



NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

June 2, 1972

Mr Boyce H Grier, Regional Director
Directorate of Regulatory Operations, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr Grier:

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

In your letter of May 9, 1972, you identified an activity which appeared to be in noncompliance with AEC requirements. A copy of the correspondence describing this activity is attached for reference. As requested, the following information is hereby submitted.

Each of the four Main Steam Line Radiation Monitor channels is provided with a front panel Trip Test switch and an internally located trip test potentiometer. The trip test potentiometer is used in conjunction with the Trip Test switch to supply a simulated detector input signal to the monitor for the purpose of checking the monitor trip settings. The monitor trip settings are checked weekly. Located within each channel in the immediate vicinity of the trip test potentiometer are the zero, upscale trip, and downscale trip adjustments.

On April 20, 1972, a Work Request Authorization was submitted for Main Steam Line Monitors B, C, and D because the zero readings were found to be outside of the surveillance test procedure limits. It was considered possible that an operator had inadvertently adjusted or affected monitor "zero" adjustments during the April 18th test of the trip settings. As had been previously discussed with the Assistant Plant Superintendent and Plant Results Engineer, the Engineer, Instruments decided that it was a convenient time to relocate the trip test potentiometers to the front panel of the instruments to eliminate the potential for upsetting the zero adjustments during weekly trip setting tests.

Relocation of the trip test potentiometers consisted of drilling a hole in the chassis front panel and changing the potentiometer mounting orientation from chassis floor to chassis front panel. No wires were lifted to change the mounting orientation because there was no significant change in location. This change in mounting orientation provided front panel access to the trip test potentiometer, and eliminated the need for the operator to partially withdraw the

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monitor chassis drawer to perform the weekly test of trip settings. The change did not involve the circuit which is active during normal operation of the monitor channel, and involved no change in the test circuit design function.

We believe there was adequate control over this activity to the extent consistent with its importance to safety. This action did not constitute a change to the facility as described in the FSAR and as governed by regulations 50.59. Contrary to the implication in your letter dated May 9, 1972 we believe this action does not and should not constitute a "change or modification to plant systems or equipment" which requires the Operations Committee to "review and submit recommendations to SAC for concurrence" (and the SAC to review and advise the Vice President to take appropriate action).

It may be noted that the developing program of additional administrative controls at Monticello will address itself to changes to equipment or instrumentation which are a part of a safety system. These controls will establish that when the work to be performed does not constitute a change as regulated by 50.59 (b), no review beyond the Operations Committee will be required unless the Operations Committee or the Plant Manager specifically requests Safety Audit Committee review.

Yours very truly,



L J Wachter, Vice President
Power Production & System Operation

LJW/CEL/ma

cc: W W Larkin
L O Mayer