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April 3, 1985

Mr R L Spessard, Director
Division of Reactor Safety
U S Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

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

In response to your letter of March 4, 1985, concerning Inspection Report No. 50-263/85-07 (DRP), the following information is offered.

Violation

Technical Specification 6.6.A.3 states that plant operating records and logs relative to tests performed to satisfy the technical specifications be retained for a minimum period of five years.

Contrary to the above, the scram timing recorder traces, which are record generated as part of the control rod drive scram tests utilized to satisfy Technical Specification 4.3.C, were not retained after the testing performed subsequent to the Cycle 11 core load.

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

Response

It is our view that the surveillance test procedure in which the scram times are documented properly constitutes a record as required by Technical Specification 6.6.A.3. The retention of this surveillance test, as a record, has been our practice since 1971 - a practice reviewed and found to be acceptable by NRC Region III inspectors in previous years. Thus, the intent of retaining a record, as stated in Technical Specification 6.6.A.3, is fully satisfied by our long-standing practice of retention of the surveillance test which documents acceptability of control rod drive scram times in accordance with Technical Specification 4.3.C.

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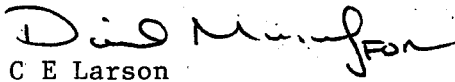
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The interpretation involved in this non-compliance centers on the idea of raw data versus transcribed data as constituting a record. Our search of applicable ANSI Standards in the N45.2 series indicates no requirement to retain raw data as opposed to transcribed data. If, for example, the control rod scram times were displayed as a digital output instead of on a strip chart, the raw data would have to be transcribed to be retained at all. Also, Section 12 of ANSI N45.2-1971 states that "Test results shall be documented, and evaluated by responsible authority to assure that test requirements have been satisfied". Both the documentation and evaluation by responsible authority are inherent in our current surveillance test completion practices.

With the belief that we are presently properly complying with the intent of Technical Specification 6.6.A.3 in retaining control rod scram timing surveillance tests, we will begin retaining the raw data printed as a computer edit along with the surveillance tests when scram time testing is recorded by the plant process computer. It is currently planned that this will occur in conjunction with projected enhancements to the process computer during the 1987 refueling outage.

Regarding Unresolved Item 263/85-07-06, our program for the calibration of measuring and test equipment is described in Administrative Control Directive 4 ACD-6.4, which establishes the requirements for calibration and control of inspection, measuring, and test equipment used in activities affecting quality at the Monticello Nuclear Generating Plant. As stated in paragraph 6.1.2 of 4 ACD-6.4, "calibration and control requirements shall not be imposed ... where normal commercial practices provide adequate accuracy". It is our belief that stopwatches are devices where normal commercial practices provide adequate accuracy.

We welcome the opportunity to discuss these issues with you in more detail. Please contact us if you have any questions relating to our response.


C E Larson
Vice President Nuclear Generation

c: Regional Administrator-III, NRC
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