

NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

November 26, 1974

Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Directorate of Licensing
Office of Regulation
U. S. Atomic Energy Commission
Washington, D C 20545



Dear Mr. Ziemann:

MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NO. 50-263 LICENSE NO. DPR-22

Proposed Technical Specifications on Reporting
Requirements and Administrative Controls

Your letter dated October 21, 1974 requested, in part, that we submit as soon as practical before December 1, 1974 proposed changes to the Monticello Technical Specifications which would incorporate the recommendations of Regulatory Guide 1.16, Revision 2 "Reporting of Operating Information-Appendix A Technical Specifications." As you may know, representatives of Northern States Power Company attended a regional seminar conducted by AEC Regulatory Operations on November 7, 1974 which presented further information on the intent and interpretations of Regulatory Guide 1.16, Revision 2.

Preparation of the proposed Technical Specification change has been on a "hold status" since that meeting pending receipt of clarifying information on certain portions of Regulatory Guide 1.16 to avoid the need to request further changes a few months later. Assuming that this information is available this week, and with a high priority processing of the proposed technical specification change through the committee review process required for Operating License amendments, we expect that the amendment would be ready for submittal to the AEC by December 18, 1974. We will exert all reasonable effort to maintain this proposed schedule.

Your October 21, 1974 letter also stated that a review of the Monticello Technical Specifications on Administrative Controls resulted in a determination that it should be revised to be consistent with the format and content of a standardized technical specification on this subject. Early in 1972 we were advised by the AEC that we should submit proposed changes to the Administrative Controls section of the Monticello Technical Specifications. NSP prepared a number of drafts of Administrative Control Technical Specifications based upon

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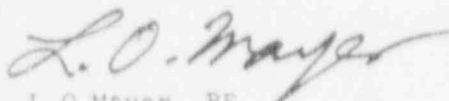
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the guidance in ANSI N18.7 and Regulatory Guide 1.33 and as a result of meetings and telephone conversations with the Regulatory Staff. On April 3, 1973 the AEC issued change No. 6 to the Monticello Operating License which incorporated new Administrative Controls. Although the wording of our Administrative Controls Technical Specification does not precisely follow the format and content of the standardized technical specification, we believe that it meets the intent of the standardized version.

We also received a letter from the AEC dated November 13, 1974 on our Prairie Island Plant which requested changes to the reporting requirements of the Prairie Island Technical Specifications; however, the review of our Administrative Controls Technical Specifications in that case apparently determined them to be adequate since the letter is silent on this subject. Except for minor reporting differences, the Administrative Controls Technical Specifications for the two plants are essentially identical.

Based on the above information, it is requested that the Regulatory Staff reevaluate the need for revision of the Monticello Administrative Controls Technical Specifications. If this reevaluation concludes that the intent of the standardized technical specification is met but that there is need for revision to the format, we believe that we should be allowed a period of six months to accomplish this "backfitting." It would be necessary for us to submit amendments to change both the Monticello and Prairie Island Administrative Controls Technical Specifications to maintain uniformity and would result in a substantial number of revisions to Administrative Control Directives, Administrative Work Instructions, etc. which are based on the current technical specification requirements. In addition to their normal operating commitments, our people are also involved in activities over the next few months related to public hearings for both plants, startup of Prairie Island No. 2 Unit, a refueling outage at Monticello and several technically oriented license amendments. Your consideration of these influences as they relate to the need for the requested technical specification changes will be appreciated.

Yours very truly,



L. O. Mayer, PE
Director of Nuclear Support Services

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