



Northern States Power Company

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September 28, 1992

10 CFR Part 50
Section 50.73

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

Design Basis Reconstitution Effort Identified That Surveillance
Requirements Are Not Being Applied to Steam Exclusion Check Dampers

The Licensee Event Report for this occurrence is attached.

Please contact us if you require additional information related to this event.

Thomas M Parker
Manager
Nuclear Support Services

c: Regional Administrator - region III, NRC
NRR Project Manager, NRC
Senior Resident Inspector, NRC
Kris Sanda, State of Minnesota

Attachment

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9210060012 920928
PDR ADOCK 05000282
C PDR

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUIREMENT IS 30.5 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 2 8 2 1	PAGE (3) 1 OF 0 3
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TITLE (4) **Design Basis Reconstitution Effort Identified That Surveillance Requirements Are Not Being Applied to Steam Exclusion Check Dampers**

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	
0 8	2 7	9 2	9 2	0 1	0	0 0	0 9	2 8	9 2	Prairie Island Unit 2
								DOCKET NUMBER(S)		
								0 5 0 0 0 3 0 6		
								0 5 0 0 0 1 1 1		

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)				
POWER LEVEL (10) 11 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.72(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 306A)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)		
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)		
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)		
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)			

LICENSEE CONTACT FOR THIS LER (12)

NAME Arne A Hunstad, Staff Engineer	TELEPHONE NUMBER
	AREA CODE
	6 1 1 2 3 8 8 1 - 1 1 2 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (16) (Do not exceed 100 words, i.e., approximately fifteen single-spaced typewritten lines) (16)

On August 27, 1992, it was determined that a requirement to test Steam Exclusion System check dampers was not being met. The Design Basis Reconstitution effort identified the deficiency during review of the Steam Exclusion System design bases.

Ventilation ducts that penetrate rooms containing equipment for mitigation of the postulated high energy line break accident are equipped with isolation dampers. Each duct has 2 redundant control dampers on the ventilation supply that are closed by actuators on high temperature in the duct and 2 check dampers that swing closed on reverse flow in the exhaust duct.

Check dampers were never included in surveillance procedures written to satisfy the requirements of Technical Specifications. It is believed that the system engineers who produced the procedures had information that showed that the check dampers were not needed, but that information has not been recovered.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (2150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Prairie Island Nuclear Gen Plt Unit 1	05000 282	92	010	0	2 OF 3

TEXT (If a space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION

On August 27, 1992, it was determined that a requirement to test Steam Exclusion System check dampers was not being met. The Design Basis Reconstitution effort identified the deficiency during review of the Steam Exclusion System design bases.

Ventilation ducts that penetrate rooms containing equipment for mitigation of the postulated high energy line break accident are equipped with isolation dampers. Each duct has 2 redundant control dampers on the ventilation supply that are closed by actuators on high temperature in the duct and 2 check dampers that swing closed on reverse flow in the exhaust duct.

Technical Specification 4.8.C states:

"Isolation dampers in each duct that penetrates rooms containing equipment required for a high energy line rupture outside of containment shall be tested for OPERABILITY once each month."

"In addition, damper mating surfaces shall be examined visually once each year to assure that no physical change has occurred that could affect leakage."

"Isolation dampers" was interpreted to mean "control dampers" only. Check dampers were never included in surveillance procedures written to satisfy the requirements of Technical Specification 4.8.C.

The comprehensive review done during the Design Basis Reconstitution effort led to the conclusion that the check dampers should also be considered isolation dampers.

Each check damper was then inspected for freedom of movement. This inspection showed that some of the check dampers may not have closed as designed; these check dampers were declared inoperable and they were wired closed until they were shown to be operable. Each check damper was then cleaned and damper mating surfaces visually inspected and shown to be operable.

CAUSE OF THE EVENT

Check dampers were not considered "isolation dampers" when surveillance procedures were initially produced. It is believed that the system engineers who produced the procedures had information that showed that the check dampers were not needed, but that information has not been recovered.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNRB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20585-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Prairie Island Nuclear Gen Plt Unit 1	05000 282	92	010	0	3 OF 3

TEXT (if more space is required, use additional copies of NRC Form 366A) (17)

ANALYSIS OF THE EVENT

Health and safety of the public were unaffected since the check dampers have never been called upon to perform their isolation function.

This event is reportable pursuant to 10 CFR Part 50, Section 50.73(a)(2)(i)(B) since a Technical Specification surveillance requirement was not being met.

CORRECTIVE ACTION

Check dampers were inspected and when some were found that would not close freely they were declared inoperable and wired closed. Each check damper was then cleaned and inspected and shown to be operable.

The monthly check damper operability test and annual damper mating surface visual examination are now included in our surveillance program.

A comprehensive review of the Technical Specification surveillance requirements is ongoing. A pilot project is nearly complete. Based on results of that effort, we expect the full review to be complete by December 31, 1993.

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

Previous similar events have been reported as Unit 1 LER's 90-10, 90-15, 90-18, 91-01, 92-04 and 92-09.