



Northern States Power Company

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D. E. Gilberts  
Senior Vice President  
Power Supply

July 10, 1981

Mr. R. F. Heishman, Acting Director  
Division of Resident and Project Inspection  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Dear Mr. Heishman:

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

In response to your letter of June 11, 1981, which transmitted IE Inspection Report No. 50-263/81-08, the following information is provided:

Violation

Amendment No. 2 to License No. DPR-22 issued March 2, 1981, states in Paragraphs 2.2 and 2.3, "The Technical Specifications contained in Appendices A and B as revised through Amendment No. 2, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications," and "This license amendment is effective as of the date of its issuance."

Contrary to the above, Amendment No. 2 was not incorporated into plant operations until April 7, 1981, and only after it was brought to the licensee's attention by the resident inspectors.

This is a Severity Level IV violation (Supplement I).

Response

We admit that the revised Technical Specification pages reflecting Amendment No. 2 to License DPR No. 22 were not printed and issued on as timely a basis as is our normal practice, but this resulted from issuance of re-numbered Technical Specifications for the Full Term Operating License in January, 1981 and followed shortly thereafter by four License Amendments. We believe that this is an unwarranted non-compliance citation in that we know of no specific requirement for incorporating Technical Specification page revisions into the manuals within a specific time period, as long as the Limiting Conditions for Operation (LCO's) and surveillance requirements contained in the revised Technical Specifications are met. We particularly object to this being categorized as a Severity IV Violation, since the inspection report states that all surveillance tests were being performed by April 8, 1981; this resulted in the tests being conducted within accepted intervals. In addition, this license amendment formalized TMI Category A commitments which had already been in place at Monticello since January 1980.

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We are of the opinion that there is no basis for a citation on this matter and we request that the citation be withdrawn.

It has been the practice for the plant to take action to prepare surveillance test procedures based upon receipt of revised Technical Specification pages from Nuclear Support Services Department. (At the time of the call to Nuclear Support Services by the resident inspector on April 7, 1981, Technical Specification page Revision No. 53 covering Amendment No. 2 was already in the printing process and was issued on April 10, 1981.) Immediate corrective action was taken to establish a practice of promptly transmitting copies of license amendments upon receipt in Nuclear Support Services to the plant surveillance coordinator and the Plant Superintendent-Engineering and Radiation Protection. This will allow the plant to proceed with any necessary procedure preparation while Nuclear Support Services is preparing the revised technical specification pages for distribution to Technical Specification manual holders.

The inspector pointed out in a telephone conversation that any LCO or surveillance requirement is legally enforceable as of the date of the license amendment. He also stated in the inspection report that the licensee is aware of the content of an amendment prior to receipt and it is his opinion that the licensee should be able to have all necessary paper work prepared prior to actual receipt of the amendment and implemented immediately. We believe that both of these opinions involve impracticabilities associated with the administrative process of issuing license amendments and preparation and transmittal of a large number of copies of Technical Specification pages. Since the actual content of a license amendment package is subject to revision by NRR Staff any time up to its issuance, it is totally impractical to prepare any revised Technical Specification pages or plant procedures until receipt by the licensee of the actual specific wording. We believe it would be contrary to good quality assurance practices to attempt to prepare the paper work on the basis of assumptions and could possibly result in unnecessary re-review and revision on receipt of the actual documents.

We believe that it is necessary to allow an implementation period for license conditions. A period of 30 days from NRC license amendment date until transmittal of revised pages to Technical Specification manual holders may be necessary under certain circumstances. Under normal circumstances, the time required would be from 1½ to 2 weeks after receipt of the amendment from the NRC.

With respect to actual implementation of Limiting Conditions for Operation and surveillance requirements, it is necessary for the plant to utilize the prompt transmittal copy of the Technical Specifications to prepare any necessary temporary procedures, orders or other documents to implement the requirements of the Technical Specifications. This process also requires a significant period of time due to the administrative requirements of preparing the necessary paper work, processing it through the various approval chains, publishing copies for the appropriate plant work groups and completing any necessary training requirements.

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It is in the latter area where we believe that some type of generic relief is necessary from the opinion expressed by the inspector that the LCO's and surveillance requirements are enforceable upon the date of license amendment issuance. We had asked the inspectors during our April 7, 1981 conversations to pursue this through IE on a generic basis. Since it poses a potentially severe enforcement problem for the licensee, it is our intent to bring this matter to the attention of NRR on a formal basis by a letter requesting a blanket implementation period of 30 days for LCO and surveillance requirements for any future license amendments issued by the NRC, unless it involves an immediate safety concern. In view of the large number of pending license amendments submitted in response to NRR requests and the fact that many of them are several years old, we do not believe that the immediate enforceability interpretation is a very creditable position from a safety need standpoint.

We believe that the citation was unwarranted based upon the circumstances described above and we would be willing to meet or discuss this problem of license amendment implementation further with regional personnel if you so desire.

#### Violation

Section 6.5 of the Monticello Technical Specification states that, implementing procedures of the security plan shall be prepared and followed. Procedure 4AWI 3.4.1 requires all visitor badged personnel to be escorted and remain with their escort at all times.

Contrary to the above, on April 28, 1981, at approximately 11:00 a.m. and again at approximately 2:15 p.m. the inspector observed the same person, wearing a visitor badge and without an escort.

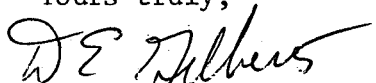
This is a Severity Level V violation (Supplement III).

#### Response

The individual acting as escort was admonished by plant supervisory personnel as to the inappropriateness of his action. In addition, supervisory personnel on the security task force were advised of the incident and instructed to be particularly vigilant towards recurrent instances of improper escorting.

Proper escorting will be discussed in the plant Employee Training Program during 1981 to further emphasize the importance of the function. It is felt these actions will serve to eliminate future recurrences of improper escorting.

Yours truly,

  
D. E. Gilberts  
Senior Vice President  
Power Supply

cc: Mr. G. Charnoff  
Mr. C. D. Feierabend

Attachment

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED JULY 10, 1981  
RESPONDING TO NRC LETTER DATED JUNE 11, 1981  
IE INSPECTION REPORT NO. 50-263/81-08

Northern States Power Company, a Minnesota corporation, by this letter dated July 10, 1981, hereby submits in response to the NRC letter dated June 11, 1981, our answer to IE Inspection Report No. 50-263/81-08.

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 10<sup>th</sup> day of July, 19 81, 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.

*Betty J. Dean*

