



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

April 27, 1976

Mr James M Allan, Chief
Fuel Facility and Materials Safety Branch
Office of Inspection & Enforcement, Region III
U S Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr Allan:

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

Your letter dated April 8, 1976, which was received on April 9, 1976, transmitted IE Inspection Report No. 050-263/76-05. The Inspection Report states at two points that certain items of discussion will be referred to the Office of Nuclear Reactor Regulation and will be examined at subsequent inspections. This letter is written to provide clarification for the record of the NSP position on those matters and several other topics discussed with the NRC personnel during their inspection. Our comments will reference the Inspection Report by page number and paragraph designation.

Page 2, paragraph A and page 12, paragraph h

NSP took the position that there are no regulatory requirements or Technical Specifications covering the Monticello plant which require the submission of meteorological data. We further pointed out that the NRC Regulatory Guides are not requirements. The discussion that ensued from that point on was with respect to the recommendations contained in Regulatory Guides 4.8 and 1.21 for inclusion with the semiannual effluents report of meteorological data and dose computations. We have reviewed the impact of a reporting requirement of this nature and find that a considerable initial investment in manpower, computer programs, consultant help and equipment would be required to provide this type of data. In addition, it would require a continuing manpower requirement, beyond that which we currently have available, and possibly intermittent or continuous consultant help to provide the data that the NRC proposes to be submitted each six months.

We carried the discussion further with the observation that the NRC is supplied with site meteorology which is used in a conservative manner with plant effluent information to set regulatory limits on radioactive effluents from the plant and highly conservative design objectives. This is coupled with requirements for an extensive Radiation Environmental Monitoring Program to confirm that the limits and design objectives have been set at such a level that there are no unexpected effects on the environment from radioactive effluent releases from the plant. We made the concluding observation that the semiannual submission of meteorological data and dose calculations would appear to be more of a data collection effort

NORTHERN STATES POWER COMPANY

Mr James M Allan

Page 2

April 27, 1976

than information that is needed for the assessment of safety related activities and that the manpower and equipment expenditures that would be involved appear to be unwarranted.

Several years ago NSP began work on a research project for providing transmission of meteorological and effluent data from NSP's fossil and nuclear plants to a centralized computer-oriented data collection system. A prototype "digitizing transmitter" was built, tested and installed at the Monticello plant on the meteorological tower about nine months ago. The "digitizing transmitter" operation has been reasonably successful for the purpose intended, but it has not been suitable for use for submittals to the NRC, such as Appendix I compliance. It was also intended that a teletypewriter would be provided in the Monticello control room to provide supplemental recording of the "digitizing transmitter" information. It should be noted that the Monticello control room already has a wind direction and velocity recorder in operation. Since the teletypewriter system is based on use of the prototype device, which might be replaced with more suitable equipment, it has been decided not to install this supplemental equipment in the Monticello control room. Meteorological data continues to be obtained from the 300' tower in strip chart form and is retained in accordance with recordkeeping requirements.

Paragraph h on page 12 references a computer printout as being available, but not in use. This is information from the prototype "digitizing transmitter" equipment and is not in a format or of the quality which could be put to beneficial use by the nuclear plant. It should also be noted that the licensee is currently hand reducing data from the meteorological strip charts in order to obtain a full year of acceptable quality meteorological data in connection with the Appendix I compliance submittal. This information will update the meteorological data that has been provided to the NRC in earlier submittals.

Page 6, paragraph 3.a

Since the Monticello plant does not have Appendix B Technical Specifications, the comment in regard to EGAD maintaining cognizance of aquatic biota protection conditions, reporting to NSS when protection conditions are exceeded, etc., is not applicable to the Monticello plant at the present time.

The NSS Department does not have administrative responsibility for non-radiological sampling as mentioned in the second sub-paragraph. The NSS responsibility for reduction and computer processing of the meteorological program results is not a routine responsibility but resulted from the needs for obtaining this information on a one-time basis for the Appendix I compliance submittal. The NSS Department has not initiated development of calculational procedures for dose pathway reporting to the NRC in line with discussion in an earlier paragraph that there are no requirements for this at Monticello.

NORTHERN STATES POWER COMPANY

Mr James M Allon
Page 3
April 27, 1976

Page 7, paragraph c

We are not aware of any computerized system used by the NSS Department for reporting the results of program audits and inspections to supervision and management for their review.

Page 8, paragraph 5

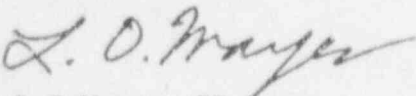
A revised Radiation Environmental Monitoring Program was submitted to the Commission on October 15, 1975 as a license amendment request; the program has not yet been put into effect since the license amendment has not been issued by the NRC. The March 1, 1976 submittal referenced in the inspection report involves interim Technical Specifications on radioactive effluents; the Radiation Environmental Monitoring Technical Specification pages that were included with the March 1, 1976 submittal were included only because there are changes in pagination in this section due to the removal of radioactive effluents from Appendix A and their transfer to Appendix B.

Pages 9-11, paragraph d

The inspection report correctly reflects the increases in levels of I-131 in milk during the summer of 1975; however, it does not point out that these levels have been greatly reduced since replacement of the defective initial 7x7 fuel during the refueling outage in October, 1975.

On the bottom of page 10 and the top of page 11, still under paragraph d, there is a discussion of the number of iodine samples which should be included in the averaging to determine if additional reporting is required on estimates of likely exposures to individuals and population groups. The Technical Specification requirement for supplemental reporting is based on the likelihood of intakes in excess of 1% of those that could result from continuous exposures to the concentration values of Appendix B, Table II, Part 20. This appears to be similar to design objective reporting. (It is our position that the samples should be averaged over a calendar quarter and if the average concentrations of I-131 in milk are greater than 2.4pCi/l, then the supplemental information would be required.)

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/ak

cc: Victor Stello
G Charnoff
MPCA - Attn: J W Ferman