

MOTION

Pursuant to 10 CFR §2.730, Intervenor, Coleman, hereby move for an Order reopening consideration of their Contentions Numbers Two and Six for the limited purpose of including in the instant record the NRC inspection report dated April 10, 1979, pertaining to the partially unsatisfactory results of venting of the Monticello Nuclear Generating Station spent fuel pool racks, attached hereto as Exhibit A.

In support of the within motion, Intervenor shall rely upon the attached brief, exhibit and testimony of the parties hereto at the hearing held on May 3, 1979.


KEITH A. ONSDORFF
ASSISTANT DEPUTY PUBLIC ADVOCATE

7910110184

STATEMENT IN SUPPORT OF MOTION

Considerable time and attention in these proceedings has been devoted to the high density spent fuel pool racks recently installed at the Monticello Nuclear Generating Station, owned and operated by the Northern States Power Company in Minneapolis, Minnesota. Due to the numerous similarities between the new racks at Monticello and those proposed for use at Salem, the experiences at this Northern States' plant are understandably deemed pertinent to what can be reasonably anticipated at this Public Service plant, if reracked. Tr.544-1 to 547-9 to 16. Of particular importance is the continued serviceability of vented cells for storage of fuel since the sole reason for installation of new racks is to increase the pool's storage capacity. Any substantial loss in cell availability will likewise substantially undermine the justification for this license amendment.

It therefore becomes highly relevant to obtain the fullest record possible on this issue which is crucial to the very efficacy of applicant's proposal. This is especially so in light of the apparently incorrect assertion by Exxon's nuclear expert, Mr. Eckhart, that the Monticello cells were used to store spent fuel after venting. Tr.708-20 to 21. The document which Intervenors are submitting herewith indicates that the Nuclear Regulatory Commission has recently inspected this Northern State's plant and determined that several vented cells did not successfully accept a test gauge for installation of fuel assemblies. This loss of serviceability of vented cells may not in and of itself present a safety concern, if the cells are eliminated from use. It does, however, present one more unknown factor undercutting the confidence with which it can be concluded that reracking Salem One's spent fuel pool is the most prudent course of action to extend this

facility's life span until away from reactor storage becomes available in the mid 1980's.

CONCLUSION

For all the foregoing reasons, it is respectfully submitted that Exhibit A, attached hereto, should be admitted as direct evidence on behalf of Colemans' Contentions Two and Six.

Respectfully submitted,


KEITH A. ONSDORFF
ASSISTANT DEPUTY PUBLIC ADVOCATE

DATED: August 1, 1979

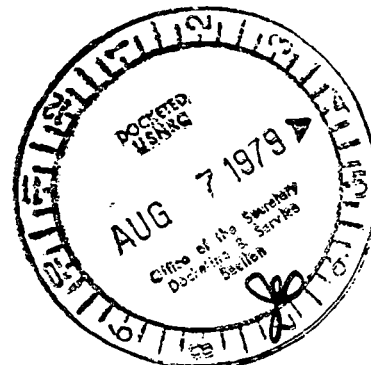


UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN ILLINOIS 60137

APR 10 1979

Docket No. 50-263

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



Gentlemen:

This refers to the inspection conducted by Messrs. T. L. Harpster, J. E. Menning and G. C. Wright of this office on March 19-23, 1978, of activities at Monticello Nuclear Generating Plant authorized by NRC Operating License No. DPR-22 and to the discussion of our findings with Mr. Eliason and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room, except as follows. If this report contains information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

EXHIBIT A

~~207-11~~

791011/89

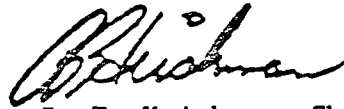
Northern States Power
Company

- 2 -

APR 10 1979

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



R. F. Heishman, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure: IE Inspector
Report No. 50-263/79-02

cc w/encl:
Mr. L. R. Eliason, Plant
Manager
John W. Ferman, Ph.D.
Nuclear Engineer, MPCA
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Anthony Roisman, Esq.,
Attorney

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-263/79-02

Docket No. 50-263

License No. DPR-22

Licensee: Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

Facility Name: Monticello Nuclear Generating Plant

Inspection At: Monticello site, Monticello, MN

Inspection Conducted: March 19-23, 1979

Inspectors: T. L. Harpster

J. E. Menning

G. Wright

Approved By: R. F. Warnick, Chief
Reactor Projects Section 2

Inspection Summary

Inspection on March 19-23, 1979 (Report No. 50-263/79-02)

Areas Inspected: Routine, unannounced inspection of design changes and modifications; design change and modification program; review of plant operations; cleanliness; followup on license amendment conditions; and followup of Bulletins, Circulars and LER's. This inspection involved approximately 85 inspector manhours on site by three NRC inspectors.

Results: No items of noncompliance or deviations were identified in any of the areas inspected.

7905 290546

DETAILS

1. Personnel Contacted

*L. Eliason, Plant Manager
M. Clarity, Plant Superintendent, Engineering and
Radiation Protection
*W. Anderson, Plant Superintendent, Operations and Maintenance
D. Anthony, Superintendent, Operations Engineering
*W. Shamla, Superintendent, Technical Engineering
R. Fey, Superintendent, Radiation Protection
R. Scheinost, Senior Quality Engineer
E. Earney, Training Supervisor
D. Nevinski, Senior Nuclear Engineer
A. Myrabo, Assistant Nuclear Engineer
L. Nolan, Chemical Engineer
O. Iverson, Associate Production Engineer
R. Goranson, Assistant Production Engineer
G. Smith, Assistant Production Engineer
S. Shurts, Engineer
P. Tobin, Engineer
S. Hammer, Engineer
T. Overlid, Engineer
D. Pedersen, Engineer
R. Nelson, Quality Engineer, Corporate

*Denotes those attending the exit interview.

2. Inoffice Review of Licensee Event Reports

The inspector conducted a review within the regional office of selected licensee event reports to ascertain whether additional reactive inspection effort or other response was warranted; whether corrective action discussed in the event reports appeared appropriate; and whether reporting requirements were satisfied.

The following events are considered closed as a result of the review:

M-R0-78-18	M-R0-78-27
M-R0-78-21	M-R0-78-28
M-R0-78-22	M-R0-79-01

No items of noncompliance or deviations were identified.

3. Onsite Licensee Event Followup

The inspector conducted a followup inspection of selected events to ascertain whether the licensee's review, corrective action and reports of the identified events and associated conditions are adequate and in conformance with regulatory requirements, technical specifications, and licensee procedures and controls.

The following events are considered closed as a result of this inspection:

M-RO-78-15	M-RO-78-23	M-RO-78-26
M-RO-78-19	M-RO-78-24	M-RO-78-29
M-RO-78-20	M-RO-78-25	M-RO-78-30

No items of noncompliance or deviations were identified.

4. IE Bulletin Followup

The inspector verified that for the following IE Bulletins, the bulletins and responses were reviewed by appropriate onsite management representatives; information discussed in the replies was accurate; any corrective actions taken were effected as described in the replies; and the replies were prompt and within the time periods requested.

The following Bulletins are considered closed as a result of this inspection:

IEB 78-09
IEB 78-14

No items of noncompliance or deviations were identified.

5. IE Circular Followup

The inspector verified that the following IE Circulars were received by licensee management; a review for applicability was performed; and for circulars applicable to the facility, action taken or planned is appropriate.

The following Circular is considered closed as a result of this inspection:

IEC 78-16

No items of noncompliance or deviations were identified.

6. Design Changes and Modifications Program

The inspector reviewed the licensee's design change and modification program to ascertain whether the program is in conformance with regulatory requirements, commitments in the application and industry guides or standards.

As part of this review, the inspector reviewed the following procedures:

1 ACD 3.3 (Rev. 3, 10/12/77) Design Change Control	3 AWI 5.3.4 (Rev. 2, 11/6/78) New Drawings
3 ACD 4.1 (Rev. 5, 12/8/78) Design Change Control	3 AWI 5.3.6 (Rev. 1, 11/6/78) Drawing Deletions
3 ACD 4.2 (Rev. 3, 11/4/77) Design Change Installation Procedure	4 ACD 3.11 (Rev. 4, 8/12/78) Procedure Review and Approval
3 ACD 4.3 (Rev. 3, 11/4/77) Design Change Preoperational/ Operational Testing	4 ACD 3.10 (Rev. 2, 3/8/77) Document Control
3 ACD 5.3 (Rev. 4, 11/6/78) Drawing Control	4 ACD 4.8 (Rev. 5, 3/18/77) Bypass Control
3 AWI 4.1.1 (Rev. 1, 3/25/75) Safety Evaluations	Document Control Procedure IX-I (Rev. 0, 12/30/77) Plant Controlled Drawing Files
3 AWI 5.3.4 (Rev. 3, 11/6/78) Drawing Revisions	Document Control Procedure I-3 (Rev. 1 11/10/76) Blank Forms and Procedures Printing, Distribution and Control

No items of noncompliance or deviations were identified.

7. Design, Design Changes, and Modifications

The inspector reviewed the documentation for selected design changes to ascertain whether the changes were made in accordance with the Technical Specifications and 10 CFR 50.59.

The inspector initially reviewed the licensee's annual report of changes, tests, and experiments which were carried out pursuant to 10 CFR 50.59 in 1978. The following three activities were then selected for detailed review:

- a. ATWS Modification. Design Change No. 77Z024.
- b. Core Spray Isolation Valve Bypass Switch. Design Change No. 78 M075.
- c. Increase Allowable Number of Reactor Vessel Startup/Shutdown Cycles to 208. Safety Review Item No. 181.

In conducting the design change reviews, the inspector noted that design change packages for the following four completed activities were not closed out and available in the plant files:

- a. Load Mitigating Spargers. Design Change No. 78 M012.
- b. Shorten Torus Vent Header Downcomers. Design Change No. 78 M014.
- c. Installation of Torus Vent Header Deflector. Design Change No. 78 M015.
- d. Main Steam Line Manifold. Design Change No. 78Z028.

Investigation revealed that these design changes were under the cognizance of the licensee's Plant Engineering and Construction Department and that related installation work was performed during the most recent refueling outage. Failure to have these four design packages closed out at the time of this inspection appeared to be in violation of the licensee's procedure 3 ACD 4.1 (Rev. 5, 12/8/78), Design Change Control, which requires that design changes be closed out three months after installation. This inconsistency was subsequently discussed with the Plant Superintendent Engineering and Radiation Protection who related that a significant back log of open design change packages existed. Since the revision to 3 ACD 4.1 which established the three-month close out requirement was fairly recent (12/78), the inspector did not consider the failure to have these four design packages closed out to be an item of noncompliance. However, the inspector did encourage the licensee representative to institute the controls necessary to ensure the timely close out of design change packages. The inspectors' concerns in this area were reiterated during the exit interview.

No items of noncompliance or deviations were identified.

8. License Amendments Nos. 34, 35 and 36

The inspector reviewed the implementation of license amendments 34, 35 and 36 to verify compliance with commitments made therein.

Amendment 34; High Density Fuel Storage System (HDFSS)

The inspector reviewed procurement documents, receiving inspection reports, installation procedures, special test procedure and modification procedure for the four High Density Fuel Storage Racks now installed to verify compliance with commitments made in the license amendment.

The review of the procurement documents verified that; appropriate product quality certification documents from the designer/vendor were available; analysis of the boron sheets used in the fuel racks were available; and that certificates of compliance from the assembler were available.

Receiving inspection reports including; inspection for cleanliness, dimensional checks and confirmation of poison plate installation by neutron source/detection were reviewed for completeness and conformity with commitments.

The following procedures were reviewed for each of the four modules installed.

- a. HDFSS Module Inspection and Preparation Procedure
- b. HDFSS Boron Test Equipment Setup Procedure
- c. HDFSS Module Boron verification Procedure
- d. HDFSS Drilling and Re-sizing Procedure
- e. HDFSS Module Installation Procedure
- f. HDFSS Module Re-installation Procedure
- g. HDFSS Module Unloading Procedure

Dimensional checks, with a 5.960" go/no-go gauge, after initial installation revealed that 11 of the 676 fuel storage locations would not accept the gauge and that two of the 11 locations would not accept a dummy fuel element.

After removal of the modules, drilling of 3/16" holes in the top adjacent corners of each boron tube, re-sizing of each tube by vacuum and mechanical means, and re-installation of the modules into the fuel pool, six of the original 11 tube locations would still not accept the 5.690" gauge however, all locations now accepted the dummy fuel element.

The licensee instituted a special test program to test each boron tube, in each module, after 60 days and again after 90 days prior to storing fuel in the modules. The results of the 60 day test:

revealed that seven of the original 11 locations would not accept the go/no-go gauge and the results of the 90 day test revealed that eight of the original 11 locations would not accept the go/no-go gauge. In all cases the dummy fuel element could be inserted with no problem.

The license is presently storing fuel in both boral tubes and adjacent spaces with the exception of the eight locations identified during the 90 day test. These eight locations have been "Red" flagged and the licensee stated they would not be used unless absolutely necessary.

At the time of the inspection the test specimens, both stainless steel boral and boral alone configurations, had not been installed. The material certifications had just been received and plans to install the specimens are in progress.

In addition the inspector reviewed the Safety Evaluation Report pertaining to the High Density Fuel Storage System.

No items of noncompliance or deviations were identified.

9. Review of Plant Operations

The inspector conducted a review of plant operations to ascertain whether facility operation was in conformance with technical specifications, regulatory requirements, administrative procedures, or other commitments.

The inspector reviewed selected operating records for the period January 1 - March 21, 1979. These included: Control Room Operators Daily Logs, Shift Supervisors Daily Log, Jumper and Bypass Log, Night Order Book, Hold and Secure Card Log.

The inspector conducted a tour of the control room and other accessible plant areas to observe instrumentation; radiation, fire prevention, and equipment tagging controls; and status of selected plant systems and equipment. In addition, housekeeping was observed on two separate tours through the reactor building and found to be completely acceptable at this time.

No items of noncompliance or deviations were identified.

10. Exit Interview

At the conclusion of the inspection on March 23, 1979, the inspectors met with Station Management personnel (Denoted in Paragraph 1) and summarized the scope and findings of the inspection.



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :
PUBLIC SERVICE ELECTRIC : DOCKET NO. 50-272
& GAS CO. :
(Salem Generating Station :
Unit #1) :

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor's Colemans, Motions to Reopen Contentions Two, Six and Thirteen in the above captioned matter have been served upon the parties hereto by deposit in the United States mail at the post office in Trenton, N.J., with proper postage thereon, this 2nd day of August, 1979.


KEITH A. ONSDORFF
ASSISTANT DEPUTY PUBLIC ADVOCATE

Dated: August 2, 1979