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RECIP.NAME RECIPIENT AFFILIATION
Office of Nuclear Reactor Regulation (800428-851124)

SUBJECT: Provides status of conformance w/Generic Ltr 83-28 re
generic implications of Salem ATWS events.

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Northern States Power Company

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November 4, 1983

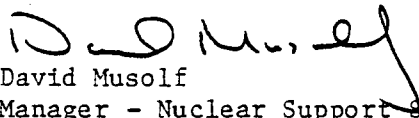
Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

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

Generic Implications of Salem ATWS Events (Generic Letter 83-28)

The purpose of this letter is to provide, to the extent practical, the status of current conformance with the positions contained in Generic Letter 83-28, and where possible, plans and schedules for needed improvements. Clarifications contained in a letter dated October 20, 1983 from Mr Domenic B Vassallo, Chief, Operating Reactors Branch #2, Division of Licensing were used in preparing this information.

We will submit, within ten days under separate cover, detailed supporting information for the status of conformance we have reported in the attached material. In some cases this supporting information may consist of detailed plant directives or procedures which are not normally incorporated as docketed material. These directives and procedures will be provided to our Project Manager in the Division of Licensing for use in the review of our response.

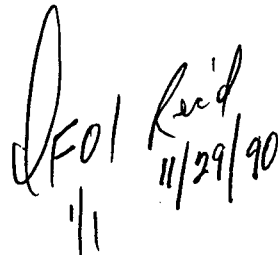

David Musolf
Manager - Nuclear Support Services

DMM/ECW/bd

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

Attachment

9012030019 831104
PDR ADOCK 05000243
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UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

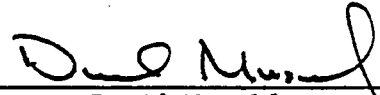
LETTER DATED NOVEMBER 4, 1983
RESPONSE TO GENERIC LETTER 83-28

Northern States Power Company, a Minnesota corporation, by this letter dated November 4, 1983 hereby submits information related to Salem ATWS Events in response to a letter dated July 8, 1983 from Mr Darrel G Eisenhut, Director, Division of Licensing, USNRC (Generic Letter 83-28)

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

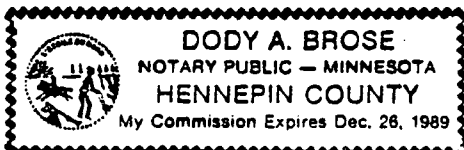
By



David Musolf

Manager - Nuclear Support Services

On this 4th day of November, 1983, before me a notary public in and for said County, personally appeared David Musolf, Manager - 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.



1.1 Post Trip Review (Program Description and Procedure)

NRC Position

Licensees shall describe their program for ensuring that unscheduled reactor shutdowns are analyzed and that a determination is made that the plant can be restarted safely. A report describing the program for review and analysis of such unscheduled reactor shutdowns should include the topics identified in the Generic Letter 83-28 Enclosure, section 1.1.

Status of Conformance

As required in the position above, the description of our current program is provided in section 1.1 of the supplement transmitted under separate cover.

Plans and Schedules

None required.

1.2 Post Trip Review (Data and Information Capability)

NRC Position

Licensees shall have or have planned a capability to record, recall and display data and information to permit diagnosing the causes of unscheduled reactor shutdowns prior to restart and for ascertaining the proper functioning of safety-related equipment.

A report shall be prepared which describes and justifies the adequacy of equipment for diagnosing an unscheduled reactor shutdown. The report shall describe the topics identified in the Generic Letter 83-28 Enclosure, section 1.2.

Status of Conformance

As required in the position above, a description of our data and information capability and a justification of the adequacy of that capability are provided in section 1.2 of the supplement transmitted under separate cover.

Plans and Schedules

None required.

MONTICELLO NUCLEAR GENERATING PLANT

2.1 Equipment Classification Vendor Interface (Reactor Trip Components)

NRC Position

Licensees shall confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities including maintenance, work orders, and parts replacement.

The licensee shall establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures. Where vendors can not or will not supply the information, the licensee shall assure sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reactor trip system reliability.

Status of Conformance

At this time, the confirmation requested regarding the equipment classification of reactor trip components cannot be provided. It is believed that the current programs are in substantial conformance with the intent of the position.

With respect to vendor interfaces, an interface exists with the primary supplier of Reactor Trip Function Systems, General Electric Company. It is also recognized that improvements are necessary to be in full conformance.

A description of current practices on these issues is provided in section 2.1 of the supplement transmitted under separate cover.

Plans and Schedules

The BWR Owners' Group (BWROG) has considered the equipment classification issue with respect to the Reactor Trip System to be generic. As such, the BWROG is evaluating a number of alternative generic approaches to addressing the issue. Continued evaluation of the alternatives and their implications is necessary prior to completing our review.

Institute of Nuclear Power Operations (INPO) has taken a lead position in addressing the vendor interface issue by establishing and funding a Nuclear Utility Task Action Committee (NUTAC). Northern States Power Company is actively participating in this NUTAC. The committee's results will be evaluated and plans and schedules for plant actions will be prepared if appropriate.

*INPO
only
into 2.2*

2.2 Equipment Classification and Vendor Interfaces (Programs for all Safety-Related Components)

2.2.1

NRC Position 1

Licensees shall describe their program for ensuring that all components of safety-related systems necessary for accomplishing required safety functions are identified as safety-related on documents, procedures, and information handling systems used in the plant to control safety-related activities, including maintenance work orders and replacement parts. This description shall include the topics presented under the Generic Letter 83-28 Enclosure, section 2.2.1.

NRC Position 2

2.2.2

Licensees shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Where vendors can not or will not supply information, the licensee shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function.

Status of Conformance

As required in Position 1 above, the description of the program in place for ensuring safety-related components are identified as safety-related is provided in section 2.2 of the supplement transmitted under separate cover.

With respect to Position 2, an interface exists, with the primary supplier of safety-related systems, General Electric Company. It is also recognized that improvements are necessary to be in full conformance. A description of current practices on this issue is provided in section 2.2 of the supplement transmitted under separate cover.

Plans and Schedules

2.2.1

Position 1

None required.

Position 2

2.2.2

INPO has taken a lead position in addressing the vendor interface issue by establishing and funding a NUTAC. Northern States Power Company is actively participating in this NUTAC. The committee's results will be evaluated and plans and schedules for plant actions will be prepared if appropriate.

3.1 Post Maintenance Testing (Reactor Trip System Components)

NRC Position 1

3.1.1

Licensees shall submit the results of their review of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

NRC Position 2

3.1.2

Licensees shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications.

NRC Position 3

3.1.3

Licensees shall identify any post-maintenance test requirements in existing Technical Specifications which can be demonstrated to degrade rather than enhance safety.

Status of Conformance

Although the reviews and checks are incomplete, there are provisions in plant procedures to assure appropriate post-maintenance testing is accomplished. Furthermore, there are programs in place to monitor and evaluate vendor and industry recommendations for incorporation into existing tests and procedures. A description of those provisions and programs are provided in section 3.1 of the supplement transmitted under separate cover.

No testing provisions which degrade rather than enhance safety have been identified.

Plans and Schedules

Position 1 and 2

The results of the review and check prescribed above will be submitted by January 31, 1984.

Position 3

None required.

3.2 Post Maintenance Testing (All Other Safety-Related Components)

NRC Position 1

3.2.1

Licensees shall submit a report documenting the extending of test and maintenance procedures and Technical Specifications review to assure that post-maintenance operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

NRC Position 2

3.2.2

Licensees shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications.

NRC Position 3

3

Licensees shall identify any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety.

Status of Conformance

Programs will be implemented to conduct the reviews and checks prescribed in Positions 1 and 2. The description of post-maintenance testing provisions described in section 3.1 of the supplement describes safety-related post-maintenance testing provisions.

No testing provisions which degrade rather than enhance safety have been identified.

Plans and Schedules

Position 1 and 2

The existing periodic review program will be revised to require the prescribed reviews and checks. A report will be submitted documenting the revision of appropriate administrative procedures by January 1, 1984.

The results of the check of vendor and engineering recommendations will be submitted by March 1, 1986, following completion of the biennial review cycle.

Position 3

None required.

MONTICELLO NUCLEAR GENERATING PLANT

4.1 Reactor Trip System Reliability

to

4.4 These generic issues are not applicable to a GE supplied BWR license.

4.5 Reactor Trip System Reliability (System Functional Testing)

NRC Position 1

On-Line functional testing of the reactor trip system including the scram pilot valve, the backup scram valves and all initiating circuitry shall be performed.

NRC Position 2

Where the current plant design precludes periodic on-line testing, plants shall justify not making modifications to permit such testing.

NRC Position 3

Existing intervals for on-line functional testing required by Technical Specifications shall be reviewed to determine that the intervals are consistent with achieving high reactor trip system availability when accounting for various failure rates, redundancy, testing errors and component wear-out.

Status of Conformance

The specified on-line functional testing, with the exception of backup scram valves, is being performed. With respect to Position 3, the basis for establishing the existing testing frequency of reactor trip systems was to assure reliability and operability of systems subject to various component and common mode failure rates.

A description of current practices on these issues is provided in section 4.5 of the supplement transmitted under separate cover.

Plans and Schedules

Position 1 and 2

The BWROG has identified the on-line testing of scram pilot valves and backup scram valves as a generic issue. The BWROG has contracted with GE to evaluate the implications and alternatives of such on-line testing. The BWROG results will be reviewed and evaluated to identify appropriate actions. Plans and schedules will then be prepared to support those actions.

Position 3

The BWROG committee reviewing Generic Letter 83-28 has referred the issue of testing interval improvement to the BWROG committee on Technical Specification Improvement. Committee results will be evaluated and appropriate improvements incorporated in accordance with established processes for Technical Specification change.