



AUG 28 2013

L-PI-13-083
10 CFR 2.201

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
Renewed License Nos. DPR-42 and DPR-60

Reply to a Notice of Violation

Pursuant to the provisions of 10 CFR 2.201, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), hereby submits a written statement in reply to the Notice of Violation included with NRC Inspection Report 05000282/2013003; 05000306/2013003 for the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, dated July 30, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13212A038).

This violation was cited because of failure to restore compliance with NRC regulations in 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants", (Maintenance Rule) after the NRC identified a non-cited violation in 2011 and NSPM identification of additional issues approximately 18 months ago.

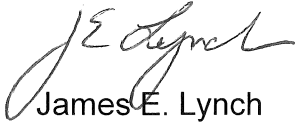
The enclosure to this letter provides the following information required by 10 CFR 2.201 and requested in the Notice of Violation:

- (1) the reason for the violation,
- (2) the corrective steps that have been taken and the results achieved,
- (3) the corrective steps that will be taken, and
- (4) the date when full compliance will be achieved.

If there are any questions or if additional information is needed, please contact Mr. Dale Vincent, P.E., at 651-388-1121.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.



James E. Lynch
Site Vice President, Prairie Island Nuclear Generating Plant
Northern States Power Company - Minnesota

Enclosures (1)

cc: Administrator, Region III, USNRC
Project Manager, PINGP, USNRC
Resident Inspector, PINGP, USNRC

Enclosure

Reply to Notice of Violation

Cited Violation

During an NRC inspection conducted from April 1 to June 30, 2013, at the Prairie Island Nuclear Generating Plant (PINGP), Units 1 and 2, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 CFR 50.65(a)(1), requires, in part, that the holders of an operating license shall monitor the performance or condition of structures, systems and components (SSCs) within the scope of the rule as defined by 10 CFR 50.65(b), against licensee-established goals, in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions.

Title 10 CFR 50.65(a)(2) states, in part, that monitoring as specified in 10 CFR 50.65(a)(1) is not required where it has been demonstrated that the performance or condition of an SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to the above, from November 11, 2011 through June 30, 2013, the Prairie Island Nuclear Generating Plant, Units 1 and 2, failed to demonstrate that the performance or condition of SSCs specified in 10 CFR 50.65(b) were being effectively controlled through the performance of appropriate preventive maintenance. In addition, the Prairie Island Nuclear Generating Plant, Units 1 and 2, failed to establish goals sufficient to provide reasonable assurance that such SSCs were capable of performing their intended safety function after demonstrating that the condition of the SSCs was not being effectively controlled through the performance of appropriate preventive maintenance. Specifically, goals sufficient to provide reasonable assurance that the D5/D6 ventilation system and the 21 inverter were capable of fulfilling their intended functions were not established after the demonstration showing that the performance or condition of these systems was being effectively controlled became invalid. In addition, more than 300 examples existed where the monitoring described in 10 CFR 50.65(a)(2) had not been performed.

This violation is associated with a Green Significance Determination Process finding.

Reason for the Violation

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), failed to monitor structures, systems and components (SSCs) specified in 10 CFR 50.65. The causes for this failure were identified as follows:

- **Inadequate Organizational Structure:** Engineering management has disregarded the Maintenance Rule (MR) Program by leaving the Maintenance Rule Coordinators (MRCs) exclusively responsible for assuring 10 CFR 50.65 requirements were met for PINGP.
- **Inadequate Standards and Enforcement:** The plant staff has not been consistently sensitive to MR regulatory concerns. MR regulatory issues have not received the needed level of plant visibility and ownership to ensure all aspects are addressed from problem identification (Corrective Action Program) through issue resolution.

Corrective Steps That Have Been Taken and the Results Achieved

NSPM has taken the following actions at PINGP in response to the conditions described in the Notice of Violation:

- The Maintenance Rule Expert Panel (MREP) reviewed more than 300 outstanding Maintenance Rule Evaluations (MREs) which includes the D5/D6 ventilation, 21 inverter and the more than 300 examples (backlog) specifically cited in the Notice of Violation.
- As the result of this review, the D5/D6 ventilation, 21 inverter and other systems in the MRE backlog were classified for monitoring within the provisions of 10 CFR 50.65(a)(1).
- Radiation Monitors were evaluated for inclusion in the MR Program scope under 10 CFR 50.65(b)(2)(i) at an MREP meeting. The Radiation Monitor basis document was approved by the MREP.
- The Radiation Monitoring System was classified for monitoring within the provisions of 10 CFR 50.65(a)(1) at an MREP meeting.

Corrective Steps That Will Be Taken

NSPM will take the following steps in accordance with the Corrective Action Program to restore compliance:

- MREP will complete the review and disposition of outstanding (backlog) MREs from November 11, 2011 to June 30, 2013.
- Emergency Operating Procedure (EOP) equipment will be evaluated by the MREP for inclusion in the MR Program scope under 10 CFR 50.65(b)(2)(i). Applicable EOP equipment will be added to the MR Program.

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- Performance of EOP equipment included in the MR Program will be compared to the new performance criteria and the EOP equipment will be properly classified for monitoring within the provisions of 10 CFR 50.65(a)(1) or 10 CFR 50.65(a)(2).
- Plant system engineers will review the PINGP power history for the last two years to assure plant level events have been appropriately captured in the MR Program. Results will be presented to the MREP.
- Plant system engineers will review PINGP Licensee Event Reports for the last two years to assure they were appropriately captured in the MR Program. Results will be presented to the MREP.
- MR Program systems will be evaluated to assure they have been properly classified for monitoring within the provisions of 10 CFR 50.65(a)(1) or 10 CFR 50.65(a)(2). Results will be presented to the MREP.

NSPM will take the following steps to prevent recurrence:

- Revise fleet procedure FP-E-MR-05, "Maintenance Rule Expert Panel (MREP)" to include MRC experience requirements under Section 5.2.2, "Expert Panel Member Specific Experience Requirements". The minimum requirements shall be five years of nuclear power plant experience and two years PINGP engineering experience.
- Develop and implement "Roles and Responsibilities" for regulatory program positions and qualified full-time equivalents (backups) identified on the engineering organizational chart. This will include daily, weekly, monthly, quarterly, and annual requirements for these positions. Implementation will include roles and responsibilities procedure development for the PINGP Engineering Department.
- Develop and implement a Program Engineering Steering Committee to monitor the effectiveness of engineering program health and implementation, and provide the appropriate level of management oversight and line ownership. Completion of this action will include defining the charter, identifying the members, and implementing monthly meetings.
- Evaluate and implement industry standard (benchmarking) prerequisite requirements for the MRC position.
- Create an engineering supervisor position to oversee MR and Mitigating System Performance Index (MSPI) Program recovery efforts; this position will report to the Equipment Reliability Manager and directly supervise the MRC position.
- Develop and implement a knowledge transfer procedure to ensure subject matter expert knowledge can be captured.

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- Develop a comprehensive desk guide for the MRC position to consistently maintain the continuity of MRC duties required per fleet procedure FP-E-MR-05.

Date When Full Compliance Will Be Achieved

For the violation described above, full compliance will be achieved by March 28, 2014.