



Northern States Power Company

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April 24, 1985

Mr. W. S. Little
Operations Branch - Region III
U S Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

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

Dear Mr. Little:

Your letter of March 26, 1985 acknowledged our response to the violation identified in Inspection Report No. 50-263/85-04 (DRS) and also recognized that we have agreed to resubmit responses to noncompliance examples Nos. three, four and nine. Our revised responses to those examples are as follows:

- 3. Purchase orders did not document the scope of work to be performed by the supplier as required by Procedure 3 ACD-6.1.

Corrective Action Taken and the Results Achieved

The standard heading on actual purchase order documents that are sent to vendors is "Material or Services to be furnished". This statement together with identification of parts and documentation to be furnished was considered to adequately provide the "scope of work" for parts orders. While this is not considered acceptable by your staff, we believe we have agreed that corrective action on past and current purchase orders would not provide any increased quality of the items or services purchased. Accordingly, no corrective action on past or current purchase orders will be taken.

Corrective Action To Be Taken To Avoid Further Noncompliance

During the inspection on-site, it was recognized that the implementing instructions, i.e., 3 AWI-6.1.1, provides an acceptable example of a scope of work statement. We will apply that or another appropriate "Scope of Work" statement to purchase orders in the future. However, our current interpretation of ANSI N45.2.13, to be implemented this year with upgraded instructions, is that a "Scope of Work" for parts may not be required.

Date When Full Compliance Will Be Achieved

Compliance with the provisions as stated above has been achieved.

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4. Purchase orders did not document the catalog number used when ordering items by part number as required by Procedures 3 AWI-6.1.1 and 3 AWI-6.1.2.

Corrective Action Taken and the Results Achieved

While the information provided was not precisely as identified in the referenced administrative controls documents, it is felt that the information provided adequately identified items to be supplied. If any items are questionable with respect to identification, this would be resolved with direct communication with the supplier, upon receipt inspection, or possibly when the item is to be installed. While this is not desirable, processing of revisions to closed and outstanding purchase orders to resolve these procedural inadequacies would not provide any substantial improvement in the quality of the items supplied. Accordingly, no corrective actions on past or current purchase orders is believed necessary.

Corrective Action To Be Taken To Avoid Further Noncompliance

Personnel will be directed to follow the prescribed administrative controls documents when preparing purchase requisitions. Further, QA reviews of the purchase requisitions will include reviews to assure required items are addressed. It should also be recognized that NSP is revising the procedures for procurement activities. These revised procedures are expected to provide improved preparation and processing instructions.

Date When Full Compliance Will Be Achieved

All actions except for updating the procurement process procedures have been implemented. The revised procurement process is expected to be implemented by May 31, 1985.

9. Purchase requisitions did not specify adequate receipt inspection requirements as required by Procedure 3 AWI-6.1.2, Table 6.1.1-1, Paragraph C.

Corrective Action Taken and the Results Achieved

Certificates of compliance with purchase order requirements were provided for all of the purchase orders referenced with this item in the report text. These certificates have been considered as vendor documentation that the items were inspected by them as a basis to certify that requirements had been met.

Corrective Action To Be Taken To Avoid Further Noncompliance

For future purchase orders, more specific receipt inspection provisions will be addressed. These provisions may include documentation from the vendor of characteristic inspections and examinations they have conducted, or characteristic inspections and examinations conducted on receipt.

Additionally, verification of supplier programs will include increased evaluation of their shipping and certification processes.

Date When Full Compliance Will Be Achieved

Compliance with the provisions stated above has been achieved.



C. E. Larson
Vice President-Nuclear Generation

c: G Charnoff
NRC Resident Inspector