



NORTHERN STATES POWER COMPANY

414 Nicollet Mall
Minneapolis, Minnesota 55401

August 13, 1982

Mr. R. L. Spessard, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Spessard:

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

The following is submitted in response to Appendix A, NOTICE OF VIOLATION, dated July 15, 1982; and Appendix B, NOTICE OF DEVIATION, also dated July 15, 1982 which was enclosed with your letter of July 15, 1982 which transmitted I.E. Inspection Report No. 50-263/82-01 (DPRP).

VIOLATION NO. 1:

10CFR50, Appendix B, Criterion V, requires that activities affecting quality be accomplished in accordance with instructions, procedures or drawings.

The Northern States Power "Operational Quality Assurance Plan" Section 1.0 states that the program shall incorporate "...the following standards to the extent specified by ANSI N18.7-1976..." One of the standards is ANSI N45.2.2-1972 (Reg. Guide 1.38 Rev. 2) which states: "Periodic inspections shall be performed to assure that storage areas are being maintained in accordance with these requirements." Section 6.6.1 of the licensee's procedure 4 ACD-9.5, "Handling, storage, shipping and preservation of materials", requires that: "Periodic inspections shall be performed and documented by the storage area supervisor..."

Contrary to the above, no periodic inspections were being performed.

RESPONSE:

The storage area supervisor has initiated and specified that quarterly checks of the warehouse/storage areas facilities would be done since the

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periodicity wasn't given in 4 ACD-9.5. A revision of 4 ACD-9.5, Section 6.6.1 will be issued to change the term "periodic" to "quarterly", which should be issued by January 1, 1983. A checklist for Storage Facilities/Materials has been developed to ensure that specific areas are looked at while conducting these quarterly inspections.

VIOLATION NO. 2:

10CFR50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with instructions, procedures or drawings. The Northern States Power "Operational Quality Assurance Plan" Section 1.0 states that the program shall incorporate "... the following standards to the extent specified by ANSI N18.7-1976...". One of the standards is ANSI N45.2.2-1972 (Reg. Guide 1.38 Rev. 2) which requires the following:

- a. "Items in storage shall have all covers, caps, plugs or other closures intact." (3.5.1)
- b. "Nonmetallic plugs and caps shall be brightly colored." (A3.5.1(1))
- c. "Packages and items containing desiccant shall be marked. The total number of separate bags and/or containers in the packages shall be indicated." (A3.6.3(7))
- d. "All items and their containers shall be plainly marked so that they are easily identified..." (6.3.4)
- e. "Barrier and wrap materials shall be non-halogenated when used in direct contact with austenitic stainless steel, and shall be non-corrosive, shall not readily support combustion and shall not be otherwise harmful..." (Section 3.6)

The licensee's Administrative Work Instructions (AWI) 4 AWI-9.1.4, "In Storage Maintenance Program", requires the following:

- a. "Items in storage shall have all covers, caps, plugs or other closures intact." (6.2)
- b. "Non-metallic plugs and caps shall be brightly colored." (6.2.1.1.1)
- c. "Packages and items containing desiccant shall be marked. The total number of separate bags and/or containers in the packages shall be indicated." (6.4.2.3.7)
- d. "...Barrier and wrap materials shall be non-halogenated when used in direct contact with austenitic stainless steel, shall be non-corrosive, shall not readily support combustion and shall not be otherwise harmful..." (6.4.2)

The licensee's Administrative Control Directive (ACD) 4 ACD-9.5, "Handling, storage, shipping and preservation of materials", requires, in part, the following:

- a. A separate area within the storage area shall be set aside and designated, as necessary, as a nonconforming item storage area. (6.4.1.3)
- b. The proper identification traceable to the associated QA documentation shall be maintained during receiving process, storage, and if shipped offsite. (6.4.3.1)

Contrary to the above:

- a. Many end caps on safety related tubing and pipe were missing.
- b. In many cases, grey tape was used as an end cap instead of a bright colored tape.
- c. Several containers containing desiccant were not marked to indicate the number of containers of desiccant.
- d. Several instances were found of safety related austenitic stainless steel in contact with carbon steel and painted surfaces.
- e. Several items requiring hold tags were not tagged and were not in a segregated hold area.
- f. Many untagged items were in the aisles. In many cases, these were found to be placed in the warehouse to await disposal.

RESPONSE:

Immediate corrective actions taken on the above areas were as follows:

- a. End caps or nuclear approved tape were placed on the ends of safety related tubing and pipe.
- b. Nuclear grade grey tape was removed and replaced with red nuclear approved tape or end caps on the ends of all stainless steel safety related tubing.
- c. Boxes or containers holding parts packed with desiccant have been labeled with the number of desiccant bags marked on the outside of the container. Future action on this item will incorporate this process, of marking the amount of desiccant on the outside of the container, into the warehouse personnel's receipt inspection process if the packaging is received from the vendors without this information marked on the package.
- d. The stainless steel piping was separated from contact with the carbon steel and painted surfaces. Additionally, more storage racks have been installed to allow additional segregated storage area for piping to prevent physical contact of dissimilar metals and separation from painted and halogenated materials.

- e. Items requiring hold tags were tagged and released items have been removed from the hold area. Future plans call for increasing the physical size of the QA hold area so that large items which do not fit in the present area can be better controlled. Enlargement of the QA hold area is planned and being budgeted for implementation in fiscal year 1983 (June 1983). Additional administrative control measures have also been implemented with the establishment of a QA hold area list which, by updating weekly, will help expedite the removal of released items from the QA hold area. This will make additional room in the QA hold area for items awaiting receipt inspection.
- f. Untagged items were removed and either disposed of or placed in their proper storage locations.

The above actions have been taken to correct the problems in the warehouse area. Each of the above items has been discussed with warehouse personnel and documented by the warehouse area supervisor. Periodic (quarterly) inspections (see response to Violation No. 1) will insure that problems of these types will not continue in the future.

VIOLATION NO. 3:

10CFR50, Appendix B, Criterion V, requires that the licensee accomplish activities affecting quality in accordance with instructions, procedures, or drawings. The Northern States Power Company "Operational Quality Assurance Plan" Section 1.0 states that the program shall incorporate "(1) the requirements of ANSI N18.7-1976 ..." ANSI N18.7 requires written procedures to control the documentation and performance of maintenance activities affecting safety related structures, systems or components.

The licensee's procedure 4 ACD-3.6, Section 6.2.19 governing Work Request Authorizations states:

Upon completion of the work, the job supervisor or job leadman shall fill out or assure that a workman has filled out Section V on pages 2 and 3, describing as applicable:

- a. Work actually performed
- b. Results of work/test results
- c. Replacement parts
- d. Disposition of parts removed
- e. Stores requisition(s) used
- f. Identification of additional WRA(s) initiated to complete work if work performed is temporary or beyond the scope of the original WRA.

Contrary to the above, the inspector reviewed five safety related WRAs and found that three did not contain all of the required information.

RESPONSE:

A random check of seventy six (76) WRA's was conducted to ensure that parts traceability, issued via a stores requisition, could be adequately verified, and that required information was actually contained within the WRA.

As a result of this check, traceability of parts issued against safety related WRAs was able to be performed even though the detailed information required by 4 ACD-3.6, Section 6.2.19 had not been completely filled out in some areas. The actions and results of this check have been discussed with plant supervisory personnel with actions recommended and documented by letter to the plant superintendents on May 11, 1982 to prevent recurrence of these problems as follows:

All materials, safety related or not, used when work is controlled with a WRA are to be identified in Section V on Pages 2 and 3 of the WRA. In addition, copies of the Stores Requisition Forms for all items obtained from the warehouse are to be attached to page 2 of the completed WRA.

Long term measures will be finalized and implemented with issuance of revised administrative controls documents, which should be completed by January 31, 1983.

DEVIATION:

FSAR Section 2.4.3 identifies the RHR suction inboard isolation valve is required to be operable during shutdown operation to provide overpressure protection for the RHR low pressure piping.

Contrary to the above on April 8, 1982, the RHR suction inboard valve was made inoperable when the unit was shut down with the RHR system in operation.

RESPONSE:

The outboard shutdown cooling isolation valve, MO-2030, has a relaxing torque switch that could cause valve damage if an automatic isolation signal is present and the valve is already closed. To alleviate this problem, a special operating procedure was written to lift a lead in the valve control circuitry when automatic isolation capability is not required. This special procedure was misinterpreted by an operator and the lead was lifted incorrectly. When the lifted lead was discovered by the Shift Technical Advisor, it was immediately reinstalled.

The special operating procedure was revised so that the lead cannot be lifted unless the valve is closed. A modification will be made on the motor operator, to permanently correct the problem, during the 1982 refueling outage.

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT

Docket No. 50-263

LETTER DATED AUGUST 13, 1982
RESPONDING TO NRC LETTER DATED JULY 15, 1982
Inspection Report No. 50-263/82-01

Northern States Power Company, a Minnesota corporation, by this letter dated August 13, 1982 hereby submits, in response to the NRC letter dated July 15, 1982, our answer to Inspection Report No. 50-263/82-01.

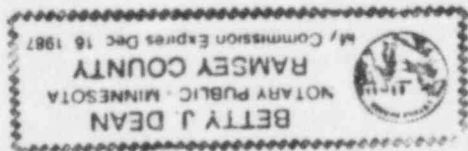
This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By C E Larson
C E Larson
Director
Nuclear Generation

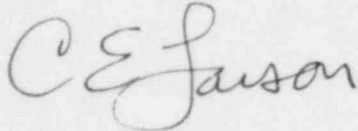
On this 13th day of August, 1982, before me a notary public in and for said County, personally appeared C E Larson, Director, Nuclear Generation and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Northern States Power Company, that he knows the contents thereof and that to the best of his knowledge, information and belief, the statements made in it are true and that it is not interposed for delay.

Betty J. Dean



The pressure switches for the overpressure protection of the shutdown cooling and head spray piping is tested once per cycle. This testing will be added to the plant Technical Specifications.

Very truly yours,

A handwritten signature in cursive script that reads "C E Larson".

C E Larson
Director
Nuclear Generation

cc: C D Brown, NRC Resident Inspector
G Charnoff