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 FACIL: 50-263 Monticello Nuclear Generating Plant, Northern States  
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SUBJECT: Responds to NRC 920612 ltr re violation noted in Insp Rept 50-263/92-08. Corrective action: written safety evaluation prepared which demonstrated that existing configuration of reactor bld roof acceptable.

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July 10, 1992

10 CFR Part 2  
Section 2.201

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

Reply to a Notice of Violation  
NRC Inspection Report No. 92008  
Failure to Perform Safety Evaluations

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, the following response to the notice of violation contained in your letter of June 12, 1992 is submitted. As requested, we have also included an evaluation of the open item identified in that letter.

Violation:

10 CFR 50.59, section (b)(1), requires, in part, that the licensee shall maintain records of changes in the facility . . . to the extent that these changes constitute changes in the facility as described in the safety analysis report and that these records must include a written safety evaluation which provides the basis for the determination that the change . . . does not involve an unreviewed safety question.

Contrary to the above, in October/November 1984 the licensee allowed a contractor to install several hundred screws through the reactor building roof, part of the secondary containment boundary as described in section 5.3.3 of the Monticello Updated Safety Analysis Report (USAR), without a written safety evaluation. In January 1992 the licensee installed blocking plates over several supply registers, part of the reactor building heating and ventilation system as described in section 5.3.4 of the USAR, without a written safety evaluation.

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

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Reason for the Violation

This violation occurred because, at the time the initial changes to the reactor building roof and the ventilation supply registers were performed, workers and work group supervisors did not have adequate guidance concerning the types of work activities that represented a modification and might therefore require a safety evaluation.

The work done to the reactor building roof in 1984 was performed under a Work Request Authorization. At that time, the work control process did not contain an engineering review to ensure that modifications were not inadvertently performed under the process. Also, personnel did not recognize that the work on the reactor building roof represented a modification and that a safety evaluation was required.

Similarly, the problems involving the blocking of reactor building ventilation system supply registers stemmed from the installation of temporary covers by personnel who were apparently unaware that this action represented a modification and thus required a safety evaluation. Although it is unknown exactly when the temporary covers were first installed, it is believed that this also occurred during the 1980's. This problem was not corrected when the old wood and plastic register covers were replaced with new metal covers in 1992 because the work was considered to be cosmetic minor maintenance (i.e. replacement of existing deteriorated plastic and plywood covers) and was therefore performed without a work request.

Both of the examples mentioned in the violation should have been classified as modifications and should have had safety evaluations prepared. Administrative procedures for the work request process were modified in 1985 to require engineering reviews of all work requests to screen them for activities that should be classified as modifications. Power Supply Quality Assurance recently completed an audit of work performed under this revised process and found no instances of unauthorized modifications. Plant administrative procedures were revised again in December of 1991 to further enhance this guidance. Both of these actions occurred subsequent to when the initial work leading to the violation occurred and thus could not have prevented this violation. However, we believe that the guidance currently provided in plant administrative procedures is adequate to prevent such problems from occurring in the future.

Corrective Actions Taken

A written safety evaluation was prepared which demonstrated that the existing configuration of the reactor building roof is acceptable.

A written safety evaluation was prepared demonstrating that the refueling floor ventilation blocking plates did not constitute an unreviewed safety question and "temporary modification" tags were installed in accordance with design control procedures.

Corrective Actions to be Taken to Avoid Future Violations

Elements will be added to the health physics and maintenance initial and continuing training programs to describe what constitutes a modification by January 1, 1993.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Open Item No. 1 from Section 4.b. page 12:

What was the specified nut engagement criteria at the time the supports were constructed and which nuts did not meet that specification?

Response

The original Bechtel specification for platforms (Bechtel Civil-Structural Design Criteria, Rev. 1, 4-19-67, DSS Seq.No.HEJ00077) required construction to meet the AISC "Manual of Steel Construction, sixth edition". Section 1.23.5 of this manual; "Riveted and High Strength Bolted Construction - Assembling", addresses bolting practices. There is no explicit nut engagement criteria given here. No other original bolting specifications can be located. In addition, Appendix A of the Design Criteria Documents for the CRD Scram Discharge Volume Modification (81Z021) gives a table of comparison between original design codes and those used for the modification. There is no original code listed under the heading of "Installation of Concrete Expansion Bolts". There is also no known inspection report showing which nuts did not have full thread engagement during original construction, since no Quality Assurance program was required at the time.

Although there was no original criteria for nut engagement, calculation CA-92-017 has shown that acceptable thread engagement for these connectors is no more than two threads short of full engagement. A visual walkdown has shown that all of the baseplates have nuts with adequate engagement (not more than two threads short of full engagement).

It is currently good practice to have full thread engagement of nuts, but this is not always required in order to develop the full capacity of the bolt. As calculation CA-92-017 states:

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... typically the capacity of wedge type anchor bolts are governed by the ability of the surrounding concrete. Typically, the anchor bolt's wedges will cause localized crushing in the vicinity of the wedges prior to tensile or shear failure of the bolt material."

Open Item No.2 from Section 4.b, page 12:

Did the system meet appropriate seismic criteria?

Response:

An operability determination, based on Calculation CA-92-018, was made promptly upon discovery of the nonconformance. It was determined that the system met operability requirements with the existing anchor bolt configuration. The baseplates were considered operable since they were confirmed to have a factor of safety of at least two. Based on the platform stresses, engineering judgement indicates that the baseplates will also meet the design criteria. Due to the complexity of the structure, a detailed analysis is required to confirm that design criteria are met. This analysis is in process, and is expected to be completed by August 31, 1992. If the analysis indicates repairs need to be done to ensure all design criteria are met, they will be completed during the 1993 refueling outage.

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

*Garrett Neils, for*

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