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DESCRIPTION Furn info on operational quality assurance plan implementation....3P...

ENCLOSURE

PLANT NAME : Prairie Island & Monticello Plants...

JCM 3-10-78

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SAFETY

FOR ACTION/INFORMATION

ENVIRONMENTAL

ASSIGNED AD:		ASSIGNED AD:	V. MOORE (LTR)
BRANCH CHIEF:	(7) LEAR	BRANCH CHIEF:	REGAN
PROJECT MANAGER:	SCHWENGER (3)	PROJECT MANAGER:	BAJWA
LIC. ASST:		LIC. ASST:	M. DUNCAN
			B. HARLESS

INTERNAL DISTRIBUTION

<del>REG FILES (3)</del>	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY &
NRC PDR	R. MATTSON	TEDESCO	ENVIRON ANALYSIS
I & E (2)	SCHROEDER	BENAROYA	DENTON & MULLER
OELD		LAINAS	CRUTCHFIELD
GOSSICK & STAFF	ENGINEERING	IPPOLITO	
HANAUER	KNIGHT	F. ROSA	ENVIRON TECH
MIPC	BOSNAK		ERNST
CASE	SIHWEIL	OPERATING REACTORS	BALLARD
ROYD	PAWLICKI	STELLO	YOUNGBLOOD
THORNBERG		EISENHUT	
PROJECT MANAGEMENT	REACTOR SAFETY	SHAO	SITE TECH
SKOVHOLT	ROSS	BAER	GAMMILL (2)
P. COLLINS	NOVAK	BUTLER	
HOUSTON	ROSZTOCZY	GRIMES	SITE ANALYSIS
MELTZ	CHECK		VOLLMER
HELTEMES (2)			BUNCH
SK	AT & I		J. COLLINS
	SALTZMAN		KREGER
ASLB	PUTBERG		

EXTERNAL DISTRIBUTION

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**NORTHERN STATES POWER COMPANY**

MINNEAPOLIS, MINNESOTA 55401

March 8, 1978

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



MONTICELLO NUCLEAR GENERATING PLANT  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket Nos. 50-263 License Nos. DPR-22  
50-282 DPR-42  
50-306 DPR-60

OPERATIONAL QUALITY ASSURANCE PLAN IMPLEMENTATION

Mr D K Davis's letter dated December 29, 1977, stated that the NSP Quality Assurance Plan, Revision 2, is acceptable, with one addition regarding radiograph retention. That letter also stated that if there are any portions of the program which could not be implemented within 90 days of the date of the letter, we should notify the NRC in writing, within 60 days of receipt of the letter, specifying which aspects of the program cannot be implemented and stating reasons therefore. This letter is to document the portions of the Operational Quality Assurance Plan, Revision 2, which cannot be implemented within 90 days.

NSP has an Operational Quality Assurance Program which is responsive to the requirements of Appendix B to 10 CFR Part 50. In a letter dated March 2, 1976 from Mr D L Ziemann of the NRC, it is stated that the NRC is knowledgeable of the fact that past inspections performed by the Office of Inspection and Enforcement of the Operational Quality Assurance Programs both at Monticello and Prairie Island Plants have not indicated any significant weakness in these programs; however, the NRC Staff requires documentation of the managerial and administrative controls contained in the QA Program to be fully confident that the applicable requirements of Appendix B will be satisfied. In response to that request, NSP submitted a description of the Operational Quality Assurance Programs for the Monticello and Prairie Island Plants on June 17, 1976. The Plan provided a description of how the Operational Quality Assurance Program satisfies the requirements of Appendix B, 10 CFR Part 50. As a result of NRC Staff review of the Plan, NSP was asked to make certain revisions to the Plan including commitment to the guidelines contained in a number of ANSI Standards and NRC Regulatory Guides. The Operational Quality Assurance Plan, Revision 2, which was accepted by the NRC by their letter of December 29, 1977, contained commitments to fifteen ANSI Standards and the Regulatory Guides applicable to those Standards. Although the Quality Assurance Program implementation to date meets the general requirements of Appendix B, 10 CFR Part 50, there are many details in the ANSI Standards and Regulatory Guides (a portion of which has been specifically included in the Plan) which will require a period of time for implementation

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beyond the 90-day period suggested by the NRC. Implementation of these details will require generation of additional directives and procedures and assignment and training of additional personnel. In the case of records management, construction of appropriate facilities may also be necessary.

Incorporation of the requirements contained in the Standards and Guides will require a detailed review of each Administrative Control Directive, making appropriate changes and reissuing them. We have included this review in our 1978 Review Program. In the succeeding year, 1979, we will verify implementation of these revised Directives in our 1979 Audit Program; thus we can assure reasonable compliance by the end of 1979. It should be noted that approximately 210 Administrative Control Directives are involved in this review-revision-audit process.

In addition our Operational Quality Assurance personnel have recently reviewed the Operational Quality Assurance Plan with regard to implementation of its provisions. This review revealed that certain areas of the Program need further attention to fully satisfy NSP's concerns. The majority of these areas of concern are minor in nature and easily corrected.

The more significant areas of concern include:

## Section 3.3 Items 1, 2, 3 & 4

Directive requirements associated with In Service Inspection (ISI) and Non-Destructive Examination (NDE) need to be implemented by issuance of appropriate Instructions. Directives associated with ISI need to be revised. Preparation of Instructions which implement ISI & NDE requirements have been scheduled for preparation in 1978. Revision of Directives associated with ISI have been incorporated into the 1978 QA Review Program.

## Section 3.6.2

The responsibilities assigned to the Manager, Maintenance & Testing have not been fully implemented. A concerted effort is being made by management and quality assurance personnel to expedite full implementation.

## Section 3.12.1 Items 1, 2, 3 & 4

The requirements associated with Special Processes and Inservice Inspection require further attention. Preparation of appropriate Instruction and Directive revisions has been scheduled for 1978.

## Referenced Administrative Control Directive

Seven of the General Office Administrative Control Directives referenced in the Plan have not been prepared. Preparation of these Directives has been scheduled for 1978.

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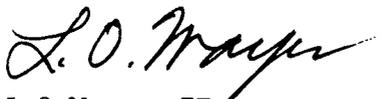
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Correction of the deficiencies identified by our quality assurance personnel, including the above items, is expected to be fully implemented by the end of 1979.

In retrospect NSP recognized the need for documentation of the Operational Quality Assurance Program early in 1974 to include extended coverage of the off-site NSP organization. At that time NSP quality assurance personnel discussed our plans with NRC I&E personnel regarding the content of a Company-wide Operational Quality Assurance Program and the schedule for implementing such a program. It was concluded that full implementation could not be expected in less than five years and such a schedule was acceptable provided a number of areas of special concern were implemented expeditiously. It was pointed out to NRC personnel at that time that we could and would take care of these areas of special concern immediately but that an effective and orderly program could not be developed on a "fire-fighting" basis and that after these areas of special concern were satisfied further development of the program would proceed on an orderly scheduled basis. We have adhered to this verbal commitment.

We plan to continue this orderly process of preparing the necessary Directives, implementing the Directive requirements, and verifying implementation by audit. A new element has now been introduced; i.e., revising Directives to incorporate provisions of Standards and Guides. We do not feel this will be a major problem since the changes for the most part are minor but it will take more than 90 days.

We reiterate that those elements of the Operational Quality Assurance Program that are necessary to assure the safety and operations of the Monticello and Prairie Island Nuclear Plants have been implemented. The individual plants and the General Office Operational Quality Assurance group are ready to discuss our implementation plans in more detail with the Region III I&E personnel during future site or General Office visits.



L O Mayer, PE  
Manager of Nuclear Support Services

LOM/ak

cc: J G Keppler  
G Charnoff