

MAR 4 1985

Docket No. 50-282
Docket No. 50-306

Northern States Power Company
ATTN: Mr. C. E. Larson
Director of Nuclear
Generation
414 Nicollet Mall
Minneapolis, MN 55401

Gentlemen:

Thank you for your letter of January 30, 1985, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Reports No. 50-282/84-13(DRP) and No. 50-306/84-15(DRP) forwarded by our letter dated December 31, 1984. We will examine these matters during a subsequent inspection.

You commented in your response to the first violation involving failure to follow Section Work Instruction SWI-0-4 related to logging requirements, that this Instruction is not a procedure required by TS 6.5. Setting aside this specific question regarding TS 6.5, we conclude that the failure to properly record in the Reactor Log the events surrounding operation of No. 11 TD TDAFW pump on October 27, 1984 is more appropriately a violation of 10 CFR, Appendix B. Violation 1 should have read as follows:

Technical Specification 6.5 states, in part, "Detailed written procedures . . . , covering areas listed below shall be prepared and followed. . . . A. Plant Operations. . ."

Contrary to the above, on October 28, 1984, operating procedure C28 was not followed during the operation of the No. 11 turbine driven auxiliary feedwater pump.

In addition, Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Criterion V (10 CFR 50 Appendix B, Criterion V) requires, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

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Section Work Instruction, SW1-0-4, Section 3.6.2, Reactor Logs, states, in part:

"(3) All significant operating actions or occurrences will be entered in the Reactor Log, including, but not limited to:

- (a) All operations affecting the operation of the reactor or major unit equipment
- (f) Occurrence of significant annunciator alarms."

Contrary to the above, review of the Unit 1 Reactor Log for the day shift of October 28, 1984 failed to disclose any entries with regard to the No. 11 AFWP operation nor any entries on the subject of alarms received from the Auxiliary Feedwater Pump Room related to operation of 11 AFWP.

In addition to the response already provided us in your January 30, 1985 letter, and pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

"Original signed by W. D. Shafer"

W. D. Shafer, Chief
Reactor Projects Branch 2

cc: E. L. Watzl, Plant Manager
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