

NOTICE OF VIOLATION

Northern States Power Company
Prairie Island Nuclear Generating
Station - Units 1 and 2

Docket Nos. 50-282; 50-306
Licenses No. DPR-42; DPR-60

As a result of the inspection conducted on January 8-12 and January 29 through February 2, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, (1989) (Enforcement Policy) the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion V, as implemented by the Northern States Power Quality Assurance Manual, Section 5, requires that activities affecting quality be prescribed by documented instructions, procedures, and drawings, that those activities be accomplished in accordance with those instructions, procedures and drawings, and that instructions, procedures, or drawings include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above:

- a. Six instances were noted where miscellaneous waste debris, oil soaked absorbant materials, and wooden carts were left unattended while no work activities were in progress. Procedure 5ACD 3.13, "Housekeeping", Revision 3, required that all waste, debris, scrap, spills or other combustibles, which resulted from work activities, be cleaned up or disposed of in proper containers and removed from the area immediately following completion of the work activity. As a result, the cumulative debris showed a breakdown in the control of combustibles (282/89029-01A; 306/89029-01A).
- b. No acceptance criteria were included in surveillance procedure SP 1189, "Safety Related Fire Detector Surveillance", Revision 7. As a result, ionization and flame detectors were not checked to alarm within vendor recommendations (282/89029-01B; 306/89029-01B).
- c. Vendor recommended modifications were implemented without a processed modification as specified in procedure NIAWI 5.1.2, "Modification Initiation", Revision 3, paragraph 6.2. As a result, modifications of a disc to disc nut seal weld were made to main steam isolation check valve, RS-19-4 (282/89029-01C; 306/89029-01C).
- d. Many instances of nonconforming actions and nonconforming items were not documented and evaluated as required by procedures 5ACD 2.4, "Nonconforming Activities," Revision 2, paragraph 6.0 and 5ACD 8.4, "Nonconforming Items," Revision 5, paragraph 6.0. As a result, conditions such as the bus bar corrosion on the IM transformer and

4.16 kV Bus 11 and 12, the uncontrolled vendor modification performed on MS isolation check valve RS-19-4, and the December 1989 failure of #22 turbine driven auxiliary feedwater pump surveillance due to a defective governor were not documented as nonconforming actions or items and; therefore, were not trended, analyzed for root cause, and given corrective action to prevent recurrence (282/89029-01D; 306/89029-01D).

This is a Severity Level IV violation (Supplement 1).

2. 10 CFR 50, Appendix B, Criterion XVI, as implemented by the Northern States Power Quality Assurance Manual, Section 18.1, requires that measures be established to assure conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition adverse to quality is determined and corrective actions taken to preclude repetition, and that the significant conditions adverse to quality, the causes of the condition, and the corrective actions taken are documented and reported to the appropriate levels of management.

Contrary to the above:

- a. Adequate corrective action was not taken to preclude repetitive failures of Emergency Lighting Unit #63. As a result, ten work requests were written since March 1988 to correct low electrolyte levels without or taking action to preclude repetition (282/89029-02A; 306/89029-02A).
- b. Timely action was not taken to assess potential conditions adverse to quality embodied in Operating Experience Assessment Items. Fifty-five of eighty-nine items were more than six months old; thirty-nine were more than one year old, and eight were more than three years old. As a result, in one case, the licensee failed to promptly inspect, correct, or justify continued operation of more than 25 Units 1 and 2 motor operated valves (MOVs) that were subject to common mode failure of torque switches made of melamine material as described in a 10 CFR 21 Report issued by Limitorque Corporation on November 23, 1988. The licensee completed a Justification for Continued Operation (JCO) of the MOVs on January 15, 1990 (282/89029-02B; 306/89029-02B).

- c. Corrective action was not effective to preclude repetition of procedural violations in the area of modifications. In 1989, the Prairie Island quality organization identified eight instances of failure to use the modification process for performing modifications/alterations (282/89029-02C; 306/89029-02C).

This is a Severity Level IV violation (Supplement 1).

3. Section 6.5.G of the Prairie Island Technical Specifications requires that temporary changes to Operations Committee reviewed procedures be made with the concurrence of two members of the unit management staff, at least one of whom holds a senior reactor operator license and that the changes be documented and reviewed by the Operations Committee within one month.

Contrary to the above:

- a. Temporary changes were made to preventive maintenance procedure 3170-1-12, "Main Steam Isolation Valve CV-31099 Refueling Inspection", without the approval of the Operations Committee. As a result, work was performed utilizing the changed procedure without the required reviews for system and plant impact (282/89029-03A; 306/89029-03A).
- b. Temporary changes were made to five steps of procedure EP17-76, "Prairie Island Nuclear Plant #D2 Emergency Generator Electrical Maintenance," Revision 5, without the approval of a senior reactor operator or the Operations Committee and changes were made to three additional steps of the procedure without the approval of the Operations Committee. As a result, work was performed utilizing the changed procedure without the required reviews for systems and plant impact (282/89029-03B; 306/89029-03B).

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each violation: (1) the corrective actions that have been taken and the results achieved; (2) the corrective actions that will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

March 19, 1990
Dated

T. O. Math for
H. J. Miller, Director
Division of Reactor Safety