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FROM: Northern States Power Company Minneapolis, Minn. 55401 L. O. Mayer.	DATE OF DOC: 4-6-73	DATE REC'D		LTR	FILE		
		4-11-73			MEMO	RPT	OTHER
TO: Mr. Skovholt	ORIG	CC	OTHER	SENT AEC PDR X			
	1 signed			SENT LOCAL PDR X			
CLASS: <u>U</u> /PROP INFO	INPUT	NO CYS REC'D		DOCKET NO:			
		40		50-263			

DESCRIPTION:
Ltr re their 6-15-72 ltr & our 1-2-73 ltr...
furnishing requested info re managerial &
administrative controls for operation.....

ENCLOSURES:

Do Not Remove
ACKNOWLEDGED

PLANT NAMES: Monticello

FOR ACTION/INFORMATION 4-11-73 AB

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| WOODWARD/H ST. | 1- R. CATLIN,E-256-GT | 1-AGMED(WALTER KOESTER, |
| ✓ 16-CYS ACRS HOLDING SENT TO LIC ASST. | 1- CONSULTANT'S | RM C-427, GT) |
| R. DIGGS ON 4-11-73 | NEWMARK/BLUME/AGABIAN | 1- RD...MULLER...F-309GT |
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NSP

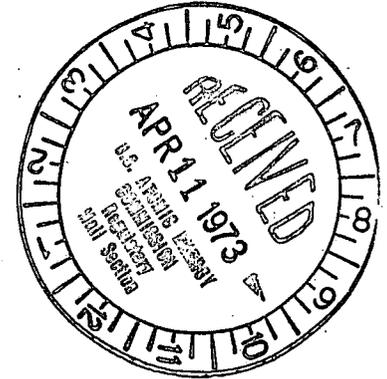
NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401



April 6, 1973

Mr. D J Skovholt
Assistant Director for Operating Reactors
Directorate of Licensing
United States Atomic Energy Commission
Washington, D C 20545



Dear Mr. Skovholt:

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

Reply to Request for Information on Managerial
and Administrative Controls for Operation

Northern States Power Company's letter of June 15, 1972 to AEC-DL presented "information pertaining to the managerial and administrative controls to be used to assure safe operation" as required under the regulations of 10 CFR Part 50, Appendix B. Your January 2, 1973 letter to NSP identified certain items that were not addressed or inadequately covered and requested further information on the management and administrative controls in response to the established requirements. Your letter further referenced Safety Guide 33, Quality Assurance Program Requirements (Operation) which was issued several months subsequent to our June 15, 1972 submittal.

The requirements of Appendix B of 10 CFR Part 50 govern a limited scope of operating activities as contrasted with operating activities in general. For operating facilities, the requirements established by Appendix B concern management and administrative controls for the operating activities affecting the safety related functions of those structures, systems and components provided to prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

Northern States Power Company proposed changes to the Technical Specifications in the form of a revised Section 6.0, Administrative Controls. This change was prepared using the guidance of ANS 3.2, Standard for Administrative Controls for Nuclear Power Plants, which was subsequently referenced in Safety Guide 33, and which provides an adequate basis for complying with the manage-

ment and administrative controls requirements of 10 CFR Part 50, Appendix B for operating plants. The proposed change to Technical Specification Section 6.0, Administrative Controls was submitted to AEC-DL November 20, 1972. Certain modifications to these proposed changes were made by AEC-DL and the revised Section 6.0 was issued by AEC-DL as Change No. 6 dated April 3, 1973.

The management and administrative controls program requirements in the April 3, 1973 revision of Section 6.0, Administrative Controls are believed to properly address and adequately cover those items identified in your letter of January 2, 1973. This information is referenced hereunder in response to your letter.

Item: "Criterion I - A provision that those checking, auditing, or inspecting have sufficient independence of the line organization responsible for operation."

Response: Section 6.2.A. of the revised Technical Specifications describes the Safety Audit Committee and assigns to it responsibility for review and audit of plant operational activities. Section 6.1.B. describes the corporate organizational structure relating to plant operation and illustrates that the Safety Audit Committee is independent of the line organization responsible for operation.

Item: "Criterion II - Special controls processes, test equipment, tools, and skills to obtain and verify quality."

Response: Section 6.1.D. establishes the qualifications of the plant personnel, and Section 6.2.A.1.d. establishes the required capability of the Safety Audit Committee members. Section 6.5.A.4. and Section 6.5.C. parts 1, 2, 4 and 5 set forth requirements of controlling procedures for surveillance and testing, routine testing, calibration and testing of instrumentation, and special testing. Section 6.6.A.3. sets forth related records requirements, and Section 6.5. establishes the review and approval authority for these processes.

Item: "Criterion VI - 1. Procedures to cover review, approval, issuance, and use of both initial and revised documents. 2. Review and approval of document revisions by the same organization that performed the original review and approval."

Response: Section 6.5.A., B. and C. establish the requirements for "Plant Operating Procedures" documents. Section 6.5. establishes the approval authority under which they are issued, including changes thereto. Section 6.2.B.4.c. and h. establish the Operations Committee as the review authority and establish the requirements for Operations Committee conduct of such reviews.

- Item: "Criterion XI - 1. Proof tests prior to installation, preoperational tests, and operational tests. 2. Test results documented and evaluated to assure that the test requirements have been satisfied."
- Response: Section 6.5.C.1., 2. and 5. set forth the requirements for routine and special testing procedures and their approval, including special testing of changes to procedures or equipment. Section 6.6.A.3. establishes a requirement for records of tests, and Section 6.6.A.4. establishes a requirement for records of reviews of such tests. Section 6.2.B.4.a. requires Operations Committee review of the results of tests.
- Item: "Criterion XIV - Measures to indicate the operating status of structures, systems, and components to prevent inadvertent operation."
- Response: The detailed surveillance testing and minimum operability requirements of the Technical Specifications establish the bases and intervals for demonstrating operability status of structures, systems and components. Section 6.5.A.4. and Section 6.5.C.1. and 2. establish the requirements for approved detailed procedures governing this surveillance, including applicable check-off and instructions.
- Item: "Criterion XVI - 1. Measures to assure that the corrective action is sufficient to preclude recurrence of the unsafe operating condition. 2. Procedures to assure that the cause and corrective action are properly documented and reported."
- Response: Section 1.0.A. defines abnormal occurrences or conditions, which may be regarded as unsafe operating conditions. Sections 6.2.A.4.g. and 6.2.B.4.e. and f. establish requirements for review of such occurrences including recommendations to prevent recurrence. Section 6.3.A. sets forth actions to be taken in the event of an abnormal occurrence, including documentation and reporting requirements.
- Item: "Criterion XVII - 1. Records, such as operating logs, and results of reviews, inspections, tests, and audits. 2. Records which include such items as completed procedures and the qualifications of personnel. 3. Inspection and test records which, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the actions taken on noted deficiencies. 4. Records which are identifiable and retrievable. 5. The duration of record retention, and their location and assigned responsibility."

D J Skovholt
April 6, 1973
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Response: Section 6.6.A. and 6.6.B. set forth in detail the nature and scope, including the retention periods, of records to be maintained of logs, results of reviews, inspections, tests, staff qualifications, and all other essential records.

Yours very truly,



L O Mayer, P.E.
Director of Nuclear Support Services

LOM/GHN/br

cc: B H Grier
G Charnoff
Minnesota Pollution Control Agency
Attn. K Dzugan