

NOTICE OF VIOLATION

Northern States Power Company
Prairie Island Nuclear Generating Plant

Docket Nos. 50-282; 50-306
License Nos. DPR-42; DPR-60

During an NRC inspection conducted from August 30 through October 8, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification 4.2.A.2 required that inservice testing of American Society of Mechanical Engineers (ASME) Code Class 1, Class 2, and Class 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the NRC.

Section XI of the ASME Boiler and Pressure Vessel Code (1989) states that valve testing shall be performed in accordance with the requirements stated in ASME/American National Standards Institute Operations and Maintenance Standards, Part 10, 1988 (ASME/ANSI OM-10), "Inservice Testing of Valves in Light-Water Reactor Power Plants."

Paragraph 4.3.2.4(a) of OM-10 required quarterly verification that the disk of a normally open check valve travels to its seat on cessation or reversal of flow by observing a position indicating device or changes in system pressure, flow rate, level, temperature, seat leakage testing or other positive means.

Licensee procedure H10.1, "ASME Section XI Inservice Testing Implementation Program," Appendix B, "Unit 1 and Common Equipment Check Valve Tables," revision 4, listed check valve CF-11-2 as requiring a quarterly test in the closed direction using Surveillance Procedure SP 1355. H10.1, Appendix F, "Unit 2 Check Valves Tables," revision 4, listed check valve 2CF-11-2 as requiring a quarterly test in the closed direction using Surveillance Procedure SP 2355. SP 1355, "Checking Chemical Feed and Auxiliary Feedwater Check Valves - Unit 1," revision 6, required testing of CF-11-2 by verifying a differential pressure existed between the downstream and upstream side of the valve with pressure existing on the downstream side. The differential pressure was verified using temporarily installed gauges. Similarly, SP 2355, "Checking Chemical Feed and Auxiliary Feedwater Check Valves - Unit 2," revision 2, required similar testing of 2CF-11-2.

Contrary to the above, from about March 1994 until October 1, 1996, normally open check valves CF-11-2 and 2CF-11-2 were not properly tested quarterly in that differential pressure across the valves was not adequately verified because the temporary pressure gauges upstream of the valves were isolated.

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

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Pursuant to the provisions of 10 CFR 2.201, Northern States Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois,
this 5th day of November 1996