



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

July 2, 1997

10 CFR Part 2

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 Notice of Violation (Inspection Report 97009),
Concerns with the Adequacy of and Compliance with Procedures

Your letter of June 2, 1997, which transmitted Inspection Report No. 97009, required a response to a Notice of Violation. Our response to the notice is contained in the attachment to this letter.

In this response we have made new Nuclear Regulatory Commission commitments, these are indicated by italics.

Please contact Jack Leveille (612-388-1121, Ext. 4662) if you have any questions related to this letter.

Joel P Sorensen
Plant Manager
Prairie Island Nuclear Generating Plant

c: Regional Administrator -- Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg

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Attachment: RESPONSE TO NOTICE OF VIOLATION

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RESPONSE TO NOTICE OF VIOLATION

10 CFR 50, Appendix B, Criterion V, Instructions Procedures, and Drawings," required, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

- a. Procedure 2C12.2, "Purification and Chemical Addition - Unit 2," Revision 34, required that a mixed bed ion exchanger be borated to within 20 ppm of the reactor coolant system boron concentration prior to it being placed in service.

Contrary to the above, on April 5, 1997, a Unit 2 mixed bed ion exchanger was placed in service without having first been borated to within 20 ppm of the reactor coolant system boron concentration and resulted in an unplanned reactivity addition.

- b. Work Order 9614859 identified a valve lineup required for system operation following maintenance.

Contrary to the above, on December 31, 1996, Work Order 9614859 was not of a type appropriate to the circumstances because it specified an incorrect valve restoration position and resulted in an unplanned reactivity addition.

- c. Preventive Maintenance Procedure PM 3001-2-D1, "D1 Diesel Generator 18 Month Inspection," Revision 12, provided instructions required for diesel generator post-maintenance testing.

Contrary to the above, on May 8, 1997, Procedure PM 3001-2-D1 was not of a type appropriate to the circumstances because it did not provide instructions to check and add engine oil and resulted in stopping the emergency diesel engine due to a low oil condition.

- d. Administrative Work Instruction 5AWI 3.2.4, "Conduct of Work," Revision 13, requires, in part, that work shall be conducted in the sequence presented in the work control package and changes to procedures shall be per 5AWI 3.2.8.

Administrative Work Instruction 5AWI 3.2.8, "Work Order Package Change Process," Revision 2, requires, in part, that changes to work packages shall be prepared, reviewed, and approved prior to implementation, and shall be documented in the affected procedure.

Contrary to the above, on May 8, 1997, a change to procedure PM 3001-2-D1 was implemented, in that procedure steps were performed out of sequence, without documentation of its preparation, review and approval in the procedure.

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

Response to Violation

Reason for the Violation

Prairie Island management recognizes and is concerned that procedure compliance and procedure adequacy issues exist at the plant. Recognizing that the examples given are indicators of problems broader than just the specific examples we, therefore, are addressing the problems at a systemic level. During the management meeting we attended with the NRC at the NRC Region III Office on May 20, 1997, we discussed procedure compliance problems and informed you that corrective actions will be developed to address them. A comprehensive effort is needed to characterize the nature and extent of the problem as it applies to the various work groups and the various programs at the plant. This characterization would be followed by root cause analysis on the major problem areas identified by the characterization process. Corrective action recommendations would then follow the determination of the root causes. The characterization phase has been completed and the following areas are being considered for root cause determination. Some areas may be added to or deleted from this selection as additional information is gathered.

	Work Control	Equipment Control	Procedure Control	Industrial Safety
Operations		X	X	
Mechanical Maintenance	X			X
Operations Engineering	X	X		
Procedure Content Deficiencies*	X	X	X	

X indicates an area chosen for root cause determination

* omission of relevant information and technical inaccuracies

The root cause determination phase is underway. *The root cause and corrective action determinations of procedure non-compliance and procedure inadequacy are planned to be completed by 7/31/97.*

Corrective Steps That Have Been Taken And The Results Achieved

In example "a," the ion exchanger was borated to within 20 ppm of the RCS boron concentration before further use.

In example "b," the valve was placed in its normal position, terminating the dilution.

In examples "c" and "d," the procedure was annotated with the additional instructions or steps that had been performed and the changes were approved by appropriate plant personnel.

Corrective Steps That Will Be Taken To Avoid Further Violations

For the specific examples noted in the notice of violation:

Example "b" - The correct 'normal' or restored position for the valve has been input to the data base used to aid in constructing Isolation and Restorations (I&R). The data for the similar unit valve was checked and found to have the proper information. Additionally, a review and upgrade of the data for all Unit 1 Chemical and Volume Control system valves in the I&R data base has been completed. A similar review and upgrade is in progress for the Unit 2 Chemical and Volume Control system valves.

Example "c" - D1 diesel generator 18 month preventative maintenance procedure P3001-2-D1 and the similar procedure for D2, P3001-2-D2, have been quarantined. *These procedures will be revised prior to their next use. The revisions will include adding a step to check the lube oil level at an appropriate place in the sequence prior to the local-manual starting of the diesel.*

To address the generic problems highlighted by the examples cited:

Operations department instruction, SWI-O-10, 'Operations Manual Usage', will be revised, using INPO Good Practice OA-106, Technical Procedure Use and Adherence, as a guide.

We will meet with you later in the summer to discuss the comprehensive corrective actions to address the procedure compliance and adequacy issues based on the root cause analyses described above. We believe this approach will result in effective corrective actions and long lasting improvement.

The Date When Full Compliance Will Be Achieved

Full compliance has been achieved for each of the examples per the dates given below.

- a. December 31, 1996
- b. April 6, 1997
- c. May 8, 1997
- d. May 8, 1997