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December 11, 1989

Mr W L Axelson, Chief
Projects Branch 2, Region III
U S Nuclear Regulatory Commission
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PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Supplemental Response to Notice of Violation
On Substation Work Control
Inspection Reports No. 50-282/86007 and 50-306/86007

The purpose of this letter is to update our response to Inspection Reports No. 282/86007 and 306/86007 which was provided by our letter dated August 19, 1986.

Violation No. 3 in the subject inspection report concerned procedural deficiencies in maintenance activities in the Prairie Island Substation. As part of our response to this violation, we committed to perform a task analysis of the relay panels in the substation to identify potential rearrangement of equipment and re-labeling to help avert future human errors.

Subsequent to the event which resulted in the notice of violation, a Task Force was formed to evaluate improvements in operating and maintenance activities in the NSP nuclear plant substations. The following actions were taken as a result of the task force evaluation:

1. A work control process for substation maintenance was implemented.
2. Procedures were developed to address regular routine maintenance activities in the substation.
3. Substation drawings and labeling were field checked for accuracy.
4. A substation coordinator function was established in the Production Plant Maintenance Department with site coordinators at each plant.

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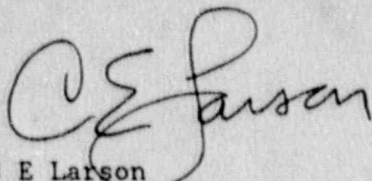
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W L Axelson
December 11, 1989
Page 2

These actions have increased the quality of the work performed in the substation and reduced the probability of error during substation maintenance.

During the Task Force evaluation, the desirability of a task analysis of the substation equipment house was reviewed. While a task analysis was found to be desirable, it was concluded that with the measures described above in place, the benefits that could be gained from a task analysis were not great enough to justify the performance of a task analysis. We would like to modify our response to Violation No. 3 of the subject inspection reports to reflect that no task analysis will be performed.

Please contact us if you have any questions related to our response to the subject inspection reports.



C E Larson
Vice President
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c: Regional Administrator III, NRC
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