

October 6, 1998

Mr. M. Wadley  
President, Nuclear Generation  
Northern States Power Company  
414 Nicollet Mall  
Minneapolis, MN 55401

SUBJECT: RESPONSE TO UNRESOLVED ITEM (NRC INSPECTION REPORT  
NO. 50-263/98009(DRS))

Dear Mr. Wadley:

This will acknowledge receipt of your letter dated August 28, 1998, in response to our letter dated July 30, 1998, requesting a response associated with an unresolved item related to a procedure for controlling temporary modifications at your Monticello Nuclear Generating Plant. We have reviewed the actions taken and have no further concerns at this time. These corrective actions may be examined during future inspections.

Sincerely,

Original /s/ S. A. Reynolds for

John A. Grobe, Director  
Division of Reactor Safety

Docket No.: 50-263  
License No.: DPR-22

Enclosure: Ltr dtd 8/28/98 from M. Hammer,  
NSP to USNRC

cc w/o encl: Plant Manager, Monticello

cc w/encl: State Liaison Officer, State  
of Minnesota

See Attached Distribution

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Northern States Power Company

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

August 28, 1998

US Nuclear Regulatory Commission  
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MONTICELLO NUCLEAR GENERATING PLANT  
Docket No. 50-263 License No. DPR-22

Reply Requested by Letter Transmitting  
NRC Inspection Report 50-263/98009

Reference 1. Letter from John A. Grobe, USNRC, to M. Wadley, NSP, "NRC Inspection Report 50-263/98009(DRS)," July 30, 1998.

The July 30, 1998 letter which transmitted Inspection Report 50-263/98009(DRS) (Reference 1) requested that within 30 days of receipt of the letter NSP respond to an unresolved item related to our procedure for controlling temporary modifications. Specifically, the inspection report states:

*Bypass Control Procedure: During the review of bypass control procedure 4AWI-04.04.03, "Bypass Control," Revision 9, the inspectors noted that Section 4.3.1.D of the procedure stated "...a System Engineer is required to determine the need for a 10 CFR 50.59 evaluation. Note that for an Urgent or Emergency condition, the bypass may be used and the review performed later."*

*While 10 CFR 50.54(x) allows immediate action in an emergency condition, the procedure does not define the terms "urgent or emergency condition." Immediate action and bypass of the requirements of 10 CFR 50.59 are acceptable only within the context of the conditions described in 10 CFR 50.54(x). The procedure, as written, does not provide adequate controls to assure that the requirements of 10 CFR 50.59 are met.*

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Departures from license conditions or Technical Specifications are addressed in Section 4.3.2.C of procedure 4 AWI 04.01.01 Revision 19, "General Plant Operating Activities," which states, in part:

*C. Special plant conditions involving departures from license conditions of Technical Specifications.*

*1. A departure from license conditions or Technical Specifications **SHALL** be made when necessary and provided the following conditions have been met:*

- a. The departure has received proper authorization.*
- b. Emergency conditions exist.*
- c. The departure is necessary to protect the public health and safety (including a likely threat of injury to plant personnel).*
- d. Adequate or equivalent protective action consistent with the operating license is not immediately apparent.*

The wording in items c and d above address 10 CFR 50.54(x). However, we acknowledge that Section 4.3.1.D of 4 AWI 04.04.03 introduces the term "urgent" without definition. This is the only place the word urgent is used in the procedure. We will therefore amend 4 AWI-04.04.03 by eliminating the term "urgent," thereby retaining only the words "emergency condition" which are consistent with 10 CFR 50.54(x).

In the event that under emergency conditions a 10 CFR 50.59 review is deferred, the Bypass Control procedure contains provisions for it to be completed promptly. Section 4.1.2.A of 4 AWI-04.04.03 states the following:

*4.1.2 In an emergency situation as determined by the Shift Supervisor, a bypass may be issued prior to completion of the required Jumper Bypass Form and 10CFR50.59 screening.*

*A. If the bypass was not installed per an OC reviewed procedure,*

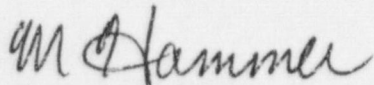
- 1. The Shift Supervisor **SHALL** complete and provide a copy of the Jumper Bypass Form to the General Superintendent Engineering as soon as possible.*
- 2. The Gen Supt Engr **SHALL** ensure the 10CFR50.59 screening is conducted.*

3. *If a 10CFR50.59 evaluation is required, the General Superintendent Engineering **SHALL** ensure that an SRI is prepared and approved.*

This letter contains the following new NRC commitment:

By October 30, 1998 procedure 4 AWI-04.04.03 will be revised to eliminate the term "urgent" from Section 4.3.1.D.

Please contact Marcus Voth, Licensing Project Manager, at (612) 271-5116 if you require further information.



Michael F. Hammer  
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