (Green), and an associated cited violation of Title 10, *Code of Federal Regulations* (CFR), Part 50, Appendix B, Criterion XVI, "Corrective Actions," for the failure to correct a condition adverse to quality (CAQ). Specifically, on August 1, 2011, the NRC issued an NCV for the failure to monitor five safety-related gas susceptible locations considered to be inaccessible, which is a CAQ. As of November 24, 2015, the licensee had not corrected this CAQ for two of those locations and did not have plans to restore compliance. The licensee captured this issue into their Corrective Action Program (CAP) with a proposed corrective action to develop an alternative monitoring method for these locations when the unit is operating.

Reason for the Violation:

Northern States Power Company, (a Minnesota Corporation) doing business as Xcel Energy (hereafter "NSPM"), failed to correct a condition adverse to quality (CAQ) in a timely fashion as required by 10CFR50 Appendix B Criterion XVI. The cause for this failure was identified to be inadequate administrative rigor, applied by engineering personnel, in Corrective Action Program (CAP), coupled with inadequate oversight of Engineering CAP products. Specifically, in 2011 a corrective action (CA) was created to resolve the lack of gas void monitoring of five inaccessible locations. This unresolved issue was previously identified by the NRC as a NCV and not corrected; therefore the station received this Notice of Violation (NOV). The behaviors demonstrated by the Engineering CA performers, and the Engineering Oversight of the CAP product were inadequate, resulting in the condition not being corrected in a timely manner.

Enclosure

Corrective Steps That Have Been Taken and the Results Achieved:

After receipt of the Notice of Violation in 2015 NSPM verified both locations in question for void monitoring (2RH-13 -12/1/2015 & 2 RH-15 -11/30/2015) were full of water. In addition, NSPM purchased and placed in service high temperature probes to verify gas void size or absence at correct location. The high temperature probe allows easier access to these areas of high temperature, and is effective at measuring void absence or growth.

In 2014 the Station began to aggressively address resolution on longstanding poor CAP behaviors. The station has identified this issue of rigor and oversight in CAP and put in place actions as part of the CAP recovery to improve both CAP quality and behaviors. Specific actions taken include:

In 2014 the Station instituted a Quality Review Group (QRG) to review all CAQ Corrective actions with severity level A-C. The initial pass rate in mid-2014 was around 75%; today the pass rate is consistently above 90%. This indicates not only improvement in CAP quality but the behaviors associated with fixing CAQs. In addition, FP-PA-ARP-01 (CAP Action Request Process) was revised to require all NRC findings or violations received, have a completion review by the Regulatory Affairs Group to verify the condition documented in the finding or violation has been corrected/addressed and documented in the CAP prior to closure.

In 2015 the Station performed CAP rebaseline training for the station population of nearly 1000 personnel (including Security) on CAP process requirements, history, rigor, and quality. Improvements resulting from the training included: strengthened low level identification of CAQs, better quality written corrective actions and improved ownership of the corrective action process. These improvements have led to resolving CAQs in a more prompt manner and with better quality.

In addition, training for CAP screening and Performance Assessment Review Board (PARB) was conducted on roles, responsibilities and accountability to not only own issues at the station, but to drive timely resolution. This training resulted in reduced backlogs from over 450 CAP actions open greater than 6 months to approximately 50 CAP actions open greater than 6 months. This reduction in backlog allows the workers to focus on the current items and ensure a better quality product.

In 2015 the Station also trained Site Supervisors and Managers in Engineering, Maintenance, and Planning on need to reinforce and observe whether individual contributors are validating assumptions and ensuring high quality products with adequate technical rigor are produced. This resulted in improved CAP quality pass rate in QRG, from 75% to consistently above 90%.

Enclosure

At the end of 2015 and into 2016 the station revised the causal evaluation training process and worked with senior leaders to hand select the most qualified/desired individuals to be part of the new causal evaluation pool, to ensure the right people are doing the causal evaluations. To date we have trained approximately 30 individuals with this improved training.

Corrective Steps That Will Be Taken:

In 2016 NSPM will take additional actions to restore both compliance and correct the cause of the NOV. NSPM will revise applicable program documents that establish the requirement and conduct of the control of gas voiding to ensure absence or measurements of voids are required to occur at the exact location listed or approved alternate location. In addition, if measurements can't be made, a corrective action will be initiated and a formal engineering evaluation will be required to justify not being able to perform the measurement.

In 2016, NSPM will conduct follow-up CAP rebaseline training with station engineering personnel, Site Supervisors and Site Managers, incorporating the lessons learned from this NOV. In addition, NSPM will revise FP-E-QRT-01, Quality Review Team (QRT), section 5.0 to go further in now requiring a sample review of completed engineering CAP products at each QRT meeting. For any quality concerns identified, a corrective action is issued and these quality concerns are included in individual performance feedback.

NSPM will revise the requirements of the corrective action process to require not only the Regulatory Affairs close out review of NCVs, but to also require the "owed to" of the corrective action to perform an adequacy closeout to ensure the finding or violation has been corrected.

Date When Full Compliance Will Be Achieved:

For the violation described above, full compliance will be achieved by August 30, 2016.