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 RECIP. NAME RECIPIENT AFFILIATION
 NORELIUS, C.E. Region 3, Ofc of the Director

SUBJECT: Resubmits response to NRC 890613 ltr re violations noted in Insp Rept 50-263/89-04.

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July 13, 1989

Mr C E Norelius, Director
Division of Radiation Safety and Safeguards
US Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

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

Resubmittal of the Response to Notice of Violation
Effluent Monitoring

- References:
1. Letter from Mr. C.E. Norelius, Director, Division of Radiation Safety and Safeguards, USNRC, "Violations from NRC Inspection Report No. 263/89004(DRSS) - Effluent Monitoring", dated June 13, 1989.
 2. Letter from Mr. C. E. Larson, NSP, to C. E. Norelius, USNRC, "Response to Notice of Violation, Effluent Monitoring", dated April 14, 1989.

The purpose of this letter is to resubmit our response to Violation 1 which was submitted by Reference 1. This was requested by your letter dated April 14, 1989 (Reference 2).

Violation 1

Technical Specification 6.7.A.4 requires, in part, that the Semiannual Radioactive Effluent Release Report include the identification of unplanned releases from the site of radioactive materials in gaseous effluent and include a summary of radioactive gaseous effluent as specified in Appendix B to Regulatory Guide 1.21, Revision 1, June 1974. Sections A.5 and A.6 of the aforementioned appendix specify, in part, the identification of batch and abnormal (unplanned or uncontrolled) gaseous releases, respectively.

- a. Contrary to the above, the Semiannual Radioactive Effluent Release Report for the period from January 1 thru June 30, 1988 did not identify an abnormal (unplanned) gaseous release which occurred on May 31, 1988, and did not identify containment purge/vent batch releases which occurred during the reporting period.
- b. Contrary to the above, the Semiannual Radioactive Effluent Release Reports for 1987 did not identify containment purge/vent batch releases which occurred during the reporting period.

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C E Norelius
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Corrective Actions That Have Been Taken and the Results Achieved

We have adopted the NRC's interpretation of batch and abnormal releases. Data consistent with these interpretations has been gathered since the date of the violation and will continue to be gathered for reporting in future Semi-Annual Radioactive Effluent Release Reports.

Currently, we are using the definition for abnormal releases used at the Prairie Island Nuclear Generating Plant which we understand is acceptable to the NRC.

Corrective Action to Be Taken to Avoid Further Violations

Future Semiannual Radioactive Effluent Release Reports will reflect this revised interpretation of batch and abnormal releases.

We will develop a definition acceptable to the NRC for abnormal releases specifically for Monticello and include it as a revision to the ODCM in the Semiannual Radioactive Effluent Release Report for the second half of 1989.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

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



C E Larson
Vice President Nuclear Generation

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Resident Inspector, NRC
G Charnoff