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February 20, 1984

Mr Richard C DeYoung, Director  
Office of Inspection and Enforcement  
U S Nuclear Regulatory Commission  
Washington, DC 20555

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

Revised Schedule for Implementation of  
Uniform Modification Process

In our letter dated May 11, 1983 we provided a description of the corrective steps already taken or planned in response to the Region III Notice of Violation and Proposed Imposition of Civil Penalty issued on April 11, 1983. The purpose of this letter is to provide a status report on the corrective steps we described and also provide an updated schedule for completion of one of these items.

The status of the corrective steps described in our letter of May 11, 1983 is summarized on the attached Table. As noted in this table, all items have been completed with the exception of two items related to the new uniform design change process and the modification turnover checklist.

The uniform modification process has proven to be far more time consuming to develop than originally planned. Draft changes to our directives system related to this new program have been prepared and distributed within NSP for review and comment. These comments are now being consolidated prior to preparation and release of new directives. Implementation of this new program at our Prairie Island Plant is scheduled for this summer. We do not plan to implement this new system at Monticello until after the current refueling and maintenance outage. This outage will last approximately seven months. Imposition of a new modification control process at this time, with many projects already in progress, would not be prudent. Allowing sufficient time for training in the new process, we believe an implementation date of January 1, 1985 can be achieved.

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The modification turnover checklist referred to in our May 11, 1983 letter was intended to be part of the new modification process. As noted above, this process is not yet in place. However, the plant has taken interim measures which address this concern. An "Individual Modification Checklist" has been prepared which addresses many items planned for the checklist which will be part of the new modification process. This checklist will be completed for each modification prior to startup of the affected system. A "Master Modification Checklist" has also been prepared which assures that all "Individual Modification Checklists" are identified and completed prior to plant startup. Additional requirements have also been added to plant directives to assure interfaces are addressed and holds established in the current design change process. We believe these measures provide adequate interim controls until the revised modification process, including the turnover checklist, is implemented.

Please contact us if you have any questions related to the status of these actions.



C E Larson

Director - Nuclear Generation

c: J G Keppler  
NRC Resident Inspector  
G Charnoff

Attachment

Violation 1

<u>Corrective Steps To Be Taken</u>	<u>Specified Completion Date</u>	<u>Status</u>
1. A revised Schedule of training requirements is being prepared.	8/31/83	Completed
2. Manpower requirements will be reviewed by involved organizations and actions initiated as needed.	10/31/83	Completed
3. The modification process is being revised to provide a process that is common to all departments within NSP. The new process will provide improved interface between modification organizations and the operating organization.	11/30/83	Draft directives issued
4. A modification turnover checklist is being developed to ensure that operational requirements are satisfied.	11/30/83	Interim checklist in place

Violation 2

<u>Corrective Steps To Be Taken</u>		
1. The ACD addressing WRA's and WRA forms is being revised to improve the work control process. This includes a clarification of system alignment verification requirements.	6/1/83	Completed
2. Training is being provided on the revised WRA process for appropriate personnel.	6/1/83	Completed
3. A new ACD on work supervision addressing supervisor responsibilities is being prepared.	8/1/83	Completed
4. Supervisor training will be provided on new ACD.	1/1/84	Training began in December, 1983 and is continuing for individuals having outage responsibilities.
5. Manpower requirements will be reviewed by involved organizations and actions initiated as needed.	10/31/83	Completed

Violation 3

Corrective Steps To Be Taken

Specified  
Completion Date

Status

- |  |         |   |
|--|---------|---|
| 1. Hold and Secure cards are being revised to provide specific blanks for entering equipment number and location and for documenting independent verification. | 12/1/83 | The revised ACD to address revised cards was issued effective December 27, 1983. However, other NSP departments have raised concerns with the plant establishing their own cards. This concern has been resolved, at least temporarily, and we will use the new cards for the refueling/maintenance outage. |
| 2. The ACD addressing equipment control will be revised, as necessary, to address the new Hold and Secure cards.   | 12/1/83 | Completed in conjunction with (1) above.  |
| 3. Valve position verification requirements will be established.   | 8/1/83  | Completed in conjunction with (2) and (3) above.  |