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SUBJECT: Responds to Generic Ltr 90-04 re GSI implementation status.

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June 28, 1990

Response to  
Generic Letter 90-04

Director of Nuclear Reactor Regulation  
U S Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT  
Docket Nos. 50-263 License Nos. DPR-22

Response to Generic Letter 90-04  
Generic Safety Issues Implementation Status

Generic Letter 90-04, "Request for Information on the Status of Licensee Implementation of Generic Safety Issues Resolved With Imposition of Requirements or Corrective Actions", requested that we provide documentation of the current implementation status of all generic safety issues for Monticello. This letter is provided in response to Generic Letter 90-04.

Attachment 1 is a completed copy of Enclosure 1 from Generic Letter 90-04 which shows the status of each Generic Safety Issue at Monticello. Attachment 2 contains comments on the status of the Generic Safety Issues that are referenced in Attachment 1.

Please contact us if further information on the status of the implementation of the Generic Safety Issues at Monticello is required.

Thomas M Parker  
Manager  
Nuclear Support Services

c: Regional Administrator - Region III, NRC  
Senior Resident Inspector, NRC  
NRR Project Manager, NRC  
G Charnoff

Attachments:

Attachment 1 - Status of Licensee Implementation of Generic Safety Issues  
Resolved with Imposition of Requirements or Corrective Actions

Attachment 2 - Comments on Status of Generic Safety Issues

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# ATTACHMENT 1

FACILITY NAME: Monticello  
 DOCKET NO.: 50-263  
 LICENSEE: Northern States Power

## STATUS OF LICENSEE IMPLEMENTATION OF GENERIC SAFETY ISSUES RESOLVED WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
40 (B065)	Safety Concerns Associated With Pipe Breaks In The BWR Scram System	All BWRs	C	See Attachment 2
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	C	See Attachment 2
43 (B107)	Reliability Of Air Systems	All Plants	C	See Attachment 2
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	I	See Attachment 2
67.3.3 (A017)	Improved Accident Monitoring	All Plants	C	See Attachment 2
75 (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	C	See Attachment 2
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	C	See Attachment 2

\*Status: C = Submittal of information and/or changes were necessary and such  
 submittals were made or changes are complete  
 I = Changes are necessary but such changes are not yet fully implemented  
 NA = Not applicable

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	C	See Attachment 2
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	I	See Attachment 2
75 (B078)	Items 3.1.1 & 3.1.2 - Post - Maintenance Testing (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B079)	Item 3.1.3 - Post-Maintenance Testing-Changes to Test Requirements (Reactor Trip System Components)	All Plants	C	See Attachment 2
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All Other Safety-Related Components)	All Plants	C	See Attachment 2
75 (B088)	Item 3.2.3 - Post-Maintenance Testing-Changes to Test Requirements (All Other Safety-Related Components)	All Plants	C	See Attachment 2
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	NA	

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability-Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	NA	
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation Of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	NA	
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W & B&W Plants	NA	
75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	NA	

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability-Diverse Trip Features (System Functional Testing)	All Plants	C	See Attachment 2
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	C	See Attachment 2
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	All BWRs	C	See Attachment 2
93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	NA	
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	NA	
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3 Ft. Calhoun	NA	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	C	See Attachment 2

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS*</u>	<u>COMMENTS</u>
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	C	See Attachment 2
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP-1	NA	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	C	See Attachment 2
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	NA	
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 4/1/80	NA	
B-63 (B045)	Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary	All Plants	NA	See Attachment 2

## Attachment 2

### Comments on Status of Generic Safety Issues

#### GSI-40, Safety Concerns Associated With Pipe Breaks in the BWR Scram System

NRC Generic Letter 86-01, "Safety Concerns Associated with Pipe Breaks in the BWR Scram System", transmitted the NRC Staff generic Safety Evaluation Report for this issue. The evaluation concluded that through-wall cracks in scram discharge volume piping need not be postulated.

#### GSI-41, BWR Scram Discharge Volume Systems

An order for modification of license concerning BWR scram discharge systems was issued by the NRC on January 9, 1981. That order required prompt implementation of certain actions to assure the safe operation of BWR's with inadequate scram discharge volume. NSP responded to the NRC order by letters dated May 20, 1982, July 12, 1982, September 7, 1982, September 17, 1982 and September 23, 1982. An NRC Safety Evaluation Report for License Amendment No. 11, dated October 8, 1982, documented completion of the required modifications during the refueling outage for reload 9. The annual report (Item 8, Design Change Request 81-021) for the period January 1, 1982 to October 31, 1982, which was transmitted to the NRC by letter dated April 29, 1983, documents the completion of scram discharge volume modifications required by this generic safety issue.

#### GSI-43, Reliability of Air Systems

NRC Generic Letter 88-14, issued by the NRC on August 8, 1988, requested licensees to review NUREG-1275 Volume 2 and perform a design and operations verification of their plants instrument air supply. NSP responded to Generic Letter 88-14 by letter dated February 17, 1989. An NRC letter dated March 9, 1989 found the Monticello response to Generic Letter 88-14 to be acceptable. The March 9, 1989 NRC letter also requested a schedule for completion of several remaining items. That schedule was provided by NSP letter dated April 19, 1989. All of the actions implemented in response to Generic Letter 88-14 were complete by July 21, 1989.

#### GSI-51, Improving the Reliability of Open-Cycle Service Water Systems

Generic Letter 89-13, issued by the NRC on July 18, 1989, requested licensees to advise the NRC staff whether they have established programs to implement the actions resulting from the resolution of GSI No. 51. NSP responded to Generic Letter 89-13 for Monticello by letter dated January 29, 1990. Our response indicated that the committed actions would be complete prior to the end of the 1991 refueling outage presently scheduled for April and May of 1991. An NRC letter dated March 6, 1990 acknowledged our commitments and projected completion dates.



### GSI-67.3.3. Improved Accident Monitoring

NSP was required by Generic Letter 82-33, dated December 17, 1982, to provide a report describing how the post-accident monitoring instrumentation meeting Regulatory Guide 1.97, Revision 2 guidance was applied to emergency response facilities. NSP's response was provided in letters dated December 30, 1983 and April 22, 1985. Monticello's conformance to RG 1.97 Rev. 2 was documented by an NRC Safety Evaluation Report dated November 18, 1985. All modifications related to Regulatory Guide 1.97 were completed by November 27, 1987. By letter dated March 30, 1990, the NRC requested additional information regarding the post accident neutron monitoring system. The NSP response to the March 30, 1990 request for additional information is pending.

### GSI-75 Item 1.1. Post-Trip Review (Program Description and Procedure)

NSP letters dated November 4, 1983 and November 14, 1983, responded to Generic Letter 83-28, Item 1.1. An NRC Safety Evaluation Report dated July 3, 1985 found the Monticello response to Generic Letter 83-28 Item 1.1 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in July, 1985.

### GSI-75 Item 1.2. Post-Trip Review (Data and Information Capability)

NSP letters dated November 4, 1983 and November 14, 1983, responded to Generic Letter 83-28, Item 1.2. An NRC Safety Evaluation Report dated June 2, 1986 found the Monticello response to Generic Letter 83-28 Item 1.2 to be acceptable. The new Emergency Response Information System (ERIS) was declared operational on January 11, 1987.

### GSI-75 Item 2.1. Equipment Classification and Vendor Interface

NSP letters dated November 4, 1983, November 14, 1983, and June 9, 1988, responded to Generic Letter 83-28, Item 2.1. An NRC Safety Evaluation Report dated February 13, 1989 found the Monticello response to Generic Letter 83-28 Item 2.1 to be acceptable. NSP letter dated May 30, 1986 reported that this item was complete.

### GSI-75 Item 2.2.1. Equipment Classification for Safety Related Components

NSP letters dated November 4, 1983, November 14, 1983, and June 9, 1988, responded to Generic Letter 83-28, Item 2.2.1. An NRC Safety Evaluation Report dated September 15, 1989 found the Monticello response to Generic Letter 83-28 Item 2.2.1 to be acceptable. NSP letter dated May 30, 1986 reported this item complete.

GSI-75 Item 2.2.2, Vendor Interface for Safety-Related Components

NSP letters dated November 4, 1983 and November 14, 1983, responded to Generic Letter 83-28, Item 2.2.2. NRC letter dated May 20, 1988 requested additional information on Item 2.2.2 in order for the NRC Staff to complete their review. The additional information was provided to the NRC by letter dated June 9, 1988. Per a discussion with the NRC Project Manager for Monticello this item remains open and is being addressed as part of Generic Letter 90-03 issued March 20, 1990. Response to GL 90-03 will be submitted before September 26, 1990.

GSI-75 Items 3.1.1 and 3.1.2, Post-Maintenance Testing

NSP letters dated November 4, 1983, November 14, 1983 and December 26, 1984 responded to Generic Letter 83-28, Items 3.1.1 and 3.1.2. An NRC Safety Evaluation Report dated March 21, 1986 found the Monticello response to Generic Letter 83-28 Item 3.1.1 and 3.1.2 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in December, 1984.

GSI-75 Item 3.1.3, Post-Maintenance Testing - Changes to Test Requirements

NSP letters dated November 4, 1983 and November 14, 1983 responded to Generic Letter 83-28, Item 3.1.3. An NRC Safety Evaluation Report dated April 29, 1986 found the Monticello response to Generic Letter 83-28 Item 3.1.3 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in April, 1986.

GSI-75 Items 3.2.1 and 3.2.2, Post-Maintenance Testing

NSP letters dated November 4, 1983, November 14, 1983 and February 28, 1986 responded to Generic Letter 83-28, Items 3.2.1 and 3.2.2. An NRC Safety Evaluation Report dated May 2, 1986 found the Monticello response to Generic Letter 83-28 Items 3.2.1 and 3.2.2 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in February, 1986.

GSI-75 Item 3.2.3, Post-Maintenance Testing - Changes to Test Requirements

NSP letters dated November 4, 1983 and November 14, 1983 responded to Generic Letter 83-28, Item 3.2.3. An NRC Safety Evaluation Report dated April 29, 1986 found the Monticello response to Generic Letter 83-28 Item 3.2.3 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in November 1983.

GSI-75 Item 4.5.1, Reactor Trip System Reliability - Diverse Trip Features

NSP letters dated November 4, 1983, November 14, 1983 and December 21, 1984 responded to Generic Letter 83-28, Item 4.5.1. An NRC Safety Evaluation Report dated March 21, 1986 found the Monticello response to Generic Letter 83-28 Item 4.5.1 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in November 1983.

GSI-75 Items 4.5.2 and 4.5.3, Reactor Trip System Reliability - Test Alternatives and Intervals

NSP letters dated November 4, 1983 and November 14, 1983 responded to Generic Letter 83-28, Item 4.5.2. An NRC Safety Evaluation Report dated January 27, 1989 found the Monticello response to Generic Letter 83-28 Item 4.5.2 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in November 1983.

NSP letters dated November 4, 1983, November 14, 1983 and June 17, 1988 responded to Generic Letter 83-28, Item 4.5.3. An NRC Safety Evaluation Report dated June 7, 1989 found the Monticello response to Generic Letter 83-28 Item 4.5.3 to be acceptable. NSP letter dated May 30, 1986 reported this item complete in November 1983.

GSI-86, Long Range Plan for Dealing With Stress Corrosion Cracking in BWR Piping

Generic Letter 84-11, dated April 19, 1984, requested that NSP supply plans for inspections of stainless steel piping susceptible to intergranular stress corrosion cracking (IGSCC). NSP responded initially to Generic Letter 84-11 by letter dated May 31, 1984. NSP informed the NRC by letter dated July 2, 1987 that most of the piping that was classified by Generic Letter 84-11 as IGSCC susceptible had been replaced or corrosion resistant cladding had been applied. NSP committed to an inspection program on the two remaining welds that was to be completed during the October, 1987 refueling outage. That inspection program was completed by December 1987. The two welds were subsequently removed from service during the October-November 1989 refueling outage.

GSI A-13, Snubber Operability Assurance - Hydraulic and Mechanical Snubbers

NRC letter dated July 11, 1975 provided model snubber technical specifications and requested that a license amendment request be submitted to incorporate them into the Monticello technical specifications. A license amendment request was submitted by NSP letter dated August 15, 1975 to incorporate the model technical specifications provided by the July 11, 1975 letter. The August 15, 1975 license amendment request was approved by NRC letter dated September 15, 1975.

NRC letter dated December 17, 1975 provided revised model snubber technical specifications and requested that a license amendment request be submitted to incorporate them into the Monticello technical specifications. A license amendment request was submitted by NSP letter dated October 1, 1976 to incorporate the revised model technical specification provided by the December 17, 1975 letter. The October 1, 1976 license amendment request was approved by NRC letter dated October 27, 1976.

NRC letter dated November 20, 1980 provided revision 1 of the In-service Surveillance Requirements for snubbers under the Standard Technical Specifications and requested that a license amendment request be submitted to incorporate them into the Monticello technical specifications. A license amendment request was submitted by NSP letter dated October 9, 1981 to incorporate the changes requested by the November 20, 1980 letter. The October 9, 1981 license amendment request was approved by NRC letter dated December 28, 1981.

#### GSI A-35. Adequacy of Offsite Power Systems

In response to a July 1976 degraded grid voltage event at Millstone Unit 2 the NRC issued a letter dated August 13, 1976 which required an analysis of the degraded voltage issue as it affected Monticello. Responses to the August 13, 1976 NRC letter were provided by NSP letters dated September 17, 1976 and March 4, 1977.

NRC letter dated June 3, 1977 requested installation of degraded voltage relays designed to separate the safety buses from offsite power whenever degraded voltage conditions existed for a specified period of time. Licensees were also requested to propose Technical Specifications for those relays and associated instrumentation. Responses to the June 3, 1977 NRC letter were provided by NSP letters dated July 25, 1977, October 14, 1977 and April 21, 1978. NRC letter dated June 18, 1979 requested additional information with regard to the Monticello response to the June 3, 1977 letter. NSP letters dated September 14, 1979 and October 31, 1979 provided the additional information requested by the June 18, 1979 NRC letter and reported that the modifications required in response to the June 3, 1977 NRC letter had been completed. The NRC was informed of a change in the voltage protection circuitry logic described in the April 21, 1978 letter by an NSP letter dated August 4, 1980. A License Amendment Request was submitted on May 15, 1980 to incorporate into the Monticello Technical Specifications the modifications implemented in response to the June 3, 1977 NRC letter. That license amendment request was approved by NRC letter dated March 27, 1981.

NRC letter dated August 8, 1979 requested licensees to reanalyze their plants to ensure that safety-related equipment was not subjected to voltages outside design limitations when grid voltage was at its maximum and minimum levels. Licensees were also requested to perform tests to measure station voltages at various locations in the plant to verify the accuracy of the calculations. Responses to the August 8, 1979 NRC letter were provided by NSP letters dated

October 22, 1979, November 17, 1980 and January 30, 1981. The reanalysis requested by the August 8, 1979 NRC letter was submitted to the NRC by the January 30, 1981 letter. NSP letter dated March 16, 1981 provided updated information with regard to actions described in the January 30, 1981 NSP letter.

NRC letter dated May 5, 1981 requested additional information on the January 30, 1981 response. NSP letter dated June 25, 1981 responded to May 5, 1981 NRC request for additional information. NRC letter dated August 28, 1981 requested additional information required for the NRC Staff to complete their review of the adequacy of Monticello electric distribution system voltages. NSP letter dated November 2, 1981 responded to August 28, 1981 NRC request for additional information. NSP letter dated May 20, 1982 reported the completion of modifications needed to meet the NRC's acceptance criteria for electrical distribution system voltages and described Monticello's plans for assuring adequate voltage conditions over the life of the plant. NRC letter dated May 28, 1982 concluded that the Monticello design was acceptable with respect to the adequacy of station electric distribution system voltages.

NRC Confirmatory Action letter dated August 15, 1983 reiterated actions to be taken by NSP in response to a trip of the normal power supply to the 4160 volt AC essential bus number 16 which occurred at Monticello on August 1, 1983. NSP letter dated August 24, 1983 provided information related to the August 1, 1983 actuation of degraded voltage protection logic at Monticello. The August 15, 1983 Confirmatory Action letter was clarified by NRC letter dated August 31, 1983. NRC letter dated September 8, 1983 notified NSP that the August 1, 1983 degraded voltage event was determined to be a significant operating event and transmitted a safety evaluation which resulted from an NRC visit to the site. NSP letter dated November 15, 1983 provided the results of the NSP review of the NRC safety evaluation transmitted by the September 8, 1983 NRC letter.

Further information in response to the August 15, 1983 Confirmatory Action letter was provided by NSP letters dated September 9, 1983, September 26, 1983, October 14, 1983, October 28, 1983 and December 30, 1983. NRC letter dated August 7, 1984 requested additional information on the December 30, 1983 response. NSP letter dated September 25, 1984 responded to August 7, 1984 NRC request for additional information. Additional information related to modifications to the degraded voltage protection logic and the diesel generator start logic were provided by NSP letter dated October 25, 1984.

NSP letter dated July 27, 1984 transmitted a license amendment request resulting from the revised analysis of the allowable ranges of switchyard voltages for operation of Monticello. The July 27, 1984 NSP letter also transmitted a report for NRC Staff review describing the testing that was performed at Monticello to verify the models and analytical techniques used in the analysis performed in response to the August 1, 1983 degraded voltage event. Revision 1 to the July 27, 1984 license amendment request was submitted by NSP letter dated November 9, 1984. The July 27, 1984 license amendment request was approved by NRC letter dated November 27, 1984.

NSP letter dated December 27, 1984 provided clarifying information related to one of the statements in the NRC Staff Safety Evaluation Report included in the November 27, 1984 NRC license amendment transmittal. A revised Safety Evaluation Report was issued by NRC letter dated March 20, 1985.

GSI A-63, Isolation of Low Pressure Systems Connected to the Reactor Coolant System Pressure Boundary

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NRC letter dated August 8, 1980 confirmed that the two specific Event V value configurations did not exist at Monticello and as such no further action was required.