

Northern States Power Company

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> 10 CFR Part 50 Section 50.73

> > IEZZ

January 16, 1991

U S Nuclear Regulatory Commission Attn: Docume: Control Desk Washington, DC

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

Discovery That Filter Testing Requirements Are Not Being Met Due to Personnel Oversight in Developing Procedures

The Licensee Event Report for this occurrence is attached.

Please contact us if you require additional information related to this event.

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Thomas M Parker Manager Nuclear Support Services

c: Regional Administrator - Region III, NRC NRR Project Manager, NRC Senior Resident Inspector, NRC MPCA Attn: Dr J W Ferman

Attachment

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LICENSEE EVENT REPORT (LER)										APPRO IED OME NO. 3150.0104 EXPIRES: 4/30/97 ED BURDEN I ER RESPONSE TO COMPLY WTH THIS FORN COLLES TION REQUEST SOLD HRS. FORWARD TS REGARDINI BURDEN ESTIMATE TO THE RECORDS ORTS MANAG MENT BRANCH (P.530). U.S. NUCLEAR TORY COMPLISION WASHINGTON DC TOSSS, AND TO ERWOYL REDUCTION PROJECT (3150.0104) OFFICE CLMENT AND BUDGET, WASHINGTON, DC 20503.						
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NRC FORM 366 A						V.S	S. NUCLEAR REGULATORY COMMISSION						APPROVED OMB NO. 3150-0104 EXP/RES. 4/30/92										
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION								ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST BOD HRS. FORWARD COMMENTS REGARD ING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (PSJDI, U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE FARERWORK REDUCTION PROJECT (JISD-01041, OF FICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503,								WARD CORDS CLEAR NO TO							
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EVENT DESCRIPTION

On December 18, 1990 both units were at 100% power. A quality assurance audit had been performed to evaluate compliance with selected Technical Specifications. Ventilation filter testing specifications require that tests "... be performed at least once per operating cycle, or once every 18 months whichever occurs first, or after every 720 hours of system operation or following painting, fire or chemical release in any ventilation zone communicating with the system that could contaminate the HEPA filters or charcoal adsorbers." The audit verified that routine tests were being conducted each operating cycle, and that pr redures existed to address testing after painting, but revealed that no means existed to insure testing was done "...after every 720 hours of system operation or following fire or chemical release " Affected filter (EIIS Component Identifier: FLT) systems are in the Shield Building Ventilation System, the Auxiliary Building Special Ventilation System, of Control Roc of (a) Ventilation System and the Spent Fuel Pool Special Vention System. The audit showed that the 720-hour limit was expeeded without attendant testing on both the Shield Building Ventilation and Spent ruel Pool Special Ventilation Systems.

CAUSE OF THE EVENT

Cause of the event was oversight by those system engineers charged with developing testing procedures to satisfy the surveillance requirements of Technical Specifications. Procedures do exist to address the concern of paint contamination of ventilation filters; however, there are no procedures addressing testing following 720 hours of operation, or following a fire or chemical release.

ANALYSIS OF THE EVENT

Although procedures did not exist to address testing following a fire or chemical release, a records review indicates that no violations resulted from this oversight. Records of operating hours of the subject fans are not all-inclusive, but the records do show several instances in the early 1980's of operation of fans in the Shield Building Ventilation System (1 instance) and S end of the violation System (8 instances) in excess of 720 hours d^2 : no attendant filter testing performed. Therefore, Technical Specifications 4.4.8.4.a and 4.15.8.1 were violated, and this event is reportable pursuant to 10CFR50.73(a)(2)(i)(B). Charcoal efficiency testing of these filters done each operating cycle shows that, even though special testing was not done, filter efficiency was not degraded.

NRC FORM 3864

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED ONE NO. 3150-0104

EXFIRES ADDATE ESTIMATED BURDEN FER RESPONSE TO COMPLY WTH T INFORMATION COLLECTION REQUEST 50.0 HRS. FORW. COMMENTS REG.REDING BURDEN ESTIMATE TO THE RECO AND REPORTS MANAGEMENT BRANCH (P.630), U.S. NUCI. REGULATORY COMMISSION WASHINDTON DC 20555, ANI THE FARFWORK REDUCTION ROJECT (J1560/1041, OF

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EX'T (If more spece is required, use additional NRC Form 3664's) (17)

CORRECTIVE ACTION

An investigation was begun to determine if the lack of procedures resulted in any actual Technical Specification violations. A records review indicates that no violations have occurred regarding filter testing after fires or chemical releases; however, the requirement to test after 720 hours of operation was violated in the case of the Shield Building Ventilation System and the Spent Fuel Pool Special Ventilation System.

Procedure revisions have been initiated to address the need for special testing after 720 hours of operation or after a fire or chemical release that could contaminate the filters. Procedures addressing paint contamination of filters were already in place.

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

A recent similar event was reported as Unit 1 LER 1-90-18.