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 Office of Nuclear Reactor Regulation, Director

SUBJECT: Provides info re status of NUREG-0737 items w/implementation dates between 810701 & 820301, in response to 820317 Generic Ltr 82-05.

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 TITLE: Response to NUREG -0737/NUREG-0660 TMI Action Plan Rgmts (OL's)

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**NSP**

Northern States Power Company

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April 16, 1982

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



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

Information Related to Post-TMI Requirements

In a letter dated March 17, 1982 from Mr Darrell G Eisenhut, Director, Division of Licensing, USNRC (Generic Letter 82-05) we were requested to provide information related to the status of certain NUREG-0737 requirements with implementation dates between July 1, 1981 and March 1, 1982. We were requested to reply in accordance with 10 CFR Part 50, Section 50.54(f) within 30 days.

The requested information is provided on the attached sheets for each of the NUREG-0737 items listed in Enclosure (1) of Mr Eisenhut's letter.

Please contact us if you have any questions related to the information we have provided.

*L. O. Mayer*

L O Mayer, PE  
Manager of Nuclear Support Services

LOM/DMM/bd

cc: Regional Administrator-III, USNRC  
NRR Project Manager, USNRC  
Resident Inspector, USNRC  
G Charnoff

Attachments

*AOAG  
5/11*

8204270260

*P*

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY  
MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED APRIL 16, 1982  
INFORMATION RELATED TO POST-TMI REQUIREMENTS

Northern States Power Company, a Minnesota corporation, by this letter dated April 16, 1982 hereby submits information related to post-TMI requirements in response to a letter dated March 17, 1982 from Mr Darrel G Eisenhut, Director, Division of Licensing, USNRC (Generic Letter 82-05).

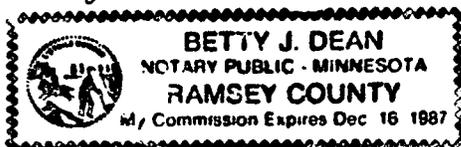
This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

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

On this 16<sup>th</sup> day of April, 1982, 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.

Betty J. Dean



ONTICELLO NUCLEAR GENERATING PL  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |  |
|-----------------------|--|
| NUREG-0737 Item No.   | <u>I.A.3.1</u>   |
| Applicability         | <u>All</u>   |
| NUREG-0737 Schedule   | <u>10/1/81</u>   |
| Requirement           | <u>Include simulator exams in licensing</u><br><u>examinations</u> |
| Implementation Status | <u>Completed 10/1/81</u>   |

Remarks

In our letter dated December 30, 1980 exception was taken to portions of Item I.A.3.1. These areas have now been clarified by the Commission and we now believe we are in compliance with this item.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

NTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |   |
|-----------------------|---|
| NUREG-0737 Item No.   | <u>II.B.2</u>   |
| Applicability         | <u>All</u>  |
| NUREG-0737 Schedule   | <u>1/1/82</u>   |
| Requirement           | <u>Modify facility to provide access to vital</u><br><u>areas under accident conditions</u> |
| Implementation Status | <u>Schedule relief requested</u>  |

Remarks

This item is complete with the exception of the postaccident sampling system. Schedule relief was requested in our letter dated December 29, 1981. Completion is scheduled for August 1, 1982.

Justification for Proposed Schedule

The postaccident sampling (PAS) system design requires that the sample lines from the hydrogen monitoring system be heated to preclude condensation. Installation of the PAS heated sample piping will be delayed until the hydrogen monitoring system piping has been completely installed (see response for item II.F.1(6)). Furthermore, heated sample piping must be completely installed prior to design of the heating elements.

Demonstration of Need for Proposed Schedule

Following installation of the hydrogen monitoring system piping, approximately 16 weeks will be required to design and install the system piping; design, manufacture, and install the PAS heating elements; and complete testing and startup of the PAS system.

Because of delays in the installation of the PAS system, the sample station will not meet the accessibility requirements of NUREG-0737, Item II.B.2.

Description of Compensatory Measures Being Taken in the Interim

Interim measures were described in Enclosure (1) of our December 31, 1979 letter. These measures include the use of additional shielding equipment such as lead aprons, lead gloves, additional lead blankets for sample line shielding, and special sample kits.

ONTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.B.3

Applicability All

NUREG-0737 Schedule 1/1/82

Requirement Install upgraded post accident  
sampling capability

Implementation Status Schedule relief requested

Remarks

The post accident sampling system piping is still being installed. Schedule relief was requested in our letters dated December 29, 1981 and February 17, 1982. Completion is scheduled for August 1, 1982.

Justification for Proposed Schedule

See response for II.B.2.

Demonstration of Need for Proposed Schedule

See response for II.B.2.

Description of Compensatory Measures Being Taken in the Interim

See response for II.B.2.

MONTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |   |
|-----------------------|---|
| NUREG-0737 Item No.   | <u>II.B.4</u>   |
| Applicability         | <u>All</u>  |
| NUREG-0737 Schedule   | <u>10/1/81</u>  |
| Requirement           | <u>Complete training program for mitigating</u><br><u>core damage</u> |
| Implementation Status | <u>Schedule relief requested</u>                                      |

Remarks

Phase I training is completed. Phase II training is scheduled for completion within 60 days after implementation of the Emergency Procedure Guidelines at the end of the 1982 refueling outage. Refer to our letter dated November 19, 1981.

Justification for Proposed Schedule

Phase II training involves use of the Emergency Procedure Guidelines under development by the BWR Owners Group. This training concentrates on use of installed systems to mitigate the consequences of a degraded core.

Demonstration of Need for Proposed Schedule

The Emergency Procedure Guidelines have not been placed into effect at Monticello yet. No training has yet been conducted using them. Phase II training is closely tied to implementation of these Guidelines.

Description of Compensatory Measures Being Taken in the Interim

Phase I training has been completed. The General Electric course in mitigating core damage was used.

TRINITY NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |   |
|-----------------------|---|
| NUREG-0737 Item No.   | <u>II.E.1.2</u>   |
| Applicability         | <u>PWR</u>  |
| NUREG-0737 Schedule   | <u>7/1/81</u>   |
| Requirement           | <u>Auxiliary feedwater initiation and</u><br><u>flow indication</u> |
| Implementation Status | <u>Not Applicable</u>   |

Remarks

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

ONTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.E.4.2(5)  
Applicability All  
NUREG-0737 Schedule 7/1/81  
Requirement Part 5 - lower containment  
pressure setpoint to level  
compatible with normal operation  
Implementation Status Completed - No Action Required

Remarks

Existing setpoint was found adequate. Refer to NSP letter dated January 30, 1981 and NRC letter dated August 31, 1981.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

MONTECELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |   |
|-----------------------|---|
| NUREG-0737 Item No.   | <u>II.E.4.2(7)</u>  |
| Applicability         | <u>All</u>  |
| NUREG-0737 Schedule   | <u>7/1/81</u>   |
| Requirement           | <u>Part 7 - isolate purge and vent valves</u><br><u>on radiation signal</u> |
| Implementation Status | <u>Completed - No Action Required</u>                                       |

Remarks

Isolation is provided by reactor building plenum radiation monitors as described in NSP letter dated March 2, 1981. We believe this satisfies Item II.E.4.2(7). No response has been received from the NRC.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

TRINITY CELLULOSE NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |  |
|-----------------------|--|
| NUREG-0737 Item No.   | <u>II.F.1(1)</u>                           |
| Applicability         | <u>All</u>                                 |
| NUREG-0737 Schedule   | <u>1/1/82</u>                              |
| Requirement           | <u>Install noble gas effluent monitors</u> |
| Implementation Status | <u>Schedule relief requested</u>           |

Remarks

Stack high range monitoring system is completed. Reactor Building vent high range monitoring system is scheduled for completion by May 1, 1982. Schedule relief was requested in our letters dated November 30, 1981 and February 16, 1982.

Justification for Proposed Schedule

Final assembly of equipment has been delayed by component unavailability. The last of the three probe assemblies required by the system was damaged just prior to shipment.

Demonstration of Need for Proposed Schedule

Four weeks will be required following receipt of the remaining probe assembly and the signal processors.

Description of Compensatory Measures Being Taken in the Interim

As noted in Enclosure (1) to our December 31, 1979 letter interim procedures are in place for estimating noble gas release rates if existing effluent instrumentation goes off scale.

In the event of an accident, the principal release point will be the plant stack. The stack high range monitors were completed 12/31/81.

TRINITY NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.F.1(2)  
Applicability All  
NUREG-0737 Schedule 1/1/82  
Requirement Provide capability for effluent  
monitoring of iodine  
  
Implementation Status Completed - no action required

Remarks

This capability was provided in the original plant design. New wide range noble gas monitoring systems required by II.F.1(1) will have sampling racks to provide for collection of particulates and iodines.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

TRINITY MONTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.F.1(3)  
Applicability All  
NUREG-0737 Schedule 1/1/82  
Requirement Install in-containment radiation  
level monitors  
  
Implementation Status Completed 12/31/81

Remarks

This modification was described in NSP letter dated June 5, 1980. Redundant monitors were installed.

Exception was taken in our December 30, 1980 letter to "Special Environmental Qualification" noted in Table II.F.1-2 of NUREG-0737 and Appendix B of NUREG-0737.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

ONTICELLO NUCLEAR GENERATING PL  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.F.1(4)  
Applicability All  
NUREG-0737 Schedule 1/1/82  
Requirement Provide continuous indication of  
containment pressure  
  
Implementation Status Completed 6/8/81

Remarks

This modification was described in our letters dated December 30, 1980 and December 31, 1981. Exception was taken to certain requirements of Appendix B to NUREG-0737.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

MONTECELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.F.1(5)  
Applicability All  
NUREG-0737 Schedule 1/1/82  
Requirement Provide continuous indication of  
containment water level  
  
Implementation Status Completed 5/18/81

Remarks

This modification was described in our letters dated December 30, 1980 and December 31, 1981. Exception was taken to certain requirements of Appendix B to NUREG-0737.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

MONTICELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |  |
|-----------------------|--|
| NUREG-0737 Item No.   | <u>II.F.1(6)</u>   |
| Applicability         | <u>All</u>   |
| NUREG-0737 Schedule   | <u>1/1/82</u>  |
| Requirement           | <u>Provide continuous indication of hydrogen<br/>concentration in containment.</u> |
| Implementation Status | <u>Schedule relief requested</u>   |

Remarks

This modification was described in our letters dated December 30, 1980 and December 31, 1981. This modification is scheduled for completion by June 1, 1982. Schedule relief was requested in our letter dated November 18, 1981.

Justification for Proposed Schedule

Installation of portions of the sample piping have been delayed due to the difficulty of designing to accomodate Mark I containment program loads.

Demonstration of Need for Proposed Schedule

Following installation of the piping, approximately eight weeks are required to design, manufacture, and install the heating elements needed to prevent condensation in the sample lines.

Description of Compensatory Measures Being Taken in the Interim

Interim measures were described in Enclosure (1) of our December 31, 1979 letter for obtaining and analyzing containment atmosphere samples in the laboratory.



MONTECELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.K.3.15

Applicability BWR

NUREG-0737 Schedule 7/1/81

Requirement Modify pipe break detection logic  
to prevent inadvertent isolation

Implementation Status Completed 5/12/81

Remarks

This modification was described in our letters dated December 30, 1980 and December 22, 1981. No modifications were needed for the HPCI system.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

CONTICELLO NUCLEAR GENERATING PL  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |   |
|-----------------------|---|
| NUREG-0737 Item No.   | <u>II.K.3.19</u>  |
| Applicability         | <u>BWR (non jet pump)</u>                                       |
| NUREG-0737 Schedule   | <u>7/1/81</u>   |
| Requirement           | <u>Install interlocks on recirculation</u><br><u>pump loops</u> |
| Implementation Status | <u>Not Applicable</u>   |

Remarks

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

MONTECELLO NUCLEAR GENERATING PL  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.K.3.22

Applicability EWR

NUREG-0737 Schedule 1/1/82

Requirement Modify design of RCIC suction to provide  
automatic transfer to torus

Implementation Status Completed 12/31/81

Remarks

This modification was described in our letter dated December 31, 1981.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

TRINITY NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

|                       |  |
|-----------------------|--|
| NUREG-0737 Item No.   | <u>II.K.3.24</u>   |
| Applicability         | <u>BWR</u>   |
| NUREG-0737 Schedule   | <u>1/1/82</u>  |
| Requirement           | <u>Confirm the adequacy of space cooling for HPCI</u><br><u>and RCIC</u> |
| Implementation Status | <u>Completed - no action required</u>                                    |

Remarks

Completion of this evaluation was reported in our letter date  
December 31, 1981.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim

MONTECELLO NUCLEAR GENERATING PLANT  
STATUS OF NUREG-0737 ITEMS REQUIRING LICENSEE RESPONSE  
WITH IMPLEMENTATION DATES BETWEEN JULY 1, 1981 AND MARCH 1, 1982

NUREG-0737 Item No. II.K.3.27

Applicability BWR

NUREG-0737 Schedule 7/1/81

Requirement Provide common reference level for  
vessel level instrumentation

Implementation Status Completed 5/15/81

Remarks

This modification was described in our letter dated December 30, 1980.  
Acceptance was documented in an NRC letter dated October 27, 1981.

Justification for Proposed Schedule

Demonstration of Need for Proposed Schedule

Description of Compensatory Measures Being Taken in the Interim