

DISTRIBUTION AFTER ISSUANCE OF OPERATING LICENSE

NRC FORM 195
(2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER

50-263

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO: Mr. Victor Stello

FROM: Northern States Power Company
Minneapolis, Minnesota
L. O. Mayer

DATE OF DOCUMENT
11/30/77

DATE RECEIVED
12/5/77

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DESCRIPTION

ENCLOSURE

Consists of response to NRC's 10/14/77 ltr. which questioned the use of relays in the Recirculation Pump Trip circuitry, which are made by the same manufacturer as relays in the Reactor Protection System.....

PLANT NAME: Monticello
RJL 12/5/77

(1-P)

40 ENCL*

SAFETY

FOR ACTION/INFORMATION

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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

November 30, 1977

Mr Victor Stello, Director
Division of Operating Reactors
c/o Distribution Services Branch, DDC, ADM
U S Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr Stello:

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

Response to 10/14/77
NRC ATWS Questions

This letter responds to Mr Goller's October 14, 1977 letter, which questions the use of relays in the Recirculation Pump Trip (RPT) circuitry, which are made by the same manufacturer as relays in the Reactor Protection System (RPS). The referenced letter further states, "Use of identical relays does not fulfill the desired system diversity, in that a common mode failure similar to that described in WASH-1270 could render both reactor scram and RPT inoperative."

It is our opinion that the diversity requirement is met through functionally opposite application of the relays. Our description of RPT (NEDO-25016) submitted on September 15, 1977 states that the RPT system is "energize to trip" while the RPS is a "de-energize to trip" system. The application of functional diversity to common elements is discussed in detail in Section 4.5.3 of NEDO-25016. The likelihood of a common cause failure which would adversely affect functional application of these relays is considered acceptably low. Further pursuit of diversity presents not only unnecessary redundancy, but causes a significant impact on design work completed in the last year.

The NRC staff safety evaluation dated February 23, 1977 states, "This evaluation presents the results of our review of a proposed RPT modification, which is considered a short term solution to the anticipated

NORTHERN STATES POWER COMPANY

Mr Victor Stello
Page 2
November 30, 1977

transient without scram, ATWS. Evaluation of the long term program, which addresses all the WASH-1270 requirements and considers the need for additional modifications, will be accomplished for Monticello and other WASH-1270 Class C plants at a later date." It further states, "The diversity between the ATWS logic and reactor protection system (RPS) logic has been achieved primarily through the functional application of the logic elements and the location of the logic elements. . . . We have determined that the diversity of this system, based on the above factors, is acceptable."

We interpreted your safety evaluation to be concurrence for the entire design, installation and implementation (pending issuance of technical specifications) of the RPT circuitry as proposed; design, procurement of materials and installation activities are presently underway. We request that your determination on this recent inquiry consider the existence of functional diversity as discussed above and the applicability of the conclusions of your February 23, 1977 safety evaluation. If our understanding of your concurrence on RPT circuitry is incorrect, please inform us immediately since current efforts would have to be halted, reinitiated under newly approved criteria, and would cause significant additional delays in the implementation of RPT.

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/MHV/deh

cc: J G Keppler
G Charnoff
MPCA
Attn: J W Ferman

DISTRIBUTION AFTER ISSUANCE OF OPERATING LICENSE

NRC FORM 195
(2-76)

U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER

50-263

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

TO: Mr. Gaston Fiorelli		FROM: Northern Staes Pwr. Company Mianneapolis, Minnesota L. J. Wachter		DATE OF DOCUMENT 11/8/77
<input type="checkbox"/> LETTER <input type="checkbox"/> ORIGINAL <input type="checkbox"/> COPY		<input type="checkbox"/> NOTORIZED <input type="checkbox"/> UNCLASSIFIED		DATE RECEIVED 11/14/77
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DESCRIPTION

re out 10-14-77 HR

Consists of response to notification of item of noncompliance concerning liquid penetrant testing being performed on control rod drive collets between Sept. 14 and 22, 1977.....

PLANT NAME: Monticello
RJL 11/15/77 (1-P)

ENCLOSURE

SAFETY		FOR ACTION/INFORMATION	
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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

November 8, 1977

Mr. Gaston Fiorelli, Chief
Reactor Operations and Nuclear Support Branch
Region III
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137



Dear Mr. Fiorelli:

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

Your letter of October 14, 1977, identified an item which appeared to be in noncompliance with NRC requirements and requested that we reply within 20 days of receipt of letter. The noncompliance, as stated, was:

Contrary to Technical Specifications 6.5 and 6.5.C.3 and Section IV.A of your procedure, NSP-PT-1, liquid penetrant testing was performed on control rod drive collets between September 14 and 22, 1977, by a noncertified technician.

When the Control Rod Drive (CRD) collets were inspected, the only NSP approved liquid penetrant inspection procedures available were NSP-VS-1 and NSP-NPT-1. These procedures were prepared and approved for use during the 1975 and 1977 refueling outages, respectively, for inspection of ASME Code-related pressure boundary components. The ASME Code applicable to in-service inspection requires NDE to be performed by certified personnel and the procedure included this requirement. However, the CRD collets are not pressure boundary or code-related components. Although the technician was not certified in accordance with SNT-TC-1A, his qualifications were more than sufficient to assure quality in the performance of the collet liquid penetrant examination.

This infraction has been discussed with the quality engineers and other personnel responsible for processing work control documents. The importance of using appropriate procedures and assuring that personnel qualifications are in accordance with procedure requirements was emphasized. We believe that this action is sufficient to prevent a recurrence.

Should you have any questions concerning our response, please communicate directly with the plant management.

Yours very truly,

L. J. Wachter

Vice President - Power Production
and System Operation

cc: Mr. Victor Stello
Mr. G. Charnoff
Minnesota Pollution Control Agency
Attention: Mr. J. W. Ferman

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RECEIVED DOCUMENT
C. 12500 12071

1977 NOV 14 AM 9 55

TO ALL POWER REACTOR FACILITY LICENSEES

Northern States

50-263

Gentlemen:

NOV 1 1977

It has come to our attention that NRC reactor facility licensees occasionally find it necessary to send a component contaminated with radioactivity to manufacturers or service companies for repair or calibration. It is not always practical or feasible, however, for the facility licensee to reduce the radioactivity associated with the component to levels acceptable for unrestricted use. The manufacturers or service companies do not, in many cases, have appropriate NRC or Agreement State licenses authorizing receipt, possession, use and transfer of byproduct material nor do they have the qualified personnel necessary to obtain such licenses. The shipment of these components by or to unlicensed persons has resulted in enforcement action being taken against the persons shipping or receiving the contaminated components. Urgently needed repairs and service have been delayed while the concerned regulatory agencies attempted to resolve the problem.

It is essential that appropriate licenses be held by the repair shop or the facility licensee in accordance with the guidance of this letter, prior to shipment of the contaminated component. Some NRC facility licensees have obtained NRC or Agreement State licenses, as appropriate, authorizing possession and use of components containing byproduct material at unspecified off site locations throughout the state in which the facility is located. We suggest that you consider obtaining such a license to avoid such problems.

Applications to the NRC or to an Agreement State by NRC facility licensees for such byproduct materials licenses must be completely supported by necessary information, including contract provisions to be employed to demonstrate full licensee control of all related matters, such as shipping procedures, health physics support personnel, health physics procedures, training and experience, cleanup operations, and final survey reports. In instances where full licensee control of all matters relating to the contaminated item while in the repair shop is not intended or is not feasible, the repair shop must obtain the appropriate license to permit the repair. If the licensee is able to satisfy the requirements for a byproduct materials license authorizing possession and use of his contaminated materials at unspecified sites, he may, in accordance with reciprocal NRC or Agreement State regulations receive, possess, use and transfer such contaminated components at unspecified off-site locations in other states.

[Handwritten signature]
mky

OFFICE >						
SURNAME >						
DATE >						

If the facility is located in a non-Agreement State, the NRC byproduct material license (issued pursuant to 10 CFR Part 30) would authorize the possession and use of the contaminated component in other non-Agreement States. By notifying the appropriate Agreement State authority by letter, or if necessary by telephone, at least five days prior to shipment of a contaminated component, an NRC licensee authorized to possess and use components containing byproduct material at unspecified off site locations throughout a non-Agreement State can (pursuant to Agreement State regulations similar to 10 CFR 150.20) obtain authorization to conduct the same activities within an Agreement State.

If the licensed facility is located in an Agreement State, the facility licensee must obtain from the Agreement State a license authorizing possession and use of components containing byproduct material at unspecified locations throughout that State. Under the reciprocity provisions of 10 CFR 150.20 and similar provisions in other Agreement State regulations, the licensee is permitted (for up to 180 days in any calendar year) to conduct the same activities in other Agreement and non-Agreement States. If the shipment is to be made to a location in a non-agreement State, NRC Form 241 must be submitted at least three days prior to shipment. A copy of Form 241 is enclosed with this letter (enclosure 1). For shipments to locations in other Agreement States, appropriate notification must be made. If the licensee conducts the same activity for more than 180 days in any calendar year in any other state than the one for which the license was issued, he must obtain another byproduct material license from the NRC or the Agreement State, as appropriate, authorizing him to conduct such activities in that State.

For facilities located in a non-Agreement State, an application form and guidance for these byproduct materials licenses are included as Enclosures 2 and 3. For facilities located in Agreement States, you should contact the appropriate Agreement State licensing official (see Enclosure 4).

Sincerely,
Original signed by:
Karl R. Goller

Karl R. Goller, Assistant Director
for Operating Reactors
Division of Operating Reactors

Enclosures:

- 1. NRC Form 241
- 2. Application form
- 3. Guidance
- 4. Agreement States

FOR CONCURRENCES TO THIS LETTER, SEE MEMO DATED 11/1/77 FOR DOR BRANCH CHIEF FROM KARL R. GOLLER: SHIPMENT OF CONTAMINATED COMPONENTS FROM NRC LICENSED NUCLEAR POWER FACILITIES TO VENDORS OR SERVICE COMPANIES FOR REPAIR. (CENTRAL FILES)

cc w/o enclosures:

See next page

OFFICE >					
SURNAME >					
DATE >					

DISTRIBUTION FOR GENERIC CONTAMINATED COMPONENTS LETTER

Docket 50-263/282/306

NRC PDR (3)
Local PDR (2)

ORB #2 Reading

DKDavis

RMDiggs

MGrotenhuis

Project Manager

Attorney, OELD

· OI&E (3)

DEisenhut

TJCarter

TBAbernathy

JRBuchanan

ACRS (16)

Suedic / Grotenhuis

NOV 01 1977

Docket No. 50-263
 Docket No. 50-282
 Docket No. 50-306

Northern States Power Company
 ATTN: Mr. Leo Wachter
 Vice President
 Power Production and System
 Operation
 414 Nicollet Mall
 Minneapolis, MN 55401

Gentlemen:

Enclosed for your information is the notice of a planned Nuclear Materials Management and Safeguards System Seminar to be held in Columbus, Ohio, on November 15-17, 1977. The agenda for the meeting and other logistics information are included.

Since significant SNM reporting requirements and form changes are to be discussed, you are encouraged to attend. Please note the completed registration forms are needed immediately.

Sincerely,

J. A. Hind Chief
 Safeguards Branch

Enclosure: As stated

cc w/o encl:
 Mr. L. R. Eliason, Plant
 Manager
 Mr. F. P. Tierney, Jr.,
 Plant Manager
 Central Files
 Reproduction Unit NRC 20b
 PDR
 Local PDR
 NSIC
 TIC
 Anthony Roisman, Esq.,
 Attorney

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