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 AUTH. NAME AUTHOR AFFILIATION
 PERSON, C. E. Northern States Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 GULDEMOND, W. G. Region 3, Office of Director

SUBJECT: Responds to NRC 870312 ltr re violations noted in Insp Rept
 50-263/87-03. Corrective actions: procedure revised to clarify
 prerequisites on Tech Spec 3.3.A insuring adequate shutdown
 margins prior to performance of isolations.

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Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone (612) 330-5500

April 14, 1987

W G Guldemon, Chief Reactor Projects Branch 2
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

In response to your letter of March 12, 1987, concerning Inspection Report No. 50-263/87003(DRP), the following information is offered regarding the violation cited:

Violation

Technical Sepcification (TS) 3.3.A.1 requires that shutdown margin be available to make the reactor subcritical in the most reactive condition during the operating cycle with the strongest operable control rod in its full-out position and all other operable rods fully inserted.

TS 6.5.C.3 requires that detailed written procedures shall be prepared and followed for areas including preventive or corrective maintenance of plant and systems that could have an effect on nuclear safety.

Contrary to the above, Operations Controlling Document (OCD) 4201 was prepared in a manner whereby its use could result in not satisfying TS 3.3.A.1 when performing preventive maintenance on one or more hydraulic control units (HCU) for a control rod. This procedure did not satisfy the requirements of TS 6.5.C.3.

Reason for Violation

OCD 4201 included a prerequisite to verify compliance with TS 3.3.A. At the time the procedure was written this was felt to be sufficient guidance to meet the requirements of TS 6.5.C.3. This event indicates that reference to the Technical Specification alone in this case does not insure compliance with the Technical Specification and that additional guidance is needed.

Corrective Steps Taken and Results Achieved

1. OCD 4201 was revised to clarify the prerequisite on TS 3.3.A to insure adequate shutdown margin is available prior to performing isolations that result in control rod inoperability. This insures that adequate shutdown margin will exist for any activities performed under this OCD.

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2. Operations Manual B.1.3, which is referenced by OCD 4201, was revised to add a precaution prior to the procedure for HCU Isolation for Maintenance to insure that shutdown margin is verified prior to making isolations resulting in an inoperable control rod. This insures that adequate shutdown margin will exist for any activities performed under this procedure. In addition the Operations Manual was revised to define isolations which result in an inoperable control rod drive.

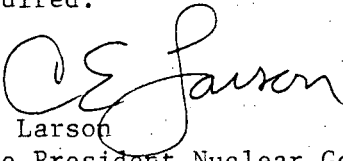
Corrective Steps to be Taken to Avoid Further Violations

In order to provide additional guidance for procedures that reference Technical Specifications a Technical Specification Interpretations Manual will be developed.

Date When Full Compliance will be Achieved

All corrective steps to be taken will be completed by December 31, 1987.

It is believed that the corrective actions taken and planned in response to this violation will prevent future similar occurrences. Please contact us if you have any questions, or if additional information is required.



C E Larson
Vice President Nuclear Generation

CEL/MMV/dab

c: NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff