

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 May 14, 1997, through June 25, 1997, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

1. 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.

Contrary to the above, the inspectors determined that the following documented instructions, procedures, or drawings were not of a type appropriate to the circumstances for the reasons cited:

- a. On March 7, 1997, Operating Procedure 2C1.3, "Unit 2 Shutdown," Revision 39, did not contain adequate instructions for the operation of the charging pump suction valves.
- b. On May 17, 1997, Operating Procedure 2C1.3, "Unit 2 Shutdown," Revision 39, did not contain adequate instructions for maintaining steam generator level within the limits assumed in the design basis.
- c. On June 17, 1997, Operating Procedure 1C1.2, "Unit 1 Startup Procedure," Revision 17, could have allowed the plant to enter the power operation mode with an inoperable auxiliary feedwater system.
- d. On June 24, 1997, Plant Safety Procedures F5, Appendix B, "Control Room Evacuation (Fire)," Revision 17, and F5, Appendix C, "Control Room Evacuation (Fire) Diesel Generator Operation," Revision 12, did not identify the lighted emergency paths for operators to travel to the safeguards bus No. 15 room and D5/D6 building, nor identify emergency lighting in the D5/D6 building.
- e. On June 19, 1997, Surveillance Procedure SP 1116, "Monthly Power Distribution Map Unit 1," Revision 23, directed the removal of fuses for the R7 radiation monitor, but did not include instructions to re-install the fuses and verify operability of the monitor.
- f. On June 17, 1997, Surveillance Procedure SP 1319, "Rod Position Verification - Unit 1," Revision 4, did not contain instructions to consider the rod deviation monitor inoperable if inaccuracies in the rod position indicators were proven.

- g. On June 16, 1997, Surveillance Procedure SP 1376, "Auxiliary Feedwater Pump Technical Specification Flow Verification Test," Revision 2, would have allowed the surveillance to be accomplished at up to 10 percent reactor power, but conducting it above 2 percent power would have resulted in inoperability of the auxiliary feedwater system.
- h. On May 17, 1997, Work Order WO 9704425, "Transfer Buses 21 and 22 from 2RX to 1RX Transformer," was inadequate in that the instructions failed to anticipate that de-energizing both the 21 and 22 electrical buses would result in an automatic actuation of the auxiliary feedwater pump, an engineered safety feature.
- i. On June 24, 1997, Surveillance Procedure SP 1332, "Safe Shutdown Emergency Light Verification," Revision 2, did not verify that an emergency light was available to illuminate access to the safeguards bus No. 15 room, did not verify that emergency light No. 15 was available to illuminate the safeguards bus No. 15 room, did not verify that emergency light No. 1 was available to illuminate access to the D1 emergency diesel generator room, and did not verify that emergency light No. 95 was available to illuminate access to the D5/D6 emergency diesel generator building.

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

- 2. Technical Specification 6.2.B delineated requirements for the Operations Committee, including:
 - a. 6.2.B.4.c which required Operations Committee review of proposals which would effect permanent changes to normal and emergency operating procedures and any other proposed changes or procedures that will affect nuclear safety as determined by the Plant Manager.
 - b. 6.2.B.4.h which required, in part, that all procedures required by the Technical Specifications be reviewed initially and periodically with a frequency commensurate with their safety significance but at an interval of not more than two years.
 - c. 6.2.B.1 which required, in part, that no more than two alternates participate as voting members of the Operations Committee at any one time.

Contrary to the above, the inspectors determined that the requirements of Technical Specification 6.2.B were not met in the following circumstances:

- a. At the June 11, 1997, Operations Committee meeting, 34 proposed permanent changes to normal and emergency operating procedures and other proposed changes or procedures that could affect nuclear safety as determined by the plant manager were not adequately reviewed.

- b. On May 21, 1997, the Operations Committee failed to review 24 procedures required by the Technical Specifications at an interval of not more than two years.
- c. At the April 26, 1997, Operations Committee meeting more than two alternate members participated as voting members in Operations Committee business at one time.

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

- 3. 10 CFR 50, Appendix R, Section III.J, required emergency lighting units with at least an 8-hour battery power supply shall be provided in all areas needed for operation of safe shutdown equipment and in access and egress routes thereto.

Contrary to the above, on June 24, 1997, 8-hour emergency lighting was not provided for access and egress routes to the safeguards bus No. 15 room, which contained equipment needed for operation of safe shutdown equipment.

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

The inspection showed that adequate corrective actions had been taken or were planned for Violation No. 1, and consequently no response is required. For Violations No. 2 and 3, 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 Regional Administrator, Region III, and 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. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of

withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Lisle, Illinois
this 24th day of July 1997