



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

May 14, 1980

Director of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
License Nos. DPR-42 Docket Nos. 50-282
 DPR-60 50-306

Definition of Safeguards Equipment Operability

In a letter dated April 10, 1980 from Mr D G Eisenhut, Acting Director, Division of Operating Reactors, USNRC, Northern States Power Company was requested to review existing Prairie Island Technical Specification requirements and plant procedures to determine if the term "operable" as it applies to the single failure criterion for safety systems is being correctly used. We were requested to submit, within 30 days of receipt of Mr Eisenhut's letter, proposed Technical Specification changes to incorporate the requirements of the NRC's Standard Technical Specifications for Westinghouse Pressurized Water Reactors, NUREG-0452, relating to the definition and application of the term "operable". We were also requested, within 60 days of receipt of Mr Eisenhut's letter, to adopt all necessary procedure changes to assure compliance with NUREG-0452 in this matter.

We have reviewed the definition and application of the term "operable" in current Prairie Island Technical Specifications and compared them with the requirements of NUREG-0452. The definition of "operable" in the existing Technical Specifications is not as comprehensive as the definition in NUREG-0452. We believe, however, that our interpretation and use of the term has generally been consistent with the NRC Staff requirements expressed in NUREG-0452 and expanded on in Mr Eisenhut's letter.

We will submit by the end of May a proposed change to the Prairie Island Technical Specifications which will incorporate the NRC's Model Technical Specification definition of "operability". Because the Prairie Island Technical Specifications have specific action statements and plant operating mode requirements integrated with the Limiting Conditions for Operation for each safety related system, we believe that it would not be practical to include the additional standard Technical Specification requirements contained in section 3.0.3 and the table of operability conditions. The existing Prairie Island Technical Specifications adequately provide for actions to be taken in various plant operating modes when safety related equipment is

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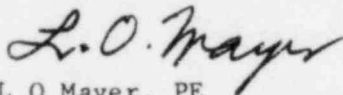
NORTHERN STATES POWER COMPANY

Director of NRR
May 14, 1980
Page -2-

made or found to be operable. In some cases these provisions differ from the requirements of NUREG-0452, but we believe they accomplish the objectives discussed in Mr Eisenhut's letter.

Over the next 60 days we will review plant administrative procedures and make those changes necessary to make them consistent with the NRC Staff position related to the definition and application of the term "operable". Specific guidance will be provided in individual operating, surveillance, and maintenance procedures, if found to be necessary, during their next regular biennial review.

Please contact us if you require additional information related to this matter or if you have any questions regarding the action we propose to take to comply with Mr Eisenhut's request.



L O Mayer, PE
Manager of Nuclear Support Services

LOM/DMM/jh

cc J G Keppler
G Charnoff