

Northern States Power Co.
ATTN: Mr. Arthur V. Dienhart
Vice President of Engineering
414 Nicollet Mall
Minneapolis, Minnesota 55401

Gentlemen:

In June 1970 the Atomic Energy Commission issued requirement for quality assurance for nuclear power plants. Section 50.34(b)(6)(ii) and Appendix B of 10 CFR 50 set forth the criteria for a quality assurance program for design, construction and operation of the structures, systems and components of the facility.

Your application for a full term license for the Monticello Nuclear Generating Plant dated June 15, 1972, addressed, in part, your quality assurance program for operations. Your submittal was evaluated against the criteria of Appendix B as each applies to quality assurance during operation of the facility. In particular, we were interested in determining to what extent your program covers such activities as operation, maintenance, repair, refueling, and modification. Also reviewed was the change request dated November 20, 1972 to the Monticello license, which included a proposed Section 6, Administrative Controls, of the Technical Specifications. Our review disclosed some specific deficiencies in your program, which are tabulated below:

Criterion

Items Not Addressed or Inadequately Covered

I

A provision that those checking, auditing, or inspecting have sufficient independence of the line organization responsible for operation.

<u>Criterion</u>	<u>Items Not Addressed or Inadequately Covered</u>
II	Special controls processes, test equipment, tools, and skills to obtain and verify quality.
VI	<ol style="list-style-type: none">1. Procedures to cover review, approval, issuance, and use of both initial and revised documents.2. Review and approval of document revisions by the same organization that performed the original review and approval.
XI	<ol style="list-style-type: none">1. Proof tests prior to installation, preoperational tests, and operational tests.2. Test results documented and evaluated to assure that the test requirements have been satisfied.
XIV	Measures to indicate the operating status of structures, systems, and components to prevent inadvertent operation.
XVI	<ol style="list-style-type: none">1. Measures to assure that the corrective action is sufficient to preclude recurrence of the unsafe operating condition.2. Procedures to assure that the cause and corrective action are properly documented and reported.
XVII	<ol style="list-style-type: none">1. Records, such as operating logs, and results of reviews, inspections, tests, and audits.2. Records which include such items as completed procedures and the qualifications of personnel.

Criterion

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3. Inspection and test records which, as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the actions taken on noted deficiencies.
4. Records which are identifiable and retrievable.
5. The duration of record retention, and their location and assigned responsibility.

As you may be aware, Safety Guide No. 33, Quality Assurance Program Requirements (Operation), was issued on November 3, 1972. The Guide references ANS 3.2, Standard for Administrative Controls for Nuclear Power Plants, and ANSI N45.2-1971, Quality Assurance Program Requirements for Nuclear Power Plants. Conformance with these standards will provide an adequate basis for complying with Appendix B of 10 CFR Part 50.

Please reassess your quality assurance program as it applies to the operations phase of plant life, in light of Safety Guide No. 33 and the above comments, and resubmit within 90 days, a description of the program that is responsive to the guide. Where reference is made in the discussion that the requirement is satisfied by a statement in the Technical Specifications, a specific reference to the appropriate subsection of the Technical Specifications should be made.

To assist you in preparing your reply we have enclosed a copy of Safety Guide No. 33.

Sincerely,

Enclosure:
Safety Guide No. 33

Donald J. Skovholt, Assistant Director
for Operating Reactors
Directorate of Licensing