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SUBJECT: Responds to NRC 880211 ltr re violations noted in Insp Rept  
 50-263/87-21. Corrective actions: individual involved in  
 example counseled re misinterpretation of procedural step.

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March 14, 1988

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MONTICELLO NUCLEAR GENERATING PLANT  
DOCKET NO. 50-263 LICENSE NO. DPR-22

Response to Inspection Report No. 50-263/87021(DRP)

The purpose of this letter is to provide our response to the individual items listed in the Notice of Violations forwarded to us with NRC Inspection report 50-263/85021(DRP) dated February 11, 1988.

VIOLATION

Technical Specification 6.5, Plant Operating Procedures, states that detailed written procedures, including the applicable check-off lists and instructions, shall be prepared and followed.

Contrary to the above, during the period of December 1, 1987 to January 12, 1988 several examples of failure to follow approved plant procedures were identified. Each example is discussed below;

- a. During the performance of Test Procedure #0417-2, Revision 0, "B" CGCS Recombiner Reactor Chamber Operability Test an operator failed to perform a soak of the CGCS Recombination Reaction Chamber in accordance with the procedure.
- b. During the performance of Test Procedure #0189-1, Revision 12, Emergency Diesel Generator Automatic Fast Start Initiation operators failed to follow approved methods of independent verification specified in 4 ACD (Administrative Control Document)-04.07, Revision 12, Section 6.16.
- c. During the performance of Test Procedure #0036-1/0039-1, Revision 10, ECCS Emergency Bus Undervoltage Test-1/ECCS Loss of Normal Auxiliary Power Test-1 operators failed to follow approved methods of independent verification specified in 4 ACD-04.07, Revision 12, Section 6.16.

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- d. During performance of Test Procedure No. 1025A, a radiation protection specialist failed to follow an approved procedure by testing a different radiation monitor than required by the test procedure. This resulted in engineered safety feature (ESF) actuations.
- e. During performance of Test Procedure No. 0067, a license operator failed to follow an approved procedure step of installing a jumper on a specified terminal. This resulted in an ESF actuation.
- f. During performance of the modification preoperational test procedure for residual heat removal Valve MO-2407, a license operator failed to install a jumper on the proper terminal as required. The error resulted from installation by wire identification rather than terminal verification. This resulted in ESF actuations.

RESPONSE

- a. The individual performing the test misinterpreted the intent of Step 16 of the procedure. The intent of Step 16 was to provide a one-hour period of operation of the reaction chamber heater to verify proper heater controls after the 600-degree F temperature was reached. The operator performing the test interpreted this Step as requiring recording of the temperature as the reaction chamber increased to 600 degrees F.
- b. The individual who performed the independent verification referred to in this example was the system engineer, not "operators" as stated in the report. The system engineer was not aware of the strict requirements concerning independent verification that are addressed in 4ACD4.7. It is the Shift Supervisor's responsibility to assure that individuals performing independent verification are qualified to do so. The Shift Supervisor felt that the System Engineer, because of his extensive system knowledge, was qualified to perform the verification.
- c. The procedure referred to in this example has several steps that require a "verified" signature. It was not the intent of this procedure to require this verification to be an "Independent Verification". 4ACD4.7 requires that an independent verification be performed "prior to returning the associated system to its final pre-operational status". Test #0036-1/0039-1 was performed following completion of electrical preventive maintenance and prior to startup of the plant following a major refueling outage. The test switches in question are independently verified as part of pre-startup checklist #2173. Checklist #2173 was completed on December 13, 1987 (following completion of test 0036-1/0039-1 and prior to the plant startup).

- d. This event was identified by the licensee and reported to the NRC in accordance with 10 CFR 50.72 and 50.73. Refer to Licensee Event Report 87-018 dated December 11, 1987.
- e. This event was identified by the licensee and reported to the NRC in accordance with 10 CFR 50.72 and 50.73. Refer to Licensee Event Report 87-019 dated December 11, 1987.
- f. This event was identified by the licensee and reported to the NRC in accordance with 10 CFR 50.72 and 50.73. Refer to Licensee Event Report 87-021 dated December 23, 1987.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

- a. The individual involved in this example was counseled concerning the misinterpretation of the procedural step. No similar problems with this individual following the procedures have been experienced.
- b. The Shift Supervisors have been instructed not to consider a system engineer qualified to perform independent verifications without written documentation of the engineer's qualifications for performing such verifications.
- c. It is our belief, in this example, that there was no violation of the 4ACD4.7 requirements.
- d. Refer to the Licensee Event Report for a description of the corrective actions taken. There have been no similar occurrences since this event.
- e. Refer to the Licensee Event Report for a description of the corrective actions taken. There have been no similar occurrences since this event.
- f. Refer to the Licensee Event Report for a description of the corrective actions taken. There have been no similar occurrences since this event.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

- a. Procedure #0417-2 is being revised to prevent future misinterpretations with respect to Step 16. The revision will be completed by April 15, 1988.
- b. No additional corrective actions are required.

Charles E Norelius  
March 14, 1988  
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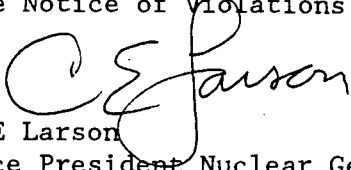
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- c. 4ACD4.7 will be revised to further clarify the verification requirements. This will be completed by May 31, 1988.
- d. Refer to the Licensee Event Report for a description of corrective actions taken and planned.
- e. Refer to the Licensee Event Report for a description of corrective actions taken and planned.
- f. Refer to the Licensee Event Report for a description of corrective actions taken and planned.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved for items (a) through (f).

Please contact us if you have any questions related to our response to the Notice of Violations.



C E Larson  
Vice President Nuclear Generation

c: Administrator, Region III, NRC  
Sr Resident Inspector, NRC  
Sr NRR Project Manager, NRC  
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