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TO: MR D L ZIEMANN

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DESCRIPTION

LTR REF THEIR 6-17-76 LTR, AND THEIR 9-24-76
SUBMITTAL.....TRANS THE FOLLOWING.....

ENCLOSURE

REVISION OF OPERATIONAL QUALITY ASSURANCE PLAN
DTD 9-24-76.....

PLANT NAME: Monticello

ACKNOWLEDGED

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FOR ACTION/INFORMATION

ENVIRO

10-04-76 RKB

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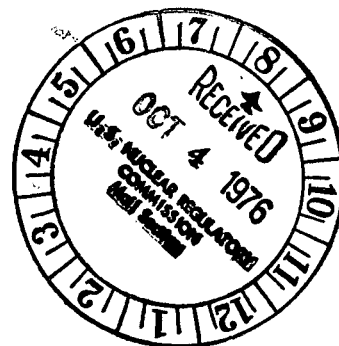
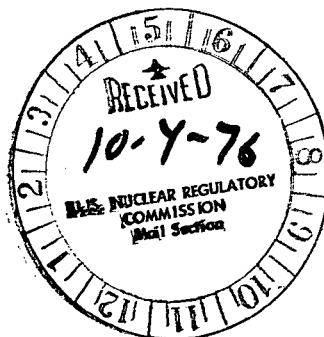
MINNEAPOLIS, MINNESOTA 55401

Regulatory Docket File

September 30, 1976

Mr D L Ziemann, Chief
Operating Reactors Branch # 2
Division of Operating Reactors
U S Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr Ziemann:



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

Revision of Operational Quality Assurance Plan

Our letter dated June 17, 1976 transmitted the NSP Operational Quality Assurance Plan, Revision 0, dated June 9, 1976. Subsequent to its submittal, we have had discussions with the Regulatory Staff on additional information that is needed to complete their review of the plan. We have also now secured copies of the approved standard, ANSI N18.7-1976. On the basis of this additional information, the Operational Quality Assurance Plan has been revised and 40 copies of Revision 1 to the plan, dated September 24, 1976 are submitted herewith for the docket listed above. It is requested that this letter of transmittal and the attached plan supersede, in entirety, the previous submittal.

The operational quality assurance programs for the Monticello and Prairie Island plants have been formalized and documented by the issuance of written directives, procedures and instructions. The attached Operational Quality Assurance Plan has been written more recently for use as an internal document with a detailed description of the existing QA program, including many references to titles, positions and administrative control directive numbers. This may require more frequent and extensive revision than a summary description document which would have been prepared for the NRC review process alone. On the basis that the plan can be revised, as required, through an internal review process, and to avoid preparation of a separate summary description, we have chosen to submit the detailed plan for your review needs.

Our operational quality assurance programs have been developed to conform to the requirements of 10CFR50-Appendix B and our Technical Specifications, with heavy reliance upon the guidance and interpretations of ANSI N18.7. The Regulatory Staff has asked us for commitments to additional documents, particularly Regulatory Guides. Most of the Regulatory Guides invoke the

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D L Ziemann

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September 30, 1976

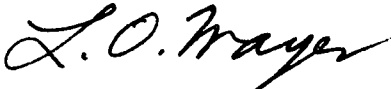
guidance of ANSI N45.2 and its series of "daughter standards". In fact, Regulatory Guide 1.33 on Operational Quality Assurance which was issued in 1972, referenced both ANS3.2 (later ANSI N18.7-1972) and ANSI N45.2.

Since the N45.2 series of standards were written mostly for the design and construction of nuclear power plant structures, systems and components, confusion arose among users. This resulted in the development of ANSI N18.7-1976, which could stand on its own in defining the requirements and recommendations for quality assurance for the operational phase of nuclear power plants.

We believe that our Operational Quality Assurance Plan and its implementing administrative control directives meet both the requirements of 10CFR50-Appendix B and the objective of having a single consistent set of documents for implementation of the program. The imposition of commitments to other sets of documents will only lead to confusion for the user, which the revision to ANSI N18.7 sought to eliminate, and will result in an increase in paper rather than meaningful quality assurance.

We believe that the revision of ANSI N18.7 fulfilled its objectives and we endorse it as the singular standard for implementation of 10CFR50-Appendix B for operating nuclear plants. This includes implementation of the portions of the N45.2 series of standards which ANSI N18.7-1976 references as being applicable for activities during the operational phase. It would be appropriate, in our opinion, for the NRC to revise Regulatory Guide 1.33 to adopt ANSI N18.7-1976 as being an adequate basis for complying with the quality assurance requirements of Appendix B to 10CFR50 and eliminate the multiplicity of references to operational quality assurance in other Regulatory Guides.

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/deb

cc: J G Keppler
G Charnoff
MPCA
Attn: J W Ferman