



Northern States Power Company

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January 30, 1984

Mr R L Spessard, Director
Division of Engineering, Region III
U S Nuclear Regulatory Commission
799 Roosevelt Road
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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to NRC Notice of Violation Dated December 30, 1983

This refers to the Notice of Violation issued by the Director of the Division of Engineering, Region III, NRC, on December 30, 1983. One violation was identified. Pursuant to 10CFR2.201, the following information is submitted:

Description of Violation

10CFR Part 50, Appendix B, Criterion III states, in part "...design control measures shall provide for verifying or checking the adequacy of design, such as ...by the performance of a suitable testing program." Criterion XI states, in part, "A test program shall be established to assure that all testing required to demonstrate that ...systems, and components will perform satisfactorily in service." The Operational Quality Assurance Plan, Revision 3, dated June 20, 1978, Section 13.2 states, in part, "Measures shall be established to assure that appropriate preoperational and operational tests are performed on safety related structures, systems and components that have been subject to modifications...."

Contrary to the above, all appropriate tests were not conducted following the installation in 1978 of six new degraded voltage protection relays on 4160 V Essential Busses 15 and 16 (Design Change 78 M 060). Although the dropout value was correctly measured and set as part of WRA 78-2498, the reset value was not measured and was assumed to be the same as the dropout value. As a result of this incorrect assumption, the plant was operated at bus voltages that increased the susceptibility to spurious separations from the offsite (preferred) power source.

Cause of Violation

This violation resulted from a failure to consider relay reset deadband in the design, implementation and testing of the degraded voltage protection modification.

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Corrective Actions Taken

4 AWI-7.1.1, Special Items for Consideration, is an administrative work instruction (AWI) which establishes a system for ongoing recognition of special items to consider for design changes. This AWI was revised to include a recommendation that new relay protection schemes be reviewed by the Protection and Electrical Maintenance Department. This department can provide expertise in the area of electrical protection systems that may not be available in the plant staff. It is believed that this review will identify appropriate requirements for the design, implementation and testing of such modifications.

Planned Corrective Actions

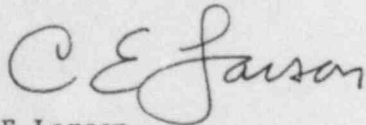
4 AWI-7.1.1 will be further revised to specifically identify relay and instrument reset deadband as an item to consider when preparing design changes.

The administrative procedures controlling the modification process are currently undergoing extensive review and upgrading. The new modification process will provide for the assignment of multi-disciplinary teams to be involved with the planning, implementation and closeout of modifications. It is believed that the consultation provided by these teams will ensure that appropriate criteria are established and that the final design will, in fact, satisfy the criteria.

Schedule for Full Compliance

4 AWI-7.1.1 will be revised as described above by March 31, 1984.

Our schedule for implementation of the revised Northern States Power Company modification process was originally November 30, 1983. Draft directives establishing the revised modification process have been issued for review. Comments are now being incorporated. The amount of effort required for formulating the revised program was greatly underestimated. An implementation date following the end of the 1984 outage is now planned (January 1, 1985). A detailed discussion of this schedule change is being provided by separate correspondence.



C E Larson
Director, Nuclear Generation

c: J G Keppler
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G Charnoff