

Northern States Power Company

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September 14, 1984

Mr. C. E. Norelius, Director Division of Reactor Projects 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 Plants Docket No. 50-282, License No. DPR-42 Docket No. 50-306, License No. DPR-60

In response to your letter of August 17, 1984 which transmitted Inspection Report 50-306/84-10 (DRP), the following information is offered.

## Violation

Technical Specification 3.2, Chemical and Volume Control System, C. states, in part,

"the reactor in the second unit shall not be made or maintained critical nor shall it be heated or maintained above 200° with the reactor in the other unit already critical unless the following conditions are satisfied.

 Automatic valves, piping, and interlocks associated with the above components which are required to operate for the steam line break accident are operable."

Contrary to the above, on June 18, 1984 with Unit 2 at full power, and during performance of Surveillance Test Procedure 1032 (STP 1032), Unit 2 RWST valves 32182 and 32183 stroked open and remained open for about 1 hour and 55 minutes. Under these conditions, concentrated boric acid from the boric acid storage tanks would not have been automatically supplied to the Unit 2 safety injection pumps had a safety injection signal been received. Valves 32182 and 32183 were closed by the control room operating crew when it was noticed that the valves were open. C E Norelius, Region III September 14, 1984 Page 2

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However, during the 1 hour and 55 minute period described above, the licensee was in violation of a Technical Specification Limiting Condition for Operation (LCO).

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

Response

All procedures related to switching and testing of the boric acid storage tank logic and level channels were reviewed and changes made where appropriate. Full compliance has been achieved.

Further, the event will be reviewed in operator license training and requalification training. A Design Change has been initiated to replace the boric acid storage tank level transmitters since they have been a high maintenance item.

As discussed in the July 18, 1984 Enforcement Conference, an independent review of the Prairie Island surveillance activities has been initiated. The intent of this review is to focus on and identify those surveillance areas which may warrant strengthening of methods and procedures to minimize the probable recurrence of similar events.

Respectfully yours,

C. E. Larson Vice President Nuclear Generation

cc: J. Hard G. Charnoff