



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Welch, Minnesota 55089

April 14, 1997

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 Notice of Violation (Inspection Report 97003),
Failure to Submit Relief Requests for Limited Inservice Inspection Examinations

Your letter of March 14, 1997, which transmitted Inspection Report No. 97003, required a response to a Notice of Violation. Our response to the violation is contained in the attachment to this letter.

In this response we have made no new Nuclear Regulatory Commission commitments; the corrective actions to prevent further violations were previously committed to in our Licensee Event Report 97-02 for Unit 1, dated March 21, 1997.

Please contact Jack Leveille (612-388-1121, Ext. 4662) 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

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RESPONSE TO NOTICE OF VIOLATION

VIOLATION

Technical Specification 4.2.A.1 requires that the "inservice inspection of ASME Code Class 1, Class 2, and Class 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55(g), except where relief has been granted by the Commission pursuant to 10 CFR 50.55(g)(6)(i)."

ASME Code, Section XI, 1980 Edition Winter 1981 Addenda, IWB-2500(a) requires "Components shall be examined and tested as specified in Table IWB-2500-1," IWC-2500(a) required "Components shall be examined and pressure tested as specified in Table IWC-2500-1" and IWF-2500 required "Components supports subject to examination shall be examined and tested as specified in Table IWF-2500-1."

10 CFR 50.55a(g)(5)(iii) requires "If the licensee has determined that a Code requirement is impractical for its facility, the licensee shall notify the commission and submit, as specified in 50.4, information to support the determinations."

10 CFR 50.55a(g)(5)(iv) requires "Where an examination requirement by the Code or addenda is determined to be impractical by the licensee and is not included in the revised inservice inspection program as permitted by paragraph (g)(4) of this section, the basis for this determination must be demonstrated to the satisfaction of the Commission no later than 12 months after the expiration of the initial 120-month period of operation and each subsequent 120-month period of operation during which the examination is determined to be impractical."

10 CFR 50.55a(g)(6)(i) states "The Commission will evaluate determinations under paragraph (g)(5) of this section that code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines is authorized"

Contrary to these requirements:

- a. On February 10, 1997, the inspector identified seven welds in each unit (listed in report section M4.1) for which Code volumetric examination requirements had not been met and for which authorized Code relief had not been obtained pursuant to 10 CFR 50.55a(g)(6)(i) and Technical Specification 4.2.A.1 requirements.
- b. On February 12, 1997, the inspector identified 73 examinations affecting both units (identified in Attachment A as a "Limited exam") for which Code examination requirements had not been met and for which authorized

Code relief had not been obtained pursuant to 10 CFR 50.55a(g)(6)(i) and Technical Specification 4.2.A.1 requirements.

This is a Severity Level IV violation (Supplement 1).

RESPONSE TO VIOLATION

Reason For The Violation

The reason for the violation is that our interpretation of the Code of Federal Regulations (CFR) Section 10CFR50.55a(g)(1) differed from the regulating authority's.

10CFR50.55a(g)(1) states, "For a boiling or pressurized water-cooled nuclear power facility whose construction permit was issued prior to January 1, 1971, components (including supports) must meet the requirements of paragraphs (g) (4) and (5) of this section to the extent practical." We interpreted this section to mean that interferences inherent in the design constituted impracticality and, therefore, were exempt because the Prairie Island construction permit was issued in 1967. This has been the approach taken for the ISI Program since Section XI was implemented at Prairie Island.

Limitations have been noted on Inservice Inspection (ISI) examination reports and included in the ISI Outage Summary Reports. Since relief requests have not been submitted for ISI examination components with limitations, this constitutes a non-compliance with Technical Specification 4.2, Inservice Inspection and Testing of Pumps and Valves Requirements.

Corrective Steps That Have Been Taken And The Results Achieved

We are now a third of the way through the third interval. We have reviewed all 1st period, 3rd interval summary reports for ISI examinations with limitations. These ISI examination reports with limitation have been tallied. The tally shows 81 limited examinations for Unit 1 and 45 limited examinations for Unit 2 during the 3rd interval, 1st period. These limitations will be evaluated for extent to determine if relief is required, as outlined in the following section.

Corrective Steps That Will Be Taken To Avoid Further Violations

An administrative procedure is being prepared establishing a process to identify, quantify, and document limited access ISI examinations. This procedure will be completed by July 1, 1997.

The 1st period, 3rd interval ISI examinations with limitations tally will be reviewed for "essentially 100%" coverage per guidance given in NRC Information Notice 96-32: Implementation of 10CFR50.55a(g)(6)(ii)(A), Augmented Examination of Reactor Vessel, June 5, 1996 and Code Case N-460.

Review may require physical access to components to adequately quantify extent of limitation. Physical review will be performed as permitted during operation and during the next two refueling outages. Review may require two refueling outages per unit to complete.

Relief from 1st period examinations will be included with the refueling outage summary reports for each unit, respectively. Relief will be submitted for each limited examination.

Each future examination with limitations will be documented to quantify the extent of limitation and relief will be requested. Relief will be submitted with the outage summary report for each limited examination.

Note: Rather than examining different components, we will be examining the same components in the 3rd interval as in the previous intervals, unless those components no longer are required to be examined by the newer (1989) edition of ASME Code Section XI. Thus, the components with less than "essentially 100" coverage, for which we failed to obtain relief in the first and second intervals will be re-examined in the third interval and relief requests will be submitted for the third interval.

The Date When Full Compliance Will Be Achieved

We are currently in compliance for the 3rd interval since the time limit for requesting relief has not expired yet. Since we are now aware of the intent of the regulation, we will remain in compliance.