

**ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM**  
 REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 ACIL: 50-263 Monticello Nuclear Generating Plant, Northern States      05000263  
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SUBJECT: Responds to NRC 890804 ltr re violation noted in Insp Rept  
 50-263/89-17.

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|           | NUDOCS-ABSTRACT           | 1                   | OE LIEBERMAN, J           | 1                   |
|           | OGC/HDS1                  | 1                   | <u>REG FILE 02</u>        | 1                   |
|           | RES MORISSEAU, D          | 1                   | <u>RGN3 FILE 01</u>       | 1                   |
| EXTERNAL: | LPDR                      | 1                   | NRC PDR                   | 1                   |
|           | NSIC                      | 1                   |                           |                     |

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September 5, 1989

Mr. W. L. Axelson, Chief  
Reactor Projects Branch 2  
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MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22

Response to Notice of Violation  
NRC Inspection Report No. 263/89017 (DRP)

In response to your letter dated August 4, 1989, which transmitted the NRC Inspection Report noted above, the following information is offered.

VIOLATION

10CFR50, Appendix B, Criterion V, states: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, and drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Administrative Control Document 4ACD-4.8, (Rev. 11 dated April 5, 1989); Bypass Control, states: (in paragraph 6.3.4): "Prior to modifying circuits by the use of a bypass device, the as-built condition shall be verified"; and, (in paragraph 6.3.4.c) "The proper configuration shall be recognized before installing a bypass."

Contrary to the above, on June 20, 1989, operations personnel installed jumpers for relay 16A-K21 without correctly verifying the as-built condition of the circuitry. When the operators elected to test the logic of the circuitry by temporarily pulling a fuse, the Shutdown Cooling function was lost for ten minutes due to the closure of an RHR inboard injection isolation valve.

This is a Severity Level IV violation.

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IED 110

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RESPONSE

This event was reported as LER 89-010, submitted on July 20, 1989.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

This event was primarily caused by a mis-interpretation of the Primary Containment Isolation System elementary drawings by the operating crew on-duty. A contributing cause to the event was the lack of clarity in the elementary drawings. Corrective actions have been taken to address both concerns.

Supplemental print reading training for the operating crew on-duty at the time of the event was completed on July 14, 1989. This training specifically corrected their mis-interpretation of the Primary Containment Isolation System elementary drawing, which led to their belief that the fuse could be pulled without any unexpected resultant actions.

A review of Primary Containment Isolation System drawings has been conducted by engineering and operations personnel. Several revisions have been identified to clarify these drawings. Drawing Revision Requests to revise the Primary Containment Isolation System elementary drawings and update the construction drawings used by plant operators have been submitted.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATIONS

The training lesson plan on reading and interpreting electrical prints is being revised to emphasize a symptom-based approach to diagnosing electrical problems with plant electrical drawings. This lesson plan will be presented to all operating shifts during their scheduled requalification training, along with a review of 4ACD-4.8, Bypass Control. Training per the revised electrical print-reading lesson plan and the review of 4ACD-4.8 will be completed for all operating shifts by November 16, 1989.

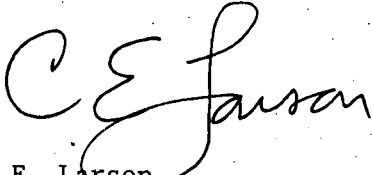
DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

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Please contact us if you have any questions related to our response to this  
Notice of Violation.



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