

October 9, 1998

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

SUBJECT: NRC FIRE PROTECTION FUNCTIONAL INSPECTION (FPFI)
REPORTS 50-282/98016(DRS); 50-306/98016(DRS)

Dear Mr. Wadley:

On August 28, 1998, the NRC completed an inspection at your Prairie Island Nuclear Generating Plant. The enclosed report presents the results of that inspection.

Areas examined during the inspection included the fire protection program and the results of your recently performed Appendix R self-assessment. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

The inspectors concluded that your fire protection self-assessment project contained acceptable administrative controls to identify, track, and resolve issues; to review, identify, and control commitments; and to ensure configuration management controls were appropriate. No cited violations of NRC requirements were identified at this time. However, we were concerned that your self-assessment activities did not identify the significant safe shutdown deficiencies subsequently identified by the NRC inspection team.

During this inspection period, three apparent violations of NRC requirements were identified by the inspectors which 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. These apparent violations pertain to: 1) the failure to identify and protect safe shutdown equipment which could be susceptible to fire damage; 2) the failure to maintain fire wrapping for safe shutdown equipment identified by NRC approved exemptions as being required to assure safe shutdown in the event of a postulated fire in Fire Areas 32 and 58/73; and 3) the susceptibility of valves to fire-induced mechanical damage as described in Information Notice 92-18. Although your preliminary reviews of these issues were documented in Licensee Event Reports 1-98-10, 1-98-12, 1-98-14, and 1-98-15, we understand that these issues are still being evaluated by your staff for safety significance. 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 of your completed analyses of safety significance. You will be advised, by separate correspondence, of the results of our deliberations on this matter.

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During this inspection, we also identified that the fire-resistive performance of the Kaowool fire barrier system used extensively at Prairie Island to protect safe shutdown equipment was indeterminate. We understand that your staff has implemented and will maintain appropriate compensatory actions until this issue is resolved. We request that you respond within 30 days of the date of this letter describing your project plan for addressing this issue.

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

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

John A. Grobe, Director
Division of Reactor Safety

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

Enclosure: Inspection Reports 50-282/98016(DRS); 50-306/98016(DRS)

cc w/encl: Plant Manager, Prairie Island
State Liaison Officer, State of Minnesota
State Liaison Officer, State of Wisconsin
Tribal Council, Prairie Island Dakota Community

Distribution:

- CAC (E-Mail)
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- Project Mgr., NRR w/encl
- J. Caldwell, RIII w/encl
- C. Pederson, RIII w/encl
- B. Clayton, RIII w/encl
- SRI Prairie Island w/encl
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DATE	10/6/98		10/6/98		10/6/98		10/7/98		10/ /98	

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During this inspection, we also identified that the fire-resistive performance of the Kaowool fire barrier system used extensively at Prairie Island to protect safe shutdown equipment was indeterminate. We understand that your staff has implemented and will maintain appropriate compensatory actions until this issue is resolved. We request that you respond within 30 days of the date of this letter describing your project plan for addressing this issue.

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Sincerely,

Original /s/ J. A. Grobe
 John A. Grobe, Director
 Division of Reactor Safety

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 * See previous concurrence