

J. P. O'Reilly
Region I

X

RE: MONTICELLO MANAGEMENT INSPECTION ENFORCEMENT
LETTER

J. G. Davis
Region II

X

Please find enclosed a copy of the enforcement letter we sent to Northern States Power Company following the Monticello management inspection. I just realized you were inadvertently left off the distribution list - Sorry!

Enclosure:
As Stated

N. C. Moseley
Region IV

X

cc: B. H. Grier, w/o Encl.

R. W. Smith
Region V

X

50-263
Insp

J. G. Keppler

11/20/72

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|-----------|---------------|--|--|--|--|--|
| OFFICE ▶ | <i>JK</i> | | | | | |
| SURNAME ▶ | J. G. Keppler | | | | | |
| DATE ▶ | 11/20/72 | | | | | |

OCT 19 1972

Docket 50-263

Northern States Power Company
ATTN: Mr. Wade Larkin
Vice President, Power Supply
414 Nicollet Mall
Minneapolis, Minnesota 55401

Gentlemen:

This letter refers to the inspection of your activities authorized under AEC Facility Operating License No. DPR-22 conducted by Mr. Seyfrit of our Region III Regulatory Operations Office and other Regulatory personnel on May 23-26, 1972, at the Monticello Nuclear Generating Station in Wright County, Minneapolis, Minnesota.

Based on the results of the above inspection, it appears that certain of your activities were not conducted in full compliance with AEC requirements. These matters, which Messrs. Engelken and Grier of this Directorate discussed with you and Mr. McElroy, and which Messrs. Fiorelli, Seyfrit, and Hildreth discussed with other members of your senior staff, at the NSP offices in Minneapolis on August 24, 1972, are identified in the enclosure to this letter. As you were informed during the meeting, the number and nature of these violations indicate the need for improvement in the management control of the operational and administrative aspects of your licensed operations.

This notice is sent to you pursuant to the provisions of Section 2.201 of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty (20) days of your receipt of this notice a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

50-263
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Northern States Power
Company

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OCT 19 1972

In your reply to this notice, please provide us with your plans and schedule for upgrading your quality assurance program for operations to assure full compliance with the AEC's quality assurance criteria contained in Appendix B to 10 CFR 50.

Very truly yours,

Original signed by
F. E. Kruesi

F. E. Kruesi, Director of
Regulatory Operations

Enclosure:
Description of Items of
Noncompliance

bcc: J. O'Leary, L
P. A. Morris, RO
R. H. Engelken, RO
H. D. Thornburg, RO
L. I. Cobb, RO
J. Gallo, GC
D. J. Skovholt, L
D. L. Ziemann, L
PDR
Local PDR
NSIC
DTIE
R. F. Fraley, ACRS (3)
DR Reading File
DR Central File
B. H. Grier, RO:III

| OFFICE | RO | RO | RO | L | RO | OGC |
|---------|--------------------------|----------|------------|------------|----------|----------|
| SURNAME | Mildreth;mm KVSeyfrit | JKeppler | RHEngelken | DJSkovholt | FEKruesi | JMB |
| DATE | 10/13/72 | 10-13-72 | 10/16/72 | 10/16/72 | 10/19/72 | 10/18/72 |

Enclosure

NORTHERN STATES POWER COMPANY
DOCKET NO. 50-263

Items of Noncompliance with Regulatory Requirements:

1. Paragraph 3.5.C.3 of the Technical Specifications provides that when one of the Residual Heat Removal (RHR) service water systems is inoperable for any reason, reactor operation is permitted during the next seven days only if all active components of the redundant operable RHR service water system are demonstrated to be operable at least once each day.

Contrary to the requirements of Paragraph 3.5.C.3 of the Technical Specifications, the reactor was operated with loop A of the RHR service water system inoperative during the period of June 1, 1971, through September 21, 1971, without demonstrating the operability of the active components in loop B during this period.

2. Paragraph 3.5.C.5 of the Technical Specifications requires, if certain limiting conditions for operation of the RHR service water system cannot be met, that a written report be submitted to the AEC in accordance with Paragraph 3.5.H of the Technical Specifications, or that an orderly shutdown of the reactor be initiated and the reactor water temperature be reduced to less than 212°F within 24 hours. One of these limiting conditions for operation, Paragraph 3.5.C.2 of the Technical Specifications, permits an RHR service water pump to be out of service a maximum of 30 days.

Contrary to the requirements of Paragraph 3.5.C.5 of the Technical Specifications, the reactor was operated for more than 2200 hours from March 1, 1971, until the end of September, 1971, with RHR service water pump No. 11 inoperable. No written report was made to the AEC in accordance with Paragraph 3.5.H of the Technical Specifications.

3. Paragraph 4.5.C.1 of the Technical Specifications requires that surveillance tests of the RHR service water system be performed to demonstrate pump and valve operability once every three months.

Contrary to the requirements of Paragraph 4.5.C.1 of the Technical Specifications, the operability of RHR service water pumps No. 13 and 14 had never been individually demonstrated. In this regard, the surveillance test procedure was deficient in that it did not require operability of each pump to be demonstrated.

4. Paragraph 4.5.C.2 of the Technical Specifications requires that, when one RHR service water pump is determined to be inoperable, the redundant components of the remaining subsystem be demonstrated to be operable immediately and daily thereafter.

Contrary to the requirements of Paragraph 4.5.C.2 of the Technical Specifications, when RHR service water pump No. 12 was out of service for maintenance during the period from September 22 through October 16, 1971, the redundant components of the remaining subsystem were not demonstrated to be operable from September 23, 1971, through October 9, 1971.

5. Item 5 of Table 6.1.1 of the Technical Specifications provides a description of responsibilities of the Monticello Safety Organization as they relate to proposed plant operating procedures and proposed changes thereto which affect nuclear safety or involve the license, Technical Specifications, or Final Safety Analysis Report.

Contrary to the requirements of Table 6.1.1, Item 5, of the Technical Specifications:

- a. Volume F, which contains temporary changes to operating procedures, had not been reviewed and approved;
 - b. Changes to operating procedures contained in internal correspondence had not been reviewed and approved (e.g., Work Request Authorization Forms and Procedures); and
 - c. The Safety Audit Committee had not reviewed recommendations made by the Operations Committee relating to proposed procedures or changes thereto, or advised the Vice President - Power Production and System Operation concerning these recommendations.
6. Paragraph 6.1.D of the Technical Specifications requires the selection, training and retraining of plant personnel to be in accordance with the Proposed Standard for Selection and Training of Personnel for Nuclear Power Plants - Draft No. 9 dated July 3, 1969, and prepared by Subcommittee ANS-3, Reactor Operations, of the American Nuclear Society Standards Committee.

Contrary to the requirements of Paragraph 6.1.D of the Technical Specifications, there was no evidence that an evaluation of the effectiveness of the retraining program had been made as specified in Draft No. 9 of the above referenced standard. In addition, the formal retraining program did not include all subjects specified in Paragraph 5.5.1 of Draft No. 9 of the referenced standard (e.g., first aid training).

7. Paragraph 6.1.E.1.f.(3) of the Technical Specifications requires that the findings of all reviews by the Safety Audit Committee of Technical Specification violations and the Committee's recommendations to prevent recurrence of the violations be reported in writing to the Vice President - Power Production and System Operations, and the Manager of Power Production.

Contrary to the requirements of Paragraph 6.1.E.1.f.(3) of the Technical Specifications, the Safety Audit Committee failed to take the required action on an item of noncompliance that was brought to the Committee's attention at a SAC meeting on August 26-27, 1971. The pertinent item of noncompliance was the lack of a preventive maintenance program for instrumentation as required by Paragraph 6.2.C of the Technical Specifications.

8. Paragraph 6.1.E.2.g.(1) of the Technical Specifications requires that the administrative procedures for the Operations Committee be prepared and maintained and that they cover the content and method of submission of presentations to the Operations Committee.

Contrary to the requirements of Paragraph 6.1.E.2.g(1) of the Technical Specifications, the administrative procedures for the Operations Committee lacked specific instructions describing the content and method of submission of presentations to the Committee.

9. Paragraph 6.2.A of the Technical Specifications requires that plant operations be conducted in accordance with written procedures contained in the Operations Manual. These procedures are required to cover all normal and reasonably foreseeable abnormal operating conditions and must include (1) detailed check lists for all major systems, including safety and instrumentation systems, to insure that all necessary equipment is functioning and in the proper mode for plant startup (cold, hot, or scram recovery); (2) detailed procedures for startup, normal operations, and shutdown of major pieces of equipment, systems and integrated plant operation;

(3) refueling procedures; (4) abnormal operating procedures detailing the steps to be taken in abnormal situations to safely secure the plant; and (5) emergency procedures outlining personnel responsibilities, evacuation routes from the plant, and all other pertinent information necessary to effectively cope with various emergency situations.

Contrary to the requirements of Paragraph 6.2.A of the Technical Specifications, the following deficiencies were observed with respect to the development, review and implementation of procedures:

- a. The devices used to detect leakage within the drywell were not set "to detect a trend" as required by Procedure C-4.
- b. Semi-annual reviews of the Operations Manual Procedures were not completed in accordance with Procedure A.6.E.2.
- c. Four procedures were approved for issuance on August 9, 1971; however, these procedures had not been issued for use by the operating staff at the time of the inspection. In addition, the master copy of the procedures contained two different and conflicting procedures for each of four abnormal occurrence procedures.
- d. Test results required by the Procedure 0004 were not recorded for tests conducted on October 28, 1971, and August 25, 1971.
- e. Completed copies of work request authorizations were not attached to the completed surveillance test procedure for the RHR service water test conducted on March 28, 1972, as required by Procedure C.5, Paragraph VII.D.
- f. Several design changes had been made to the radwaste system; however, the operating procedures had not been revised to reflect these changes.
- g. Weekly status reports of surveillance testing had not been submitted to the Assistant Plant Superintendent as required by Procedure C.5, Paragraph VII.E.
- h. Minutes of the Safety Audit Committee (SAC) did not indicate a review of Operations Committee (OC) minutes as required by Procedure A.5, Paragraph 1.D.7.

- i. Abnormal operating procedures had not been written or were not available for the following abnormal operating conditions:
(1) Alarm procedures for the floor drain leak rate or the equipment drain leak rate annunciators; (2) instructions for localization of leaks within containment using instruments available to the operator.
10. Paragraph 6.2.B, of the Technical Specifications requires that radiation control procedures be maintained and be made available to all station personnel.

Contrary to the requirements of Paragraph 6.2.B of the Technical Specifications, written procedures had not been developed or made available to all station personnel for the respiratory protection program.

11. Paragraph 6.2.C.4 of the Technical Specifications requires that maintenance and test procedures be developed for calibration and preventive maintenance of instrumentation that could affect the nuclear safety of the plant.

Contrary to the requirements of Paragraph 6.2.C.4 of the Technical Specifications, test procedures for calibration and preventive maintenance had not been developed for the installed instruments used to verify proper operation of the Residual Heat Removal service water sytem.

12. Paragraph 6.2.D of the Technical Specifications requires that all procedures and changes to procedures described in Paragraph 6.2 of the Technical Specifications be reviewed in accordance with the requirements specified in Table 6.1.1.

Contrary to the requirements of Paragraph 6.2.D of the Technical Specifications, surveillance test procedure No. 0004 and changes thereto had not been reviewed by the Operations Committee.

13. Paragraph 6.5.A of the Technical Specifications requires that plant operating records and/or logs be kept in a manner convenient for review.

Contrary to the requirement of Paragraph 6.5.A of the Technical Specifications, records of plant radiation and contamination surveys, records of principal maintenance activities, and routine

operating data sheets were not kept in a manner convenient for review. (Specific deficiencies in the record keeping system were discussed with plant management.)

14. 10 CFR 50.59 requires in part that the licensee maintain records of changes to the facility and of changes in procedures made without prior Commission approval, and further requires that the licensee furnish to the Commission annually or at shorter intervals as specified in the license, a report containing a brief description of such changes.

Contrary to the requirements of 10 CFR 50.59, facility changes made prior to March 1971 had not been reported to the Commission.

15. Appendix B of 10 CFR 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", requires that information be developed concerning managerial and administrative controls to be used to assure safe operations and Appendix B sets forth the requirements for such controls.

Contrary to the requirements of Appendix B to 10 CFR 50, no formal quality assurance program for operations had been implemented.

Enclosure

NORTHERN STATES POWER COMPANY
DOCKET NO. 50-263

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