



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

January 21, 1998

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 a Notice of Violation (Inspection Report 97019), Inadequate Instructions
During an ATWS and Section Work Instructions not reviewed by Operations Committee

Your letter of December 23, 1997, which transmitted Inspection Report No. 97019, required a response to a Notice of Violation. Our response to the 2 violations is contained in the attachment to this letter.

Your cover letter to the inspection report states, "The second violation involved a problem with your procedure change management program and is of concern because appropriate management oversight of such changes is an important element of the process." Management involvement is an element of the procedure change management program in that the Section Work Instructions (SWI's) were approved by department managers who are Operations Committee members. The program did not have as an element full Operations Committee review. Northern States Power Company does not contest either violation.

We have made one new Nuclear Regulatory Commission commitment as indicated by the statement in bold italics in the attachment.

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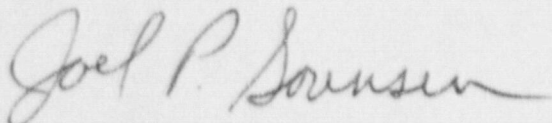


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NORTHERN STATES POWER COMPANY

Please contact us 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

Attachment: RESPONSE TO NOTICE OF VIOLATION

RESPONSE TO NOTICE OF VIOLATION

Violation 1

Code of Federal Regulation Title 10 Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," states, in part, that activities affecting quality be prescribed by documented instructions and procedures of a type appropriate to the circumstances and be accomplished in accordance with these instructions or procedures.

Contrary to the above, on July 24, 1996, the licensee implemented procedure SWI O-10, "Operations Manual Usage," Revision 28, Section 6.11.9, which contained inadequate instructions that directed operators during an ATWS (anticipated transient without a scram) condition not to enter emergency operating procedures (EOP) unless a valid protection system set point was reached and the reactor trip breakers were not open and cannot be opened manually. This instruction was in direct conflict and circumvented the requirements of EOPs 1(2)E-0, "Reactor Trip or Safety Injection," Revision 17, Section A and Step 1, and 1(2)FR-S.1, "Response to Nuclear Power Generation/ATWS," Revision 8, Step 2.

This is a Severity Level IV violation.

Reason for Violation

Reason for the violation was procedure inadequacy.

Management policy has long been that the units should not be subjected to an unnecessary ATWS transient. During simulator exercises in the spring of 1996, crews were observed responding differently to situations involving inoperable reactor trip switches on the control board. The Westinghouse Project Office was contacted to determine if the reactor trip switch failure issue had been addressed during the writing of the generic guidance Emergency Response Guidelines. Their answer was no. The project office stated that the generic guidance starts the ATWS when a transient occurs which calls for an automatic trip. Our policy to avoid the unnecessary ATWS transient failed to address the manual trip discussed in Section A of 1(2)E-0.

Section 6.11.9 of SWI O-10 was put into place in July 1996. This particular addition to the SWI was reviewed by the Operations Committee (OC) before approval.

Corrective Actions Taken

Section 6.11.9 was removed from SWI O-10. This revision was reviewed by the OC on November 19, 1997. Operations personnel were informed of the change and the reason for the change prior to distribution.

Corrective Steps Taken to Avoid Further Violations

Operations procedure writers and the Operations Committee have reviewed the violation. The need to evaluate potential changes in operating philosophy with the requirements of the EOP's and ERG generic guidance has been emphasized. Processes are in place to ensure procedure changes do not place the plant outside the requirements of Technical Specifications or the USAR, and for deviating from ERG generic guidance.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Violation 2

Technical Specification 6.5 required that detailed written procedures, including the applicable checkoff lists and instructions, covering areas listed be prepared and followed. The specification further required that the procedures and changes thereto be reviewed by the Operations Committee (OC). Areas listed under Plant Operations included the following: (1) integrated and system procedures for normal startup, operation and shutdown of the reactor and all systems and components involving nuclear safety of the facility; (2) fuel handling operations; (3) actions to be taken to correct specific and foreseen potential or actual malfunction of systems or components including responses to alarms, primary system leaks and abnormal reactivity changes and including follow-up actions required after plant protective system actions have initiated; (4) implementing procedures of the fire protection program.

Contrary to the above, the inspectors identified that as of October 9, 1997, the licensee had established a series of Operating Department Section Work Instructions (SWI's), covering areas listed in Technical Specification 6.5, which were not reviewed by the OC. The Section Work Instructions included the following:

SWI O-1, "Work Rules and Philosophy for Operation of Nuclear Plants,"
Revision 9, dated July 17, 1997, Sections 6.2, 6.6, and 6.7

SWI O-10, "Operations Manual Usage," Revision 29, dated March 24, 1997, Sections 6.4 and 6.7.5.

SWI O-41, "Duties and Responsibilities of Fuel Handling Personnel," Revision 4, dated July 17, 1997, Sections 6.1.7 and 6.2.

This is a Severity Level IV violation.

Reason for Violation

Much of the information contained in the Operations SWI's has been added over the years to provide information to the operators, or to clarify existing requirements, based on questions raised or issues that emerged during operation or in training. Other than two SWI's (Plant Security and Bomb Threats) which have always been reviewed by the OC, it was not recognized that this information was equivalent to written procedures requiring OC review per Technical Specification 6.5.

Corrective Actions Taken

The following SWI sections were reviewed by the OC on the indicated dates:

SWI O-1, Sections 6.2, 6.6, and 6.7	11/19/97
SWI O-10 Sections 7.4 and 7.7	11/19/97
(Sections previously numbered 6.4 and 6.7)	
SWI O-41, all sections	10/30/97

A review of all Operations SWI's was conducted to determine whether any others contained written instructions which should be reviewed by the OC per TS.6.5. Two additional SWI's were identified along with an additional section in SWI O-10. These were reviewed by the OC on the indicated dates:

SWI O-10, Section 7.11.8	11/19/97
SWI O-2, Attachment A	11/19/97
SWI O-3, all sections	11/13/97

Corrective Steps That Will Be Taken to Avoid Further Violations

5AWI1.5.0, Procedure Control, Table 1 (Document Review and Approval) will be updated by April 1, 1998 to indicate additional procedures that need OC review.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.