

NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

October 31, 1979

Mr. R. F. Heishman, Chief
Reactor Operations and Nuclear Support Branch
Region III
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Heishman:

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Dockets No. 50-282 and No. 50-306

In response to your letter of October 9, 1979, which transmitted IE Inspection Reports No. 50-282/79-21 and No. 50-306/79-18, the following is offered:

Infraction

10 CFR 50, Appendix B, Criterion V states in part; Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above the inspector found that procedures 3ACD4.1 and 3AWI 5.3.4 were not adhered to in that forms for Design Change 77L397 were not properly completed and drawings for the design change had not been revised. This is an infraction.

Response

- a. The forms in the sections referenced in Design Change 77L397 have been completed. In the future, no approval will be authorized before these sections are filled out completely.
- b. The required sign-off (initials) has been completed, and the revised checklist C28-2 issued. This item appears to be a result of a lack of understanding, and we intend to stress the design change requirements in our QA training sessions.
- c. The 11 drawings have been submitted to Drawing Control Services for revision. It is expected that these drawings will be incorporated into the system and distributed within two months from the date of this letter.

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The "new drawing" has been incorporated into the system and distributed.

We recognize the need to update drawings in a timely manner. A major effort will be undertaken to complete drawing revisions associated with design changes.

Infraction

10 CFR 50, Appendix B, Criterion XVII states in part; "Sufficient records shall be maintained . . . Records shall be identifiable and retrievable. Consistent with applicable regulatory requirements, the applicant shall establish requirements concerning record retention, such as duration, location, and assigned responsibility."

Contrary to the above, the inspector found that procedures 3 ACD 3.8, Rev. 0 and 5 ACD 3.4, Rev. 1 were not adhered to in that a general index listing required records has not been established or maintained listing retention times, where records are to be stored, and the location of records within a specific file. This is an infraction.

Response

It is anticipated that a "General Records Index" consisting of record retention times, location the records are to be stored, and the location of the records within a specific file will be established by December 31, 1979.

Prairie Island Nuclear Generating Plant is presently evaluating outside proposals for the establishment of a Total Records Management System which will provide a micro-media conversion process and records storage facility. The Records Management System for collection, conversion, storage, and maintenance of records cannot be totally implemented by December 31, 1979, due to insufficient lead time for the procurement of equipment and/or services. In the interim, Prairie Island Nuclear Generating Plant will procure insulated filing devices [(rated 350-1 hour) UL as to fire resistance only rating] to meet the requirements of 3 ACD 3.8, Rev. 2, "Records Management."

Deviation

Based on the inspection conducted on July 9-13, 17-19, and August 1-3, 9, 1979, it appears that certain of your activities were not in accordance with commitments, codes, standards, guides or acceptable practices, as noted below.

NSP Company response to IE Bulletin 78-05 stated that the required inspections would be completed by June 1, 1979, and on February 22, 1979,

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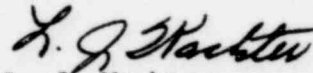
the item was discussed during Onsite Review Committee meeting No. 399 reflecting that the commitments referred to above would not be completed prior to June 1, 1979.

Contrary to the commitment, all required inspections were not done by June 1, 1979, and as of July 13, 1979, no revision to the commitment date has been received.

Response

A method for tracking commitments has been implemented. This method should prevent deviations of this kind.

Yours very truly,



L. J. Wachter
Vice President - Power Production
and System Operation

cc: Mr. G. Charnoff

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