

July 16, 1997

EA 97-290

Mr. M. D. Wadley  
Vice President, Nuclear Generation  
Northern States Power Company  
414 Nicollet Mall  
Minneapolis, MN 55401

SUBJECT: NRC INSPECTION REPORT 50-282/97008(DRS); 50-306/97008(DRS)  
AND NOTICE OF VIOLATION

Dear Mr. Wadley:

On June 13, 1997, the NRC completed a System Operational Performance Inspection (SOPI) at your Prairie Island Nuclear Generating Plant. The inspection team assessed the auxiliary feedwater (AFW), and portions of the control room ventilation and safeguards chilled water systems' operational performance by a detailed review of the design, maintenance, operation, and surveillance testing of the systems. The enclosed report presents the results of that inspection.

The inspectors identified that, with exceptions, maintenance and operations were being well performed and that your engineering staff was considered knowledgeable and conscientious. However, the results of the SOPI raised concerns about the rigor of certain aspects of engineering, particularly with verification of the design basis performance of safety-related pumps through an effective surveillance program. Concern was also raised by observations that your Updated Safety Analysis Report (USAR) was not being maintained current. Additional concern was generated because corrective actions for prior identification of these issues were not timely. The existing controls appeared to have failed to identify potentially degraded equipment (AFW Pumps) or to prompt appropriate corrective actions.

Based on the results of this inspection, apparent violations were identified and are being considered for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600.

The apparent violations include failure of your test controls to incorporate test criteria necessary to assure verification that AFW pumps could meet design requirements. In addition, apparent violations of corrective actions were noted by your failure to complete actions identified in 1991 that may likely have identified the AFW pump test criteria problem, as well as failure to take timely corrective action on inaccurate AFW flowrates in the USAR. Apparent violations of 10 CFR 50.71, "Maintenance of records, making of reports," and of 10 CFR 50.9, "Completeness and accuracy of information," were also identified for failure to correct the inaccurate USAR AFW flowrate. Further, apparent violations of 10 CFR 50.72, "Immediate Notification Requirements for Operating Reactors," 10 CFR 50.73, "Licensee Event Report System," and 10 CFR 50.59, "Changes, Tests and Experiments," were identified for failure to report that the plant was outside its

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design basis when it was determined that the main feedwater line rupture analysis used a higher AFW flow value than the pumps could deliver, and for your subsequent failure to verify via a safety evaluation that no unreviewed safety question existed. It is of particular concern that your staff had various opportunities to maintain the USAR current with respect to this issue during 1993 and 1995, but this did not occur.

Accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

A predecisional enforcement conference to discuss these apparent violations has been scheduled for August 1, 1997. This conference will be open to public observation. The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violation sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In particular, we expect you to address the continued operability of the systems we reviewed and any other affected systems and, the failures of your corrective action process.

In addition, this is an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspectives on (1) the severity of the violation(s), (2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and (3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding the(se) apparent violation(s) is required at this time.

In addition, the NRC has determined that violations of NRC requirements occurred. These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding them are described in detail in the subject inspection report. The violations are of concern because they represent a lack of rigor and control in the calculation verification program and, for the cable tray separation issue, represent another example of untimely and non-comprehensive corrective action for earlier-identified design issues.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. Additionally, please be prepared to discuss the design control violation during the pre-decisional enforcement conference. Including the reason for the violation (or basis for disputing it), and corrective action taken or planned to avoid similar design control issues.

Finally, you are also requested to respond in writing on any planned actions, including time frames, for re-performing the control room habitability dose calculations and any plans to test the control room isolation dampers for verification of the inleakage assumption as discussed in Section E1.4 of this report. This issue was of concern to the NRC because the existing analysis demonstrated a low margin to the thyroid dose limit and the effects of higher than assumed unfiltered inleakage could place the plant outside of the regulatory limit.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR).

Sincerely,

/s/ J. M. Jacobson (for)

John A. Grobe, Acting Director  
Division of Reactor Safety

Docket Nos. 50-282; 50-306; 72-10  
Licenses No. DPR-42; DPR-60

- Enclosures: 1. Notice of Violation
- 2. Inspection Report 50-282/97008(DRS); 50-306/97008(DRS)

cc w/encls: Plant Manager, Prairie Island  
John W. Ferman, Ph.D.,  
Nuclear Engineer, MPCA  
State Liaison Officer, State  
of Minnesota  
State Liaison Officer, State  
of Wisconsin  
Tribal Council, Prairie Island  
Dakota Community

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SEE ATTACHED CONCURRENCES

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