



Northern States Power Company

414 Nicollet Mall  
Minneapolis, Minnesota 55401  
Telephone (612) 330-5500

July 3, 1984

Mr J G Keppler  
Regional Administrator, Region III  
Office of Inspection and Enforcement  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Prairie Island Nuclear Generating Plant  
Docket No. 50-282, License No. DPR-42  
Docket No. 50-306, License No. DPR-60

In response to your letter of June 4, 1984 which transmitted Inspection Reports 50-282/84-07(DPRP), the following is offered:

Violation

Technical Specification 3.6, Containment System, A.1. states, "Containment system integrity as defined in Specification TS.1 shall not be violated except when one of the following conditions exist: (a) the reactor is in the cold shutdown condition with the reactor vessel head installed, (b) the reactor is in the refueling shutdown condition with the vessel head removed, or (c) the fuel inside containment has not been used for power operation."

Technical Specification 1.0, C. states, in part, "Containment system integrity exists when the containment vessel, shield building, and ABSVZ are closed and the following conditions are satisfied....7. At least one door in each shield building airlock is closed."

Contrary to the above, on May 21, 1984, with the Unit 1 reactor at full power and during the performance of Surveillance Procedure 1136 (SP 1136), both shield building maintenance airlock doors were open simultaneously for about one-half hour. (SP 1136, Volumetric Leakage Rate Test of Containment Air Locks, specifies that the Shift Supervisor should be informed before running air hoses through both Shield Building Doors. Air hoses are used to pressurize the containment building airlock being tested. This is a different lock than the shield building airlock). This condition violates a Technical Specification Limiting Condition for Operation (LCO).

8407170355 840710  
PDR ADOCK 05000262  
G PDR

JUL 9 1984

J G Keppler  
July 3, 1984  
Page 2

Immediate discussions were held with plant management and the doors were closed promptly.

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

#### Response

Cause of the event was procedural. The doors had traditionally been treated as Category I Ventilation doors, which can both be opened provided the control room is notified of the opening. This treatment was incorrect and led to the event. The test procedure allows both doors to be opened.

Existing copies of the procedure were removed from the supply file and destroyed. The test procedure will be revised prior to its next use to emphasize shield building integrity requirements. Full compliance has been achieved.

Design changes are in progress to provide a better routing of station air for the leakage tests. Other shield building-related procedures were reviewed and changes made where appropriate.

#### General

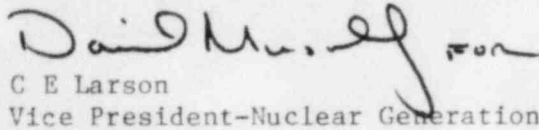
In response to your "general matter of concern", the following actions are being taken or are planned.

1. Several months ago we began trending personnel errors in periodic reports to corporate management.
2. In September 1983 we instituted the Positive Discipline program, a system which emphasizes an employee's responsibility for his own behavior.
3. We are presently studying reportable events, significant operating events, and noncompliance citations over the last two years to detect trends or common causes.
4. We presently conduct and document investigations of events caused by personnel errors. We will now do this also for noncompliance citations that involve personnel errors.

J G Keppler  
July 3, 1984  
Page 3

In addition, the Vice President-Nuclear Power Generation has requested that the Headquarters Nuclear Group plan and conduct an independent review of Prairie Island Surveillance activities. The objective of that review will be to identify and focus upon those surveillance areas which may warrant strengthening of methods or procedures to minimize the probable recurrence of similar events.

Please contact us if you have any questions related to the actions we have taken in this matter.

  
C E Larson  
Vice President-Nuclear Generation

CEL/bd

c: Resident Inspector, NRC  
NRR Project Manger, NRC  
G Charnoff