

# NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

February 1, 1979

Mr. Gaston Fiorelli, Chief  
Reactor Operations and Nuclear  
Support Branch  
Region III  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

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

Your letter of January 16, 1979, identified an item which appeared to be in noncompliance with NRC requirements and requested that we reply within 20 days of receipt of your letter. The noncompliance, as stated, was --

Technical Specification 6.5.A.4 requires that written procedures, including the applicable check-offs and instructions, covering surveillance and testing requirements that could have an effect on nuclear safety shall be prepared and followed.

Surveillance Procedure 0255-4-III requires that, when test values fall in the required action range, the pump shall be declared inoperable and the Shift Supervisor shall notify personnel in accordance with 4 ACD-3.9.

Contrary to the above, on November 14, 1978, the actions required by Procedure 0255-4-III were not taken when the results of the surveillance test of No. 12 RHR pump indicated that pump performance was in the required action range.

On November 14, 1978, the results of the surveillance test of No. 12 RHR pump indicated that the pump was performing 4.7 percent better than its reference performance. Section XI of the ASME Boiler and Pressure Vessel Code allows only a 3 percent deviation above the reference pump differential pressure for a given flow rate. At rated flow, this pump is operating on steep part of its characteristic curve (i.e., a small change in flow has a significant effect on pump differential pressure). Therefore, considering the accuracy of the installed instrumentation, it is difficult to repeatably monitor performance within 3 percent of the reference performance. In this instance, the pump was fully capable of performing its function, and it was reasonable to consider it operable.

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Based on special testing including alternate methods of pump capacity measurement, it was determined that the reference value for this pump was low and has since been increased. In addition, the technique for measuring pump performance has been changed to improve repeatability.

It is not possible to determine from existing documentation whether the Shift Supervisor notified personnel in accordance with 4 ACD 3.9. An administrative process has been established requiring documentation of notification made concerning Section XI test deviations and documentation of management decisions related to those deviations. It is believed that this process will minimize the potential for similar future occurrences.

Should you have any questions concerning our response, please communicate directly with the plant management.

Yours very truly,



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

cc: Mr. G. Charnoff