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NORTHERN STATES POWER COMPANY

Minneapolis, Minnesota 55401

April 29, 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 Items Listed on Enclosure of
Letter Dated April 9, 1974

This letter is written in response to the items noted on your letter of April 9, 1974. Your letter, addressed to Leo J. Wachter, Vice-President Power Production and Systems Operation, referred to three activities which appeared to be in violation of AEC requirements. The three activities were:

1. The reactor coolant was not analyzed for gross beta activity every 96 hours between the period of February 14 and 21, 1974.
2. An isotopic analysis of the reactor coolant was not performed during November 1973.
3. Conductivity and chloride analyses were not performed at four hour intervals during the period of February 16-18, 1974, while steaming at less than 100,000 pounds per hour.

The three subjects are discussed separately.

1. Reactor coolant was not analyzed for gross beta activity every 96 hours between February 14 and 21, 1974

On February 18, 1974, the day that the 96 hour reactor coolant gross beta activity sample was due, the Chemistry Specialist responsible for the analysis misunderstood the Technical Specification requirement and did not perform the test.

To prevent the possibility of future violations of this sort, the purpose and requirements of this test have been discussed with the Chemistry Group. In addition, a radiochemistry memorandum has been written to the Chemistry Group specifically discussing the above requirements.

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2. A Monthly Reactor Coolant Isotopic Analysis was not performed during November, 1973

The monthly reactor coolant isotopic analysis was performed in the latter part of November, 1973. However, at this time, a new Ge(LI) counting system had been brought in to use which required a longer counting time than the original Na(I) counting equipment. The Chemistry Specialist used a counting time based on the old Na(I) system and consequently, the sample was not counted sufficiently long and the data was incomplete. By the time that the data was reviewed by the Plant Chemist, in early December, the sample had been disposed of and it was too late to resample for that period. When informed that the sample had not been counted long enough, the Chemistry Specialist decided it wasn't necessary to retain the raw data and he disposed of it.

To prevent future actions of this type, the circumstances and consequences of counting errors and premature sample disposal has been discussed with the Chemistry Group. In addition, a radiochemistry memorandum has been written requiring the retention of all Technical Specification related samples and data until specific direction has been given by the Plant Chemist. The memo also directs that any analysis of this nature be completed and approved in a timely manner to preclude the retention of inadequate data.

3. Conductivity and Chloride Analyses were not performed every four hours during the period of February 16-18, 1974

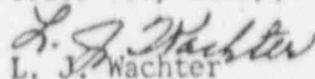
The Technical Specification related conductivity and chloride analyses were not performed during this period because of a misunderstanding of the plant conditions and the required surveillance tests.

To prevent the possibility of future violations of the chemistry requirements below 100,000 lb/hr steam flow, the plant operating procedures have been modified requiring the Shift Supervisor to notify the Chemistry Group to complete the four hour surveillance anytime the reactor water is above 212°F and the turbine is not on the line.

The chemistry requirements of the Technical Specifications have been discussed with and explained to the Chemistry personnel. Also, all Technical Specification related chemistry surveillance test procedures have been revised to state the purpose and requirements of each analysis. It is believed that the actions described above provide adequate assurance similar occurrences will be prevented in the future.

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

Yours very truly,



L. J. Wachter
Vice President - Power Production
and System Operations

LJW/rmm

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