



NORTHERN STATES POWER COMPANY  
Minneapolis, Minnesota 55401

July 16, 1973

Mr. Boyce H. Grier, Director  
Directorate of Regulatory Operations  
Region III  
United States Atomic Energy Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 61037

Dear Mr. Grier:

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

Response to Items Listed on Enclosure of  
Letter Dated June 28, 1973

This letter is written in response to the items noted on your letter of June 28, 1973. Your letter, addressed to Leo J. Wachter, Vice President-Power Production and System Operation, referred to two activities which appeared to be in violation of AEC requirements. The two activities were:

1. An inadvertent dilution of the boron bearing solution in the Standby Liquid Control System on May 24, 1973, and
2. Changing a surveillance test procedure without the concurrence of two individuals holding senior operator licenses on May 4, 1973.

The two subjects are discussed separately.

1. Inadvertent Dilution of the Boron Bearing Solution in the Standby Liquid Control System

On May 25, 1973, the sodium pentaborate concentration of the Standby Liquid Control System was measured following an addition of water to the boron solution tank. The concentration was found to be below that required by Technical Specification 3.4.C. Immediate action was taken to comply with Technical Specification 3.4.C and Technical Specification 3.4.D. This occurrence was reported in a letter sent to J. F. O'Leary, Directorate of Licensing, on June 1, 1973.

To prevent the possibility of inadvertently diluting the boron bearing solution in the future, additional administrative measures have been implemented to control the addition of chemicals or water to the boron solution tank. The additional measures include:

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- 1.) A special form has been prepared for the purpose of specifying, approving and documenting all additions of water or chemicals to the boron solution tank.
- 2.) The boron solution tank concentration must be determined within 24 hours prior to the addition of water and/or chemicals.
- 3.) Additions to the boron solution tank are made only with the approval of the Operations Supervisor and the Plant Chemist.
- 4.) The Plant Chemist reviews the analysis of the boron solution concentration following each addition of water or chemicals to the tank.

We believe that this action provides the assurance that the boron solution concentration will be maintained above that required by Technical Specification 3.4.C.

2. Changing a Surveillance Test Procedure Without The Concurrence of Two Individuals Holding Senior Operator Licenses.

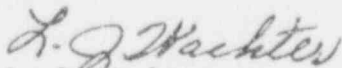
As reported in your correspondence dated June 28, 1973, changes were made to Surveillance Test 0189, Emergency Diesel Generator Automatic Fast Start Initiation, without the approval of two individuals holding Senior Operator licenses. The changes were approved by a Senior Operator licensed Shift Supervisor and the supervising test engineer who is not a licensed Senior Operator. Technical Specification 6.5.D states that temporary changes to procedures which do not change the intent of the procedure may be made with the concurrence of two individuals holding senior operator licenses.

In addition to discussing this violation with the individuals involved, a memo has been issued by the Plant Manager to the Shift Supervisors, licensed operators and plant engineering personnel reminding them of the requirements of Paragraph 6.5.D of the Technical Specifications.

It is believed that the action described will insure that plant personnel are aware of the requirements of Paragraph 6.5.D and that they will obtain proper approval for temporary procedural changes to prevent similar occurrences from happening in the future.

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

LJW/CEL/kik

cc: G Charnoff  
Minnesota Pollution Control Agency  
Attn: Ken Dzigan