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 RECIP. NAME: Office of Nuclear Reactor Regulation

SUBJECT: Responds to NRC 790913 ltr re followup actions resulting from NRC reviews of TMI-2 accident. Implementation based on receipt of NRC guidance, vendor delivery, refueling outage schedules & other factors not control led by util.

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NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

October 17, 1979

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

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

Follow-up Actions Resulting from the NRC Staff Reviews
Regarding the Three Mile Island Unit 2 Accident

A letter, dated September 13, 1979, from Darrell G Eisenhut, USNRC, transmitted NRR's requirements which have evolved from the Lessons Learned and Emergency Preparedness task forces. All operating reactor licensees were requested to begin implementation of these requirements and to submit, within 30 days of receipt of the September 13, 1979 letter, a commitment to meet these requirements on an implementation schedule set out in enclosures to the NRC letter.

Enclosed as Attachment "A" are statements describing actions already taken on NRR requirements at the Monticello Plant, plans for future actions, and expected implementation dates. The statements are keyed to the NUREG-0578 section numbers listed in Enclosure 6 to the September 13, 1979 letter on Lessons Learned and the item numbers for Emergency Preparedness in Enclosure 8.

The expected implementation dates are based upon timely receipt of NRC guidance in some areas, availability of equipment from suppliers, refueling outage schedules, and other factors not under full control of the licensee. The physical security modification program aptly demonstrated the effect on implementation schedules of limited supplies of specialized equipment for a large number of licensees. NSP will keep the NRC informed of potential delays to the schedules contained herein as they become apparent.

L. O. Mayer

L O Mayer, PE
Manager of Nuclear Support Services

LOM/ak

cc: J G Keppler
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October 17, 1979

The GE BWR Owners Group has formulated or is currently developing generic positions and criteria for each of the recommendations of NUREG-0578. Positions relating to NUREG 0578 Sections 2.1.1, 2.1.2, 2.1.3.a, 2.1.3.b, 2.1.4, 2.1.8.b, 2.1.8.c, 2.1.9, 2.2.1.a, 2.2.1.b, 2.2.1.c, 2.2.2.a, 2.2.2.b and 2.2.2.c which are being submitted to DOR by the Owners Group. We concur with those owners group positions and hereby commit to implement them in accordance with the schedule of enclosure 6 of the above reference, as modified or supplemented by the Owners Group positions and the following:

2.1.3.a SRV Valve Position Indication

Discharge line pressure switches have been in use at Monticello to monitor safety relief valve actuations since 1972. However, the existing system utilizes components which have not been formally qualified. We intend to upgrade the system with qualified components during our February, 1980, refueling outage.

2.1.5.a Dedicated H₂ Control Penetrations

This requirement will be implemented within the schedule contained in enclosure 6 to the above reference.

2.1.5.c Recombiner Procedures

There are presently no recombiners installed at the Monticello Plant for post LOCA combustible gas control. Therefore, this item is not applicable.

2.1.7.a Auxiliary Feed
& 2.1.7.b

Not Applicable (BWR).

2.1.9 RCS Venting

The following information is provided as requested at the October 11, 1979 Topical Meeting:

The Monticello plant is equipped with eight safety relief valves which vent from the main steam lines to the suppression pool. All valves are operable from the main control room. Four of the valves are safety grade and fully qualified for LOCA environment. Vessel head vent valves are operable from the Control Room. There is a normally open vessel head vent line to the main steam line. Both the HPCI and RCIC systems utilize steam driven turbines.

2.2.1.b Shift Technical Support

As identified at the Chicago regional meeting, this item is scheduled for generic resolution between the licensees and the NRC. By January 1, 1980, Monticello will have a Shift Technical Advisor on duty that meets the generic requirements arrived at as a result of regional and topical meetings between the licensees and the NRC. If complete compliance with the generic resolution by January 1, 1980 is not possible by practical application of available resources, we will inform the NRC as soon as possible, but before January 1, 1980.

The training of the Shift Technical Advisor is planned to be completed by January 1, 1981.

Additional Comments

The GE BWR Owners' Group discussed the valve qualification of 3-stage Target Rock S/RV's in the response to NUREG-0578 Requirement 2.1.2. We would like to make an additional comment. Full flow steam tests of the Monticello S/RV's have been conducted in connection with the Mark I Long Term Program. It is our understanding that similar full flow tests on a more limited scale, have been conducted at other BWR facilities.

In regard to items 2.1.6.a, 2.1.6.b, and 2.1.8.a the GE BWR Owners' Group is developing detailed recommendations that are expected to be submitted by approximately November 15. After these recommendations have been reviewed, NSP will be able to make further commitments on these three items. In addition, the following comments are in order on each of these items:

- 2.1.6.a The BWR design is such that systems outside containment normally contain fluids that are radioactive. For this reason, there is heightened awareness to leak detection and elimination. Leak reduction has been considered a prudent operating practice at the Monticello plant in order to limit worker exposure to radioactive materials and to limit the spread of contamination.
- 2.1.6.b We expect to complete a design review of plant shielding by January 1980. However, commitment to implement plant modifications will depend upon an analysis of the design review, nature and extent of the modifications, and schedule of refueling outages. We expect that after the shielding design review has been completed, we will be able to predict an accurate date for modification completion.
- 2.1.8.a We fully concur with the importance of being able to obtain and analyze samples from a post-accident environment. We expect the design review will be completed and appropriate procedures will be revised by January 1980.

The BWR Owners' Group is currently evaluating the nature of sampling required in a post-accident environment. Schedule commitments regarding description of proposed modifications and implementation of plant modifications can be made after review of the GE Owners' Group proposal has been completed.

We expect to submit further information to the NRC regarding schedule commitments on these items after review of the GE BWR Owners Group recommendations due in November.

ATTACHMENT A
MONTICELLO
ENCLOSURE 8 RESPONSE

The September 13, 1979 letter requested that we commit to comply with the emergency preparedness requirements and schedule contained in Enclosures 7 & 8 to the September 13, 1979 letter. We hereby commit to comply with those requirements as modified by the following for items in Enclosure 8:

- Item 2 As stated above we have committed to implement NUREG 0578 items 2.1.8.b and 2.1.8.c per the G.E. BWR owners group position. Our commitment to NUREG item 2.1.8.a was discussed in Part I.
- Item 5 We commit to offer our advice and assistance to the state and local agencies to assure that their plans are adequate.
- Item 6 We commit to cooperate and assist the State of Minnesota and federal, state and local agencies to achieve a test of the state plan and a joint test exercise in accordance with the required schedule.