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SUBJECT: Forwards supplemental response to NUREG-0578, Lists exceptions to NRC positions, and implementation dates which will not be met.

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NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

November 20, 1979

Director of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket Nos. 50-263 License Nos. DPR-22

Lessons Learned Supplemental Information

References

- (1) Letter, D G Eisenhut (NRC) to L O Mayer (NSP) dated September 13, 1979
- (2) Letter, L O Mayer (NSP) to Director of Nuclear Reactor Regulation (NRC)
dated October 17, 1979
- (3) Letter, H D Denton (NRC) to L O Mayer (NSP), dated October 30, 1979

Reference (1) outlined the Lessons Learned Task Force recommendations with schedule requirements. Reference (2) described the existing Monticello systems as appropriate and planned implementation dates.

Reference (3) requested a detailed explanation for any possible delays that might occur in meeting the January 1, 1980 implementation date. Enclosure (1) describes the results of our review of NUREG-0578, Reference (1), and the clarification provided in Reference (3).

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. NSP will keep the NRC informed of potential delays to the schedules contained herein as they become apparent.

L. O. Mayer

L O Mayer
Manager of Nuclear Support Services

LOM/JAG/jh

cc J G Keppler
G Charnoff

Enclosure

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Enclosure 1
November 20, 1979

This enclosure addresses the following five items related to the Lessons Learned Requirements and related correspondence cited in the cover letter.

- (1) New Commitments on Lessons Learned Items
- (2) Items with different implementation schedules than proposed by the Lessons Learned Task Force
- (3) Items for which methods may differ from the staff's requirements
- (4) Review of the North Anna incident applicability for Monticello
- (5) Previous Commitments/Discussion regarding Lessons Learned Items.

A. New Commitments

As indicated in Reference (2), the GE Owners' Group had planned on submitting positions on Items 2.1.6a, 2.1.6b, and 2.1.8a in November. The GE BWR Owners Group has formulated positions regarding items 2.1.6.a, 2.1.6.b and 2.1.8.a which are being transmitted to DOR by the Owners Group. We concur with those positions and hereby commit to implement them in accordance with the schedule in enclosure 2 of your October 30, 1979 letter.

The Owners Group position, submitted on October 17, 1979, addressed the recommendations for containment pressure, level, and hydrogen monitors. We hereby commit to implement those recommendations in accordance with the schedules in Enclosure 2 of your October 30, 1979 letter.

B. Implementation Schedule Differences

We intend to meet the implementation schedules contained in Enclosure (2) of Reference (3) with the exception of the four items discussed below:

2.1.2 Relief and Safety Valve Testing

It is our understanding that a revised Owners' Group position is being developed.

2.1.3.a Relief Valve Position Indication

A safety/relief valve position monitoring system which utilizes the pressure switch method is presently installed at Monticello. This system provides a computer alarm and identification in the control room whenever a S/RV opens. A backup temperature recording system monitors the S/RV discharge pipe temperatures at 15 second intervals and provides a redundant alarm whenever high temperature is detected. The pressure switch alarm system and the temperature monitor are powered from redundant vital instrument AC supplies. Operating and extensive test experience demonstrated that these systems operate satisfactorily for both low pressure and high pressure S/RV pops. Our emergency procedures will be reviewed and revised, if necessary, to assure that the control room operators are familiar with normal S/RV discharge pipe pressure and temperature responses.

The existing system will be upgraded with safety grade, seismic and environmentally qualified components. The system will be modified to include the computer information plus independent light and alarm indication in the control room. A purchase order has been issued for pressure switches designed for a LOCA environment. Even though additional expense has been incurred to expedite the order, the pressure switches will not be delivered by January 1, 1980. It is expected that the switches will be received sometime during our February 1980 outage and they will be installed at that time. The results of a formal qualification test are not expected to be completed for six months.

2.1.3.b Inadequate Core Cooling

It is our understanding that the analysis of inadequate core cooling which is being performed for the GE BWR Owners' Group will not be available until November 30, 1979 and that procedure guidelines are not scheduled to be available until January 15, 1980. We will implement procedures and retraining prior to the end of our February 1980 refueling outage if the guidelines are available on schedule.

2.1.4 Containment Isolation

Equipment required to modify the containment isolation system to prevent reopening of the isolation valves upon reset of the isolation logic has been ordered, however delivery is not expected prior to January 1, 1980. It is anticipated that the equipment will be available for installation during the refueling outage scheduled to begin in early February, 1980, and the modification would be accomplished at that time.

As an interim measure, administrative controls, including procedure changes and a physical barrier (with information provided on the physical barrier to remind the operator of administrative requirements placed on the operation of isolation reset switches) will be implemented prior to January 1, 1980.

C. Possible Methods Differences

We believe our methods are in complete agreement with the NRC staff's requirements for all items discussed in Enclosure 1 of the October 30 letter with the possible exception of the items described below:

2.1.1 Emergency Power Supply, Pressurizer Level and Relief Block Valves

In the November 14, 1979 NRC letter concerning the GE BWR Owners' Group positions on NUREG-0578 implementation, it was stated that the position on item 2.1.1 was acceptable provided emergency power was available to provide a long term source of air for air-operated relief valves. The safety/relief valves at Monticello are pilot-operated and self-actuating in their overpressure protection safety valve function. An air supply is required only for manual operation and for the ECCS function of automatic depressurization. The ECCS systems are designed to operate totally independent of the station air systems, therefore each of the eight SRV's is supplied with a pneumatic accumulator. We believe that this is acceptable.

2.1.2 Relief and Safety Valve Test

It is our understanding that the GE BWR Owners' Group is developing a revised position on this item which will be submitted to DOR.

2.1.9 RCS Venting

We believe that our present design incorporates adequate inherent venting capability. Our October 17, 1979, letter provided specific information as requested at the October 11, 1979 Topical Meeting (see Section E).

D. North Anna Incident Applicability

The following comments are in response to your October 17, 1979 letter regarding a Radioactive Release at North Anna Unit 1. Monticello is a BWR and does not appear to have any systems directly analogous to those involved in the release pathway at North Anna. We have reviewed our systems to determine if potential pathways exist whereby an inadvertent operator error following ECCS initiation might release any significant liquid or gaseous activity from systems designed to contain it. No such possibilities have been identified.

Several years ago, tank vent modifications were made at Monticello to prevent releases to plant buildings. Process tanks which normally contain high level waste are not vented to the building atmosphere or to low level waste tanks. Such tanks are vented through filters and fans to the reactor building vent, which is a monitored release point. We plan to reroute vents on the reactor building floor drain and equipment drain sumps and tanks to the reactor building vent. We expect this work to be completed by June 30, 1980.

E. Previous Commitments/Discussions

Our October 17, 1979 response to the NRC September 13, 1979 letter contained the following information:

The GE BWR Owners Group formulated 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 were submitted to DOR by the Owners Group. We concurred with those owners group positions and committed to implement them in accordance with the schedule of enclosure 6 of the September 13 letter 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 of the September 13 letter.

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 was not applicable.

2.1.7.a Auxiliary Feed

& 2.1.7.b

Not Applicable (BWR).

2.1.9 RCS Venting

The following information was 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 system 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 offered 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 was expected to submit a generic response by approximately November 15. After these recommendations had been reviewed, NSP expected to be able to make further commitments on these three items. In addition, the following comments were made for 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 could be expected after review of the GE Owners' Group proposal.

Emergency Preparedness Requirements

NSP was requested to comply with the emergency preparedness requirements and schedule contained in Enclosures 7 & 8 to the September 13, 1979 letter. We committed to comply with those requirements as modified by the following for items in Enclosure 8 of the September 13 letter.

- Item 2 As stated above we committed to implement NUREG-0578 items 2.1.8.b and 2.1.8.c per the GE BWR owners group position. Our commitment to NUREG item 2.1.8.a was discussed.
- Item 5 We committed to offer our advice and assistance to the state and local agencies to assure that their plans are adequate.
- Item 6 We committed 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.