

#### Northern States Power Company

414 Nicollet Mall Minneapolis, Minnesota 55401-1927 Telephone (612) 330-5500

10 CFR Part 50 Section 50.73

September 28, 1992

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.

MAG Mahar

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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NRC FORM 366A

## U.S. NUCLEAR REGULATORY COMMISSION

#### APPROVED BY OME NO. C150-0104 EXPIRES 5/31/95

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST \$0.0 HRS FORWARD COMMENTS REGARDING RUNDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), US NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20553-0001 AND TO THE PARENWORK REDUCTION PHOLECT (3150-0194), OFFICE OF MANAGEMENT AND BUDDET, WASHINGTON, DC 20503.

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#### E.LAT 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 equipp 1 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 belie ad 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. NRC FORM 366A

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## U.S. NUCLEAR REGULATORY COMMISSION

# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

#### APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95

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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)(1)(B) since a Technical Specification surveillance requirement was not being mat.

## 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 vis all 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.