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 dated October 15, 1984, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report No. 50-282/84-08(DRS) and 50-306/84-07(DRS), forwarded by our letter dated June 29, 1984.

With regard to your response, we reviewed the Safety Evaluation Report dated January 4, 1983, item 3.2.1. Relief Request Number 59 requested relief from the Section XI requirement IWV-3420(d), which describes test methods for valve leak rate determination. Relief from the requirements of IWV-3420(d) was granted by the Commission with the condition that leakage for valves MV-32066, 32165 and 32231 be subject to the requirements stated in Prairie Island Technical Specification 4.3. The maximum leakage stated in Technical Specification 4.3 is less than or equal to 5 gallons per minute per valve. Granting relief from paragraph IWV-3420(d) does not implicitly exempt the valves from the requirements IWV-3420(f) or (g) which require leak rate analysis and associated corrective action be taken. Consequently, Northern States Power is required to quantitatively determine and analyze the leak rates for Motor Operated valves MV-32064, MV-32065, MV-32066, MV-32165 and MV-32231 for Unit 1. Additionally, although the corresponding valves for Unit 2 were not explicitly reviewed during the inspection, the same criteria apply to MV-32168, MV-32167, MV-32169, MV-32139 and MV-32233 for Unit 2.

Therefore, we do not agree with your position that valve leakage need only be qualitatively determined. As discussed in your response, procedure changes will be made to incorporate a quantitative measurement technique developed for the valves in question and these actions will be reviewed in subsequent inspections.

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Your cooperation with us is appreciated.

Sincerely,

"Original Signed by R. L. Spessard"

R. L. Spessard, Director Division of Reactor Safety

cc w/ltr dtd 10/15/84:
D. Dilanni, NRC
E. L. Watzl, Plant Manager
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII Prairie
Island
Resident Inspector, RIII Monticello
John W. Ferman, Ph.D.,
Nuclear Engineer, MPCA

RIII

Eng/1c Goldemond Reyes

RIII

Jackin

RIII

Spessard

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