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SUBJECT: Responds to NRC 891025 ltr re violations noted in Insp Rept
 50-263/89-22.

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November 22, 1989

Mr R W Copper, II, Chief
Engineering Branch, Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

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

Response of Notice of Violation
Concerning Nondestructive Testing Examination
Inspection Report No. 263/89-22

In response to your letter dated October 25, 1989, which transmitted Inspection Report 263/89-22 and a Notice of Violation, the following information is offered.

Violation A

10 CFR 50, Appendix B, Criterion VI, document control, requires that measures be established to control the issuance of documents which prescribe activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel. In accordance with this requirement site procedure M&SP5.5 Revision 1, Inservice Inspection Program - Examination Plan Manual, requires that Inservice Inspection Program drawings be controlled and updated.

Contrary to the above, an NRC inspection during September 18-28, 1989, disclosed that the ISI program drawings, ISI 24C Revision 2 and ISI 24A Revision 2, were not properly controlled in that several items contained duplicate identification numbers, nonexistent welds were shown in the drawings and the drawings did not include appropriate drawing references.

This is a Severity Level IV violation (Supplement I).

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Corrective Steps Which Have Been Taken and the Results Achieved

The errors identified in the notice of violation were promptly corrected.

Corrective Steps Which Will be Taken to Avoid Further Violations

All inspection sketches (drawings) in the Inservice Inspection Program will be checked for accuracy. Instructions describing the items to be verified on inspection sketches are being prepared and will be in place prior to the start of inspection sketch checking. Checks will be accomplished by a drawing comparisons and a field walk down when possible. Drawing comparisons will be made to controlled drawings. Accuracy checks and necessary inspection sketches revisions will be completed prior to the next scheduled inspection for each component.

Administrative procedures will be revised to clarify the review and control process for inspection sketches. This will assure future piping and component changes will be properly reflected in the inspection sketches. These procedures will be revised by March 1, 1990.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Violation B

Title 10, Paragraph 50.55a of the code of Federal Regulations requires that plant inservice inspection programs be performed in accordance with applicable editions of the ASME code. Accordingly, the Monticello Inservice Inspection Program states that Monticello shall meet the requirements of the 1977 Edition of Section XI of the ASME Code with addenda through the Summer of 1978 for the second 10 year interval. ASME, Section XI, Appendix III Supplement 2 of that code established requirements to stamp the weld center line, establish zero reference starting points and identify the direction of examination of weld inspections.

Contrary to the above, an NRC inspection identified welds included in the Monticello Inservice Inspection Program that had no reference markings. Welds CIAJ-51 HPCI, MSBJ-37, MSBJ-25 and MSBJ-18 in the main steam system had no reference starting point nor were the center line of welds established.

This is a Severity Level IV violation (Supplement I).

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Corrective Steps Which Have Been Taken and the Results Achieved

We will change our weld location reference system for all piping welds in the Inservice Inspection Program. We will change from using the weld toe location reference system to a system conforming to Article III-4330 of Section XI of the ASME Boiler and Pressure Vessel Code. Procedure changes incorporating this change will be made by May 1, 1990.

Corrective Steps Which Will be Taken to Avoid Further Violations

The procedure changes discussed above will require that each weld be marked in conformance with Article III-4330 prior to the next examination of that weld.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Please contact us if you have any questions related to our responses to the subject violations.



C E Larson
Vice President
Nuclear Generation

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