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 MAYER, L.O.      Northern States Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards commitments to implementation dates specified in NUREG-0737 re hardware, procedural & organizational requirements. Remaining submittals re design descriptions & evaluations will be provided by 810201.

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Northern States Power Company

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December 30, 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

Post TMI Requirements - NUREG-0737

All licensees of operating plants were mailed a letter dated October 31, 1980 from Mr D G Eisenhut, Director, Division of Licensing, Office of Nuclear Reactor Regulation, which contained revised Post TMI Requirements in a document identified as NUREG-0737. The licensees were requested to furnish confirmation that the implementation dates indicated in Enclosure 1 to NUREG-0737 will be met or to furnish justification for delays.

In the attachment to this letter, Northern States Power Company provides commitments to those hardware, procedural and organizational implementation requirements that will be met or furnishes justification and requests for exemption for those implementation requirements that may be delayed. Our commitments are dependent on equipment availability and assume no changes in regulatory positions or interpretations beyond those stated in the October 31, 1980 letter.

Mr Eisenhut's October 31, 1980 letter requires a large number of design descriptions, evaluations, and information transmittals to be submitted by January 1 or 2, 1981. Much of this material has already been submitted for NRC Staff review and other items will be addressed in Owners Group correspondence. For the remaining submittals we find we will be unable to meet the required January 1 or 2, 1981 date because of the lateness of the NRC's clarification information, the holiday vacation schedule, and the already heavy burden placed on our technical staff by other NRC requirements such as fire protection, environmental qualification, and on-going TMI modification work. We are directing our efforts to providing the written submittals for these items by February 1, 1981. Information submittals for the following NUREG-0737 items are involved:

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Director of Nuclear Reactor Regulation  
December 30, 1980  
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I.A.1.1(3 & 4)  
II.E.4.2 (5a & b)  
II.K.3 (17)  
III.A.2 (1 & 2)  
III.D.3.4 (1 & 2)

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



L O Mayer, PE  
Manager of Nuclear Support Services  
LOM/DMM/bd

cc: J G Keppler  
NRC Resident Inspector  
G Charnoff  
Attachment

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED DECEMBER 30, 1980  
RESPONDING TO NRC LETTER DATED OCTOBER 31, 1980  
POST TMI REQUIREMENTS - NUREG 0737

Northern States Power Company, a Minnesota corporation, by this letter dated December 30, 1980 hereby submits information in response to the NRC letter dated October 31, 1980 which contains revised post TMI requirements in a document identified as NUREG-0737.

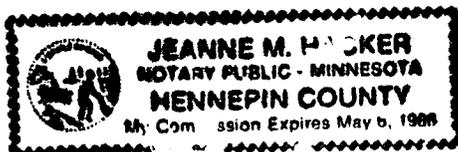
This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By *L.O. Mayer*  
L O Mayer  
Manager of Nuclear Support Services

On this 30th day of December, 1980, before me a notary public in and for said County, personally appeared L O Mayer, Manager of Nuclear Support Services, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

*Jeanne M Hacker*



Attachment  
Director of NRR  
December 30, 1980

MONTICELLO NUCLEAR GENERATING PLANT

COMMITMENTS TO IMPLEMENTATION DATES SPECIFIED IN NUREG-0737,  
"CLARIFICATION OF TMI ACTION PLAN REQUIREMENTS"

Northern States Power Company has reviewed the clarifying information contained in NUREG-0737 and has committed, where possible, to the implementation dates specified in that document. For many of the Action Plan items, it was necessary to summarize our understanding of the Commission's requirements and discuss, in some detail, what actions have been taken or are in progress to resolve the issue. The following Action Plan items covered by NUREG-0737 are applicable to the Monticello Nuclear Generating Plant. Our commitment to each of the applicable requirements is contained on the page indicated:

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\*Previously reported as being applicable to Monticello, but is applicable only to BWR's with isolation condensers.

### I.A.1.1 Shift Technical Advisor (STA)

Technical Advisors have been on duty since January 1, 1980, as described in Enclosure (1) to the December 31, 1979, letter from L O Mayer to the Director of NRR.

NSP will comply with the other implementation requirements for this item with the following exceptions: the description of the current STA training program and demonstration of conformance with the October 30, 1979 letter, and the description of the long-term STA program, will be submitted by February 1, 1981. Preliminary information on this subject is offered below.

The Shift Technical Advisor will have a bachelor's degree or equivalent in a scientific or engineering discipline and will have received training in (a) response and analysis of the plant for transients and accidents, and (b) plant design and layout including the control room, instrumentation and controls. Any individual with a degree in engineering or science and who possesses or has possessed a senior reactor operator license and is participating in the STA or SRO requalification program is considered to meet both the short and long term training requirements.

For those who possess a degree in engineering or science or equivalent and have not had an SRO license, the Shift Technical Advisor training program involves training in the following areas:

- Reactor Theory
- Heat Transfer, Fluid Flow, and Thermodynamics
- Radiation Safety
- Chemistry
- Materials
- Instruments and Controls
- Plant and Control Room Systems
- Transient and Accident Analysis (including simulator)

This training consists of formal lectures (including videotape); self-study; quizzes, exams, or checkoffs; and on-the-job training.

The STA retraining program consists of lectures involving the aforementioned topical areas following similar guidelines as the licensed operator requalification program. This program also includes simulator training sessions.

In the long term, the STA program will include the following subjects:

- Reactor Theory (including calculus as appropriate)
- Reactor Chemistry
- Nuclear Materials
- Thermal Sciences
- Electrical Sciences
- Radiation Protection and Health Physics
- Plant Systems and Procedures
- Transient Analysis
- Simulator Training

The long term requalification program will be the same as the short term program.

Proposed Technical Specifications were contained in our License Amendment Request dated December 12, 1980.

I.A.1.2 Shift Supervisor Responsibilities

Refer to our letter of December 31, 1979. This item is considered complete.

I.A.1.3 Shift Manning

Refer to our letter of October 29, 1980. The changes to page three of the NRC's July 31, 1980 letter contained in NUREG-0737 are still being reviewed. We may take exception to some of these requirements. Our position related to these additional requirements will be submitted by February 1, 1981. It should be noted that NUREG-0737 Enclosure (1) does not list this additional clarification to item I.A.1.3.

I.A.2.1 Immediate Upgrading of Reactor Operator & Senior Reactor Operator Training and Qualifications

On August 1, 1980, the revised requalification program and topical outlines for training in heat transfer, fluid flow, thermodynamics, mitigation and control of core damage and plant transients were submitted. No response from the NRC on this submittal has yet been received. Further action on this item is awaiting NRC review and approval.

SRO Experience

NSP practice has been to encourage plant staff engineers to become licensed SRO's. The SRO training program, as previously implemented at Prairie Island and being implemented at Monticello, is an eight-phase program. This program, described in a letter from F P Tierney (by J A Gonyeau) to P Collins, USNRC, dated April 22, 1976, covers the following topics:

- Phase A - Theory (Reactor Physics, Chemistry, Materials)
- Phase B - Systems
- Phase C - Control Room Checkoffs & Training
- Phase D - Simulator Training & Certification
- Phase E - RO Exam Review
- Phase F - SRO Exam Review
- Phase G - Pre-NRC Written Examinations
- Phase H - Pre-NRC Oral Examinations

Phase C will include the requirement that the trainee spend three months on shift as an extra person for applications received by the NRC after December 1, 1980. Personnel with degrees in engineering or related science will be required to have had two years of responsible nuclear power plant experience as a technical specialist (e.g. engineer, chemist, etc.) and satisfactory completion of the aforementioned training program.

At NSP nuclear power plants, the control room operators are either licensed or trainees in accordance with the Technical Specifications. The operations training program normally consists of two years apprenticeship formal and on-the-job training followed by approximately one to two years of formal and on-the-job training as a journeyman including licensed operator training.

It has not been NSP's practice to have non-degreed personnel become "instant SRO's" except on a few rare occasions where the individuals have demonstrated superlative performance while involved in license training and may have had prior experience.

By the time a non-degreed individual has been promoted through "plant attendant" and "auxiliary operator" positions to "control room operator", the individual will normally have accumulated several years of responsible power plant operating experience. To arbitrarily require four years of experience as "control room operator" beyond that point is unwarranted.

For the reasons discussed above, we must take exception to the requirement in NUREG-0737 for non-degreed personnel to have four years of control room experience prior to becoming an SRO.

#### I.A.2.3 Administration of Training Programs

Permanent members of the plant training staff or members of other organizations who routinely conduct training at the facility in integrated systems responses and transients associated with the licensed operator (hot license and requalification) NRC approved programs will be or have been senior reactor operator qualified or certified and be enrolled in appropriate requalification programs. When a simulator is available at the facility, this requirement will also apply to the simulator course instructors. Guest lecturers who are experts in certain areas (e.g. rod control, transient analysis, specific systems training) will not be required to meet this requirement.

#### I.A.3.1 Revise Scope & Criteria For Licensing Examinations - Simulator Exams

Monticello did not have a simulator onsite as of October 1, 1980, thus it would be necessary to schedule time for simulator examinations at other facilities since a plant specific simulator is not expected to be fully operational for three to four years.

Northern States Power Company believes it is appropriate that the simulator examinations, when conducted, be completed on a simulator at which the trainees have completed certification. The NRC has not as yet defined the scope or nature of the simulator examinations. Because there are differences between the simulators used for certification and the trainee's specific plant, the NRC simulator examinations and grading should take into account that trainees should not be penalized for subtle differences in simulator compared to plant behavior.

At present, the simulators used by Northern States Power are being scheduled one to two years in advance and simulator schedules may not agree with when licenses or examinations are needed. The current requirement for simulator examinations within two weeks of the NRC examinations at the plant is susceptible to schedule slippage on the part of the NRC, NSP or the simulator vendor.

For these reasons, Northern States Power requests exemption from this requirement and proposes the following:

1. The NRC should define the scope and nature of the simulator examinations.
2. Within one year of the definition of requirements, the licensee would commit to simulator examinations. This time period would provide the licensee the opportunity to schedule more simulator training time if required.
3. The NRC should expand the time frame between when the simulator and plant examinations take place.

I.C.1 Short Term Accident and Procedures Review

Analyses and guidelines submitted by the GE BWR Owners Group have been reviewed and approved for trial implementation. In response to an NRC request, an appendix to the guidelines is being prepared by the Owners Group for submittal by January 1, 1981. Following NRC approval, our procedures will be revised and implemented at the first refueling outage after January 1, 1982.

I.C.2 Shift and Relief Turnover Procedures

Refer to our letter of December 31, 1979. This item is considered complete.

I.C.3 Shift Supervisor Responsibilities

Refer to our letter of December 31, 1979. This item is considered complete.

I.C.4 Control Room Access

Refer to our letter of December 31, 1979. This item is considered complete.

I.C.5 Procedures for Feedback of Operating Experience

Northern States Power Company has systems in effect to ensure that feedback of operating experience is occurring. The plant operating staff and training staff are reviewing plant events to ensure that information pertinent to plant safety is continually supplied to operating personnel and other personnel and is incorporated into training and re-training programs. Through the use of the NSAC-INPO Notepad and SEE-IN system, events occurring outside the utility organization are being reviewed and presented to member utilities. We are receiving the output from the Notepad SEE-IN system at this time and disseminating the material internally as necessary.

Responsibilities for feedback of operating experience to the plant staff have been identified and agreed upon. Due to internal re-organization, approved procedures to address all areas of item I.C.5 will not be available by 1/1/81. It is anticipated that complete procedures will be available by 4/1/81. Because the main functions of Item I.C.5 will be in place on 1/1/81 we see no safety significance in delayed issuance of formal procedures.

I.C.6 Verify Correct Performance of Operating Activities

We have reviewed and revised existing Directives, Instructions and Procedures, where necessary, to assure conformance with items (2) through (5) of the five supplemental positions mentioned in the clarification. We believe that the existing Operational Quality Assurance Program (based largely upon ANSI Standard N18.7-1976), with the revisions mentioned above, satisfies the intent of this item.

I.D.1 Control Room Design Reviews

The GE BWR Owners Group has developed a control room survey checklist and has established survey teams to perform the control room design reviews. Completion of the Monticello survey is expected by the end of March 1981. Although the guidelines and schedules to be issued by the NRC are not anticipated to require any alteration of these plans, a firm commitment cannot be made until these are finalized.

I.D.2 Plant Safety Parameter Display Console

The GE BWR Owners Group has developed a list of Critical Parameters and is planning to develop a design specification. Design and procurement efforts will begin following final issuance of NUREG-0696, which will establish requirements and schedules for implementation. A firm commitment cannot be made until that time.

II.B.1 Reactor Coolant System Vents

It is our belief that previous submittals by the GE BWR Owners Group pertaining to LOCA analysis, emergency procedure guidelines, and the inherent venting capability of existing BWR designs, plus the information concerning specific Monticello systems contained in the October 17, 1979, submittal from L O Mayer to the Director of NRR, have provided a large measure of the information required by this item. We continue to support the GE BWR Owners Group position and criteria as stated in NEDO-24782. It is our intent to supply any remaining information required by July 1, 1981. We are not aware of any need for modifications. In the event such a need is identified, we will attempt to meet the implementation date contained in Enclosure 1 of NUREG-0737.

II.B.2 Plant Shielding

Enclosure (1) to the December 31, 1979, from L O Mayer to the

Director of NRR described the design review of plant shielding. The following changes and updating of that submittal result from further review and evaluation, and consideration of the clarification contained in NUREG-0737:

1. The sample preparation area (chemistry laboratory) should be included as an essential area. Our analysis shows that GDC 19 dose criteria are met for both sample preparation and analysis.
2. The following components have been determined to be acceptable:
  - a) RHR/CS pump motors - current information indicates these motors can withstand  $1 \times 10^7$  rads. Analysis shows that they will receive less than  $1 \times 10^7$  rads.
  - b) ECCS H&V Fan Motors - Further analysis indicates the highest expected dose to HPCI and RCIC fan motors will be less than  $5 \times 10^5$  rads.
  - c) Drywell and Torus Purge and Vent Valves - Further analysis indicates the valve seats will receive less than  $1 \times 10^7$  rads. Recent data indicates they will withstand  $1 \times 10^7$  rads.
3. Items yet to be resolved include:
  - a) Standby gas treatment system - present data indicates some equipment associated with this system will not withstand the postulated total integrated dose.
  - b) AC/DC Power and Control Wiring - Present data indicates this wiring will withstand at least  $5 \times 10^6$  rads. A few areas in the plant will receive a dose in excess of this.

We intend and expect to meet the implementation dates indicated in Enclosure 1 of NUREG-0737. However, final design details for the unresolved items mentioned above will not be available by 1-1-81. We expect final design details will be available for these items by 7-1-81.

### II.B.3 Postaccident Sampling

Interim sampling capability is as described in the December 31, 1979 and June 30, 1980 submittals from L O Mayer to the Director of NRR. A new post-accident sampling station will be installed by the date indicated in Enclosure 1 of NUREG-0737. This supersedes all previous schedule commitments. We expect to meet all aspects of the position and clarification contained in NUREG-0737.

### II.B.4 Training For Mitigating Core Damage

Northern States Power Company submitted an outline of this training program on August 1, 1980. (J A Gonyeau, NSP, to Director of Nuclear Reactor Regulation, NRC). It is our intent to initiate the program by April 1, 1981 and complete the initial program by October 1, 1981. Additional information on the training program will be provided if necessary.

#### II.D.1 Relief and Safety Valve Test Requirements

The test program to be performed is described in Enclosure 1 of the September 17, 1980 letter from D B Waters to R H Vollmer, Director, Division of Engineering, USNRC. We intend to meet the implementation dates contained in Enclosure 1 of NUREG-0578.

#### II.D.3 Valve Position Indication

A relief valve position indication system is currently installed as described in previous submittals from L O Mayer to the Director of NRR dated November 20, 1979 and December 31, 1979. We have been informed by General Electric Co. that the qualification of the pressure switches has been satisfactorily completed.

Proposed Technical Specifications were contained in our License Amendment Request dated December 12, 1980.

#### II.E.4.1 Dedicated Hydrogen Penetrations

Dedicated hydrogen penetrations, as described in the December 31, 1979 submittal from L O Mayer to the Director of NRR, were installed in November, 1980. No procedure changes are required since recombiners are not yet installed or available. Implementation and documentation of this item is therefore complete.

#### II.E.4.2 Containment Isolation Dependability

Items 1-4 are complete as described in the December 31, 1979, submittal from L O Mayer to the Director of NRR.

We will make a submittal by February 1, 1981, which will show that our existing containment pressure setpoint of 2 psig complies with the NUREG-0737 position for item 5.

Previous submittals from L O Mayer to the Director of NRR dated January 3, June 7, and November 14, 1979, and January 17, and February 26, 1980, provide information concerning item 6. The September 3, 1980 letter from T A Ippolito, Division of Licensing, USNRC, stated that our commitments were acceptable and were to remain in effect pending long term review.

We intend to complete the modifications required by item 7 by the implementation date indicated in Enclosure 1 of NUREG-0737.

Proposed Technical Specifications were contained in our License Amendment Request dated December 12, 1980.

## II.F.1 Accident Monitoring

### 1. Noble Gas Monitor

We intend to meet the implementation date indicated in Enclosure 1 of NUREG-0737. System design information was submitted with the June 5, 1980 letter from L O Mayer to the Director of NRR. This supersedes the previous schedule commitment contained in the November 20, 1979, submittal from L O Mayer to the Director of NRR.

Procedures relating to clarification item (4)(b) of II.F.1, Attachment 1, of NUREG-0737 are available for the interim noble gas monitoring equipment. Revised procedures for the improved system will be developed when it is installed. A description of the revised procedures is not and will not be available until vendor operating manuals are received on site and the equipment is installed.

### 2. Iodine/Particulate Sampling

We intend to meet the implementation date indicated in Enclosure 1 of NUREG-0737. System design information was submitted with the June 5, 1980 letter from L O Mayer to the Director of NRR. This supersedes the previous schedule commitment contained in the November 20, 1979, submittal from L O Mayer to the Director of NRR.

### 3. Containment High Range Radiation Monitor

We intend to meet the implementation date indicated in Enclosure 1 of NUREG-0737. System design information was submitted with the June 5, 1980, letter from L O Mayer to the Director of NRR. Redundant monitors will be installed.

These monitors have been ordered and received on-site. We therefore must take exception to the "Special Environmental Qualification" noted in Table II.F.1-3 of NUREG-0737. Our monitors have not been tested on all scales to  $10^6$  R/hr nor have they been provided with a certified calibration on each decade between 1 R/hr and  $10^3$  R/hr. We feel that the test data provided by the manufacturer for our monitors is sufficient to assure that linearity and calibration is adequate. We must also take exception to some of the requirements in Appendix B, which are referenced in the table. These Appendix B exceptions are addressed following the next item.

### 4,5 & 6 Containment Pressure, Level and Hydrogen Monitors

We intend to provide control room indication of containment pressure, level, and hydrogen concentration by January 1, 1982. This supersedes the previous schedule commitment contained in the November 20, 1979, submittal from L O Mayer to the Director of NRR.

As stated in the previous item we must take exception to some of the Appendix B requirements.

Criteria 1 of Appendix B invokes Regulatory Guide 1.89 which in turn requires qualification of equipment to the IEEE 323, 1974 Standard. There are presently no transmitters or recorders available that are qualified to the 1974 IEEE 323 standard. Therefore, we will use the 1971 version of the standard.

Criteria 2 of Appendix B requires redundant channels of instrumentation to be separated in accordance with Regulatory Guide 1.75. Our existing plant separation scheme does not allow us to fully meet this requirement. Therefore, we will use the existing separation scheme.

Criteria 3 requires a Class IE power source. Monticello does not have a complete Class IE instrument AC system. The existing instrument AC system, which has diesel generator and battery backup, will be used.

We have initiated design and procurement of equipment to assure ourselves that the implementation schedules can be met. We are also using the best equipment available at this time and working within the constraints of the existing plant design to assure ourselves that the system installed will function in accident conditions and provide the control room operators with accurate information. It is felt that the exceptions noted above do not significantly affect the reliability of the monitor systems.

#### II.F.2 Instrumentation for Detection of Inadequate Core Cooling

Analyses and operator guidelines for detection and mitigation of inadequate core cooling were developed per NUREG-0578 item 2.1.9 and questions from the Bulletins and Orders Task Force. These studies included evaluation of currently installed reactor vessel water level instrumentation and other currently installed instrumentation to detect inadequate core cooling. As stated in Section 3.5.2.1 of NEDO-24708, which was submitted to the Director, Division of Licensing, USNRC, by R H Bucholz (GE) on September 16, 1980:

For all analyses, it was shown that the process variable information available to the operator in the control room is sufficient to adequately warn of an inventory threatening event and to present the information the operator needs to assure that appropriate actions are taken to maintain adequate core cooling. The control room indications will not mislead the operator when taking corrective actions. Even under the extremely degraded conditions considered in these analyses, the BWR requires only the most basic operator actions to mitigate the consequences of any inventory threatening event.

Therefore, no additional instrumentation has been determined to be necessary.

Proposed Technical Specifications were contained in our License Amendment Request dated December 12, 1980.

## II.K.1 IE Bulletins

Further action on our part is awaiting the outcome of NRC review of earlier information submittals.

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

As noted in our letter of June 11, 1980 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.

### II.K.3.13 HPCI and RCIC Initiation Levels

The October 24, 1980 letter from L O Mayer to the Director of NRR documented our concurrence with the Owners Group generic response for this item. Separation of HPCI and RCIC initiation setpoints is not warranted. Modification to incorporate automatic low level restart of RCIC is beneficial. The GE BWR Owners Group plans to submit an analysis and description of the RCIC automatic reset by January 1, 1981. Upon NRC approval of the proposed modifications we will proceed with installation. However, we have been informed by the Terry Turbine Company that equipment necessary to implement the reset will not be available until December, 1981. Therefore, we plan to install this modification during the subsequent refueling outage, which is currently scheduled to begin in June 1982. We are not aware of any practical compensating safety actions which could be taken and believe that the safety implications of this delay are insignificant.

### II.K.3.15 HPCI and RCIC Break Detection Logic

The existing HPCI break detection system is considered adequate as stated in attachment 1 of the June 11, 1980 letter from L O Mayer to the Director of NRR. We plan to implement the modification recommended by the Owners Group for the RCIC system by July 1, 1981.

### II.K.3.16 Challenges to and Failures of Relief Valves

The GE BWR Owners Group is developing a generic response to this item. We expect that response to be submitted by the required date. It is our intention to implement any required modifications, following NRC staff approval, by the date indicated in Enclosure 1 of NUREG-0737.

#### II.K.3.17 ECC System Outages

The information which we felt was required by NUREG-0660 has been gathered. However, the clarification contained in NUREG-0737 indicates additional information, relating to test and maintenance outages and corrective action, must be supplied. A submittal containing all the information required by NUREG-0737 for this item will be made by February 1, 1981.

#### II.K.3.18 ADS Actuation

As described in Attachment 1 to the June 11, 1980 submittal from L O Mayer to the Director of NRR, a generic response to the item is being prepared by the General Electric Company. We expect a submittal to be made by the required date. We intend to meet the implementation dates indicated in Enclosure 1 of NUREG-0737.

#### II.K.3.21 Restart of CSS and LPCIS

As stated in Attachment 1 of the June 11, 1980 submittal from L O Mayer to the Director of NRR:

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.

Also, the GE BWR Owners Group plans to make a generic submittal by January 1, 1981, which concludes that no modifications should be made. Therefore, we do not plan any further action on this item.

#### II.K.3.22 RCIC Suction

As stated in attachment 1 of the June 11, 1980 submittal from L O Mayer to the Director of NRR, we intend to meet the implementation dates indicated in enclosure 1 of NUREG-0737. We have issued clear and cogent procedures for manual switchover of RCIC suction from the condensate storage tank to the suppression pool. This response is intended to satisfy the January 1, 1981 documentation requirement.

#### II.K.3.24 Space Cooling for HPCI and RCIC

As stated in Attachment 1 to the June 11, 1980 submittal from L O Mayer to the Director of NRR, we intend to meet the implementation date indicated in Enclosure 1 of NUREG-0737.

#### II.K.3.25 Power on Pump Seals

The GE BWR Owners Group is preparing a generic response to this item. As stated in Attachment 1 to the June 11, 1980 submittal from L O Mayer to the Director of NRR, we will meet the implementation dates indicated in Enclosure 1 of NUREG-0737.

### II.K.3.27 Common Reference Level

A common reference level will be provided on all control room reactor vessel level indicators by July 1, 1981. This supersedes the previous commitment stated in our submittal from L O Mayer to the Director of NRR dated June 11, 1980.

A review of our present level instrumentation scheme indicates that use of the Yarway zero (10'6" above the active fuel) as the common reference point for all reactor level indicators will help reduce operator confusion yet minimize the impact on retraining and changes to procedures. The Yarway and GE-MAC level instrumentation on the main control panels already use the Yarway zero as the common reference. The vessel flood-up and core flooding level instruments will be provided with new scales referenced to the common zero. The core flooding indicators will also have the core region shaded to aid the operator in identifying water level with respect to the active fuel. No changes to the Technical Specifications will be required by this modification since all existing technical specification level settings are referenced to the distance above the active fuel or the Yarway zero. The above description is intended to satisfy the January 1, 1981 requirement for submittal of documentation.

### II.K.3.28 Qualification of ADS Accumulators

The GE BWR Owners Group is developing a generic position on this item. We intend to meet the implementation date indicated in Enclosure 1 of NUREG-0737.

### II.K.3.29 Performance of Isolation Condensers

Enclosure 1 of the May 7, 1980 letter from Darrel Eisenhut to all Operating Reactor Licenses indicated this item as applicable to all LWR's. The corrected table of Implementation Schedules attached to the June 9, 1980 letter from Darrel Eisenhut to all Operating Reactor Licenses indicated the item was applicable to all BWR's. Enclosures 1 and 3 of NUREG-0737 indicate the item is applicable to BWR's with isolation condensers. Since Monticello does not have an isolation condenser this item is not applicable. This supersedes the previous commitment contained in Attachment 1 to the June 11, 1980 submittal from L O Mayer to the Director of NRR.

### II.K.3.30 Revised Small-Break Loss-of-Coolant-Accident Methods to Show Compliance With 10CFR Part 50, Appendix K

NSP believes that General Electric is the most appropriate group to work with the NRC staff to resolve staff concerns with small break LOCA models for Monticello. We understand that the NRC staff is holding meetings with the various vendors on this item. Accordingly, the staff should continue to direct their questions regarding the scope and schedule for this requirement to General Electric. We believe that the November 15, 1980 requirement for a submittal on this item is now moot. It is our understanding that General Electric will submit this information in response to the NUREG-0737 requirement on a generic basis. NSP will file a letter with the NRC

if appropriate to reference the General Electric submittal on the Monticello docket.

II.K.3.31 Compliance With 10 CFR 50.46

NSP will submit, if required, the plant-specific analyses using the revised models by January 1, 1983 or one year after any model revisions are approved by the NRC, whichever is later.

II.K.3.44 Evaluation of Transients With Single Failure

The GE BWR Owners Group plans to submit a generic response for this item by January 1, 1981.

II.K.3.45 Manual Depressurization

The GE BWR Owners Group plans to submit a generic response for this item by January 1, 1981.

II.D.3.46 Michelson Concerns

The February 21, 1980 letter from R H Bucholz (GE) to D F Ross (NRC) and the June 30, 1980 letter from L O Mayer to the Director of NRR, provided a complete response to this item.

II.K.3.57 Manual Actuation of ADS

The BWR Owners Group has submitted guidelines for NRC staff review. No further action on this item is required until guidelines are approved by the NRC staff.

III.A.1.1 Emergency Preparedness, Short Term

It is our understanding that all short term requirements have been met.

III.A.1.2 Upgrade Emergency Support Facilities

Interim requirements have been satisfactorily implemented. Additional NRC guidance will be issued in a revision to NUREG-0696. Submittal and implementation dates have not yet been firmly established and no commitments can be made at this time.

### III.A.2 Emergency Preparedness

NSP upgraded emergency plans were previously submitted. NRC comments were received and plans are being revised to accommodate comments. The plan (as revised) will be implemented by April 1, 1981.

The applicable State and Local plans have been submitted to the NRC according to Part 50.54 (s)(1) by a letter dated December 18, 1980.

The NSP emergency plan implementing procedures are in preparation and will be submitted by March 1, 1981.

Study and investigation work is being carried out for proposed meteorological systems. Because some of the regulatory guidance has not yet been finalized (Reg. Guide 1.23 and NUREG-0696) only a tentative plan can be submitted by February 1, 1981 describing staged implementation of meteorological systems to meet the full operational capability required by June 1, 1983.

### III.D.1.1 Leak Reduction

A leak reduction program as described in the December 31, 1979 submittal from L O Mayer to the Director of NRR has been fully implemented.

Proposed Technical Specification changes were contained in our License Amendment Request dated December 12, 1980.

### III.D.3.3 Inplant Radiation Monitoring

We believe that the existing equipment and associated training and procedures comply with the requirements of this item.

Proposed Technical Specification changes were included in our License Amendment Request dated December 12, 1980.

### III.D.3.4 Control Room Habitability

A control room air treatment system will be installed at Monticello. This system will generally satisfy the latest NRC criteria specified for this item.

Due to the expanded nature of the evaluation required by item III.D.3.4, a January 1, 1981 submittal date is impossible. This information will be submitted by February 1, 1981. Our February 1, 1981 submittal will include a description of our planned modifications and schedule for completion.