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SUBJECT: Forwards response to four of five new TMI-2 requirements identified in NRC 800507 ltr.Includes items re licensing exams,operating experience feedback,Bulletins & Orders,Task Force final recommendations & control room habitability.

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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

June 11, 1980

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

Additional TMI-2 Related Requirements

Mr Darrell Eisenhut's May 7, 1980 letter identified five new TMI-2 requirements related to shift manning, licensing examinations, operating experience feedback, B&O Task Force final recommendations, and control room habitability for the Monticello Nuclear Generating Plant. The "shift manning" requirements (Item I.A.1.3) have not yet been identified by the NRC staff.

Attachment 1 provides our response to four of the five Items of the May 7 letter. We intend to comply with the requirements and implementation dates specified except as noted in the attachment. Bases for the delay in implementation dates or exceptions are provided in the Attachment 1 discussion of those items.

Our agreement to meet the implementation dates specified in the May 7 letter is dependent on equipment availability and assumes no changes in regulatory position beyond those stated in the May 7 letter.

We will notify the NRC Project Manager if delays in the implementation dates are expected.

L.O. Mayer

L O Mayer, PE
Manager of Nuclear Support Services

LOM/JAG/ak

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cc: J G Keppler
G Charnoff

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Attachment 1 to
June 11, 1980 NSP Letter

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

Five Additional TMI-2 Related Requirements

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I.A.1.3 Shift Manning

Response on this item is postponed until 30 days after receipt of the NRC letter spelling out the shift manning requirements.

I.A.3.1 Revised Scope and Criteria for Licensing Examination

Northern States Power Company commits to the requirements and schedule with the following exceptions:

(1) A.1.a. Experience

"Exceptions can be made as determined by the Training Supervisor provided at least four years of power plant experience and two years of competent operating experience, including a minimum of 1 year of control room related experience, have been satisfied."

We feel this is a justifiable position based on experience gained with the Nuclear Plant Operator Training Programs. At least 1 year of control room related experience is a minimum requirement.

(2) A.2.b. Training - Control Room Operator

"Staff engineer applicants for an operator's license shall have 3 months of control room related training."

We feel this is a justifiable position for staff engineers. The intent is not to limit control room training but to provide flexibility.

(3) "Effective date: Present programs have been modified in response to Bulletins and Orders. Revised programs should be submitted for OLB review by October 1, 1980".

We feel the above extension of the effective date is necessary to allow additional preparation of the formal program submitted in light of the increased workload associated with item A.2.d.

(4) A.2.d. Training - Instructor Competence

"Effective date: Applications should be submitted no later than December 1, 1980 for individuals who do not already hold a senior operator license."

We feel the above extension of the effective date is necessary to allow additional time for exam preparation.

We agree that training instructors must be expert in their course of instruction - systems, integrated responses, transient and simulator courses. A senior reactor operator or shift technical advisor knowledge level is generally required for instruction in integrated responses, transient, and simulator courses. Our 10 years of experience in training operators and engineers for RO and SRO licenses have shown that in some cases the expert knowledge possessed by plant systems engineers or accident analysis engineers (who may not possess an SRO) can provide a greater in-depth training benefit to the students. In addition, we have found that selected training consultant personnel (e.g. former NRC operator licensing examiners or others who may not possess an SRO license) have been able to provide very capable instruction in systems, integrated responses, and transients. Thus we feel this requirement is overly restrictive.

In addition, we interpret this requirement to mean that personnel who have passed an SRO examination previously and whose licenses may have lapsed (but have been engaged in nuclear power plant operation and/or support activities) have demonstrated "their competence to NRC by successful completion of a senior operator examination."

"We agree that any individuals who provide training instruction in systems, integrated responses, transient and simulator courses at the NSP nuclear plants should be or have been NRC licensed or have equivalent knowledge level (e.g. systems engineers). Exceptions (as noted above) would be granted only by the Manager-Production Training or designate who holds or has held a Senior Reactor Operator License for a large light water reactor."

(5) A.2.e. Training - Requalification Programs

"Effective date: Programs should be initiated May 1, 1980. Programs should be submitted to OLB for review by December 1, 1980."

We feel the above extension of the effective date is necessary to allow additional preparation of the formal program submittal. The Training Group's workload is taxed especially with the A.2.d position requiring extensive training within the training group.

(6) A.3. Facility Certifications

"Certifications completed pursuant to Sections 55.10(a)(6) and 55.33a(4) and (5) of 10 CFR Part 55 shall be signed by the plant managers."

It is felt that the plant manager is a more appropriate level of authority to attest to the validity of the license applications. Higher levels of corporate management would have significantly less personal knowledge of the validity of the application and the capability of the applicant. We propose that the past practice of issuing such items under signature of the plant manager be retained.

(7) B.1, D.1, D.2 and D.3

These items require further action by the NRC and are therefore not appropriate for commitments by the licensee at this time.

I.C.5 Procedures for Feedback of Operating Experience to Plant Staff

Northern States Power Company commits to the requirement and schedule. Presently, a system exists that assures distribution of pertinent information important to plant safety. This operating experience assessment function will be reviewed in light of the position; modifications, as necessary, to this system will be completed by 1-1-81.

II.K.3 LOFW and Small Break LOCA Generic Review Matters

We hereby commit to meet the requirements and associated schedules for the following items:

II.K.3.17 Report on Outage of ECC Systems

II.K.3.22 Automatic Switchover of RCIC Systems Suction - Verify Procedures and Modify Design

II.K.3.24 Confirm Adequacy of Space Cooling for HPCI and RCIC Systems

II.K.3.25 Effect of Loss of AC Power on Pump Seals

II.K.3.28 Study and Verify Qualification of Accumulators on ADS Valves

II.K.3.29 Study to Demonstrate Performance of Isolation Condensers with Non-Condensibles

II.K.3.44 Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Failure

II.K.3.45 Evaluation of Depressurization with Other Than ADS

II.K.3.46 Response to List of Concerns from ACRS Consultant

II.K.3.57 Identify Water Sources Prior to Manual Activation of ADS

Our response to the remaining BWR and LWR items is as follows:

II.K.3.13 Separation of HPCI and RCIC Initiation Levels - Analysis and Implementation

II.K.3.16 Reduction of Challenges and Failures of Relief Valves - Feasibility Study and System Modification

II.K.3.18 Modification of ADS Logic - Feasibility Study and Modifications for Increased Diversity for Some Event Sequences

With respect to II.K.3.13, II.K.3.16, and II.K.3.18, studies and analyses are being performed by the General Electric Company to evaluate these three items. We expect that BWR Owners sub-groups will be established to work with GE and the NRC on these items. We believe the evaluations will be available by the scheduled dates. A commitment for implementation of any changes that are justified by the evaluation results must await definition of hard-ware requirements and determination of hardware availability.

II.K.3.14 Isolation of Isolation Condensers on High radiation. Monticello does not have an isolation condenser.

II.K.3.15 Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC systems.

The Monticello plant has not experienced spurious isolation problems with either the HPCI or RCIC break detection systems that are currently installed. The systems have each been tested extensively in the fast start mode and have experienced several automatic iniations due to operational transients. The Monticello HPCI isolation system has a venturi flow element rather than elbow taps and utilizes a time delay dual setpoint circuit to accomodate the initial flow surge. Therefore, we feel that this item does not apply to our HPCI system.

A generic position on this time item is being developed via the BWR Owners group. We believe that position will be applicable to our RCIC system. We expect the position to be established during August, 1980.

II.K.3.19 Interlock on Recirculation Pump Loops

Not applicable since Monticello is a jet pump BWR.

II.K.3.21 Restart of Core Spray and LPCI System on Low Level - Design and Modification

The existing logic and control scheme at Monticello is such that these systems do restart automatically on loss of water level. The operator can only defeat a pump restart by placing individual pump control switches in the pull to lock position. This is not a normal operator action when stopping a pump. We feel that the pull-to-lock feature should not be eliminated.

A generic position is being developed on this item via the BWR Owners group. We expect this position to be established during July, 1980.

II.K.3.27 Provide Common Reference Level for Vessel Level Instrumentation

Preparation of a technical position paper concerning this item is being considered by the BWR Owners. It is expected that this paper will be prepared during August, 1980. It is expected that recommendations of the paper applicable to Monticello will be implemented by the scheduled date.

II.K.3.30 Revised Small Break LOCA Methods to Show Compliance with 10CFR50, Appendix K

General Electric, working directly with the NRC Staff, will address the conclusions and recommendations regarding smallbreak LOCA analytical methods set forth in items (1) through (5) of Section 4.2.10 of NUREG-0626 by the required date.

II.K.3.31 Plant Specific Calculations to Show Compliance with 10CFR50.46

We will submit plant-specific calculations by the required date, provided that such plant-specific calculations are determined to be necessary after the conclusion and NRC Staff review of requirement II.K.3.30.

II.K.3.3 Reporting Safety Relief Valve Failures and Challenges

We agree to report on a prompt basis, failures of reactor system safety relief valves. Prompt reporting is interpreted to mean within 24 hours by telephone, the same as LER reporting. Reporting to the Resident Inspector or Assistant Resident Inspector is considered adequate. If neither of the inspectors can be contacted, the failure will be reported to the IE-III office. Documentation of failures and challenges will be included in an annual report covering the period 4-1-80 to 12-31-80 initially. The annual report will be submitted within 90 days of the end of the calendar year.

III.D.3.4 Control Room Habitability

We hereby commit to meet the requirements and associated schedule for this item.