



Northern States Power Company

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January 16, 1991

10 CFR Part 50
Section 50.73

U S Nuclear Regulatory Commission
Attn: Document 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.

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)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (R-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNIT 1 DOCKET NUMBER (2) 0 5 1 0 | 0 1 2 1 8 1 2 1 OF 0 1 3 PAGE (2)

TITLE (4) Discovery That Filter Testing Requirements Are Not Being Met Due to Personnel Oversight in Developing Procedures

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES
12	18	90	90	019	00	01	16	91	Prairie Island Unit 2
								DOCKET NUMBER(S)	
								0 5 1 0 0 1 3 1 0 1 6	
								0 5 1 0 0 1 1 1	

OPERATING MODE (9) N THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 50. (Check one or more of the following) (11)

20.402(a)	20.406(a)	50.73(a)(2)(H)	73.71(B)
20.406(a)(1)(I)	50.73(a)(1)	50.73(a)(2)(H)	73.71(a)
20.406(a)(1)(II)	50.73(a)(2)	50.73(a)(2)(H)	OTHER (Specify in Abstract below and in Text, NRC Form 368-A)
20.406(a)(1)(III)	50.73(a)(2)(I)	50.73(a)(2)(H)(A)	
20.406(a)(1)(IV)	50.73(a)(2)(II)	50.73(a)(2)(H)(B)	
20.406(a)(1)(V)	50.73(a)(2)(III)	50.73(a)(2)(K)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
Arne A Hunstad	6 1 1 2 3 1 8 1 8 1 - 1 1 1 2 1 1
	AREA CODE

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14) YES (If yes, complete EXPECTED SUBMISSION DATE) NO

EXPECTED SUBMISSION DATE (15) MONTH DAY YEAR

ABSTRACT (Limit to 400 words, i.e., approximately 10 lines, unless space requirements allow) (16)

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 procedures 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..." The audit showed that the 720-hour limit was exceeded without attendant testing on both the Shield Building Ventilation and Spent Fuel Pool Special Ventilation Systems.

Cause of the event was oversight by those system engineers charged with developing testing procedures to satisfy the surveillance requirements of Technical Specifications.

Procedure revisions have been initiated to address the need for special testing.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST, 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Prairie Island Nuc Gen Plt Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 8 2	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 0	— 0 1 9	— 0 0	0 2	OF 0 3

TEXT: If more space is required, use additional NRC Form 366A (1) (17)

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 procedures 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 (EIS Component Identifier: FLT) systems are in the Shield Building Ventilation System, the Auxiliary Building Special Ventilation System, the Control Room Local Ventilation System and the Spent Fuel Pool Special Ventilation System. The audit showed that the 720-hour limit was exceeded without attendant testing on both the Shield Building Ventilation and Spent Fuel 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 Spent Fuel Pool Special Ventilation System (8 instances) in excess of 720 hours with no attendant filter testing performed. Therefore, Technical Specifications 4.4.B.4.a and 4.15.B.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.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1) Prairie Island Nuc Gen Plt Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 8 2 9 0	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 0	0 1 9	0 0 0	3	OF 0 3

TEXT (If more space is required, use additional NRC Form 386A'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.