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SUBJECT: Responds to NRC 910503 ltr re violations noted in insp rept
 50-263/91-02. Corrective actions: item included in future
 Engineering/Tech Staff training session & Addl clarification
 & guidance for proper correction of data entry errors.

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June 3, 1991

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

Response to Notice of Violation
Inspection Report No. 91002, Maintenance Team Inspection

In response to your letter dated May 3, 1991, which transmitted Inspection Report No. 282/91002, the following information is offered:

Violation 1

10 CFR 50, Appendix B, Criterion V, as implemented by the Northern States Power Quality Assurance Manual, Section 5, requires that activities affecting quality be prescribed by documented instructions, procedures, or drawings, and that these activities be accomplished in accordance with these instructions, procedures, drawings or appropriate acceptance criteria.

Contrary to the above, in several cases the licensee did not develop adequate procedures, with adequate acceptance criteria, for activities affecting quality; in other cases, licensee personnel were not knowledgeable of the applicable procedures and the procedures were not followed. Examples are as follows:

(The examples are listed below with the associated response.)

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

Example a:

On March 11, 1991, licensee personnel adjusted the operator limit switch open position contact settings for valves MO 4043A and MO 4044A though no gap settings, tolerances or acceptance criteria were specified in the procedure (263/91002-01A(DRS)).

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Response a:

Corrective Actions That Have Been Taken and the Results Achieved

Verbal clarifications provided to the electricians during the initial performance of this procedure have been sufficient to preclude problems with the use of this procedure during the recent refueling outage.

Corrective Action Which Will be Taken to Avoid Further Violations

Motor Operator Valve procedures containing limit switch contact checks will be revised to include the enhancements identified in the inspection report. These revisions will be completed before the next refueling outage, which is the next scheduled use of these procedures.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example b:

On March 11 - 15, 1991, there were several instances in the # 11 and # 12 emergency diesel generator service water monthly tests where temporary changes were made without documenting the reason for the change as required by procedure 4 AWI-15.02.02 (263/91002-01B(DRS)).

Response b:

Corrective Actions That Have Been Taken and the Results Achieved

Engineering and operations personnel have been reminded of the requirement to state the reason for temporary changes.

Corrective Action Which Will be Taken to Avoid Further Violations

This item will be included in a future Engineering/Technical Staff continuing training session. The training will be completed by June 30, 1991.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example c:

On March 11, 1991, a by-pass was used in the performance of test 0253 "Standby Gas Treatment System Operability Test," without the shift supervisor's authorization initials in the appropriate block of the jumper by-pass form, as was required by procedure (263/91002-01C(DRS)).

Response c:

Corrective Actions That Have Been Taken and the Results Achieved

The missing initials were recorded on the Jumper Bypass Form promptly after the deficiency was identified by the inspector. In addition, the Shift Supervisors have been reminded of the importance of proper completion of these forms.

Corrective Action Which Will be Taken to Avoid Further Violations

No further corrective actions are required.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example d:

On March 14, 1991, licensee personnel began performing preventive maintenance on # 11 control rod drive pump without appropriate approved acceptance criteria. Procedure 4926PM did not contain the appropriate acceptance criteria and subsequently had to be changed to include the correct information (263/91002-01D(DRS)).

Response d:

Corrective Actions That Have Been Taken and the Results Achieved

Procedures 4200-1PM (11 Control Rod Drive pump) and 4200-2PM (12 Control Rod Drive pump) have been changed to identify the correct alignment information, the correct technical manual number and to delete reference to the speed increaser oil filter.

Corrective Action Which Will be Taken to Avoid Further Violations

No further corrective actions are required.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example e:

During the inspection, the inspectors noted that changes were made to WRA packages 83-03407, 90-5230, and 90-00724 without the responsible individuals approving the change by recording their initials and the date as required by Section 4.3 of procedure 4 AWI-15.02.02 (263/91002-01E(DRS)).

Response e:

Corrective Actions That Have Been Taken and the Results Achieved

Personnel have been reminded of the correct method of documenting data entry errors.

Corrective Action Which Will be Taken to Avoid Further Violations

Additional clarification and guidance for proper correction of data entry errors will be developed and issued by November 30, 1991.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Violation 2

10 CFR 50, Appendix B, Criterion XII requires that measures be established to assure that tools, gages, instruments and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated and adjusted at specified periods to maintain accuracy within necessary limits.

Contrary to the above, two flow indicators, installed in 1987 to measure air flow during surveillance testing of the control room emergency filtration train system, were not included in the established plant instrument calibration system and master instrument index (263/91002-02(DRS)).

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

Response:

Corrective Actions That Have Been Taken and the Results Achieved

These two and eight other similar instruments in the control room ventilation (Emergency Filtration Trains) system have been added to the master instrument list and the instrument calibration program.

These instruments have been calibrated.

Corrective Action Which Will be Taken to Avoid Further Violations

Design documents for the Emergency Filtration Trains will be reviewed to identify any other instruments that may have been excluded from the instrument list or calibration program. If any are identified, they will be included in the list and calibrated as appropriate. This review will be completed by October 1, 1991.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Violation 3

10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, the licensee identified a deficient condition on May 4, 1990, yet had not taken action to correct the condition as of the start of this inspection. The deficient condition related to a modification (887042) made to the type of control switches for the drywell vacuum breakers in the control room. The original safety evaluation for this modification failed to determine that a technical specification (TS) change was required. However, on May 4, 1990, the licensee identified that because the specific switches were described in Section 3.7.A.4.d of TS, a change to TS was required (263/91002-03(DRS)).

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

Response:

During the 1989 refueling outage, several control room panels were modified and upgraded. During this activity the control switches for the drywell to suppression chamber vacuum breakers were changed from push-button switch to a two-position rotary switch. This two-position rotary switch was not a spring return type switch.

Technical Specification 3.7.A.4.d states:

Drywell-suppression chamber vacuum breakers may be cycled, one at a time using the exercise test pushbutton, during containment inerting and deinerting operations to assist in purging air or nitrogen from the suppression chamber vent header.

The fact that the Technical Specification referenced a "pushbutton" switch was overlooked in the modification review. This was identified on March 19, 1990. Guidance for switch operation during inerting and de-inerting the vent header was provided to the operating personnel on March 20, 1990. On March 26, 1990 a Non-Conforming Item Report was initiated.

The purpose of the Non-Conforming Item Report was to:

- 1) investigate and appraise the significance of using a two-position rotary style switch instead of a pushbutton,
- 2) evaluate the significance of the Technical Specification mentioning a pushbutton and the plant having a two-position rotary style switch.

The conclusion of the Non-Conforming Item Report was that the two-position rotary switch could be used in the short term. However, the switch should be replaced with a switch with a spring return feature in the future.

The Non-Conforming Item Report determined that a Technical Specification change was necessary. The intent of the Technical Specification is to allow cycling of the vacuum breakers, not to specify the type of control switch that should be used. The fact that the plant and Technical Specifications were different was recognized as a problem and this was added to a list of Technical Specification changes to be made on a routine basis. This change was given a low priority, since it was determined to be administrative in nature and the intent of the specification was being met.

Corrective Actions That Have Been Taken and the Results Achieved

A result of this event is the sensitization of key plant and licensing staff personnel to the importance of recognizing changes to Technical Specification descriptions and the need for NRC concurrence.

Corrective Action Which Will be Taken to Avoid Further Violations

A License Amendment Request will be submitted that will remove the switch type from the Technical Specifications by June 30, 1991.

This violation response will be routed to all members of management and engineering involved in the modification process by June 30, 1991.

The control switch for the drywell to suppression chamber vacuum breakers will be modified during the next refueling outage to include a spring return feature to conform with the intent of the original design.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved following issuance of the Technical Specification change.

Our maintenance program is a key part of successful safe plant operation. The maintenance team inspection raised several philosophical issues concerning maintenance program goals. We believe that it would be beneficial to meet with you and discuss our maintenance program goals. We would like to do this at our next periodic management meeting in Glen Ellyn.

Please contact us if you have any questions related to our response to the subject inspection report.

Leon R Eliason
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