Northern States Power Company

Monticello Nuclear Generating Plant
2807 West Hwy 75
Monticello, Minnesota 55362-9637

January 26, 1996

10 CFR Part 2
Section 2.201

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Reply to Notice of Violation Contained in
NRC Inspection Report No. 50-263/95011

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, our reply to the notice of violation contained in your letter of December 28, 1995, is provided as Attachment A. Information concerning the issues identified in the notice of violation has been provided to the NRC via Monticelio Licensee Event Report (LER) 95-007, submitted by letter dated Novernber 13, 1995, and during a pre-decisional enforcement conference held at the NRC Region III offices on December 15, 1995. Our response to the notice of violation provides a summary of this previously provided information as well as the specific information requested in the notice of violation.

NSP has previously committed to completion of the actions below as reported in LER 95-007. This letter modifies these previously committed to actions by providing completion dates for the actions.

1. Training will be provided to all personnel involved in the valve line-up process on:

   - this event,
   - self checking,
   - the importance of proper valve position,
   - the purpose of having locked valves, and
   - the importance of independent verification.

   This training will be completed by March 30, 1996.

2. The following processes are being evaluated for possible improvements:

   - valve line-up (checklists) process (including signature transfers),
   - independent verification process,
   - locked valve process, and the
   - hold and secure card process.

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Changes proposed for the hold and secure process, as a result of this evaluation will be implemented by February 29, 1996.

Any critical changes that are identified for the valve line-up, independent verification and locked valve processes will be implemented before the upcoming refueling outage, scheduled to start April 10, 1996

3. The process of conducting refueling outages has been evaluated for possible improvement in the area of Operations staff work load near the end of the outage. In addition, an evaluation has been performed on the integration of system restorations into outage activities. Proposed changes will be reviewed and will be implemented before the upcoming refueling outage, scheduled to start April 10, 1996. The changes will be evaluated following the outage for possible improvements. This action will be completed by September 30, 1996.

Please contact Marv Engen, Sr Licensing Engineer, at (612) 295-1291 if you require further information.

William J Hill

William J Hill
Plant Manager
Monticello Nuclear Generating Plant

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg

Attachments: Affidavit to the US Nuclear Regulatory Commission
A - Reply to Notice of Violation

UNITED STATES NUCLEAR REGULATORY COMMISSION

NORTHERN STATES POWER COMPANY

MONTICELLO NUCLEAR GENERATING PLANT DOCKET NO. 50-263

Reply to Notice of Violation Contained in
NRC Inspection Report No. 50-263/95011

Northern States Power Company, a Minnesota corporation, hereby provides the required response to the Notice of Violation associated with NRC Inspection Report 50-263/95011. The Notice of Violation was transmitted to NSP via a letter from Hubert J Miller, NRC Region III Regional Administrator, to Mr. E Watzl, Northern States Power Company, on December 28, 1995.

This letter contains no restricted or other defense information.

NORTHERN STATES POWER COMPANY

By William J Hill
William J Hill
Plant Manager
Monticello Nuclear Generating Plant

On this 26th day of January 1996 before me a notary public in and for said County, personally appeared William J Hill, Plant Manager, Monticello Nuclear Generating Plant, 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.

Marvin R Engen
Notary Public - Minnesota
Sherburne County
My Commission Expires January 31, 2000

MARVIN RICHARD ENGEN
NOTARY PUBLIC - MINNESOTA
My Comm. Exp. Jan. 31, 2000

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Attachment A

Reply to a Notice of Violation

Violations Identified in 12/28/95 NRC Letter

Violation A:

"A. Technical Specification 3.5.C.1 required that both Containment Spray/Cooling Subsystems shall be operable whenever irradiated fuel is in the reactor vessel and the reactor water is greater than 212°F. A Containment Spray/Cooling Subsystem includes the valves necessary for Drywell Spray.

Technical Specification 3.5.C.4 provided that one Containment Spray/Cooling Subsystem may be inoperable for 7 days.

Technical Specification 3.5.C.5 required, in part, that if the requirements of 3.5.C.1 and 4 cannot be met, an orderly shutdown of the reactor will be initiated and the reactor water temperature shall be reduced to less than 212°F within 24 hours.

Contrary to the above:

1. *From 9:55 a.m. on October 3, 1995, until 5:53 p.m. on October 5, 1995, while irradiated fuel was in the reactor vessel and the reactor water was greater than 212°F, both Containment Spray/Cooling Subsystems were inoperable, a period greater than 24 hours, and action was not taken to initiate an orderly shutdown of the reactor and to reduce reactor water temperature to less than 212°F within 24 hours.*

2. *From October 23, 1994, until December 17, 1994, and from December 21, 1994, until October 12, 1995, the "B" Containment Spray/Cooling Subsystem was inoperable, periods greater than 7 days, and action was not taken to initiate an orderly shutdown of the reactor and to reduce reactor water temperature to less than 212°F within 24 hours."*

Violation B:

"B. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

1. *Residual Heat Removal System Prestart Valve Checklist No. 2154-12, Revision 29, Step 1, required operators to walk down the system and place valves in the proper position required by the valve checklist. Step 3 required operators to perform an independent verification of the checklist and note discrepancies in the comments section.*

Contrary to the above, the Residual Heat Removal System Prestart Valve Checklist completed on October 21, 1994, documented that valve RHR-74-2 was locked open, when in fact, it was unlocked closed, and no discrepancies were noted in the comments section.

2. *Administrative Work Instruction No. 4 AWI-04.04.01, "Equipment Isolation," Revision 8, Step 4.8.12.C.2, required the Shift Supervisor to direct the required independent verification to be performed and documented on the Isolation Worksheet or on Form 3063-1 if permanently clearing safety tags. Step 4.12.6 required an independent verification of positioning and relocking of locked equipment to its operating status.*

   Contrary to the above, in October 1994, the Shift Manager, while fulfilling the duties of the Shift Supervisor, did not direct an independent verification following a permanent clear of safety tags associated with Isolation Worksheet 94-80312 for normally locked open valve RHR 74-2.

This is a Severity Level III Problem (Supplement I)."

NSP Response

NSP acknowledges the above violations.

On October 12, 1995, while at 100 percent power, a plant equipment operator found the "B" residual heat removal (RHR) drywell spray manual isolation valve (RHR 74-2) unlocked and closed with a hold card attached to it. The valve had been mispositioned since returning to power from the last refueling outage on October 23, 1994. This violates the Monticello Technical Specifications, since this train of drywell spray was inoperable for more than 7 days, during a period when operability was required. During the period of mispositioning of RHR 74-2, the "A" drywell spray system had been taken out of service for 56 hours to perform on-line maintenance in early October 1995. This also violates the Monticello Technical Specifications, since both trains of drywell spray were inoperable at the same time.

Reasons For Violations:

A combination of inattention to detail and procedural weakness resulted in the examples identified in Violation B. The RHR Prestart Valve Checklist was incorrectly completed in October 1994 documenting RHR 74-2 as being locked open when, in fact, it was closed and unlocked. This error occurred even though operators had completed a walk down of the system including independent verification. The Shift Manager subsequently exhibited a lack of questioning attitude when confronted with the conflicting information between the Prestart Valve Checklist and Isolation Worksheet for RHR 74-2. As a result, it is believed that the Isolation Worksheet was closed without direct verification of the valve position. The Operations staff workload at the end of the refueling outage may have contributed to this error.

The reason that the plant Technical Specifications were not met as identified in Violation A, is that the valve was not known to be mispositioned until October 12, 1995, approximately one

year after the valve is believed to have been mispositioned. The reasons that the valve was mispositioned are as stated above.

Additional information can be found in Licensee Event Report (LER) 95-007, dated November 13, 1995.

Corrective Action Taken and Results Achieved:

The following actions have been taken to avoid further violations associated with Violations A and B:

1. The hold card was removed from RHR 74-2 on October 12, 1995, and the valve was opened and locked in the open position.

2. All locked valves outside the inerted drywell have been verified to be locked in their proper position.

3. All Emergency Core Cooling System (ECCS) valves outside the inerted drywell have been verified to be in their proper position.

4. All critical locked valves inside the drywell were determined to be in the proper position by indication or by correct system operation to date.

5. All on-line maintenance was temporarily halted unless specifically authorized by the plant manager. Initially, there was a concern associated with the temporary lift process for Hold cards during on-line maintenance. The investigation identified no process problems associated with the temporary lift process and on-line maintenance. A process improvement to the temporary lift process has been implemented. Based on these findings, the on-line maintenance temporary halt has been removed.

6. The locked valve checklist has been changed to remove the high radiation exemption for RHR 74-2. The quarterly locked valve surveillance was successfully completed on all locked valves outside the drywell on December 17, 1995.

7. Management has addressed the improper closeout of the isolation associated with the hold card found on RHR 74-2 with the entire Operations staff. The following issues were emphasized:

   - the importance of maintaining a questioning attitude,
   - follow the procedural processes, and
   - the importance of self-checking.

8. Quality Services personnel has changed their audit plans and will periodically observe a sampling of Prestart Valve Checklists. The quarterly locked valve surveillance, conducted on December 17, 1995, was observed by Quality Services personnel. No problems were observed.

Corrective Action to be Taken to Avoid Further Violations:

The following actions will be taken to avoid further violations. NSP has previously committed to completion of these actions as reported in LER 95-007, submitted by letter dated November 13, 1995. These actions are restated herein for completeness and to provide a status concerning completion.

1. Training will be provided to all personnel involved in the valve line-up process on:

   - this event,
   - self checking,
   - the importance of proper valve position,
   - the purpose of having locked valves, and
   - the importance of independent verification.

   Approximately 75% of the involved personnel have been trained. Training will be completed by March 30, 1996.

2. The following processes are being evaluated for possible improvements:

   - valve line-up (checklists) process (including signature transfers),
   - independent verification process,
   - locked valve process, and the
   - hold and secure card process.

   The hold and secure process has been evaluated. Changes proposed, as a result of this evaluation have been reviewed by Operations personnel and these changes will be implemented by February 29, 1996.

   Committees have been identified for the other three processes and any critical changes that are identified will be implemented before the upcoming refueling outage, scheduled to start April 10, 1996.

3. The process of conducting refueling outages has been evaluated for possible improvement in the area of Operations staff work load near the end of the outage. In addition, an evaluation has been performed on the integration of system restorations into outage activities.

   The Scheduling department has reviewed this event and proposed several changes to lower the work load on the Operations staff at the end of the outage. These changes are being reviewed and will be implemented before the upcoming refueling outage, scheduled to start April 10, 1996. The changes will be evaluated following the outage for possible improvements. This action will be completed by September 30, 1996.

Date when Full Compliance Will Be Achieved:

Full compliance has been achieved.