



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

TELEPHONE
(312) 858-2660

DEC 11 1973

Northern States Power Company
ATTN: Mr. A. V. Dienhart
Vice President Engineering
414 Nicollet Mall
Minneapolis, Minnesota 55401

Docket No. 50-263

Gentlemen:

Thank you for your letter dated November 5, 1973, informing us of the steps you have taken to correct the violations which we brought to your attention in our letter dated October 15, 1973.

While your letter states that you have filed an application for changes in your radiological monitoring Technical Specifications, we wish to remind you that until such time as your Technical Specifications are revised to reflect these changes your present Technical Specifications remain in effect. Additionally, regarding the "laboratory mishaps" referred to in your letter, provisions should be made to require that additional samples be collected and analyzed in such instances. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

James G. Keppler
Regional Director

cc: Mr. C. E. Larson
Plant Manager, MNGP

bcc w/ltr dtd 11-5-73:
RO Chief, FS&EB
RO:HQ (4)
Licensing (4)
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RO Files
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Local PDR
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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

November 5, 1973

Mr. James G. Keppler, Regional Director
Directorate of Regulatory Operations
U S Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

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

Radiological Environmental Monitoring Program
Response to Notice of Violation Dated October 15, 1973

We have been asked by Mr. L. J. Wachter, Vice President - Power Production and System Operations, to respond to your notice of violation dated October 15, 1973, which was directed to him. The following presents our comments on the specific violations and our plan to correct any deficiencies in the Radiological Environmental Monitoring Program.

Violation 1

1. "Fish, aquatic vegetation, and plankton, algae or insect samples have apparently not, on all occasions, been collected and analyzed as required."

"Contrary to the above, the required fish, aquatic vegetation, and plankton, algae or insect samples were not collected during the first quarter or the fourth quarter of 1972."

Explanation

The aquatic samples described above according to Table 4.8.1 Technical Specifications, Environmental Monitoring Program, must be collected quarterly and in a restricted area of the river (within 600 feet upstream of the water

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intake canal and within 600 feet downstream of the end of the water discharge canal). Due to water and ice conditions and the lack of these aquatic samples within this stretch of the river, the samples were not taken during the first and fourth quarters of the year. A technical specification change request submitted November 1, 1973 will permit elimination of samples if water or ice conditions compromise field personnel safety or if the sampling point or zone does not support those aquatic organisms needed for a sample. Specific reasons for not taking a sample will be given in future reports.

Violation 2

"Precipitation, milk, and vegetation samples have apparently not, on all occasions, been analyzed as required."

- a. "³H analyses of the precipitation samples collected at the State Health Department Building for February 1972, May 1972, and June 1972 were missing."

Explanation

Fallout pots are used to collect precipitation samples. Due to lack of rainfall during the three sampling periods listed above, it was impossible to perform a tritium analysis on the limited contents of the fallout pots. The explanation was omitted from the report.

- b. "Gross beta, gamma scan, ¹³¹I, and ⁹⁰Sr analyses for the November 1972 precipitation sample collected at the State Health Department Building were missing."

Explanation

The contract laboratory (Minnesota Department of Health) explained the analyses were missing due to a laboratory mishap. The explanation was not given in the report.

- c. "³H analysis of the precipitation sample collected at the Monticello meteorological station for February 1972 was missing."

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Explanation

As explained for (a) above, it was impossible to perform a tritium analysis on the limited contents of the fallout pot. The explanation was not given in the report.

- d. "¹³¹I and ⁹⁰Sr analyses of the milk samples from Region No. 1 for October 1972 were missing."

Explanation

The ¹³¹I analyses missing from the report for the two dairy farms in Region 1 for October 1972 are:

James Dwinger Farm	<1.8pCi/l
Henry Kirchenbauer Farm	<1.6pCi/l

⁹⁰Sr analysis was not performed on Region 1 milk due to a laboratory mishap.

- e. "¹³¹I analysis of field No. 1 vegetation sample collected May 1972 was missing."

Explanation

The missing ¹³¹I analysis data for field No. 1 is <0.04pCi/gm

- f. "¹³¹I analyses of field No. 2 vegetation samples for May and August of 1972 were missing."

Explanation

The missing ¹³¹I analyses data for field No. 2 vegetation samples were:

May 1972	<0.04pCi/gm
August 1972	<0.01pCi/gm

We have met with contract laboratory personnel to communicate a complete understanding of the need to meet the Technical Specification requirements of Table 4.8.1 and reporting completeness. We have under development by a consultant the following procedures to minimize the potential for future violations:

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1. Evaluation of the methods and administrative procedures being used in the Environmental Monitoring Program. This includes sampling and reporting procedures.
2. Evaluation of contractor's quality control procedures and administrative procedures. A system will be developed to follow the progress of a sample from collection, receipt at the laboratory, data submission, and incorporation in the report.
3. Development of criteria for a quality assurance program to be followed by the contract laboratory.
4. Development of auditing and review procedures to assure continued good quality of the laboratory's performance.

We expect full implementation of the above program by February 15, 1974.

We are confident that our corrective action will insure full compliance with the Radiological Environmental Monitoring requirements of Technical Specifications for the Monticello Nuclear Generating Plant.

Yours very truly,

Arthur V. Dienhart, P.E.

Arthur V. Dienhart
Vice President - Engineering

kd

Cc: A R Renquist
G Charnoff
MECA
Attn: K Dzugan
MDH
Attn: David Gray