



Northern States Power Company

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Telephone (612) 330-6071

D. E. Gilberts
Senior Vice President
Power Supply

February 12, 1981

Mr. R. F. Heishman, Chief
Reactor Operations and Nuclear
Support Branch
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Heishman:

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

The following is offered in response to IE Inspection Report No. 80-20:

Northern States Power Company denies the first and accepts with exception the second alleged items of noncompliance identified in the above referenced report. This is based on the following observations:

- I. The two purchase orders addressed, C56216 (should be C-56210) and M53583, were initiated in the years 1970 and 1974 respectively. ANSI N45.2, 1971 and ANSI N45.2.2, 1972 were committed to by NSP in Rev. 2 of the Operational Quality Assurance Program and acknowledged by the NRC in a letter dated November 29, 1977. It is therefore recognized that these two purchase orders do not provide a representative sample in regard to the present Operational Quality Assurance Program. More representative purchase orders would be M03434, requisitioned 4/24/79 (MSIV O Rings) and purchase order M96600, requisitioned 12/11/78 (CRD Hydraulic System O Rings) which include provisions for shelf life and cure date.

It is also noted that ANSI N45.2, 1971, Section 5 Procurement Document Control states "Procurement documents shall include provisions for the following as applicable" and Subsection 2, "Basic Technical Requirements," states that these provisions include "...special instructions and requirements such as designing, fabrication, cleaning, erecting, packaging, handling, shipping and if applicable, extended storage in the field". 3ACD 6.1 clearly delineates appropriate provisions to be incorporated into procurement documents. Thus the first alleged item of noncompliance is considered moot.

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- II. The second item of noncompliance is accepted, with exception taken to the items given as examples. First, it should be recognized that to turn the shaft of the diesel generator water pump with a dry seal would result in damage to the seal. Second, it should be noted that limit torque motors procured and qualified in accordance with IEEE 382-1972 may not require insulation resistance tests in storage when comparing their environmental qualification to the environment they are stored in. Regulatory Guide 1.38 endorses ANSI N45.2.2 (1972) for the Operations Phase as applicable (see Regulatory Guide 1.38, Section C(1)d). Thus, the in-storage maintenance requirements for items and components will be evaluated on a case by case basis.

As identified in the inspection by Messrs. C. H. Brown and A. L. Madison, O rings have been found in storage (procured in 1970 and 1974) where it is apparent the shelf life has been exceeded. Based on this observation the following response is offered:

Instructions do not presently exist which adequately address dispositioning of O rings which may have exceeded their shelf life. Some items or components may presently be in-storage which have not been evaluated with respect to in-storage maintenance.

A memorandum has been issued to the Plant Administrative Specialist (warehouse) giving instructions in regard to the issuance of safety-related O rings where the shelf life may have been exceeded. An inventory of O rings presently in-storage has been conducted. O rings which may have exceeded their shelf life will be properly dispositioned.

A review is being conducted of items or components presently in storage which may require in-storage maintenance so that an evaluation with respect to the same can be made.

Instructions will be written which clearly delineates the dispositioning of O rings which have exceeded their shelf life and addresses the implementation of the specified in-storage maintenance.

Full compliance will be achieved by December 31, 1981. to

Yours truly,



D. E. Gilberts
Senior Vice President
Power Supply

cc: Mr. C. H. Brown
Mr. G. Charnoff

Attachment

DEG:nk

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED FEBRUARY 12, 1981
RESPONDING TO NRC REQUEST
FOR INFORMATION IN IE INSPECTION REPORT NO. 80-20

Northern States Power Company, a Minnesota corporation, by this letter dated February 12, 1981, hereby submits information in response to NRC request for information concerning IE Inspection Report No. 80-20.

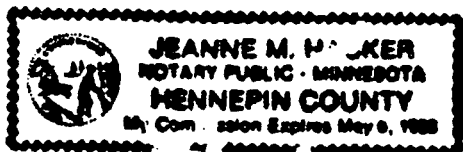
This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By: *D. E. Gilberts*
D. E. Gilberts
Senior Vice President
Power Supply

On this 12th day of February, 1981, before me a notary public in and for said County, personally appeared D. E. Gilberts, Senior Vice President Power Supply, 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



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