



Northern States Power Company

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July 10, 1992

10 CFR Part 2
Appendix C

U S Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Reply to a Notice of Deviation
NRC Inspection Report Nos. 282/92008 and 306/92008
Final Safety Analysis Report Commitment for
Inservice Examination of High Energy Line Piping

Pursuant to the provisions of 10 CFR Part 2, Appendix C, the following is submitted in response to the notice of deviation contained in your letter of June 11, 1992.

Deviation

During an NRC inspection conducted on April 14 through May 26, 1992, a deviation was identified from a commitment which you made in the Final Safety Analysis Report (FSAR). In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Action", 10 CFR Part 2, Appendix C (1992), the deviation is listed below:

In Section I.2.3 of Appendix I to the FSAR, you committed to performing periodic inservice examination, in accordance with ASME Section XI for Code Class II, Table ISC-261(b), Winter 1972 Addenda, to include 100 percent of the non-encapsulated piping welds in feedwater and main steam piping runs traversing the Auxiliary Building during each 10 year inspection interval.

Contrary to the above, your inservice inspection (ISI) scope for this high energy piping in the Auxiliary Building resulted in examination of only approximately 25 percent of the total number of subject welds during each 10 year inspection interval.

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Final Safety Analysis Report, Appendix I Deviation Response

Background

During the course of the investigation for the response to an allegation, AMS RIII-92-A-0027, a commitment was identified in the Final Safety Analysis Report, Appendix I, regarding performance of inservice inspection of high energy piping welds in non-encapsulated piping runs traversing the Auxiliary Building beyond that required by the plant ASME Section XI program.

Specifically, Final Safety Analysis Report, Appendix I, Section I.2.3, lists several requirements to be satisfied when using encapsulation sleeves at design-basis break locations as a means of reducing compartment pressurization levels in the event of a pipe break. For welds located outside of the sleeves, specific inspection requirements are included in the Final Safety Analysis Report. Appendix I states:

Piping welds which are not encapsulated and are in the piping runs traversing the Auxiliary Building will be subjected to periodic in-service examination in accordance with the ASME Section XI Code Class II, Table ISC-261(b), Winter 1972 Addenda, except that the areas to be examined (as defined by the Code) shall include 100% of the welds within the inspection interval.

The Final Safety Analysis Report, Appendix I, requires inspecting 100% of the total welds (as defined by the Code) during the inspection interval. This inspection scope is greater than that required by the ASME Section XI program presently performed at Prairie Island.

Reasons for Deviation

The basic cause of this deviation stems from an apparent oversight regarding inservice inspection requirements. Due to the length of time (over 15 years) since we initially failed to inspect these welds at the prescribed frequency, the reason for the oversight is not completely known. When the commitment was initially made, this was the only piping subject to ASME, Section XI, Inservice Inspection. Subsequent to the commitment, a Section XI program was fully implemented at Prairie Island. The subject piping has been considered in the program; i.e., our Section XI program contains inspections of Final Safety Analysis Report Augmented components (including these piping welds - even those which are not safety related and thus would not normally be included in a Section XI program). As discussed above, this inspection scope does not satisfy the Final Safety Analysis Report, Appendix I commitment. It is speculated that personnel responsible for the program at that time believed that the Section XI frequency requirements superseded those of the Final Safety Analysis Report commitment.

Corrective Actions Taken and Results Achieved

Upon discovery of this oversight the following short term corrective actions were initiated:

1. A 10 CFR Part 50, Section 50.59 safety evaluation was prepared to address potential operability concerns regarding the consequences of high energy line breaks in the Auxiliary Building during such an event. This evaluation concluded that continued plant operation does not increase the potential hazard to the health and safety of the public.
2. A review of previous inservice inspection results for the high energy piping welds was initiated. This review is now complete. No instances of service induced indications were found during this review, substantiating the safety evaluation conclusion.

The following long term actions are currently in progress:

1. During the two unit outage, scheduled for Fall, 1992, the normal Inservice Inspection program for welds in high energy piping in the Auxiliary Building will be augmented to include additional weld inspections in the main steam and feedwater lines. Selection of the welds for inspection will be based on stress levels calculated in the Plant Design Stress Analysis Reports. Those areas of highest stress, which are not encapsulated, will be inspected.
2. Presuming favorable inspection results, the Updated Safety Analysis Report, Appendix I will be revised (during the next annual submittal) to reflect the current Inservice Inspection program.

Corrective Actions to Avoid Further Deviations

This piping encapsulation is a unique configuration. Conformance with the ISI program, which is reviewed by the NRC, is believed to be sufficient to ensure that piping is adequately inspected to ensure safe plant operation. Future commitments to augmented inspections will be included in the ISI program.

Date When Corrective Actions Will be Completed

As noted above, the Updated Safety Analysis Report will be revised to correct this discrepancy, dependent on obtaining favorable inspection results during the upcoming Fall outage.

USNRC
July 10, 1992
Page 4

Northern States Power Company

Please contact us if you have any questions related to this letter.

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