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Northern States Power Company

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July 15, 1988

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U S Nuclear Regulatory Commission  
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MONTICELLO NUCLEAR GENERATING PLANT  
DOCKET NO. 50-263 LICENSE NO. DPR-22

Response to Inspection Report No. 50-263/88006(DRP)

The purpose of this letter is to provide our response to the Notice of Violation forwarded to us with NRC Inspection report 50-263/88006(DRP) dated June 21, 1988.

Violation

Technical Specification 3.13.G states in part:

- a. All penetration fire barriers in fire area boundaries protecting safe shutdown equipment shall be operable.
- b. If Specification 3.13.G.1 cannot be met, a continuous fire watch shall be established on at least one side of the affected penetration(s) within one hour.

Contrary to the above, on March 14, 1988, Fire Door No. 105 (access door to the Turbine Building) was found to be open and the automatic door closure device was not connected to the door. This condition had existed since March 12, 1988 and no continuous fire watch had been present during that time.

This is a Severity IV violation (Supplement I).

Response

On March 12, 1988, a plant operator noted the broken condition of the automatic door closure device on Fire Door No. 105 and notified the Shift Supervisor. The Shift Supervisor did not interpret the fire door as inoperable because the fire door was found closed and latched. A work request authorization was processed to fix the broken automatic door closure device. During a plant inspection by an NRC Resident Inspector on March 14, 1988, the fire door was found in the open position with the automatic door closure device not attached to the door. The length of time the fire door was left open is unknown.

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The Daily Fire Door Inspection Procedure did not provide specific instructions on what constitutes an inoperable fire door (i. e., broken automatic door closure) and General Employee Training did not provide adequate detail on fire door requirements. The root cause of this event was determined to be inadequacies in procedures and training.

Corrective Actions Taken and the Results Achieved

Procedure No. 1216-1, Daily Fire Door Inspections, was revised to require each fire door to be opened and checked to see that it self closes and latches.

The Plant Manager issued a letter to all plant personnel to bring to their attention the importance of fire doors and to remind them of their responsibilities in the use of these doors.

This event was report to the NRC as Licensee Event Report 88-002, "Failure to Provide Fire Watch Due to Inadequate Procedures and Training," on April 13, 1988.

Corrective Actions to be Taken to Avoid Further Violations

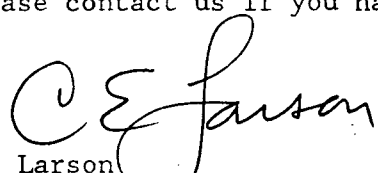
The Training Department will provide additional training on what constitutes an operable fire door in the General Employee Training Program by December 31, 1988.

A new preventive maintenance procedure for fire doors will be prepared to improve door reliability by October 30, 1988.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

We believe that the corrective actions we have taken and the longer term measures planned will prevent further occurrences of this nature. Please contact us if you have any questions related to our response.

  
C E Larson  
Vice President Nuclear Generation

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