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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

June 3, 1974

Mr. James G. Keppler, Regional Director
United States Atomic Energy Commission
Directorate of Regulatory Operations, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

MONTICELLO NUCLEAR GENERATING PLANT E-7567
Docket No. 50-263
Site Inspection of March 26, 1974

This is in reply to your letter received on May 16, 1974, that transmitted Report No. 50-263/74-03 of the site inspection conducted on March 26-29, 1974, by Messrs. P. Johnson, L. Hueter, and J. Sutton of your office.

Your letter identified three areas, for which a written response was requested.

Item A

10 CFR Part 50, Appendix B, Criterion V, states, in part, that: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions ...". The special General Electric Company Installation and Service Engineering Quality Assurance Manual for the Monticello Safety/Relief Valve Addition describes the procedures to be followed during the course of the addition work. Sections 9.0 and 17.0 of this manual establish requirements for procurement activities and the handling of nonconforming material, respectively.

Contrary to these requirements, site quality control personnel failed to implement the quality assurance procedures as follows:

1. Nonconforming weld rod was being stored in a holding oven with conforming weld material.
2. Nonconformance reports had not been prepared, in three instances, for nonconforming weld material.

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3. Material purchase orders were being processed without first being approved by the General Electric Company Quality Assurance Specialist or Quality Assurance Engineer.
4. Material was received onsite, inspected and approved for use by site quality control personnel without the required quality assurance documents being available.

NSP RESPONSE

1.0 Corrective steps taken were these:

- 1.1 The nonconforming weld material was removed from the oven.
- 1.2 To prevent recurrence, the contractor reviewed the program requirements with his responsible personnel and instructed the Q.C. inspector to perform more frequent surveillance of the weld rod storage ovens.
- 1.3 Full compliance was achieved on March 29, 1974.

2.0 Corrective steps taken were these:

- 2.1 The contractor issued Nonconformance Reports Numbers 11 and 12 to cover all nonconforming weld material.
- 2.2 To prevent recurrence, the contractor's responsible personnel have been reinstructed in the Quality program requirements for the control of nonconforming material.
- 2.3 Full compliance was achieved on March 29, 1974.

3.0 Corrective steps taken were these:

- 3.1 The contractor has approved all purchase orders in accordance with the QA Program.
- 3.2 No actions are required to prevent recurrence because all purchase orders for this project have been processed.
- 3.3 Full compliance was achieved on April 6, 1974.

4.0 Corrective steps taken were these:

- 4.1 The Quality Assurance records were located on site shortly after the conclusion of the audit. The records had been misfiled.

4.2 To prevent recurrence, the contractor has prepared and issued a written procedure for the filing and retrieval of documentation. A Quality Control Inspector was assigned the full time responsibility of keeping the files organized to assure record retrieval.

4.3 Full compliance was realized on April 11, 1974.

Item B

10 CFR Part 50, Appendix B, Criterion XVIII, states, in part, that: "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the Quality Assurance Program and to determine the effectiveness of the program." In addition, the Northern States Power Company Quality Assurance Program Summary for the Monticello Safety/Relief Valve Addition, Sections 0.1, 0.2.2(4), and 0.2.3(18) requires auditing of the implementation of the Quality Assurance Program. Contrary to the above, planned audits had not been conducted by Northern States Power Company or Bechtel Corporation to determine the effectiveness of their portions of the Quality Assurance Program.

NSP RESPONSE

1.0 Corrective steps taken were these:

- 1.1 NSP performed an audit of the Bechtel Quality Assurance Program April 8 and 9, 1974; all open items have been resolved.
- 1.2 No corrective actions to prevent recurrence are required due to the short duration of the project and no more audits are deemed necessary.
- 1.3 Full compliance is anticipated on June 25, 1974.

Item C

10 CFR Part 50, Appendix B, Criterion XVIII, states, in part, that: "Audits shall be performed in accordance with written procedures or checklists" In addition, the special General Electric Company Installation and Service Engineering Quality Assurance Manual, Section 18.0, states that site audits will be performed using checklists, and the results of the audit will be distributed to designated personnel.

Contrary to these requirements, site audits were performed without the use of audit checklists. In addition, the results of the audits were not distributed according to the procedure requirements.

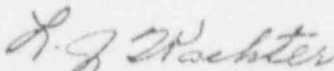
NSP RESPONSE

1.0 Corrective steps taken were these:

- 1.1 The Contractor has prepared and used written checklists for audits performed. A copy of all audit checklists are on site. Distribution of audit results has been in accordance with the program requirements.
- 1.2 To prevent recurrence, all auditors have been instructed to use checklists when performing audits, and distribute reports in accordance with the program.
- 1.3 Full compliance was achieved by April 6, 1974.

Documentation of the actions described in this communication is on file at site for review by your inspectors.

Very truly yours,


L.J. Wachter

L.W/jrm

cc: G. Charnoff
A.R. Renquist
E. Pryzina