June 11, 1974



Mr J G Keppler, Regional Director Directorate of Regulatory Operations Region III United States Atomic Energy Commission 799 Roosevelt Road Glen Ellyn, Illinois 61037

Dear Mr Keppler:

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

Response to Item Listed on Enclosure of Letter Dated May 21, 1974



The letter is written in response to an item noted on your letter of May 21, 1974. Your letter, addressed to Mr Leo J Wachter, Vice President Power Production and System Operation, referred to an activity which appeared to be in violation of AFC requirements and for which a reply was required. The activity was: "Technical Specification 4.8.C.1 states with regard to liquid effluents: The Radiation Monitor shall be calibrated quarterly and functionally tested monthly. Contrary to the above, the liquid effluent monitor is not being calibrated".

R.O. Inspection Report 050-263/74-04, Paragraph 4.b, infers that tests performed quarterly are limited to a pulse-generator check of the monitor, excluding detector, and a "Functional Test" using a check source. "f this inference were valid we would concur with the inspection report conclusion that such tests do not constitute a calibration as defined in Technical Specification 1.F. However, the surveillance actually performed at quarterly intervals is not limited to that generally considered to constitute "Functional Tests."

As explained to the R.O. inspector on May 9, 1974, our quarterly calibration surveillance in this instance is comprised of three phases. Phase 1 includes the use of a pulse generator to calibrate the monitor electronics. Phase 2 determines that the monitor responds correctly to the front panel test (which utilizes test circuitry built into the monitor) and verifies that all the associated alarms and trips are operating properly. Phase 3 utilizes a solid source of known activity. The detector is exposed to the source under controlled

NORTHERN STATES POWER COMPAN June 11, 1974 geometry and the resulting countrate is recorded. It is verified that the detector and monitor respond within established acceptance criteria. These acceptance criteria are based upon a correlation with a liquid source calibration and discriminator curve determination which were performed prior to plant startup. The activity to which the detector is exposed is chosen to be above the monitor upscale alarm level. The upscale alarms and indicating lights are again verified to operate properly during this phase. In addition, discriminator curves are periodically verified to assure the discriminator settings have not changed. The solid source method of calibration was discussed with AEC inspectors at the time of the original monitor calibration and was found to be acceptable. After receiving your letter of May 21st, a telephone survey was conducted to determine methods used by other power plants to calibrate radwaste effluent monitors. Six other BWR's were contacted, including plants located in Regulatory Regions I, II and III. Although variations in technical details were found, five other BWRs were found to imploy methods similar to ours, and none were found to perform more extensive calibrations. In summary, the quarterly surveillance actually performed is believed to constitute responsible natisfaction of the technical specifications, suitable to the application, and in accordance with generally accepted good practice. Yours very truly, X. 2 Wachta Vice President . Power Producti. 7 cc; J P O'Leary

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| Copies W/ Copies W/ Copies W/ ARR(L) VASSALLO(L) KNIGHTON(E) Copies W/ Copies W/ Copies W/ NIEL(L) PURPLE (L) YOUNGBLOOD(E) Copies W/  INTERNAL DISTRIBUTION  EG FILE TECH REVIEW DENTON HENDRIE GRIMES LIC ASST GC, ROOM P-506A SCHROEDER GAMMILL DIGGS (L UNTZING/STAFF MACCARY KASTNER GEARIN ( ASSE LAMBUSSO PAWLICKI SPANGLER LEE (L) DORE (L)(EWR) STELLO ENVIRO REED (E) COORE (L)(EWR) HOUSTON MULLER SERVICE EYOUNG(L)(PWR) HOUSTON MULLER SERVICE DOLLER(L) ROSS KNIGHTON SLATER ( ENVIRO REED (E) COLLINS IPPOLITO YOUNGBLOOD SMITH (L EG OPR LONG PROJECT LDR WADE (E) CORRIS BENAROYA HARLESS WILSON (  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION   | Prop                    |          |  |  |  |  |
| VASSALLO(L)  VASSALLO(L)  VCOPICS  W/ COPICS  W/  INTERNAL DISTRIBUTION  EC PDR  HENDRIE  GRIMES  LIC ASST  GC, ROOM P-506A  SCHROEDER  GAMMILL  DIGGS (L  ASSE  KNIGHT  BALLARD  GOULBOUR  LAMBUSSO  PAWLICKI  SPANGLER  LEE (L)  SHAO  DORE (L) (BWR)  STELLO  ENVIRO  MAIGRET  REED (E)  COULING HOUSTON  MULLER  SERVICE  KNIGHTON  MULLER  SERVICE  SHOUNG(L) (PWR)  HOUSTON  MULLER  SERVICE  SHEPPARD  COLLINS  DICKER  SHEPPARD  SILE (L)  ROSS  KNIGHTON  MAIGRET  REED (E)  WADE (E)  WALLIAMS  DERIS  FEELE  VOLLMER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  | Copies                  |          |  |  |  |  |
| Copies   |                         |          |  |  |  |  |
| INTERNAL DISTRIBUTION  EG FILE  TECH REVIEW  DENTON  GC, ROOM P-506A  SCHROEDER  UNTZING/STAFF  AACCARY  AASE  LAMBUSSO  OORE (L)(EWR)  EYOUNG(L)(PWR)  KOVHOLT (L)  COLLINS  ENUSE  FOR HENDRIE  ACCARY  KASTNER  GAMMILL  DIGGS (L  GEARIN (  GOULBOUR  LEE (L)  MAIGRET  RED (E)  MAIGRET  SERVICE  SHEPPARD  SLATER (  YOUNGBLOOD  SMITH (L  TEDESCO  REGAN  TEDESCO  SMITH (L  WADE (E)  WADE (E)  WADE (E)  TOTALIAMS  WILLIAMS  WILLIAMS  WILLIAMS  TEDESCO  TEDESCO  REGAN  TEDESCO  REGAN  TEDESCO  REGAN  TEDESCO  REGAN  TEDESCO  TEDESCO  REGAN  TEDESCO  SMITH (L  TEDESCO  TEDESCO  REGAN  TEDESCO  TEDESCO  REGAN  TEDESCO  SMITH  TEDESCO  REGAN  TEDESCO  SMITH  TEDESCO  TEDESCO  TEDESCO  REGAN  TEDESCO  TE | Coptos                  |          |  |  |  |  |
| INTERNAL DISTRIBUTION  EG FILE  TECH REVIEW  DENTON  HENDRIE  GRIMES  GC, ROOM P-506A  SCHROEDER  GAMMILL  UNTZING/STAFF  MACCARY  ASE  IAMBUSSO  OVD  OORE (L)(BWR)  STELLO  EYOUNG(L)(PWR)  HOUSTON  MULLER  SERVICE  WOLLER(L)  COLLINS  IPPOLITO  POLITO  FROJECT LDR  WADE (E)  EG OPR  ILE & REGION(3)  ORRIS  TEELE  POLIMER  INTERNAL DISTRIBUTION  DIGGS (L  ASST  KASTNER  GEARIN (  GOULBOUR  LEE (L)  MAIGRET  REED (E)  MAIGRET  SERVICE  SERVICE  SHEPPARD  SHAPP  VOUNGBLOOD  SMITH (L  BNISE  TEDESCO  REGAN  TEETS (L  WADE (E)  WADE (E)  FROJECT LDR  WADE (E)  WALLIAMS  ORRIS  BENAROYA  VOLLMER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  |                         |          |  |  |  |  |
| TECH REVIEW DENTON EC PDR HENDRIE GRIMES LIC ASST GC, ROOM P-506A SCHROEDER GAMMILL UNTZING/STAFF MACCARY KASTNER GEARIN ( ASE KNIGHT BALLARD GOULBOUR LEE (L) OORE (L)(EWR) STELLO ENVIRO REED (E) EYOUNG(L)(PWR) HOUSTON MULLER SERVICE KOVHOLT (L) NCVAK DICKER SHEPPARD COLLER(L) ROSS KNIGHTON SLATER ( ENSS KNIGHTON SLATER ( ENVIRO REED (E) SERVICE SHEPPARD SLATER ( SMITH (L TEDESCO REGAN TEETS (L WADE (E)  LONG PROJECT LDR WADE (E)  OORRIS BENAROYA HARLESS WILSON ( EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  | Copies                  |          |  |  |  |  |
| TECH REVIEW DENTON  EC PDR HENDRIE GRIMES GC, ROOM P-506A SCHROEDER GAMMILL UNTZING/STAFF MACCARY ASE LIC ASST  MACCARY KASTNER GEARIN ( GOULBOUR LEE (L)  SHAO OORE (L)(EWR) STELLO EYOUNG(L)(PWR) HOUSTON MULLER SERVICE KOVHOLT (L) NCVAK DICKER SHEPPARD SLATER ( SHEPPARD SLATER ( SMIGHTON SLATER ( SMIGHTON SLATER ( SMIGHTON SLATER ( SMITH (L MADE (E)  LONG ENISE LONG LONG FROJECT LDR WADE (E)  WADE (E)  WADE (E)  WADE (E)  WADE (E)  WALLIAMS WILLIAMS OORRIS BENAROYA VOLLMER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION   |                         |          |  |  |  |  |
| GC, ROOM P-506A SCHROEDER GAMMILL UNTZING/STAFF MACCARY KASTNER GEARIN ( ASE KNIGHT BALLARD GOULBOUR IAMBUSSO PAWLICKI SPANGLER LEE (L) OORE (L)(EWR) STELLO ENVIRO MAIGRET EYOUNG(L)(PWR) HOUSTON MULLER SERVICE KOVHOLT (L) NCVAK DICKER SHEPPARD COLLER(L) ROSS KNIGHTON SLATER ( ENVISE TEDESCO REGAN TEETS (L EG OPR LONG PROJECT LDR WADE (E) UNTZING/STAFF MINNER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  |                         |          | A/T IND  |  |  |  |
| UNTZING/STAFF  |                         |          | BRAITMA  | N  |  |  |
| ASE IAMBUSSO OYD OORE (L)(EWR) EYOUNG(L)(PWR) KOVHOLT (L) COLLER(L) COLLER(L) COLLINS EIG OPR LED (L) EIG OPR LED (L) EIG OPR LED (L) LED (L) LEE (L) MAIGRET REED (E) MULLER SERVICE SHEPPARD STELLO REGAN TEDESCO REGAN TEETS (L WADE (E) WADE (E) WADE (E) WADE (E) WADE (E) WALLIAMS ORRIS BENAROYA TEELE  VOLIMER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  | - DICCS (I)             |          | SALTZMAN   |  |  |  |
| ASE LAMBUSSO OYD OORE (L)(EWR) SHAO STELLO EYOUNG(L)(PWR) KOVHOLT (L) COLLER(L) COLLINS ENISE EG OPR LONG EG OPR LONG LAINAS ORRIS O |                         |          | B. HURT  |  |  |  |
| SHAO STELLO EYOUNG(L)(FWR) KOVHOLT (L) COLLER(L) COLLINS ENISE EG OPR LONG LONG LONG LONG LONG LONG FROJECT LDR FROJECT LDR FROJECT LDR FROJECT LDR WALLERS WILLIAMS ORRIS FEEL  COLLIMER  LEE (L) MAIGRET REED (E) MAIGRET REED (E) MAIGRET SERVICE SHEPPARD SHATER (COLLINS SHAO SHAD SHAD SHAD SHAD SHAD SHAD SHAD SHAD   | GOULBOURNE (L)          |          | PLANS  |  |  |  |
| OORE (L)(EWR) STELLO ENVIRO REED (E) EYOUNG(L)(PWR) HOUSTON MULLER SERVICE KOVHOLT (L) NCVAK DICKER SHEPPARD OLLER(L) ROSS KNIGHTON SLATER ( EGOPR JOHN JOHN JOHN JOHN JOHN JOHN JOHN JOHN   |                         |          | MCDONALD   |  |  |  |
| EYOUNG(L)(PWR) HOUSTON MULLER SERVICE  KOVHOLT (L) NCVAK DICKER SHEPPARD  OLLER(L) ROSS KNIGHTON SLATER (  COLLINS IPPOLITO YOUNGBLOOD SMITH (L  ENISE TEDESCO REGAN TEETS (L  EG OPR LONG PROJECT LDR WADE (E)  ILE & REGION(3) LAINAS  ORRIS BENAROYA HARLESS WILLIAMS  ORRIS BENAROYA HARLESS WILSON (  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn.  - TIC (ABERNATHY) (1)(2X10)-NATIONAL LAB'S   | MAIGRET (L)             |          | DUBE w/input   |  |  |  |
| KOVHOLT (L)  OLLER(L)  COLLINS  IPPOLITO  TEDESCO  EG OPR  ILE & REGION(3)  ORRIS  ORRIS  TEELE  COLLMER  LONG  BENAROYA  VOLLMER  EXTERNAL DISTRIBUTION  EXTERNAL DISTRIBUTION  (1) (2X10)-NATIONAL LAB'S   |                         |          | CHAPMAN  |  |  |  |
| OLLER(L) ROSS KNIGHTON SLATER ( COLLINS IPPOLITO YOUNGBLOOD SMITH (L ENISE TEDESCO REGAN TEETS (L LONG PROJECT LDR WADE (E) LLE & REGION(3) LAINAS ORRIS BENAROYA HARLESS WILLIAMS TEETE VOLLMER  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn TIC (ABERNATHY) (1) (2X10)-NATIONAL LAB'S   | SERVICE (L)             |          | INFO   |  |  |  |
| COLLINS IPPOLITO YOUNGBLOOD SMITH (LENISE TEDESCO REGAN TEETS (LEG OPR LONG PROJECT LDR WADE (E)  LONG PROJECT LDR WADE (E)  LAINAS WILLIAMS ORRIS BENAROYA HARLESS WILSON (  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn.  - TIC (ABERNATHY) (1) (2X10)-NATIONAL LAB'S   | SHEPPARD (L)            |          | C. MILES   |  |  |  |
| ENISE TEDESCO REGAN TEETS (L EG OPR LONG PROJECT LDR WADE (E) ILE & REGION(3) LAINAS ORRIS TEELE PROJECT LDR WILLIAMS WILLIAMS VOLLMER  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn TIC (ABERNATHY)  (1) (2X10)-NATIONAL LAB'S  | SLATER (E)              |          | KLECKER  |  |  |  |
| EG OPR LONG PROJECT LDR WADE (E) ILE & REGION(3) LAINAS ORRIS TEELE PROJECT LDR WADE (E) WILLIAMS WILLIAMS WILSON (  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn TIC (ABERNATHY) (1) (2X10)-NATIONAL LAB'S  | D SMITH (L)             |          | EISENHUT   |  |  |  |
| ILE & REGION(3) LAINAS ORRIS TEELE BENAROYA HARLESS WILSON (  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn.  - TIC (ABERNATHY) (1) (2X10)-NATIONAL LAB'S   | TEETS (L)               |          |  |  |  |  |
| ORRIS TEELE  BENAROYA VOLLMER  EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn.  - TIC (ABERNATHY)  (1) (2X10)-NATIONAL LAB'S   | DR WADE (E)             |          | AOR FILE   |  |  |  |
| TEELE VOLLMER EXTERNAL DISTRIBUTION  - LOCAL PDR Minneapolis, Minn.  - TIC (ABERNATHY) (1)(2X10)-NATIONAL LAB'S  |                         |          | D. THOM  | PSON (2)   |  |  |
| - LOCAL PDR Minneapolis, Minn TIC (ABERNATHY) (1)(2X10)-NATIONAL LAB'S   | L)                      |          |  |  |  |  |
| - LOCAL PDR Minneapolis, Minn TIC (ABERNATHY) (1)(2X10)-NATIONAL LAB'S   |                         |          |  | Do   |  |  |
| - TIC (ABERNATHY) (1)(2X10)-NATIONAL LAB'S   | -                       |          |  | A de la constante de la consta |  |  |
| AND THE STATE OF T |                         | 1        | -PDR-SA  | N/LA/NY  |  |  |
| - NSIC (BUCHANAN) 1-ASLBP (F/W Bldg Ro   | 529)                    |          | - LIBRAR   |  |  |  |
| - ASLB 1-W. PENNINGTON. Rr   | PENNINGTON, Rm E-201 GT |          |  | BROOKHAVEN NAT. LA   |  |  |
| - P. R. DAVIS (AEROJET NUCLEAR) 1-CONSULTANT'S   |                         |          |  | Ruth Guss  |  |  |
| - CYS ACRS HOLDENS SENT TO LIC ASST. NEWMARK/BLUME/AGE R. DIGGS ON 6-19-74 1-GERALD ULRIKSON   |                         |          | RM-B-1   | 27, GT.  |  |  |

1-B & M SWINEBROAD, Em F-201 GT