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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

FEB 25 1975

Northern States Power Company  
ATTN: Mr. Leo Wachter, Vice President  
Power Production and System  
Operation  
414 Nicollet Mall  
Minneapolis, Minnesota 55401

Docket No. 50-263

Gentlemen:

Thank you for your letter dated February 7, 1975, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in our letter dated January 20, 1975. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely yours,

Gaston Fiorelli, Chief  
Reactor Operations Branch

bcc w/ltr dtd 2/7/75:  
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N O R T H E R N   S T A T E S   P O W E R   C O M P A N Y

Minneapolis, Minnesota    55401

February 7, 1975

Mr. J. G. Keppler, Director  
Region III  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois    60137

Dear Mr. Keppler:

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

This letter is submitted in reply to the two apparent violations of AEC requirements identified as items A and B under Enforcement Action in the Summary of Findings section of RO Inspection Report No. 050-263/74-10. A copy of these items is attached for your reference.

Response to Item A.

The temporary bypass line around the 102 valve for CRD 46-27 was installed in early June, 1974. Since that time a number of changes to Administrative Control Directives and administrative forms have been incorporated. The Work Request Authorization (WRA) forms, which are used to initiate, authorize and control work such as the bypass line installation, were revised in late June, 1974. The plant directive governing the processing and use of the WRA forms was revised in July, 1974. All of the plant Directives related to design changes, including ACD-7.1, were superseded by Power Production Department directives in November, 1974. These changes include the addition of a blank on the WRA forms which must be signed by the Superintendent of Plant Engineering and Radiation Protection before work involving a design change is allowed to commence. This provides a means for assuring that proper review and approvals are obtained prior to operation of safety-related design changes.

The RO Inspection Report refers in several places to "Approval" by the Operations Committee. As a point of clarification, it should be noted that the Committee is only required to review and make recommendations; approval is a management function.

FEB 12 1975

Response to Item B.

In January, 1975, Administrative Control Directive 4 ACD-4.8, Bypass Control, was revised to incorporate the use of a Jumper Bypass Form. The form has clearly identified spaces for each required signature or initial, including those required to document independent verification. Instructions are printed on the back of the form. The problem has been discussed with the Shift Supervisors. It is believed that these measures will minimize the probability of a recurrence.

Yours very truly,



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

cc: Mr E. G. Case  
Mr G Charnoff  
Minnesota Pollution Control Agency  
Attn: Mr. E A Pryzina  
Assistant Director for  
Construction and Operations

attachment

## SUMMARY OF FINDINGS

### Enforcement Action

The following violations are considered to be of Category II severity.

A. Criterion V, 10 CFR 50, Appendix B, states in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures . . . and shall be accomplished in accordance with the instructions, procedures . . ." The licensee's procedure ACD7.1 has the following requirements:

1. Paragraph 6.10 states: "If a Design Change is determined to require safety review, the Operations Committee shall review the Design Change Control Form; Preliminary Design Change Package and the Safety Evaluation to assure that they are correct and complete. If they are not, they shall be returned to the responsible person or organization for revision of completion."
2. Paragraph 6.13 states: "The Operations Committee may recommend changes in the design or request additional analysis and information. The Operations Committee shall recommend approval or rejection of the change."

Contrary to the above the licensee completed and declared operational a design change before it was approved by the Operations Committee. The design change was the addition of a bypass valve around CRD-102 valve. (Management Interview, Item G and Section II Report Details, Paragraph 4)

B. Criterion V, 10 CFR 50, Appendix B, states in part, that "Activities affecting quality shall be prescribed by documented instructions, procedures . . . and shall be accomplished in accordance with instructions, procedures . . ." The licensee's Administrative Control Directive (ACD) 4.8, Bypass Control, Section 6.7.1 requires, "All bypasses installed for other reasons than trouble shooting or procedures shall have an independent verification of the installation and removal." Section 6.7.2 requires, "When a bypass is used in a procedure, the system or component shall be verified to be in the desired condition by an independent person upon completion of the procedure." Section 6.7.5 requires, "Independent verification shall be documented in the Bypass and Jumper Log Book."

Contrary to the above, independent verification was not recorded in the Bypass and Jumper Log when lifting wires to transfer control logic from "C" to "H" Steam Relief Valve per Work Request Authorization 74-1764 and when clearing of a jumper for a special test of "H" relief valve on November 21, 1974. (Management Interview, Item D.3.(a) and Section I, Report Details, Paragraph 4.C.(3)).