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SUBJECT: Responds to NRC 901218 ltr re violations noted in Insp Rept
 50-263/90-22. Corrective actions: test 1066-1/2 revised to
 eliminate containment H2/O2 analyzer & post-accident
 sampling sys heat trace electrical current checks.

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January 17, 1991

10 CFR Part 2.201

U S Nuclear Regulatory Commission
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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to NRC Inspection Report No. 50-263/90022 (DRP)
Concerning a Notice of Violation on the
Hydrogen/Oxygen Heat Trace Testing

In response to your letter dated December 18, 1990, which transmitted Inspection Report 50-263/90022 and a Notice of Violation, the following information is offered.

VIOLATION

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and be accomplished in accordance with those instructions, procedures or drawings.

Contrary to the above, on December 4, 1990, activities affecting the quality of the hydrogen/oxygen system were performed without documented instructions and procedures appropriate to the circumstances. This is a Severity Level IV violation (Supplement 1).

EXPLANATION

On December 5, 1990 at 1100 hours, two plant electricians were performing routine testing of the heat trace for the H₂/O₂ Analyzer Sample line of the Post Accident Sampling System per Test 1066-1/2, Heat Trace Check List. This test requires the heat trace be energized in order to take current readings. The Post Accident Sampling System heat trace is not normally energized because the control system energizes the heat trace at a temperature considerably below ambient temperature. Since the test procedure did not provide detailed instructions on how to energize the heat trace, the electricians requested assistance from the Shift Chemist. The Shift Chemist obtained a copy of Emergency Procedure A.2-425 (Post Accident Gas Sample Line Heat Trace) and used this document to temporarily change

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the setpoints in control cabinets C283A and C283B, energizing the Post Accident Sampling System heat trace.

The root cause of the event was personnel error. When it was recognized that the Test 1066-1/2, Heat Trace Check List, did not provide adequate instructions for turning on the Post Accident Sampling System heat trace, personnel failed to utilize required administrative processes to modify the test procedure prior to continuing work. As a result, personnel performed activities beyond the scope of Test 1066-1/2.

A contributing factor is the failure to follow the administrative process that controls procedure changes. This deficiency in Test 1066-1/2 was previously identified in November 1990. A temporary change to this test procedure had been made and a permanent revision was in progress. Plant administrative processes require that user groups be notified of pending procedure changes. However, due a personnel error, this notification was not provided. As a result, the electricians performing this test in December were not aware of the pending change to Test 1066-1/2.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Test 1066-1/2, Heat Trace Check List, has been revised to eliminate the sections requiring containment H₂/O₂ analyzer and Post Accident Sampling System heat trace electrical current checks. Engineering personnel have determined, through investigation, that it is not necessary to periodically obtain electrical current readings because the heat trace is self-monitoring.

CORRECTIVE ACTION TO AVOID FURTHER VIOLATION

Individuals involved with this incident have been counseled so that they have a clear understanding of the proper way of handling confusing or inadequate procedure instructions. In addition, the importance of proper administrative processing of procedure changes was re-emphasized to the individuals responsible for that action. This event will be submitted to the plant Human Performance Task Force for further evaluation. The expected completion date of this evaluation is March 1, 1991.

Training will be provided to appropriate plant personnel to re-emphasize the importance of following required administrative processes to ensure personnel understand how to respond appropriately to confusing or unclear procedures. The expected completion date of this training is April 1, 1991.

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DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

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

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