



Northern States Power Company

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D. E. Gilberts  
Senior Vice President  
Power Supply

November 25, 1981

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

Dear Mr Spessard:

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

The following is submitted in response to Appendix A, NOTICE OF VIOLATION, dated 10-28-81, which was enclosed with your letter of October 29, 1981, which transmitted I.E. Inspection Report No. 50-263/81-16.

Violation

Technical Specification 6.2.A.4.b states in part that the Operations Committee (OC) shall review "modifications to plant systems 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 10CFR50.59 evaluation be performed, and appropriate installation procedures be prepared and utilized.

Contrary to the above, a T-connection, shut-off valve and hose connection were installed in the Condensate Storage System without the required OC review, and prior to the completion of the activities required by the licensee's procedures. This subsequently resulted in an inadvertent, uncontrolled, unmonitored release off site of slightly contaminated condensate storage tank (CST) water.

Response

The cause of this violation was the fact that the next violation (below) occurred. Work was performed in the field that was beyond the scope of the approved work controlling documents. The existing design and work control processes are adequate to assure that work which is identified will be reviewed, evaluated, documented, and performed in accordance with Technical Specifications 6.2.A.4.b, Operational Quality Assurance Plan, Section 5.2 and 10CFR50.59. The valve and hose connection will be removed during the current plant outage.

Violation

10CFR50, Appendix B, Criterion V, requires that the licensee accomplish activities affecting quality in accordance with instructions, procedures, or drawings. The licensee's Operational QA plan requires that Administrative Control Directives (ACD) be written and followed. Directive 4ACD3.6, Section 6.2.17 states, "The Job Supervisor shall assure that work activities beyond the scope of the approved W.R.A. are not being conducted."

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Contrary to the above, the condensate storage system was cut open and components (see Item 1 above) added under a general Work Request Authorization (W.R.A.) No. 81-2366 written for the removal and replacement of the radwaste processing equipment with new processing equipment (concrete). This modification to the condensate storage system was beyond the scope of that W.R.A.

#### Response

Prior to discovery of this violation, the job supervisor involved had left the plant staff. A memo has been issued to site personnel discussing:

1. Recent violations resulting from personnel not recognizing items as design changes.
2. NRC enforcement policy and potential future enforcement actions if similar events continue to occur.
3. The need for personnel who initiate work, process control documents, or perform installation and modification to be capable of identifying potential design changes and to be aware of applicable administrative processes.
4. Guidance for recognizing and assuring control of potential design changes, with emphasis on contacting the Plant Superintendent, Engineering and Radiation Protection, or his designated alternate, for determinations regarding applicability of specific administrative controls.

As requested, an assessment of the adequacy of our management controls to prevent recurrence of the items for which violations were identified has been conducted. Potential shortcomings in these controls have been identified. The assessment and the recommendations made will be reviewed by the Plant Operations Committee for evaluation and to establish appropriate corrective actions. A copy of the assessment is available on site for review by NRC personnel.

Another response which addresses additional actions established and scheduled completion dates will be provided following Operations Committee review of the assessment. This response will be submitted by December 23, 1981.

#### Violation

Technical Specifications Section 6.5 requires Radiation Control Procedures to be written and followed. Operations Manual, Volume E, Section 1.3 IV requires a specific radiation work permit (R.W.P.) to be written or continuous escort by a Radiation Protection Specialist, and then an R.W.P. to be completed after work completion to document the job.

Contrary to the above, a contaminated line from the C.S.T. was cut open to install a T-connection, shut-off valve and hose fitting. A Radiation Protection Specialist was in attendance. However, an R.W.P. was not completed to document the job.

Mr R L Spessard

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November 25, 1981

Response

We do not agree that Operations Manual, Volume E, Section 1.3 IV was violated. Monticello procedures require an R.W.P. to be written after a job only if radiological controls were implemented solely by means of an RPS in attendance. Prior to the performance of work activities associated with WRA 81-2366, an RWP was prepared to govern such work activities. Since the exact nature of the work was not completely known at the time the RWP was prepared, it was decided an RPS should be in attendance during certain aspects of the job, in case it would be necessary to impose any radiation protection requirements in addition to those already specified on the RWP. The workmen involved in this job signed in on RWP No. 563, an RPS was in attendance during portions of the job, and the radiological health and safety of the workers was adequately and properly assured. Monticello procedures contain no requirement to update an RWP governing work in which an RPS in attendance may have specified additional requirements at a later time.

Yours truly,



D E Gilberts  
Senior Vice President  
Power Supply

cc: Mr G Charnoff  
Mr C H Brown

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED NOVEMBER 25, 1981  
RESPONDING TO NRC LETTER DATED OCTOBER 29, 1981  
IE INSPECTION REPORT NO. 50-263/81-16

Northern States Power Company, a Minnesota corporation, by this letter dated November 25, 1981 hereby submits, in response to the NRC letter dated October 29, 1981, our answer to IE Inspection Report No. 50-263/81-16.

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 25<sup>th</sup> day of November, 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*

