



UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

TELEPHONE
(312) 858-2660

JUL 31 1974

Northern States Power Company
ATTN: Mr. L. J. Wachter
Vice President
Power Production and
System Operation
414 Nicollet Mall
Minneapolis, Minnesota 55401

Docket No. 50-263

Gentlemen:

Thank you for your letter dated June 11, 1974, responding to the apparent item of noncompliance described in our letter dated May 21, 1974. As Mr. Fisher of my staff discussed with Mr. Larson on July 5, 1974, we are referring the matter to our Headquarters for further resolution.

Sincerely yours,

James G. Keppler
Regional Director

bcc w/ltr dtd 6/11/74:
RO Chief, FS&EB
RO:HQ (4)
Licensing (4)
DR Central Files
RO Files
PDR
Local PDR
NSIC
DTIE
OGC, Beth, P506A
Region I
Region IV

MSU
JB



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

June 11, 1974

Mr J G Keppler, Regional Director
Directorate of Regulatory Operations
Region III
United States Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 61037

Dear Mr Keppler:

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

Response to Item Listed on Enclosure of
Letter Dated May 21, 1974

The letter is written in response to an item noted on your letter of May 21, 1974. Your letter, addressed to Mr Leo J Wachter, Vice President Power Production and System Operation, referred to an activity which appeared to be in violation of AEC requirements and for which a reply was required. The activity was: "Technical Specification 4.8.C.1 states with regard to liquid effluents: The Radiation Monitor shall be calibrated quarterly and functionally tested monthly. Contrary to the above, the liquid effluent monitor is not being calibrated".

R.O. Inspection Report 050-263/74-04, Paragraph 4.b, infers that tests performed quarterly are limited to a pulse-generator check of the monitor, excluding detector, and a "Functional Test" using a check source. If this inference were valid we would concur with the inspection report conclusion that such tests do not constitute a calibration as defined in Technical Specification 1.F. However, the surveillance actually performed at quarterly intervals is not limited to that generally considered to constitute "Functional Tests."

As explained to the R.O. inspector on May 9, 1974, our quarterly calibration surveillance in this instance is comprised of three phases. Phase 1 includes the use of a pulse generator to calibrate the monitor electronics. Phase 2 determines that the monitor responds correctly to the front panel test (which utilizes test circuitry built into the monitor) and verifies that all the associated alarms and trips are operating properly. Phase 3 utilizes a solid source of known activity. The detector is exposed to the source under controlled

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Mr J G Keppler

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geometry and the resulting countrate is recorded. It is verified that the detector and monitor respond within established acceptance criteria. These acceptance criteria are based upon a correlation with a liquid source calibration and discriminator curve determination which were performed prior to plant startup. The activity to which the detector is exposed is chosen to be above the monitor upscale alarm level. The upscale alarms and indicating lights are again verified to operate properly during this phase. In addition, discriminator curves are periodically verified to assure the discriminator settings have not changed. The solid source method of calibration was discussed with AEC inspectors at the time of the original monitor calibration and was found to be acceptable.

After receiving your letter of May 21st, a telephone survey was conducted to determine methods used by other power plants to calibrate radwaste effluent monitors. Six other BWR's were contacted, including plants located in Regulatory Regions I, II and III. Although variations in technical details were found, five other BWRs were found to employ methods similar to ours, and none were found to perform more extensive calibrations.

In summary, the quarterly surveillance actually performed is believed to constitute responsible satisfaction of the technical specifications, suitable to the application, and in accordance with generally accepted good practice.

Yours very truly,



L J Wachter
Vice President - Power Production
& System Operation

LJW/ts

cc: J F O'Leary
G Charnoff
Minnesota Pollution Control Agency
Attn: E A Pryzina
File