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## NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

September 11, 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 IE Inspection Reports 50-282/79-18 and 50-306/79-15, the following is offered:

## Deficiency

Technical Specification 6.5.D requires that temporary changes to procedures which do not change the intent of the original procedure may be made with the concurrence of two individuals holding senior operator licenses and that such changes shall be documented, reviewed by the Operations Committee, and approved by a member of plant management designated by the Plant Manager within one month.

Contrary to the above, concurrence of individuals holding senior operating licenses, review by Operations Committee and approval by a member of plant management were not documented for temporary changes made to procedure D30 - Post Refueling Startup Testing on May 5, 1979.

## Response

The noncompliance cited was for omitting several procedural steps in D30, Post Refueling Startup Testing, as not applicable. The inspector stated he had no concern with the technical reasons for omitting the steps.

Two corrective actions have been and are being taken to prevent recurrence.

 The individuals involved have been reinstructed in the requirements of Technical Specification 6.5.D.

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2. Physics test procedures that are performed exclusively by nuclear engineers are being reviewed and revised to eliminate urnecessary inflexibilities. Physics testing by its nature requires an ongoing assessment of test results in order to focus attention on problem areas. In some cases, a redirection of testing is required. The required flexibility to perform this assessment without deviating from approved procedures will be included in the revised procedures.

Procedures will be revised, and full compliance achieved, before the next time the procedures are used -- January, 1980.

Yours very truly,

L. J. Wachter

Vice President - Power Production and System Operation

cc: Mr. G. Charnoff