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 AUTH. NAME AUTHOR AFFILIATION
 LARSON, C.E. Northern States Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 AXELSON, W.L. Region 3, Ofc of the Director

SUBJECT: Responds to NRC 900322 ltr re violation noted in Insp Rept 50-263/90-02. Corrective actions:

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Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401-1927
Telephone (612) 330-5500
10 CFR Part 2.201

April 12, 1990

W. L. Axelson, Chief,
Reactor Projects Branch 2
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

Reply to Notice of Violation
NRC Inspection Report No. 263/90002(DRP)
NRC Resident Inspector, ILRT, EOP Inspection

In response to your letter dated March 22, 1990, which transmitted Inspection Report 263/90002 and a Notice of Violation, the following information is offered.

Violation

10 CFR Part 50, Appendix B, Criterion V states: Activities affecting quality shall be prescribed by documented instructions, procedures or drawings and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, on October 21, 1989 during the performance of the containment integrated leak rate test, the licensee modified the valve lineup by installing a block between the inner and outer main steam isolation valves and by pressurizing between this block and the outer valve. The block was installed and the pressure manually maintained through verbal instructions rather than in accordance with the approved leak rate test procedure.

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

Response

At 0600 hours on October 21, 1989, with the plant shutdown for a refueling outage, the prerequisites for declaring the start of the primary containment integrated leak rate test were satisfied but the test was not officially started. The Test Director noted that the indicated leak rate was greater than the maximum allowable leak rate.

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A search for excessive leakage was initiated. The Main Steam Isolation Valves appeared to be the leakage source. To verify this assumption, test rigs were set up to pressurize the volume between the inboard and outboard Main Steam Isolation Valves on two of the steam lines to a pressure just below the pressure being maintained inside primary containment. At 2330 hours, after the "pressure blocks" were established, the measured leak rate dropped into the acceptable range.

At 0300 hours on October 22, 1989, the integrated leak rate test was officially started. Per the instructions of the Test Director the "pressure blocks" were monitored routinely by test personnel to ensure the pressure being maintained between the Main Steam Isolation Valves was below the pressure inside containment. Contrary to plant administrative controls, no temporary change to the procedure was made. The "pressure block" arrangements were documented in the Integrated Leak Rate Test Event Log which is filed with the Integrated Leak Rate Test procedure, Test 0136.

The Test Director failed to recognize the need to process a temporary change using approved administrative control methods. The root cause was cognitive personnel error.

A contributing cause was that the integrated leak rate test procedure did not have provisions for isolating excessive leaks when found. The integrated leak rate test procedure requires a search to be initiated when excessive leakage is indicated. However, the procedure provides little guidance on what should be done when a leak is found. There are cautions that require no leaks be corrected without the approval of the Test Director, but no specific instructions on documenting valve lineup changes or the use of "pressure blocks".

Corrective Actions Taken and Results Achieved

The Test Director was counseled on the need to recognize and process procedure temporary changes when required.

Corrective Action Which Will be Taken to Avoid Further Violations

Integrated Leak Rate Test, Test 0136, will be revised to include specific instructions on what should be done in the event that an excessive leak is found. These instructions will include documenting valve lineup changes, procedure for using a "pressure block" and corrections that are required to be made to the measured leak rate. Test 0136 will be revised prior to its next use.

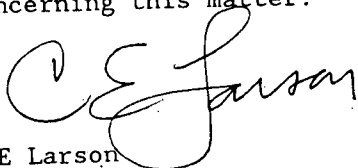
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Engineering and Technical Staff training on this event will be conducted to emphasize the importance of processing temporary changes. This training will be completed by December 31, 1990.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Please contact us, if you have questions or wish further information concerning this matter.



C E Larson
Vice President
Nuclear Generation

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