



NORTHERN STATES POWER COMPANY

414 Nicollet Mall
Minneapolis, Minnesota 55401

July 18, 1983

Mr. J. F. Streeter
Chief Engineering Branch 1
U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Streeter:

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

In response to your letter dated June 24, 1983, which transmitted Inspection Report No. 50-263/83-11 (DE), the following information is provided.

Response to Items of Noncompliance

Violation 1

Technical Specification 6.5F states, in part, that "Temporary changes to procedures which do not change the intent of the original procedures may be made with the concurrence of two individuals holding senior operator licenses". The second paragraph of Section 4 of the licensee's Procedures 4850-03, 4850-19, 4850-20 and 4850-29 states "Temporary changes to this procedure shall be written in at the appropriate location in the procedure. The change shall be initialed by two senior reactor operators prior to commencing work. For each change made, one of the SRO's initials shall be the Shift Supervisor's initials."

Contrary to the above, temporary changes were made to Procedures 4850-3, 4850-19, 4850-20, and 4850-29 performed during August, September and October 1982 without the changes being initialed by two senior reactor operators.

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Response

1. Corrective Action Taken and the Results Achieved

Maintenance and Testing Department personnel investigated why each procedure had improper temporary change processing. The following was ascertained:

- a. Procedure MT-PP7.49 (Monti-4850-03 PM), has temporary changes noted on the procedure, however, this was overlooked by departmental personnel and was not submitted to the SRO's for review and signature.
- b. Procedure MT-PP7.66 (Monti-4850-19 PM), exhibits a note to department personnel by the workmen indicating review for possible change when the procedure is revised in the future.
- c. Procedure MT-PP7.63 (Monti-4850-20 PM), exhibits a note clarifying a caution note in the procedure, however, to an auditor it would appear to be a temporary change and should not have been on the completed procedure.
- d. Procedure MT-PP7.78 (Monti-4850-29 PM), does have temporary changes noted on the procedure and was overlooked by Maintenance and Testing personnel for the required temporary change process.

NOTE: In all cases the notation "Were there any temporary changes to this procedure?" was marked YES.

The completed procedures were presented to the the Monticello Nuclear Plant Operations Committee by the responsible Maintenance and Testing Supervisor. He explained what happened during the work and the status of each completed procedure with respect to temporary changes. The Monticello Nuclear Plant Operations Committee reviewed the temporary changes made to each procedure at that time.

2. Corrective Actions To Be Taken To Avoid Further Noncompliance

In Maintenance and Testing Department meetings, the following preventive action commitments were made:

- a. No notes will be placed on procedures being used in work sequence unless they are actual temporary changes.
- b. All notes for evaluation as possible procedure changes, for a better work process, shall be noted on copies that the responsible supervisor has and maintains.
- c. Closer surveillance will be maintained by the responsible supervisor for ongoing work sequences for processing any/all temporary changes to procedures.

- d. Responsible departmental personnel shall be instructed at future pre-outage meetings as to the requirements of the temporary change process.
 - e. All involved procedures shall be revised prior to next use and shall include all noted temporary changes. The revisions shall be completed by February 1984.
3. Date When Full Compliance Will Be Achieved

The actions described in (1) and (2) (a-d) have been completed or implemented. The action described in (2) (e) shall be completed by February 1984.

Violation 2

10CFR50, Appendix B, Criterion V states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Document Control Procedure IX.7, Revision 2, requires that when a drawing identified on the Construction File Index is required to be revised, a marked up copy of the drawing be placed in the Construction File and if other controlled files contain this drawing, that each drawing be stamped as follows: CONTROLLED See Construction File for Updates on Immediate Maintenance, Operations, and Design Considerations.

Contrary to the above, Drawings NX 7828-9-2, 7828-35-2, 7828-36-2, 7833-21-1, and NH 36048, 36243, 36244, 36249, and 36253 located in the Control Room File, which were contained as marked up drawings in the Construction File, were not stamped as required.

Response

1. Corrective Action Taken and the Results Achieved

The Construction File Index was inventoried against all controlled drawing files and the drawings stamped as required.

Training sessions were conducted with staff members involved in the Construction File updating process to review the requirements and emphasize the importance of adherence to those requirements.

Existing procedures and instructions were reviewed for accuracy. No revisions were necessary.

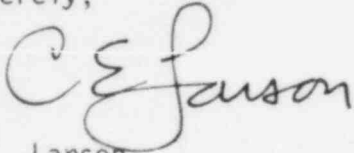
2. Corrective Actions To Be Taken To Avoid Further Noncompliance

No other actions are considered necessary to avoid further noncompliance.

3. Date When Full Compliance Will Be Achieved

All actions described in (1) have been completed.

Sincerely,

A handwritten signature in cursive script, appearing to read "C E Larson".

C. E. Larson
Director, Nuclear Generation

cc C. Brown
G Charnoff