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July 13, 1984

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Projects Branch No. 2  
U S Nuclear Regulatory Commission, Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

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

In response to your letter dated June 29, 1984 which transmitted Inspection Reports No. 282/84-04(DPRP) and 306/84-~~03~~<sup>04</sup> (DPRP), the following information is provided.

#### DEVIATION

The NRC March 27, 1984 transmittal letter for Amendment No. 69 to DPR-42 and Amendment No. 63 to DPR-60 (relating to the reactor coolant system vents, states that the amendments will not become effective until; (1) after the first cold shutdown occurring after April 1, 1984 or after the next refueling outage, whichever is earlier for each unit; and (2) after audit of the plant operating procedures related to the vent systems by the Prairie Island resident inspector.

Contrary to the above, on April 11, 1984, with both units at essentially full power, fuses were installed in the vent valve circuits for both units thus making the vent systems operational before meeting commitments 1 and 2 above.

This is a Deviation.

#### RESPONSE

The reactor coolant vent system solenoid valve fuses were removed on April 12, 1984 making the vent systems again inoperable for both units. A subsequent audit by the NRC Resident Inspector found the emergency procedure which discusses vent valve operation to be adequate. Vent system blocking and tagging requirements will be met at the next cold shutdown or refueling outage. The reactor coolant vent system fuses will not be reinstalled until the blocking and tagging requirements have been met.

While we have provided our commitment not to replace the fuses for the vent systems without meeting the conditions discussed above, we must take issue with the need for this action and the basis for issuance of this deviation. In our view, the conditions of the license amendment dated March 27, 1984 did not preclude the installation of the vent system fuses prior to manual valve blocking and tagging and NRC procedure audit.

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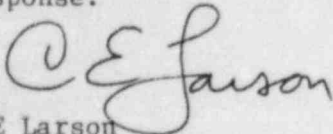
Rather it stated that the subject license amendment would not become effective until the specified conditions were met. There were no explicit restrictions on installation of the power supply fuses.

The sole purpose of the delayed implementation provision in the March 27, 1984 license amendment was to prevent a Technical Specification violation since the required valve blocking and tagging would require a containment entry. All other requirements of the Technical Specifications could have been implemented immediately since the reactor coolant vent systems were complete and fully operable with the exception of the power supply fuses. With the fuses removed, there is no control board indication of valve position. Installation of the fuses was therefore highly desirable and appeared to be permissible based on the design approval contained in the NRC Staff Safety Evaluation Report which accompanied the March 27, 1984 license amendments.

The deviation appears to be based on the premise that a system cannot be made operational unless its respective Technical Specifications are in effect. In reality, additions and changes to the plant which are not prohibited by the Technical Specifications or in conflict with the Technical Specifications are made frequently. Technical Specifications applicable to these "new" plant features may be requested by a licensee and issued by the NRC after the change to the plant has been made operable.

Our actions energizing the vent systems were taken in an effort to increase the level of safety of the plant, by establishing control board valve position indication for the vent systems as soon as it was prudent to do so. We do not believe that such actions constitute a failure to meet the requirements of the March 27, 1984 license amendment and request that the deviation be withdrawn.

Please contact us if you require further information related to our response.



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Vice President - Nuclear Generation

CEL/bd

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