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ACCESSION NBR: 8907270175 DOC. DATE: 88/09/30 NOTARIZED: NO DOCKET #
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SUBJECT: Provides results of review of mod process, per NRC 880801 ltr.

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September 30, 1988

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MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NO. 50-263 LICENSE NO. DPR-22

Response to Request to Review Modification Process

The purpose of this letter is to provide the results of our review of the modification process as requested in the cover letter to NRC Inspection Report 50-263/88009(DPR) dated August 1, 1988.

We have examined the modification process in regard to the two violations referred to in the referenced letter. Specifically, the breaker/fuse miscoordination event (LER 87-013) and the missed Emergency Filtration Train (EFT) surveillance test event (LER 88-003) were examined to determine if these two events revealed a common problem with the modification process. Examination of the human performance deficiencies in these two events revealed a common problem involving the lack of properly implementing known requirements. In the breaker/fuse miscoordination event, the responsible engineer failed to perform a complete safety evaluation and failed to perform a breaker/fuse coordination study. The engineer was aware of the requirements to perform these activities, but failed to properly implement them. Similarly, in the EFT surveillance test event, a known requirement to identify all affected surveillance tests was not properly satisfied. The root cause of these human deficiencies is the establishment of requirements without providing sufficient guidance for implementation. Corrective actions taken following these two events included providing additional guidance for implementation of requirements of the modification process.

To prevent future similar occurrences, a task force of modification process users has been formed with the purpose of:

- 1) identifying other requirements which may need additional implementation guidance
- 2) making assignments of responsibility for preparation of guidance
- 3) revising appropriate directives to incorporate guidance.

On September 20, 1988 a conference call was held between NSP management and NRC Region III to discuss concerns related to the modification process.

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E G Greenman
September 30, 1988
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The two violations referenced above were discussed as well as observations made by Mr M J Farber during a recent audit (week of 9/5/88). It was agreed that NSP's Power Supply Quality Assurance Department would conduct an audit of Monticello modifications based on the NRC inspection module for modifications. A meeting to discuss the status of this audit will be held with NRC Region III during November 1988. At this meeting we will also present to the Region III Staff our plans for making improvements in the areas of configuration management and design basis documentation.

Please contact us if you have any questions related to the actions being taken to resolve this concern.



C E Larson
Vice President Nuclear Generation

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