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Reactor Projects Branch 2, Region III
Office of Inspection and Enforcement
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

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 December 31, 1984, which transmitted Inspection Reports No. 50-282/84-13 (DRP) and 50-306/84-15 (DRP), the following information is offered.

Violation

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 and Special Work Instruction, SWI-0-4, were not followed during the operation of the No. 11 turbine driven auxiliary feedwater pump.

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

Response

The substep in procedure C28 to check certain parameters locally at the auxiliary feedwater pump was not performed. Personnel were reminded of the importance of following procedures. Full compliance has been achieved.

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This substep in C28 has remained unchanged since 1974. Since then, additional instrumentation has been added to the Auxiliary Feedwater System. These include pump discharge pressure (indicated in the Control Room), low suction pressure trips, low discharge pressure trips, and associated alarms. In addition, considerable operating experience has been gained. This experience includes numerous automatic, full flow starts - a condition more severe than manual, controlled starts. Therefore, no significant increase in safety or in system/pump reliability is gained by local checks at the time of pump start.

The necessity of proper and complete log entries has been stressed. No entry concerning the steam release to the Auxiliary Feedwater Pump room was made in the Reactor Log, a log maintained by the Lead Plant Equipment and Reactor Operator. The following summary entry is excerpted from the same shift's Operations Log maintained by the Shift Supervisor:

1430 Notified duty engineer of problems with wet electrical connections on AFWP rm. due to steam blowing to the floor drains from 11 AFWP. An electrician was called out to remove covers on boxes to check for moisture. Alarms received in C.R. indicating problems with moisture were fire alarm, 12 AFWP motor vlvs on local cont & 12 B ATP on local cont. All alarms cleared after the doors were opened to the room and a portable fan was installed.

An entry was also made in the control room log kept by the Shift Technical Adviser.

Technical Specification 6.5 part A applies to operating procedures. Failure to follow procedure C28 is contrary to 6.5 A1.

Section Work Instruction SWI-0-4 entitled Records Management, is not a procedure required by TS.6.5.

Therefore, we do not agree that failure to follow SWI-0-4 in regards to the Reactor Log is contrary to Technical Specifications and request that the severity level of the violation be reduced to Level V.

Violation

Technical Specification 3.3.B.1 states, in part, "A reactor shall not be made or maintained critical nor shall it be heated above 200°F unless the following conditions are satisfied... c.(2) The spray additive tank contains not less than 2590 gallons of solution with a sodium hydroxide concentration of 9% to 11% by weight inclusive."

Contrary to the above, on November 22, 1984, with Unit 2 at full power, the caustic addition tank level was below 2590 gallons for 2 hours and 22 minutes.

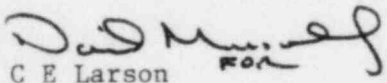
This is a Severity Level IV violation (Supplement I).

Response

While recirculating the caustic addition standpipe at 1930 the level was observed to be at 94%, below the Tech Spec level of 96.2%. A makeup operation was begun and the level at 2011 was 97.5%.

Cause of the loss of level was leakage through the overflow valve. The valve was tightened to isolate the leak. Full compliance has been achieved.

When recirculating this tank, pressure surges from the stroke of the positive displacement recirculating pump cause the High/Low Level alarm to repeatedly sound. The alarm card is typically pulled to silence the nuisance alarm. A design change is in progress which will improve operation of the system.


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c: Resident Inspector, NRC
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