



Northern States Power Company

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D. E. Gilberts  
Senior Vice President  
Power Supply

September 10, 1981

Mr R L Spessard, Director  
Division of Resident and Project Inspection  
U S Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr Spessard:

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

In response to your letter of August 11, 1981, which transmitted IE  
Inspection Report No. 50-263/81-12, the following information is provided.

Violation

Technical Specification 6.2.A.4.b states, in part, that the Operations  
Committee (OC) shall review "Modifications to Plant System or Equipment,  
as Described in the Final Safety Analysis Report and having Nuclear Safety  
Significance..." Operational Quality Assurance Plan Section 5.2 "Design  
Change Control" requires that design changes be reviewed, a 10 CFR 50.59  
evaluation be performed, and appropriate installation procedures be  
prepared and utilized.

Contrary to the above, the 250 volt DC battery system was changed from  
that described in the FSAR without the required OC review, and prior to  
the completion of the activities required by the licensee's procedures.  
This resulted in a degradation of the battery system, while the unit was  
in operation. The event was identified by the licensee and reported in  
LER 81-16.

This is a Severity Level IV violation.

Response

The Operational Quality Assurance Plan Section 5.2, "Design Change Control"  
which requires design changes to be reviewed, a 10 CFR 50.59 evaluation  
performed and appropriate installation procedures be prepared and utilized  
was inadvertently violated.

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The violation resulted from personnel failing to identify the work as a design change, rather than from any deficiency in the Design Control or Work Request processes. Appropriate action to prevent recurrence is to assure that the personnel initiating and processing Work Requests are:

1. capable of identifying items which may be design changes,
2. aware of the requirements of the Work Request and Design Control processes, and,
3. aware of the importance of these requirements.

These items have been reviewed with the personnel involved in initiating the work associated with this violation, including those who function as WRA Coordinator and have responsibility for proper processing of all Work Requests. A memo concerning these items has also been issued to plant personnel who may initiate similar work. Annual training will be revised to emphasize these items for all site personnel who may be involved in such work. This training is expected to be implemented by January 1, 1982..

Yours truly,



L J Wachter  
Vice President  
Power System Operation  
and Maintenance

for

D E Gilberts  
Senior Vice President

cc: Mr C H Brown  
Mr G Charnoff

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED SEPTEMBER 10, 1981  
RESPONDING TO NRC LETTER DATED AUGUST 11, 1981  
IE INSPECTION REPORT NO. 50-263/81-12

Northern States Power Company, a Minnesota corporation, by this letter dated September 10, 1981 hereby submits, in response to the NRC letter dated August 11, 1981, our answer to IE Inspection Report No. 50-263/81-12.

This request contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By: *L. J. Wachter*  
L J Wachter  
Vice President  
Power System Operation  
and Maintenance

On this 10<sup>th</sup> day of September, 19 81, before me a notary public in and for said County, personally appeared L J Wachter, Vice President Power System Operation and Maintenance, 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*

