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SUBJECT: Responds to NRC 870612 ltr re violations noted in Safety  
 Insp Rept 50-263/87-05. Corrective Actions: operators verified  
 alignment of all accessible safety-related valves. Mgt met w/  
 each operations shift to explain insp results.

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July 10, 1987

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

Response to Notice of Violation in NRC  
Inspection Report No. 50-263/87005(DRP)

On June 12, 1987, a report covering a routine safety inspection conducted by the NRC Senior Resident Inspector during the period April 7, 1987 through May 22, 1987 was sent to us. This report noted one Severity Level IV violation. The purpose of this letter is to provide our response to this violation.

Violation

As a result of the inspection conducted on April 7 through May 22, 1987, and in accordance with the "General Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1986), the following violation was identified:

Technical Specification 6.5.A, Plant Operating Procedures - Plant Operations, states in part: "Detailed written procedures, including the applicable check-off lists and instructions, covering areas listed below shall be prepared and followed. (1) Integrated and system procedures for normal startup, operation and shutdown of the reactor and all systems and components involving nuclear safety of the facility."

Contrary to the above, no procedure was established to verify flow through the motor cooler service water lines of Core Spray and Residual Heat Removal System. This is a weekly requirement of the reactor building daily checklist.

Explanation

On April 30, 1987 a service water outlet valve for the No. 11 Core Spray Pump was found closed rather than open as

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required. The service water valve SW-113-1 was discovered closed by an operator following a request to verify valve position by an NRC inspector during a surveillance test of the No. 11 Core Spray Pump. Based on an interview with the operator who performed a flow check of the motor cooling, it was believed that following the flow check on April 27, 1987, the valve was inadvertently left in the closed position.

The root cause of this event was the lack of a procedure. The reactor building checklist had required a verification of service water flow to the motor coolers for the Core Spray and RHR pumps. This checklist only required a checkoff when verification was completed, and lacked any details as to how it was to be accomplished, or any verification that the valves were left in proper position.

#### Corrective Actions Taken and Results Achieved

As soon as the misaligned valve was discovered, operators were immediately dispatched to verify alignment of all accessible safety related valves. No other misaligned valves were discovered.

The weekly checklist was revised so that only the flush valve on the motor coolers is manipulated. The inlet and outlet valves are no longer allowed to be operated by the checklist.

A letter was written from the General Superintendent of Operations to all Site Superintendents requiring that all safety-related valve manipulations be recorded in the Control Room Log unless already logged in a procedure or checklist. This was a temporary measure until checklists of routinely operated valves could be written.

Management met with each operations shift to explain the results of the inspection and steps being taken in response to the violation.

A review of activities done without procedures was initiated. From this review, it was discovered that a procedure was needed for the blowdown of the Emergency Diesel Generator Air Receiving Tanks. This was incorporated as part of the Turbine Side Daily Operated Valve Checklist. No other procedural deficiencies were found for safety related equipment. However, it was felt that several non-safety related valve manipulations should be better documented. These were incorporated into the Turbine and Reactor Daily Operated Valve Logs.

Corrective Actions to Be Taken to Avoid Further Violations

A detailed quarterly flush procedure is being written to provide for a flush/flow verification of service water through the Core Spray and RHR pump motor coolers. This procedure is expected to be issued and performed during July, 1987.

Date When Full Compliance Will be Achieved

All corrective steps will be completed by July 31, 1987.

Please contact us if you have any questions related to our response to this violation.



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