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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-263 Monticello Nuclear Generating Plant, Northern States 05000263

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SUBJECT: Provides response to 910910 ltr re violations noted in Insp
 Rept 50-263/91-15. Corrective actions: fire sys jockey pump
 started & operations personnel informed to stay in
 continuous operation.

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NOTES: NRR/LONG, W. 05000263

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October 9, 1991

10 CFR Part 2
Section 2.201

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

Response to NRC Inspection Report No. 91015 Concerning a
Notice of Violation for Failure to Maintain Records of Changes
to the Facility in accordance with 10 CFR Part 50, Section 50.59

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, the following response to the notice of violation contained in your letter of September 10, 1991 is submitted.

Violation

10 CFR 50.59(b)(1) requires, in part, that the licensee shall maintain records of changes in the facility and changes in procedures made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report or to the extent that they constitute changes to procedures as described in the safety analysis report. The Monticello Updated Safety Analysis Report (USAR), Revision 10, Section 10.3.1.2.1, states, in part, that the fire protection system jockey pump operates continuously to maintain fire protection system header pressure near 110 psig.

Contrary to the above, on August 2, 1991, and for an indeterminate period of time prior to August 2 on the order of several months, the fire protection jockey pump was not run continuously, and an evaluation and record of the change to the facility and operating procedures as described in the USAR was not originated or maintained.

This is a Severity Level IV violation.

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Q PDR

Handwritten signature/initials

Reason for the Violation

The four (4) Fire Protection System pumps consist of a 1500 gpm diesel engine-driven pump, two 1500 gpm electric motor-driven pumps (the fire pump and the screen wash/fire pump), and a 50 gpm electric motor-driven jockey pump. The purpose of the jockey pump is to ensure that fire protection system header pressure is continuously maintained near 110 psig.

The screen wash system is connected to the fire protection system through a check valve so that the screen wash/fire pump can serve as a third fire pump. The screen wash/fire pump operates in screen wash mode the majority of the time since screen washing is required continuously when river temperature is above 50°F or when there are large amounts of suspended materials in the river such as leaves.

Sometime in the past, an informal, undocumented practice regarding jockey pump operation was established. When screen washing was in progress the jockey pump would be secured. This practice was based on minimizing unnecessary wear on the jockey pump and increasing efficiency. The screen wash/fire pump is capable of maintaining the fire system header full and pressurized to greater than the low pressure set point for automatic fire pump start. There is no loss of fire protection system or screen wash system effectiveness. If the screen wash/fire pump was unable to maintain fire main pressure, the electric fire pump would start and an alarm would be received in the control room. This condition would be immediately investigated and resolved.

The root cause of this issue is that plant operating procedures did not identify that the USAR stated that the fire system jockey pump is operated continuously.

Corrective Action Taken and Results Achieved

1. The fire system jockey pump was started and operations personnel were informed that it is to stay in continuous operation. This action ensured system operation was consistent with the USAR description of operation.
2. A Safety Evaluation was written in accordance with 10 CFR Part 50, Section 50.59 to document that fire main pressure can be maintained with the jockey pump or by equivalent means.
3. The fire protection section of the USAR was reviewed for other potential discrepancies. One discrepancy was found. Section 10.3.1.2.1 states that "The diesel engine-driven fire pump also starts automatically upon loss of plant AC power."

In fact, the diesel engine-driven fire pump does not start directly as a result of loss of AC. Instead, with no AC powered pumps running, fire system pressure will slowly decrease to the point where the diesel fire pump starts on low pressure.

A Safety Evaluation was written in accordance with 10 CFR Part 50, Section 50.59 to document that the diesel fire pump does not automatically start as a direct result of loss of plant AC.

4. Engineering and Technical Staff training was conducted to emphasize the need for a 10 CFR Part 50, Section 50.59 Safety Evaluation when deviating from the USAR.

Corrective Action To Be Taken To Avoid Further Violation

1. USAR Section 10.3.1.2.1 will be revised to state that the fire main will be maintained full and pressurized to greater than the low pressure set point for automatic fire pump start using the fire system jockey pump, the screen wash/fire pump or equivalent means. Completion date of June 30, 1992.
2. The Fire Protection sections of the Operating Manual will be revised to ensure that the USAR description is reflected. Completion date of December 20, 1991.
3. The Operating Manual biennial review process will be revised to incorporate a verification that ensures operating procedures exist which reflect all USAR descriptions of operation. Completion date of December 20, 1991.
4. This event will be discussed in Operator training. Completion date of December 20, 1991.
5. As part of the ongoing Design Basis Reconstitution effort, plant walk downs are being conducted which will identify potential discrepancies between the licensing basis as reflected in the design basis and actual operation. A follow-on item process exists to address any discrepancies and includes performance of 10 CFR Part 50, Section 50.59 reviews as needed.

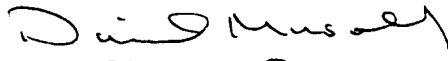
USNRC
October 9, 1991
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NORTHERN STATES POWER COMPANY

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Please contact us if you have any questions or wish further information concerning this matter.


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Vice President
Nuclear Generation

c: Regional Administrator, Region III, NRC
Senior Resident Inspector, Monticello Site, NRC
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J Silberg