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NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

May 10, 1974

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

Dear Mr Keppler:

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

Response to Item Listed on Enclosure of
Letter Dated April 19, 1974

This letter is written in response to an item noted on your letter of April 19, 1974. Your letter, addressed to Mr Leo J Wachter, Vice President Power Production & System Operation, referred to an activity which appeared to be in violation of AEC requirements and for which a reply was required. The activity was: "When the measured release rate of gross beta-gamma activity was 25% or greater of the average release rate of Specification 3.8.A.1, during portions of the period November 1973 through January 1974, only the stack filter cartridges were counted daily. The vent filter cartridges were still counted weekly."

In November 1973, when the noble gas release rate, at the plant main stack, exceeded 25% of the Technical Specification average annual release rate limit, daily counting of the stack filter cartridges was initiated. Daily counting of the stack filter cartridges was continued until the plant was shutdown for the Spring Refueling Outage. However, during the time that the noble gas release rate from the plant stack was exceeding 25% of the annual average limit, the average noble gas release rate from the reactor building vent remained at less than 0.6% of the limit. Our interpretation of the Technical Specification was that it was intended to require increased surveillance of iodine releases at the point where the noble gas release was above 25% of the limit. Therefore, counting of the reactor building vent filter cartridges continued on a weekly basis. The iodine releases remained below the Technical Specification release rate limit at all times.

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Mr J G Keppler

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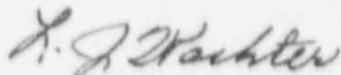
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The major portion of the iodine released from the reactor building ventilation stack was due to the processing of the radioactive waste and to the venting of radwaste tanks to the ventilating air. It was not directly related to the plant noble gas release rate. Also, the effort required to support the increased surveillance on 21 charcoal cartridges and 21 particulate filters would have amounted to approximately 30 additional hours of counting time each week without contributing significantly to the iodine release data. In fact it is felt that the shorter daily sampling time would have added unnecessary inaccuracies to the iodine release information.

Change No.12 to the Technical Specifications, which will become effective after the Modified Off-Gas System becomes fully operational, eliminates the requirement for daily filter surveillance based on noble gas release rates. Instead, it requires daily filter surveillance based on iodine release rates. It is our feeling that these surveillance requirements should be considered separately for the stack and vent. Therefore, it is our intention to submit a proposed change to the Technical Specifications to clarify the interpretation. Until such a change is effective, we will interpret the specification to apply to all filters.

Should you have any questions concerning our actions, please communicate directly with plant management.

Yours very truly,



L J Wachter, Vice President
Power Production & System Operation

LJW/ma

cc: J F O'Leary
G Charnoff
Minnesota Pollution Control Agency
Attn: E A Pryzina