

# NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

August 30, 1979

Mr. James G. Keppler  
Director - Region III  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22  
IE Bulletin 79-14  
Schedule for Reporting Inspection Results

- References:
- (1) "Seismic Analysis for As-Built Safety-Related Piping Systems", IE Bulletin 79-14, Original Issue, dated July 2, 1979, and Revision 1, dated July 18, 1979.
  - (2) "IE Bulletin 79-14; Safety-Related Piping Systems, Inspection Plan, Monticello Nuclear Generating Plant", NUTECH Report NSP-37-005, July 31, 1979.
  - (3) "Seismic Analysis for As-Built Safety-Related Piping Systems", Supplement to IE Bulletin 79-14, August 15, 1979.

In accordance with the requirements of IE Bulletin 79-14 (Reference 1), Northern States Power Company began, in mid-July, an inspection program for the accessible piping systems at the Monticello Nuclear Generating Plant. The as-built inspection was essentially completed the week of August 13.

The details and method of inspection are described in Reference 2 which was submitted to the NRC on August 1, 1979. As indicated in Reference 2, as-built measurements, which require direct access to the piping system, would have been taken on insulated systems only where removable insulation permitted such access; i.e., permanently affixed insulation would not have been disturbed for the inspection. On August 20, 1979, a Supplement to IE Bulletin 79-14 (Reference 3) was received at the Monticello Plant which requires that insulation be removed to inspect all elements important to the seismic analyses.

In response to the requirements of Reference 3, craft insulators were brought on-site, and the task of removing the insulation was started on August 20. Progress has been hampered by lack of available craft labor and by the time required to remove and reinstall insulation after inspections have been completed.

*cfp*  
A02  
Q

7910090624

NORTHERN STATES POWER COMPANY

Mr. James G. Keppler  
August 30, 1979  
Page 2

To ensure an accurate compilation of the input data used in the seismic analysis, the data is being extracted from the computer analysis rather than from the supporting documents. This approach requires more time; however, it will provide the most valid data for comparison to the inspection results.

The above factors prevent an orderly comparison of the as-built piping condition with the as-analyzed configuration for all Phase I piping systems in accordance with the schedule provided in Reference 1. To avoid the submittal of multiple reports for the Phase I piping, it is requested that the following revised schedule be permitted for documenting the results of the inspection of the accessible piping:

- August 31 - Issue revision to the inspection plan which incorporates the additional requirements of Reference 3.
- September 21 - Issue report of findings for all Phase I piping.
- October 8 - Issue report of findings for all Phase II accessible piping.

In addition, any nonconformances which are identified as potentially affecting system operability will be evaluated as specified in Reference 3 and reported in accordance with the Technical Specification requirements.

Yours very truly,



L. J. Wachter  
Vice President - Power Production  
and System Operation

cc: Mr. G. Charnoff  
Director - Office of Inspection and Enforcement  
Washington, D.C.  
Director - Division of Operating Reactors  
Washington, D.C.