



Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637

Operated by Nuclear Management
Company LLC

August 15, 2001

10 CFR Part 50
Section 50.90

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

License Amendment Request - Relocation of
Technical Specification Administrative Controls Related to Quality Assurance

- Reference 1: NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants"
- Reference 2: NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance"
- Reference 3: NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2

Attached is a request for changes to the Technical Specifications (TS), Appendix A of the Operating License, for the Monticello Nuclear Generating Plant. This request is submitted in accordance with the provisions of 10 CFR Part 50, Section 50.90 and Section 50.91.

Nuclear Management Company, LLC, (NMC) proposes changes to the Monticello TS Table of Contents and Administrative Controls section. These changes are summarized as follows:

- 1) In accordance with the guidance provided in Nuclear Regulatory Commission (NRC) Regulatory Information Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," (Reference 1) changes are proposed to reflect the replacement of Monticello's licensed operator initial and requalification training programs, previously approved by the NRC, with an accredited systems approach to training program, and make wording revisions for clarification.
- 2) In accordance with the guidance provided in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," December 12, 1995, (Reference 2) changes are proposed to relocate the existing TS requirements for procedures, records and reviews to the Xcel Energy Operational Quality Assurance Plan (OQAP). In the relocation process, minor editorial changes, such as renumbering

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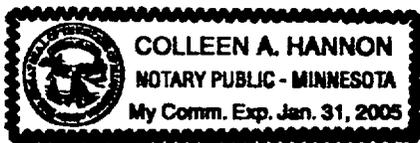
paragraphs were made, but there were no changes to the frequency, periodicity, duration or controls for Technical Specifications (TS) transferred to the Xcel Energy OQAP. Revised TS wording for procedure requirements will be similar to the wording from Standard Technical Specification as approved by the NRC in NUREG-1433 (Reference 3). Additionally, any subsequent changes to the provisions relocated to the Xcel Energy OQAP will be controlled in accordance with the requirements of 10 CFR 50.54(a).

Exhibit A contains the Proposed Change, Reasons for Change, a Safety Evaluation, a Determination of No Significant Hazards Consideration and an Environmental Assessment. Exhibit B contains current Monticello TS pages marked up to show the proposed change. Exhibit C contains the revised Monticello TS pages. Exhibit D provides a Table and markup describing where the provisions of TS will be located in the Xcel Energy OQAP

This submittal commits NMC to provide the NRC with a Revision to the Xcel Energy OQAP which establishes the location of the previous TS requirements. The Monticello Operations Committee has reviewed this application. A copy of this submittal, along with the evaluation of No Significant Hazards Consideration, is being forwarded to our appointed state official pursuant to 10 CFR 50.91.

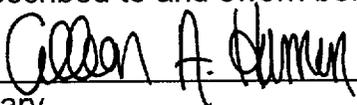
NMC respectfully request a 45-day implementation period for this revision.

If you have any questions regarding this License Amendment Request please contact Doug Neve, Licensing Project Manager (Interim), at (763) 295-1353.



By 
John D. Purkis
Plant Manager
Monticello Nuclear Generating Plant

Subscribed to and sworn before me this 15 day of August, 2001


Notary

- Attachments:
- Exhibit A – Evaluation of Proposed Change to the Monticello Technical Specifications
 - Exhibit B - Current Monticello Technical Specifications Pages Marked up With Proposed Changes
 - Exhibit C - Revised Monticello Technical Specifications Pages
 - Exhibit D - Relocation Table for Monticello Technical Specifications Relocated to the Xcel Energy Operational Quality Assurance Plan

cc: Regional Administrator-III, NRC
NRR Project Manager, NRC
Sr. Resident Inspector, NRC
Minnesota Department of Commerce
J. Silberg, Esq

Exhibit A

License Amendment Request - Relocation of Technical Specification Administrative Controls Related to Quality Assurance

Evaluation of Proposed Change to the Monticello Technical Specifications

Pursuant to 10 CFR Part 50, Section 50.90 and Section 50.91, Nuclear Management Company (NMC) hereby proposes the following changes to Appendix A, of Facility Operating License DPR-22, Technical Specifications (TS) for the Monticello Nuclear Generating Plant.

Background

Change 1, proposed below, revises the Monticello TS Table of Contents page to reflect the changes being proposed by this license amendment request.

On January 18, 2001, the Nuclear Regulatory Commission (NRC) issued Regulatory Issue Summary (RIS) 2001-01, "Eligibility of Operator License Applicants." The NRC issued this RIS to familiarize addressees with the NRC's current guidelines for the qualification and training of reactor operator and senior operator license applicants.

Change 2, proposed below, is consistent with the recommendations of RIS 2001-01, and change 3, proposed below, provides wording changes for clarification.

On December 12, 1995, the NRC issued Administrative Letter (AL) 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." This letter informed licensees of an acceptable method for the relocation of technical specification administrative controls related to quality assurance.

The NRC stated that the quality assurance program is a logical candidate for licensees to relocate technical specification requirements related to quality assurance. This is due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a).

Changes 4, 5 and 6, proposed below, are consistent with the recommendations and guidance provided in AL 95-06.

The proposed changes to Appendix A of the Monticello Operating License are described below. Specific wording changes are shown in Exhibits B and C. Exhibit D provides a Table and markup describing where the provisions of TS will be relocated to in a draft revision of the Xcel Energy OQAP. The following provides a description of the changes referenced above, the reason for the change, and a safety evaluation for the changes.

Exhibit A

Proposed Changes and Reasons for Changes

Change 1 - Revise TS Table of Contents page iv

Revise the Monticello TS Table of Contents page to reflect the revisions requested by this proposed license amendment request. Re-title TS Section 6.5 as Procedures, and reflect that TS Section 6.6 has been deleted.

Change 2 – Revise TS Section 6.1.C, “Plant Staff”

Add a new paragraph to this TS Section for clarification. This paragraph will state that licensed reactor operators and senior reactor operators shall complete qualification training in accordance with a Commission-approved training program that is based on a systems approach to training and uses a simulation facility that is acceptable to the Commission. This program has been accredited by the National Nuclear Accrediting Board.

This change is requested to reflect the replacement of Monticello’s licensed operator initial and requalification training programs, previously approved by the NRC, with an accredited systems approach to training program.

Change 3 – Revise TS Section 6.1.D

Revise the Monticello TS, replacing the word “unit” with the word “site,” which will provide for a consistent use of terminology in the plant TS, the Updated Safety Analysis Report (USAR), plant procedures and documents. This wording change clarifies that the wording in ANSI N18.1-1971, “Selection and Training of Nuclear Power Plant Personnel,” is applicable for the site staff at Monticello. Also, insert a statement that says licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8.

This change is requested to provide consistency in terminology used in the Monticello TS, the USAR and plant procedures and documents. In addition, the statement that licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8 is needed to comply with the guidance of Reference 1.

Change 4 – Re-title and Revise TS Section 6.5, “Plant Operating Procedures”

The following changes are proposed for TS Section 6.5:

- 1) Re-title TS Section 6.5 as “Procedures,” consistent with NUREG 1433.
- 2) Replace the existing procedure requirements with wording and requirements consistent with that of the “Procedures” section of Reference 3. The difference between the proposed Monticello TS wording and the wording in the Standard Technical Specifications has to do with the Section number referenced for Programs and Manuals.

Exhibit A

- 3) Relocate the current specific requirements of this TS Section, including the review and approval requirements, to the Xcel Energy Operational Quality Assurance Plan (OQAP). This change is in accordance with the guidance of AL 95-06. No content changes have been made and the TS requirements were relocated intact to the Xcel Energy OQAP. In the relocation process, minor editorial changes, such as renumbering paragraphs were made, but there were no changes to the frequency, periodicity, duration or controls for TS transferred to the Xcel Energy OQAP. Exhibit D provides a Table describing where the provisions of TS will be relocated to in a draft Xcel Energy OQAP.
- 4) Delete the statement regarding conducting drills on the procedures specified in A.3 and A.5 of this section because these drills are included as part of the their respective training programs.

As stated in Reference 2, technical specifications containing requirements for the processes related to the review and approval of procedures and changes to procedures may be relocated to the quality assurance plan. The changes to relocate these requirements will be included in a revision to the Xcel Energy OQAP. Monticello Nuclear Generating Plant meets the procedure requirements for those procedures listed in NUREG-1433, Section 5.4.

Additionally, any subsequent changes to the provisions relocated to the Xcel Energy OQAP will be controlled in accordance with the requirements of 10 CFR 50.54(a).

Change 5 – Delete TS Section 6.6, “Plant Operating Records”

Revise the Monticello TS to delete the requirements of TS Section 6.6. The requirements for plant operating records will be relocated to the Xcel Energy OQAP. This change is in accordance with the guidance of AL 95-06, no content changes have been made and the TS requirements were relocated intact to the Xcel Energy OQAP. In the relocation process, minor editorial changes, such as renumbering paragraphs were made, but there were no changes to the frequency, periodicity, duration or controls for TS transferred to the Xcel Energy OQAP. Exhibit D provides a Table and markup describing where the provisions of TS will be relocated to in a draft Xcel Energy OQAP.

As stated in Reference 2, technical specifications containing administrative controls which contain record requirements for particular specifications, as well as a section on general requirements for record retention may be relocated to the quality assurance plan. The changes to relocate these requirements will be included in a revision to the Xcel Energy OQAP.

Additionally, any subsequent changes to the provisions relocated to the Xcel Energy OQAP will be controlled in accordance with the requirements of 10 CFR 50.54(a).

Exhibit A

Change 6 – Delete TS Section 6.7.B, “Reportable Events”

Delete the reporting requirements of Monticello TS Section 6.7.B. Event reporting in accordance with 10 CFR 50.73 is required by regulation and need not be repeated as a Technical Specification requirement.

The Operations Committee review formerly contained in TS 6.7.B are embodied in the OQAP as review requirement 22.4.6 which requires review of reportable events. This requirement will be revised to require forwarding the results of the Operations committee reviews to the Safety Audit Committee and the Chief Nuclear Officer NMC. Including these review requirements in the OQAP is consistent with the guidance of AL 95-06.

Safety Evaluation

Change 1 is acceptable because it is an administrative change which revises the TS Table of Contents to reflect the changes proposed by this license amendment request.

Change 2 is acceptable based on the guidance provided by the NRC in RIS 2001-01, Reference 1, which states that in accordance with 10 CFR 55.31(a)(4), as amended on March 25, 1987, a license applicant must provide evidence that he or she has successfully completed the facility licensee’s requirements to be licensed as a reactor operator or senior reactor operator. An authorized representative of the facility licensee shall certify this evidence on the license application; the required certification must include the details of the applicant’s qualifications, training, and experience. In lieu of these details, the Commission may accept certification that the applicant has successfully completed a Commission-approved training program that is based on a systems approach to training and uses a simulation facility that is acceptable to the Commission. By letter to the NRC dated March 21, 1988, Monticello stated that it would conduct operator training in accordance with its INPO accredited program. Additionally, as indicated in the statement of consideration for the 1987 rule change, a facility licensee’s training program would be considered approved by the NRC when it is accredited by the National Nuclear Accrediting Board.

Therefore, adding an additional paragraph to the Monticello Technical Specifications is not a reduction in safety or commitment, but provides additional clarification as to the license applicant’s qualification, training, and experience.

Change 3, revising the word “unit to “site,” and inserting a statement that says licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8, is acceptable, and not a reduction in safety, because it provides for use of consistent terminology between the TS, the USAR, and plant procedures and documents.

Changes 4, 5 and 6 are acceptable based on the guidance provided by the NRC in AL 95-06 (Reference 2). NRC AL 95-06 states that it is acceptable to relocate requirements that are controlled directly by regulation and related licensee programs. Since the requirements that are being deleted by this proposed amendment are being relocated to the OQAP, this change is acceptable based on the fact that changes to the OQAP are controlled in

Exhibit A

accordance with the requirements of 10 CFR 50.54(a). No content changes have been made and the TS requirements were relocated intact to the Xcel Energy OQAP. In the relocation process, minor editorial changes, such as renumbering paragraphs were made, but there were no changes to the frequency, periodicity, duration or controls for TS transferred to the Xcel Energy OQAP.

The relocation of TS requirements from the TS to licensee controlled programs, especially those controlled by other regulations, is an NRC approved acceptable method. The relocation of requirements that do not meet the criteria of 10 CFR 50.36, for inclusion in the TS, has been previously approved by the NRC on numerous occasions.

Additionally, Monticello will comply with the requirements of 10 CFR 50.54(a) change process which provides guidance for additional revisions to the Xcel Energy OQAP.

Therefore, the relocation of requirements from the Monticello Technical Specifications to the OQAP is not a reduction in safety or commitment, but an administrative action which will reduce the resources spent by the NRC staff and NMC in preparing and reviewing license amendment request.

Determination of No Significant Hazards Considerations

Nuclear Management Company, LLC, proposes to revise the Monticello Nuclear Generating Plant Technical Specifications (TS), Appendix A to the Operating License as follows:

- 1) In accordance with the guidance provided in Nuclear Regulatory Commission (NRC) Regulatory Information Summary (RIS) 2001-01, "Eligibility of Operator License Applicants," changes are proposed to reflect the replacement of Monticello's licensed operator initial and requalification training programs, previously approved by the NRC, with an accredited systems approach to training program, and make wording revisions for clarification.
- 2) In accordance with the guidance provided in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," December 12, 1995, changes are proposed to relocate the existing TS requirements for procedures, records and reviews to the Xcel Energy Operational Quality Assurance Plan (OQAP). In the relocation process, minor editorial changes, such as renumbering paragraphs were made, but there were no changes to the frequency, periodicity, duration or controls for Technical Specifications (TS) transferred to the Xcel Energy OQAP. Revised TS wording for procedure requirements will be similar to the wording from Standard Technical Specification as approved by the NRC in NUREG-1433. Additionally, any subsequent changes to the provisions relocated to the Xcel Energy OQAP will be controlled in accordance with the requirements of 10 CFR 50.54(a).

Exhibit A

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10 CFR 50.91 using the standards provided in 10 CFR 50.92. This evaluation is provided below:

1. *The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed changes are administrative in nature and compliance with applicable regulatory requirements will continue to be maintained. The proposed changes do not involve any change to the configuration or alter existing system relationships. In addition, the proposed changes do not alter the conditions or assumptions in any of the previous accident analyses thus, the radiological consequences previously evaluated are not adversely affected by the proposed changes.

Therefore, the probability or consequences of an accident previously evaluated are not affected by the proposed amendment.

2. *The proposed amendment will not create the possibility of a new or different kind of accident from any previously analyzed.*

The proposed changes are administrative in nature and compliance with applicable regulatory requirements will continue to be maintained. The proposed changes do not involve any change to the configuration or method of operation of any plant equipment. Accordingly, no new failure modes have been introduced for any plant system or component important to safety nor has any new limiting single failure been identified as a result of the proposed changes. Also, there will be no changes in types or increases in the amounts of any effluents released offsite.

Therefore, the possibility of a new or different kind of accident from any accident previously evaluated will not be created.

3. *The proposed amendment will not involve a significant reduction in the margin of safety.*

The proposed changes are administrative in nature and do not involve any change in the methodology or method of operation of any plant equipment. The proposed changes do not involve any change to the configuration or alter existing system relationships. The appropriate controls to provide continued assurance of compliance to applicable regulatory requirements has been maintained.

Therefore, the proposed amendment will not involve a significant reduction in the margin of safety.

Based on the evaluation described above, and pursuant to 10 CFR Part 50, Section 50.91, NMC has determined that operation of the Monticello Nuclear Generating Plant in

Exhibit A

accordance with the proposed changes does not involve any significant hazards considerations as defined in 10 CFR Part 50, Section 50.92.

Environmental Assessment

NMC has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration.
2. The changes do not involve a significant change in the type or significant increase in the amounts of any effluent that may be released offsite.
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR Part 51, Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51, Section 51.22(b), an environmental assessment of the proposed changes is not required.

References

- Reference 1: NRC Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants"
- Reference 2: NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," December 12, 1995
- Reference 3: NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, April, 2001.

Exhibit B

License Amendment Request - Relocation of Technical Specification Administrative Controls Related to Quality Assurance

Current Monticello Technical Specification Pages Marked Up With Proposed Change

This Exhibit consist of current Monticello Technical Specification pages marked up with the proposed changes. The pages included in the exhibit are listed below:

Pages

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245
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	<u>Page</u>
3.13 and 4.13	Alternate Shutdown System 223
	A. Alternate Shutdown System 223
	3.13 Bases 225
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	3.14 and 4.14 Bases 229e
3.15 and 4.15	Inservice Testing 229f
	3.15 and 4.15 Bases 229g
3.16 and 4.16	(Deleted) to
3.17 and 4.17	Control Room Habitability 229u
	A. Control Room Ventilation System 229u
	B. Control Room Emergency Filtration System 229v
	3.17 Bases 229y
	4.17 Bases 229z
5.0	DESIGN FEATURES 230
	5.1 Site 230
	5.2 Reactor 230
	5.3 Reactor Vessel 230
	5.4 Containment 230
	5.5 Fuel Storage 231
	5.6 Seismic Designs 231
6.0	ADMINISTRATIVE CONTROLS 232
	6.1 Organization 232
	6.2 (Deleted) 243
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	6.4 Action to be taken if a Safety Limit is Exceeded 243
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	6.6 Plant Operating Records (Deleted) 246e
	6.7 Reporting Requirements 248
	6.8 Programs and Manuals 253
	6.9 High Radiation Area 259 to

CHANGE 1

C. Plant Staff

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.1.1.
2. At least one licensed operator shall be in the control room when fuel is in the reactor.
3. At least two licensed operators shall be present in the control room during cold startup, scheduled reactor shutdown, and during recovery from reactor trips.
4. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
5. All alterations of the reactor core shall be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
6. The operations manager shall be formerly licensed as a Senior Reactor Operator or hold a current Senior Reactor Operator License.
7. At least one member of plant management holding a current Senior Reactor Operator License shall be assigned to the plant operations group on a long term basis (approximately two years). This individual will not be assigned to a rotating shift.

Change 2

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| 8. Licensed reactor operators and senior reactor operators shall complete qualification training in accordance with a Commission-approved training program that is based on a systems approach to training and uses a simulation facility that is acceptable to the Commission. This program has been accredited by the National Nuclear Accrediting Board. |
|---|

Change 3

- D. Each member of the ^{site} unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the radiation protection manager or designated health physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, and (3) the operations manager who shall meet the requirement of ANSI N18.1-1971 except that NRC license requirements are as specified in Specification 6.1.C.7. (4) licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8. The training program shall be under the direction of a designated member of Nuclear Management Company, LLC management.

~~Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.~~

~~A. Plant Operations~~

- ~~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. Surveillance and testing requirements that could have an effect on nuclear safety.~~
- ~~5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.~~
- ~~6. Implementing procedures of the fire protection program.~~
- ~~7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.~~

~~Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.~~

~~B. (Deleted)~~

INSERT

6.0 ADMINISTRATIVE CONTROLS

6.5 Procedures

A. Written procedures shall be established, implemented, and maintained covering the following activities:

1. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;
2. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.
3. Quality assurance for effluent and environmental monitoring;
4. Fire Protection Program implementation; and
5. All programs specified in Specification 6.8.

NEXT PAGE IS 248

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~~C. Maintenance and Test~~

~~The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements:~~

- ~~1. Routine testing of Engineered Safeguards and equipment as required by the facility license and the Technical Specifications.~~
- ~~2. Routine testing of standby and redundant equipment.~~
- ~~3. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.~~
- ~~4. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.~~
- ~~5. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.~~

~~D. (Deleted)~~

~~E. (Deleted)~~

~~F. Security~~

~~Procedures shall be developed to implement the requirements of the Security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures governing work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the security manager.~~

9

CHANGE S

(Deleted)

6.6 ~~Plant Operating Records~~

~~A. Records Retained for Five Years~~

~~Records and logs relative to the following items shall be retained for a minimum of five years:~~

- ~~1. Normal plant operation including such items as power level, periods of operation at each level, fuel exposure and shutdowns.~~

- ~~2. Written shift supervisory and reactor logs.~~

- ~~3. Periodic checks, inspections, tests and calibrations of components and systems, as related to these Technical Specifications.~~

- ~~4. Reviews of changes made to procedures or equipment and reviews of tests and experiments.~~

- ~~5. Principal maintenance activities, including inspection, repairs and substitution or replacement of principal items of equipment pertaining to nuclear safety.~~

- ~~6. Records of changes to plant procedures and records of special tests and experiments.~~

- ~~7. Records of wind speed and direction.~~

~~C. Temporary Changes to Procedures~~

~~Temporary changes to those procedures which are required to be reviewed by the Operations Committee described in A, C and F above, which do not change the intent of the original procedure may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager within one month. Temporary changes to security procedures not reviewed by the Operations Committee shall be reviewed by the security manager for security procedures.~~

- ~~8. Records of individual plant staff members showing qualifications, training and retraining.~~
- ~~9. Reportable Occurrences.~~

~~B. Records Retained for Plant Life~~

~~Records and logs relative to the following items shall be retained for the life of the plant:~~

- ~~1. Liquid and gaseous radioactive releases to the environs~~
- ~~2. Radiation exposures for all plant, visitor and contractor personnel~~
- ~~3. Offsite environmental monitoring surveys~~
- ~~4. Fuel accountability including new and spent fuel inventories and transfers, and fuel assembly histories~~
- ~~5. Radioactive shipments~~
- ~~6. Plant radiation and contamination surveys~~
- ~~7. Changes made to the plant as it is described in the Final Safety Analysis Report, reflected in updated, corrected and as-built drawings~~
- ~~8. Cycling beyond normal limits for those components that have been designed to operate safely for a limited number of cycles beyond such limits~~
- ~~9. Reactor coolant system in-service inspections~~
- ~~10. Minutes of meetings of the Safety Audit Committee~~
- ~~11. Records of the service lives of all safety-related snubbers, including the date at which the service life commences and associated installation and maintenance records.~~

B. ~~Reportable Events~~ (Deleted) CHANGE 6

~~The following actions shall be taken for Reportable Events:~~

- ~~a. The Commission shall be notified by a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50 and,~~
- ~~b. Each Reportable Event shall be reviewed by the Operations Committee and the results of this review shall be submitted to the Safety Audit Committee and the corporate officer with direct responsibility for the plant.~~

C. Environmental Reports

1. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

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Exhibit C

License Amendment Request - Relocation of Technical Specification Administrative Controls Related to Quality Assurance

Revised Monticello Technical Specification Pages

This Exhibit consist of current Monticello Technical Specification pages marked up with the proposed changes. The pages included in the exhibit are listed below:

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C. Plant Staff

1. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.1.1.
2. At least one licensed operator shall be in the control room when fuel is in the reactor.
3. At least two licensed operators shall be present in the control room during cold startup, scheduled reactor shutdown, and during recovery from reactor trips.
4. An individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor.
5. All alterations of the reactor core shall be directly supervised by a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
6. The operations manager shall be formerly licensed as a Senior Reactor Operator or hold a current Senior Reactor Operator License.
7. At least one member of plant management holding a current Senior Reactor Operator License shall be assigned to the plant operations group on a long term basis (approximately two years). This individual will not be assigned to a rotating shift.
8. Licensed reactor operators and senior reactor operators shall complete qualification training in accordance with a Commission-approved training program that is based on a systems approach to training and uses a simulation facility that is acceptable to the Commission. This program has been accredited by the National Nuclear Accrediting Board.

- D. Each member of the site staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the radiation protection manager or designated health physicist who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents, (3) the operations manager who shall meet the requirement of ANSI N18.1-1971 except that NRC license requirements are as specified in Specification 6.1.C.7, and (4) licensed reactor operators and senior reactor operators shall meet the requirements of Specification 6.1.C.8. The training program shall be under the direction of a designated member of Nuclear Management Company, LLC management.

6.5 Procedures

A. Written procedures shall be established, implemented, and maintained covering the following activities:

1. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;
2. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
3. Quality assurance for effluent and environmental monitoring;
4. Fire Protection Program implementation; and
5. All programs specified in Specification 6.8.

6.6 (Deleted)

B. (Deleted)

C. Environmental Reports

1. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

Attachment D

License Amendment Request - Relocation of
Technical Specification Administrative Controls Related to Quality Assurance

ITEM	Monticello Technical Specifications	Xcel Energy OAQP
1.	6.5 Plant Operating Procedures – Detailed written procedures, including the applicable check-off list and instructions, covering areas listed below, shall be prepared and followed	OQAP - 7.3.2
2.	6.5 These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of the plant staff	OQAP - 22.4.8.b
3.	6.5.A.1 through 5.6.A.4	OQAP - 7.3.2.a.i through 7.3.2.a.iv
4.	6.5.A.5	OQAP - 7.3.2.b
5.	6.5.A.6 and 6.5.a.7	OQAP - 7.3.2.a.v and 7.3.2.a.vi
6.	6.5.C	OQAP - 8.4.5
7.	6.5.F Security procedures that implement the requirements of the Security Plan and the Security Contingency Plan	OQAP - 7.3.2.q
8.	6.5.F Security non-safety related procedures governing work activities exclusively applicable to or performed by security personnel not reviewed by the Operations Committee shall be reviewed and approved by the security manager	OQAP - 8.4.3.c
9.	6.5.G	OQAP - 8.4.3.d
10.	6.6.A	OQAP - 19.12.1
11.	6.6.B	OQAP - 19.12.2
12.	6.7.B	OQAP - 22.4.5

6.5 Plant Operating Procedures

[ITEM 1]

Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

A. Plant Operations

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. Surveillance and testing requirements that could have an effect on nuclear safety.
5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.
6. Implementing procedures of the fire protection program.
7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.

Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.

B. (Deleted)

7.0 Instructions, Procedures and Drawings

7.1 General Requirements

1. Directives, Instructions, Procedures, and drawings of a type appropriate to the circumstances shall be provided for the control and performance of activities which affect quality.
2. Directives, Instructions, Procedures, and drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

7.2 Directives and Instructions

Directives and Instructions shall be issued which establish procedural requirements for appropriate functional areas. Such procedural requirements shall include the following as appropriate:

1. Procedure review and approval requirements.
2. Procedure control requirements.
3. Procedure content requirements.

7.3 Procedures

1. Procedures of a type appropriate to the circumstances shall be provided for the performance of activities which affect the quality of safety related, fire protection related, or 10CFR71 related structures, systems, or components.

[ITEM 1]

2. At Monticello, detailed written procedures, including the applicable checkoff lists and instructions, covering areas listed below, shall be prepared and followed.
 - a. Operating procedures, including:
 - i. Integrated and system procedures for normal startup, operation and shutdown of the reactor and all systems and components involving nuclear safety of the facility.
 - ii. Fuel handling operations.
 - iii. 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

6.5 Plant Operating Procedures

[ITEM 2]

Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

A. Plant Operations

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. Surveillance and testing requirements that could have an effect on nuclear safety.
5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.
6. Implementing procedures of the fire protection program.
7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.

Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.

B. (Deleted)

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5. All reported or suspected violations of Technical Specifications, operating license requirements, administrative procedures, operating procedures. Results of investigations, including evaluation and recommendations to prevent recurrence will be reported in writing to the Chief Nuclear Officer NMC and to the Chair of the Safety Audit Committee.
6. Investigations of all Reportable Events and events requiring Special Reports to the Commission.
7. Drills on emergency procedures (including plant evacuation) and adequacy of communication with offsite support groups.

[ITEM 2]

8. Procedures required by Technical Specifications
 - a. Prairie Island: Procedures required by Technical Specifications, including implementing procedures of the Emergency Plan, the Security Plan, and the Security Contingency Plan (except as exempted in Section 8.4-4.c), shall be reviewed initially and periodically with a frequency commensurate with their safety significance but at an interval of not more than two years. Maintenance work orders and their associated procedures shall be reviewed per the requirements of Section 8.4-5.
 - b. Monticello: All procedures required by Technical Specifications, including implementing procedures of the Emergency Plan and the Security Plan (except as exempted in Technical Specification 6.5.F), shall be reviewed with a frequency commensurate with their safety significance but at an interval of not more than two years.
9. Special reviews and investigations, as requested by the Safety Audit Committee.
10. Review of investigative reports of unplanned releases of radioactive material to the environs.
11. All changes to the Process Control Program (PCP); and the Offsite Dose Calculation Manual (ODCM).
12. The review of 10 CFR 50.59 evaluations for procedures or procedure changes to verify that such actions do not require prior NRC approval. (Prairie Island only)
13. Fire Protection Program and implementing procedures and the submittal of recommended changes to the Safety Audit Committee. (Prairie Island only)

6.5 Plant Operating Procedures

Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

[ITEM 3]

A. Plant Operations

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. Surveillance and testing requirements that could have an effect on nuclear safety.
5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.
6. Implementing procedures of the fire protection program.
7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.

Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.

B. (Deleted)

7.0 Instructions, Procedures and Drawings

7.1 General Requirements

1. Directives, Instructions, Procedures, and drawings of a type appropriate to the circumstances shall be provided for the control and performance of activities which affect quality.
2. Directives, Instructions, Procedures, and drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

7.2 Directives and Instructions

Directives and Instructions shall be issued which establish procedural requirements for appropriate functional areas. Such procedural requirements shall include the following as appropriate:

1. Procedure review and approval requirements.
2. Procedure control requirements.
3. Procedure content requirements.

7.3 Procedures

1. Procedures of a type appropriate to the circumstances shall be provided for the performance of activities which affect the quality of safety related, fire protection related, or 10CFR71 related structures, systems, or components.
2. At Monticello, detailed written procedures, including the applicable checkoff lists and instructions, covering areas listed below, shall be prepared and followed.

[ITEM 3]

- a. Operating procedures, including:
 - i. Integrated and system procedures for normal startup, operation and shutdown of the reactor and all systems and components involving nuclear safety of the facility.
 - ii. Fuel handling operations.
 - iii. 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

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- follow-up actions required after plant protective system actions have initiated.
- iv. Surveillance and testing requirements that could have an effect on nuclear safety.
 - v. Implementing procedures of the fire protection program.
 - vi. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control.
- b. Emergency procedures, including implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity
 - c. Surveillance test procedures.
 - d. Routine or preventive maintenance procedures.
 - e. Calibration procedures.
 - f. Plant chemistry and count room procedures.
 - g. Radiation protection procedures and procedures that implement the requirements of the Radiation Protection Plan including applicable check-off lists and instructions.
 - h. Emergency plan procedures.
 - i. Special process procedures.
 - j. Preoperational and operational test procedures.
 - k. Audit procedures.
 - l. Fire fighting procedures.
 - m. Document control procedures.
 - n. Radioactive material shipment procedures.
 - o. Inspection and examination procedures.
 - q. Security procedures that implement the requirements of the Security Plan and the Security Contingency Plan.

6.5 Plant Operating Procedures

Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

A. Plant Operations

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. Surveillance and testing requirements that could have an effect on nuclear safety.
- [ITEM 4]**
5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.
 6. Implementing procedures of the fire protection program.
 7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.

Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.

B. (Deleted)

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follow-up actions required after plant protective system actions have initiated.

- iv. Surveillance and testing requirements that could have an effect on nuclear safety.
- v. Implementing procedures of the fire protection program.
- vi. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control.

[ITEM 4]

- b. Emergency procedures, including implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity
- c. Surveillance test procedures.
- d. Routine or preventive maintenance procedures.
- e. Calibration procedures.
- f. Plant chemistry and count room procedures.
- g. Radiation protection procedures and procedures that implement the requirements of the Radiation Protection Plan including applicable check-off lists and instructions.
- h. Emergency plan procedures.
- i. Special process procedures.
- j. Preoperational and operational test procedures.
- k. Audit procedures.
- l. Fire fighting procedures.
- m. Document control procedures.
- n. Radioactive material shipment procedures.
- o. Inspection and examination procedures.
- q. Security procedures that implement the requirements of the Security Plan and the Security Contingency Plan.

6.5 Plant Operating Procedures

Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. These procedures and changes thereto, except as specified in 6.5.G shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

A. Plant Operations

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. Surveillance and testing requirements that could have an effect on nuclear safety.
5. Implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity.

[ITEM 5]

6. Implementing procedures of the fire protection program.
7. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control measures.

Drills on the procedures specified in A.3 above shall be conducted as a part of the retraining program. Drills on the procedures specified in A.5 above shall be conducted at least semi-annually, including a check of communications with offsite support groups.

B. (Deleted)

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follow-up actions required after plant protective system actions have initiated.

iv. Surveillance and testing requirements that could have an effect on nuclear safety.

[ITEM 5]

v. Implementing procedures of the fire protection program.

vi. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control.

b. Emergency procedures, including implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity

c. Surveillance test procedures.

d. Routine or preventive maintenance procedures.

e. Calibration procedures.

f. Plant chemistry and count room procedures.

g. Radiation protection procedures and procedures that implement the requirements of the Radiation Protection Plan including applicable check-off lists and instructions.

h. Emergency plan procedures.

i. Special process procedures.

j. Preoperational and operational test procedures.

k. Audit procedures.

l. Fire fighting procedures.

m. Document control procedures.

n. Radioactive material shipment procedures.

o. Inspection and examination procedures.

q. Security procedures that implement the requirements of the Security Plan and the Security Contingency Plan.

[ITEM 6]

C. Maintenance and Test

The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements:

1. Routine testing of Engineered Safeguards and equipment as required by the facility license and the Technical Specifications.
2. Routine testing of standby and redundant equipment.
3. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.
4. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.
5. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.

D. (Deleted)

E. (Deleted)

F. Security

Procedures shall be developed to implement the requirements of the security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures governing work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the security manager.

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original procedures, may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of the plant management designated by the plant manager within one month.

- ii. The radiation protection manager shall review temporary changes to health physics procedures not reviewed by the Operations Committee.
- iii. The security manager shall review temporary changes to security procedures not reviewed by the Operations Committee.

4. Prairie Island Procedure Control

- a. Required procedures and procedure changes shall be reviewed as specified by Section 22.4-8 and approved by a member of plant management designated by the Plant Manager except that maintenance procedures shall be reviewed and approved in accordance with Section 8.4-5.
- b. Temporary changes to Operations Committee reviewed procedures, which do not change the intent of the original procedure may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator License. Such changes shall be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager within one month.
- c. Non-safety related procedures which govern work activities exclusively applicable to or performed by security personnel shall be reviewed and approved by the Superintendent Security. Temporary changes to such procedures shall be reviewed by two individuals knowledgeable in the area affected by the procedure.

[ITEM 6]

5. Maintenance Procedures.

- a. The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements.
 - i. Routine testing of Engineered Safeguards and equipment as required by the facility License and the Technical Specifications.
 - ii. Routine testing of standby and redundant equipment.

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- iii. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.
 - iv. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.
 - v. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.
- b. At Prairie Island:
- i. Maintenance work orders and their associated maintenance and test procedures for the activities listed below shall be prepared, reviewed and approved. Each procedure or procedure change shall be reviewed by a qualified individual(s) other than the individual(s) who prepared the procedure or procedure change. The appropriate superintendent (as previously designated by the Plant Manager) shall approve these procedures.
 - ii. Individuals responsible for reviews performed in accordance with the requirements of Section 8.4-5.a shall meet or exceed the qualifications described in section 4.2 or 4.4 of ANSI N18.1-1971 and shall be previously designated by the Plant Manager. Such reviews shall include a determination of whether or not additional cross disciplinary review is necessary.
 - iii. All reviews shall include a determination of the need for a evaluation to establish whether or not prior NRC approval is required in accordance with 10 CFR 50.59.
- c. At Monticello, these procedures and changes thereto, except as specified in Section 8.4-3.d, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager.

8.5 Drawing Control

1. Drawings which represent the physical and functional aspects of the operating nuclear plants and which are critical to safe plant operation or safety of personnel shall be maintained in a current status. Appropriate indexes shall be formulated and made available to personnel responsible for plant operation, maintenance, and modification.
2. Measures shall be established for revising site drawings and for distributing revised drawings. Proposed revisions to drawings shall be reviewed by a knowledgeable individual to determine the safety significance and appropriateness of the change.

C. Maintenance and Test

The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements:

1. Routine testing of Engineered Safeguards and equipment as required by the facility license and the Technical Specifications.
2. Routine testing of standby and redundant equipment.
3. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.
4. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.
5. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.

D. (Deleted)

E. (Deleted)

[ITEM 7]

F. Security

Procedures shall be developed to implement the requirements of the security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures governing work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the security manager.

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follow-up actions required after plant protective system actions have initiated.

- iv. Surveillance and testing requirements that could have an effect on nuclear safety.
- v. Implementing procedures of the fire protection program.
- vi. Implementing procedures for the Process Control Program and Offsite Dose Calculation Manual including quality control.

- b. Emergency procedures, including implementing procedures of the emergency plan, including procedures for coping with emergency conditions involving potential or actual releases of radioactivity
- c. Surveillance test procedures.
- d. Routine or preventive maintenance procedures.
- e. Calibration procedures.
- f. Plant chemistry and count room procedures.
- g. Radiation protection procedures and procedures that implement the requirements of the Radiation Protection Plan including applicable check-off lists and instructions.
- h. Emergency plan procedures.
- i. Special process procedures.
- j. Preoperational and operational test procedures.
- k. Audit procedures.
- l. Fire fighting procedures.
- m. Document control procedures.
- n. Radioactive material shipment procedures.
- o. Inspection and examination procedures.
- q. Security procedures that implement the requirements of the Security Plan and the Security Contingency Plan.

[ITEM 7]

C. Maintenance and Test

The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements:

1. Routine testing of Engineered Safeguards and equipment as required by the facility license and the Technical Specifications.
2. Routine testing of standby and redundant equipment.
3. Preventive or corrective maintenance of plant equipment and systems that could have an effect on nuclear safety.
4. Calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.
5. Special testing of equipment for proposed changes to operational procedures or proposed system design changes.

D. (Deleted)

E. (Deleted)

F. Security

[ITEM 8]

Procedures shall be developed to implement the requirements of the security Plan and the Security Contingency Plan. These implementing procedures, with the exception of those non-safety related procedures governing work activities exclusively applicable to or performed by security personnel, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager. Security procedures not reviewed by the Operations Committee shall be reviewed and approved by the security manager.

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8.4 Procedure Control

1. Required procedures shall be controlled to assure that current copies are made available to personnel performing the prescribed activities. Appropriate indexes of standing procedures shall be formulated and made available to personnel responsible for performing the prescribed activities.
2. Except as specified in Sections 8.4-3 and 8.4-4, required procedures shall:
 - a. Be reviewed by an independent knowledgeable individual and be approved by a member of management responsible for the prescribed activity.
 - b. Have significant changes to required procedures reviewed and approved in the same manner as the original.
 - c. Be periodically reviewed.
3. Monticello Procedure Control
 - a. The following procedures, including applicable checklists and instructions, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager.
 - i. Procedures required by Technical Specifications.
 - ii. The Radiation Protection Plan and implementing procedures, with the exception of those nonsafety-related procedures governing work activities exclusively applicable to or performed by health physics personnel.
 - b. Non-safety related procedures governing work activities exclusively applicable to or performed by health physics personnel not reviewed by the Operations Committee shall be reviewed and approved by the radiation protection manager.
 - c. Non-safety related procedures governing work activities exclusively applicable to or performed by security personnel not reviewed by the Operations Committee shall be reviewed and approved by the security manager.
 - d. Temporary Changes
 - i. Temporary changes to procedures which are required to be reviewed by the Operations Committee, which do not change the intent of the

[ITEM 8]

[ITEM 9]

G. Temporary Changes to Procedures

Temporary changes to those procedures which are required to be reviewed by the Operations Committee described in A, C, and F above, which do not change the intent of the original procedures may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager within one month. Temporary changes to security procedures not reviewed by the Operations Committee shall be reviewed by the security manager for security procedures.

6.6 Plant Operating Records < Deleted

Change 4

- A. Records Retained for Five Years Records and logs relative to the following items shall be retained for a minimum of five years:
1. Normal plant operation including such items as power level, periods of operation at each level, fuel exposure and shutdowns.
 2. Written shift supervisory and reactor logs.
 3. Periodic checks, inspections, tests and calibrations of components and systems, as related to these Technical Specifications.
 4. Reviews of changes made to procedures or equipment and reviews of tests and experiments.
 5. Principal maintenance activities, including inspection, repairs and substitution or replacement of principal items of equipment pertaining to nuclear safety.
 6. Records of changes to plant procedures and records of specials tests and experiments.
 7. Records of wind speed and direction.

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8.4 Procedure Control

1. Required procedures shall be controlled to assure that current copies are made available to personnel performing the prescribed activities. Appropriate indexes of standing procedures shall be formulated and made available to personnel responsible for performing the prescribed activities.
2. Except as specified in Sections 8.4-3 and 8.4-4, required procedures shall:
 - a. Be reviewed by an independent knowledgeable individual and be approved by a member of management responsible for the prescribed activity.
 - b. Have significant changes to required procedures reviewed and approved in the same manner as the original.
 - c. Be periodically reviewed.
3. Monticello Procedure Control
 - a. The following procedures, including applicable checklists and instructions, shall be reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager.
 - i. Procedures required by Technical Specifications.
 - ii. The Radiation Protection Plan and implementing procedures, with the exception of those nonsafety-related procedures governing work activities exclusively applicable to or performed by health physics personnel.
 - b. Non-safety related procedures governing work activities exclusively applicable to or performed by health physics personnel not reviewed by the Operations Committee shall be reviewed and approved by the radiation protection manager.
 - c. Non-safety related procedures governing work activities exclusively applicable to or performed by security personnel not reviewed by the Operations Committee shall be reviewed and approved by the security manager.
 - d. Temporary Changes
 - i. Temporary changes to procedures which are required to be reviewed by the Operations Committee, which do not change the intent of the

[ITEM 9]

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original procedures, may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of the plant management designated by the plant manager within one month.

- ii. The radiation protection manager shall review temporary changes to health physics procedures not reviewed by the Operations Committee.
- iii. The security manager shall review temporary changes to security procedures not reviewed by the Operations Committee.

4. Prairie Island Procedure Control

- a. Required procedures and procedure changes shall be reviewed as specified by Section 22.4-8 and approved by a member of plant management designated by the Plant Manager except that maintenance procedures shall be reviewed and approved in accordance with Section 8.4-5.
- b. Temporary changes to Operations Committee reviewed procedures, which do not change the intent of the original procedure may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Reactor Operator License. Such changes shall be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the Plant Manager within one month.
- c. Non-safety related procedures which govern work activities exclusively applicable to or performed by security personnel shall be reviewed and approved by the Superintendent Security. Temporary changes to such procedures shall be reviewed by two individuals knowledgeable in the area affected by the procedure.

5. Maintenance Procedures.

- a. The following maintenance and test procedures will be developed to satisfy routine inspection, preventive maintenance programs, and operating license requirements.
 - i. Routine testing of Engineered Safeguards and equipment as required by the facility License and the Technical Specifications.
 - ii. Routine testing of standby and redundant equipment.

G. Temporary Changes to Procedures

Temporary changes to those procedures which are required to be reviewed by the Operations Committee described in A, C, and F above, which do not change the intent of the original procedures may be made with the concurrence of two members of the unit management staff, at least one of whom holds a Senior Operator License. Such changes should be documented, reviewed by the Operations Committee and approved by a member of plant management designated by the plant manager within one month. Temporary changes to security procedures not reviewed by the Operations Committee shall be reviewed by the security manager for security procedures.

[ITEM 10]

6.6 Plant Operating Records

- A. Records Retained for Five Years Records and logs relative to the following items shall be retained for a minimum of five years:
1. Normal plant operation including such items as power level, periods of operation at each level, fuel exposure and shutdowns.
 2. Written shift supervisory and reactor logs.
 3. Periodic checks, inspections, tests and calibrations of components and systems, as related to these Technical Specifications.
 4. Reviews of changes made to procedures or equipment and reviews of tests and experiments.
 5. Principal maintenance activities, including inspection, repairs and substitution or replacement of principal items of equipment pertaining to nuclear safety.
 6. Records of changes to plant procedures and records of specials tests and experiments.
 7. Records of wind speed and direction.

8. Records of individual plant staff members showing qualifications, training and retraining.

9. Reportable Occurrences.

B. Records Retained for Plant Life

Records and logs relative to the following items shall be retained for the life of the plant:

1. Liquid and gaseous radioactive releases to the environs
2. Radiation exposures for all plant, visitor and contractor personnel
3. Offsite environmental monitoring surveys
4. Fuel accountability including new and spent fuel inventories and transfers, and fuel assembly histories
5. Radioactive shipments
6. Plant radiation and contamination surveys
7. Changes made to the plant as it is described in the Final Safety Analysis Report, reflected in updated, corrected and as-built drawings
8. Cycling beyond normal limits for those components that have been designed to operate safely for a limited number of cycles beyond such limits
9. Reactor coolant system in-service inspections
10. Minutes of meetings of the Safety Audit Committee.
11. Records of the service lives of all safety-related snubbers, including the date at which the service life commences and associated installation and maintenance records.

6.6

B. Reportable Events

19.12 Operating Records [ITEM 10]

1. Records Retained for Five Years

Records and logs relative to the following items shall be retained for at least five years:

- a. Normal plant operation including such items as power level, period of operation at each level, fuel exposure and shutdown.
- b. Written shift supervisory and reactor logs.
- c. Periodic checks, inspections, tests and calibrations of components and systems, as related to Technical Specifications
- d. Reviews of changes made to procedures or equipment or reviews of tests and experiments.
- e. Principal maintenance activities, including inspection, repairs and substitution or replacement of principal items of equipment pertaining to nuclear safety.
- f. Records of changes to plant procedures and records of special tests and experiments.
- g. Records of wind speed and direction.
- h. Records of individual plant staff members showing qualifications, training and re-training.
- i. Reportable occurrences.

2. Records Retained for the Life of the Plant

Records and logs relative to the following items shall be retained for the life of the plant:

- a. Liquid and airborne radioactive releases to the environs.
- b. Radiation exposures for all plant personnel, visitor and contract personnel.
- c. Off-site environmental monitoring surveys.
- d. Fuel accountability including new and spent fuel inventories and transfers and fuel assembly histories.
- e. Radioactive shipments.

8. Records of individual plant staff members showing qualifications, training and retraining.

9. Reportable Occurrences.

[ITEM 11]

B. Records Retained for Plant Life

Records and logs relative to the following items shall be retained for the life of the plant:

1. Liquid and gaseous radioactive releases to the environs
2. Radiation exposures for all plant, visitor and contractor personnel
3. Offsite environmental monitoring surveys
4. Fuel accountability including new and spent fuel inventories and transfers, and fuel assembly histories
5. Radioactive shipments
6. Plant radiation and contamination surveys
7. Changes made to the plant as it is described in the Final Safety Analysis Report, reflected in updated, corrected and as-built drawings
8. Cycling beyond normal limits for those components that have been designed to operate safely for a limited number of cycles beyond such limits
9. Reactor coolant system in-service inspections
10. Minutes of meetings of the Safety Audit Committee.
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- g. Records of wind speed and direction.
- h. Records of individual plant staff members showing qualifications, training and re-training.
- i. Reportable occurrences.

[ITEM 11]

2. Records Retained for the Life of the Plant

Records and logs relative to the following items shall be retained for the life of the plant:

- a. Liquid and airborne radioactive releases to the environs.
- b. Radiation exposures for all plant personnel, visitor and contract personnel.
- c. Off-site environmental monitoring surveys.
- d. Fuel accountability including new and spent fuel inventories and transfers and fuel assembly histories.
- e. Radioactive shipments.

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- f. Plant radiation and contamination surveys.
- g. Changes made to the plant as it is described in the Final Safety Analysis Report, reflected in updated, corrected and as-built drawings.
- h. Cycling beyond normal limits for those components that have been designed to operate safely for a limited number of cycles beyond such limits.
- i. Reactor coolant system in-service inspections.
- j. Minutes of meetings of the Safety Audit Committee.
- k. Records of the service lives of all safety related snubbers, including the date at which the service live commences and associated installation and maintenance records.

[ITEM 12]

B. Reportable Events

The following actions shall be taken for Reportable Events:

- a. The Commission shall be notified by a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50 and,
- b. Each Reportable Event shall be reviewed by the Operations Committee and the results of this review shall be submitted to the Safety Audit Committee and the corporate officer with direct responsibility for the plant.

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[ITEM 12]

5. All reported or suspected violations of Technical Specifications, operating license requirements, administrative procedures, operating procedures. Results of investigations, including evaluation and recommendations to prevent recurrence will be reported in writing to the Chief Nuclear Officer NMC and to the Chair of the Safety Audit Committee.
6. Investigations of all Reportable Events and events requiring Special Reports to the Commission.
7. Drills on emergency procedures (including plant evacuation) and adequacy of communication with offsite support groups.
8. Procedures required by Technical Specifications
 - a. Prairie Island: Procedures required by Technical Specifications, including implementing procedures of the Emergency Plan, the Security Plan, and the Security Contingency Plan (except as exempted in Section 8.4-4.c), shall be reviewed initially and periodically with a frequency commensurate with their safety significance but at an interval of not more than two years. Maintenance work orders and their associated procedures shall be reviewed per the requirements of Section 8.4-5.
 - b. Monticello: All procedures required by Technical Specifications, including implementing procedures of the Emergency Plan and the Security Plan (except as exempted in Technical Specification 6.5.F), shall be reviewed with a frequency commensurate with their safety significance but at an interval of not more than two years.
9. Special reviews and investigations, as requested by the Safety Audit Committee.
10. Review of investigative reports of unplanned releases of radioactive material to the environs.
11. All changes to the Process Control Program (PCP); and the Offsite Dose Calculation Manual (ODCM).
12. The review of 10 CFR 50.59 evaluations for procedures or procedure changes to verify that such actions do not require prior NRC approval. (Prairie Island only)
13. Fire Protection Program and implementing procedures and the submittal of recommended changes to the Safety Audit Committee. (Prairie Island only)