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SUBJECT: Responds to NRC 940613 ltr re violations noted in insp rept 50-263/94-06. Corrective actions: routine TLD data entry has been issued to reflect new TLD vendor & info management system.

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July 12, 1994

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 Contained in NRC Inspection
Report No. 50-263/94006(DRSS) Concerning Procedure Adherence for Dosimetry

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, our reply to the notice of violation contained in your letter of June 13, 1994 is provided as Attachment A.

Our reply contains the following new NRC commitment:

Radiation Protection Group Procedure 1.6, "Administrative Control of Radiation Protection Procedures and Records," will be revised to ensure proper administrative control of Radiation Protection Procedures. This action is to be completed by September 30, 1994.

Please contact Mel Opstad at (612) 295-1653 if you have any questions or wish further information concerning this matter.

Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator, Region III, NRC
Senior Resident Inspector, Monticello Site, NRC
NRR Project Manager, NRC
J Silberg

Attachment A: Reply to Notice of Violation

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REPLY TO NOTICE OF VIOLATION

Violation

Technical Specification 6.5.B. states, in part, that procedures which implement the Radiation Protection Plan (RPP), consistent with the requirements of 10 CFR 20, be prepared and followed.

Section 4.4.1, "Dose Exposure Monitoring," of the RPP, consistent with the 10 CFR 20 requirement to monitor individual occupational doses, requires a primary dosimetry program which includes resolution of discrepancies and quality assurance.

Procedures R.04.09, "TLD/DRD Discrepancy Resolution," Revision 4, and R.10.08, "Routine Monthly TLD Data Entry," Revision 4, ensure that discrepancies in dosimetry results are properly resolved and quality assurance is performed, as required by Section 4.4.1 of the RPP.

Contrary to the above, procedures R.04.09, "TLD/DRD Discrepancy Resolution," Revision 4 and R.10.08, "Routine Monthly TLD Data Entry," Revision 4, were not followed in the assignment and analysis of the dosimetry data for the first quarter of 1994.

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

Reason for the Violation

The Radiation Protection Plan (RPP) requires an external exposure monitoring program, including a quality assurance program which includes identification and resolution of discrepancies between primary and secondary dosimeter data and periodic blind standard processing.

On January 1, 1994, Monticello changed thermoluminescent dosimeter (TLD) service vendors and implemented a new information management system. When the results of the first quarter monitoring were received, the procedure for reviewing and assigning the exposures had not yet been updated, due in part to a lack of experience in performing the operation. It was decided to have the subject matter experts perform the operation, without benefit of a current procedure, and to use that experience to update the existing procedure. In the process, discrepancies between primary and secondary dosimeter data were identified and resolved, as required by the RPP. Blind standard processing was not performed during the 1st quarter of 1994; however, quarterly performance is not required by the RPP.

The cause of this violation was a misinterpretation of Technical Specification 6.5.B. The appropriate method would have been to use the temporary change process.

This violation involves an administrative error. No performance deficiencies associated with TLD data were identified.

Finally, we noted that the Inspection Summary section of the Inspection Report included the following statements:

One violation was identified concerning the lack of adherence to radiation protection procedures while implementing the licensee's personnel external radiation monitoring program. A lack of management oversight was identified in ensuring that these procedures were applicable to the licensee's new vendor and thermoluminescent dosimeters and properly implemented.

We disagree with the characterization of this violation as a management oversight problem. Management was fully aware that the subject procedures had not been updated for the new dosimeter vendor and had approved of using subject matter experts to complete the task, while gaining the experience necessary to prepare a new written procedure. In addition, the phrase, "and properly implemented," implies that a performance issue exists with the assignment of TLD data. As stated above, no performance issues were identified with the TLD data assignment.

Corrective Action Taken and Results Achieved

Procedure R.14.06, "Routine TLD Data Entry," has been issued to reflect the new TLD vendor and information management system. This procedure also incorporates guidance on resolving primary to secondary dosimeter data discrepancies.

Corrective Action to be Taken to Avoid Further Violations

Radiation Protection Group Procedure 1.6, "Administrative Control of Radiation Protection Procedures and Records," will be revised to ensure proper administrative control of Radiation Protection Procedures. This action is to be completed by September 30, 1994.

Date when Full Compliance will be Achieved

Full compliance has been achieved.