



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

April 12, 1976

Mr. Gaston Fiorelli, Chief  
Reactor Operations Branch  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Fiorelli:

Monticello Nuclear Generating Plant  
Docket No 50-263 License No. DPR-22

Your letter of March 19, 1976, identified a deficiency which appeared to be in noncompliance with NRC requirements and requested that we reply within 20 days of the receipt of your letter. The deficiency as stated was:

Contrary to 10 CFR Part 50, Appendix B, Criterion V, plant administrative procedures relating to quality were not adhered to in the following instances:

- A. Systems on which maintenance was performed were not identified as critical systems and second level review was not performed as required by 4 ACD 3.6, Paragraph 6.1.3.2, for Work Request Authorizations (WRAs) R1-110, R1-111, R1-146, and R2-147. (Report Details, Paragraph 3)
- B. For WRA 75-1530, the block identified on the WRA form as "Testing Completed and Satisfactory Results" was not signed off as required by 4 ACD 3.6, Paragraph 6.2.19. (Report Details, Paragraph 3)
- C. A change to Purchase Order No. 67830 was not properly documented in accordance with Paragraph 6.13 of ACD 8.1. (Report Details, Paragraph 6)
- D. Quality Assurance requirements were not included on Purchase Order No. M69357 in accordance with ACD 8.2, Paragraph 6.2. (Report Details, Paragraph 6)

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Reply to Items A and B

The Administrative Work Instruction concerning critical systems, equipment, and instruments was revised on April 5, 1976, to include a more detailed identification of such items.

Training sessions concerning the Work Request Authorization forms and processes are being conducted for plant staff members. Supervisory and engineering personnel responsible for processing the WRA forms are required to attend one of these sessions. The final session is scheduled on April 21, 1976.

It was verified that testing was actually performed as required by WRA 75-1530 and the appropriate signature has now been obtained.

Completed Work Request Authorizations R1-110, R1-111, R1-146, and R2-147 have been reviewed by the Plant Engineer Technical and the Operations Supervisor to determine if any changes in schedule or requirements relating to the work would have been made if the review required by 4 ACD 3.6, Paragraph 6.1.3.2, had been conducted. It was concluded that no changes would have been made.

Completed WRAs are reviewed periodically to identify discrepancies such as Item B. Appropriate corrective and preventive measures are completed when such items are identified.

Reply to Item C

We agree that Item C involves a deficiency, but conclude that the deficiency is more properly addressed by Control Directive 4 ACD 9.1 than by 4 ACD 8.1.

As described in Paragraph 6 of the Inspection Report, the deficient action was the acceptance of material without having received certification required on the Purchase Order. The acceptance justification was documented by a note attached to the material in storage.

A note such as the one in evidence here cannot be interpreted to be a change to the Purchase Order. Those are formal ordering documents, and the note was never made part of them. It does, however, constitute documentation of an attempt to justify acceptance of material in the absence of certification required by the Purchase Order. Material Acceptance is addressed in Control Directive 4 ACD 9.1.

We conclude, therefore, that the deficiency involves the improper acceptance of material in the absence of documentation specified by the Purchase Order. Administrative Control Directive 4 ACD 9.1, Receiving Process, will be revised by June 30, 1976, to clarify the process by which items received without documentation specified by the Purchase Order may be accepted.

In this case, the Purchase Order requirement for a certification of compliance was improper and unnecessary.

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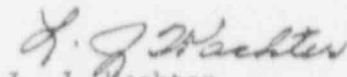
Reply to Item D

We feel that this item should not be considered a deficiency because:

1. The applicable portion of Paragraph 6.2 of 4 ACD 8.2 is a recommendation rather than a requirement.
2. Contrary to Paragraph 6 of the Inspection Report, 4 ACD 8.1 does not contain a specific requirement for a certificate of compliance.
3. The intent of the recommendation in Paragraph 6.2 of 4 ACD 8.2 is to obtain input from the product manufacturer to aid in determining storage requirements. Even in cases where the manufacturer recommendations are obtained, the final determination of storage requirements is the responsibility of the Quality Engineer. In this case, the cure date was provided and the parts were tagged for conditional release for use during the next five years.

Should you have any questions concerning our actions, please communicate directly with the plant management.

Yours very truly,



L. J. Wachter  
Vice President - Power Production  
and System Operation

cc: Mr. Victor Stello  
Mr. G. Charnoff  
Minnesota Pollution Control Agency  
Attention: Mr. J. W. Ferman