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

SUBJECT: Provides commitment to supplemental provision (1) contained in clarification of Item I.C.6 of NUREG-0737. Permission to release plant sys or equipment for maint/surveillance test shall be granted & documented by senior reactor operator.

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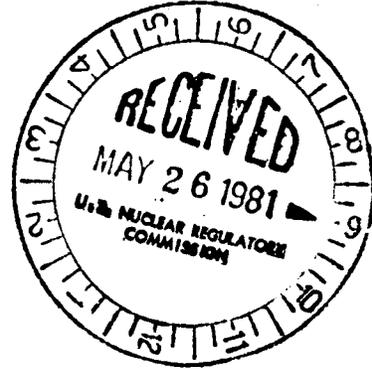
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NSP

NORTHERN STATES POWER COMPANY
Minneapolis, Minnesota 55401

May 20, 1981

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, D. C. 20555



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

NUREG-0737 Item I.C.6

Reference: Letter, L. O. Mayer (NSP) to
Director of Nuclear Reactor Regulation
dated December 30, 1980;
"Post TMI Requirements-NUREG-0737"

The above reference provided response to supplemental provisions (2) through (5) mentioned in the Clarification of Item I.C.6 of NUREG-0737. A response to supplemental provision (1) of that item was inappropriate since it referenced an unspecified and draft revision to ANSI Standard N18.7-1972 (ANS 3.2) "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants". Mr. A. L. Madison, NRC Resident Inspector, has recently provided specific provisions intended with Item (1) and has requested our commitment to those provisions. This letter is in response to that request.

The specific provisions intended with Item (1) involve the addition of surveillance testing to the provisions of Section 5.2.6 as presented in Draft 7, March 1981, of N18.7. These provisions are stated in the following paragraphs of that reference which address surveillance testing.

Permission to release plant systems or equipment for maintenance or surveillance tests shall be granted by designated operating personnel holding a senior operator license. Prior to granting permission, such operating personnel shall verify that the equipment or system can be released, determine how long it may be out of service, and determine what functional testing of redundant systems is required prior to and during the out-of-service period.

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Granting of such permission shall be documented. Attention shall be given to the potentially degraded degree of protection when one subsystem of a redundant safety system has been removed for maintenance or surveillance testing.

In addition to the requirements of the Technical Specifications, additional conditions to be considered in preparing equipment for maintenance or surveillance testing include, for example: shutdown margin; method of emergency core cooling; establishment of a path for decay heat removal; temperature and pressure of the system; valves between work and hazardous material; venting, draining and flushing; entry into closed vessels; hazardous atmospheres; handling hazardous materials; and electrical hazards. When entry into a closed system is required, control measures shall be established to prevent entry of extraneous material and to assure that foreign material is removed before the system is reclosed.

Implementation of the above provisions has been incorporated into previous and current revisions of Monticello Administrative Controls Directives. This implementation has been reviewed with Mr. Madison. NSP commits to the continued implementation of these provisions at the Monticello Nuclear Generating Plant.



L. O. Mayer, PE
Manager of Nuclear Support Services

cc: J. G. Keppler
G. Charnoff
NRC Resident Inspector