

50-282/306
50-263



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 25, 1996

Mr. Roger O. Anderson, Director
Licensing and Management Issues
Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401

SUBJECT: REVIEW OF NORTHERN STATES POWER COMPANY PROPOSED QUALITY ASSURANCE
PROGRAM DESCRIPTION CHANGES AND PRAIRIE ISLAND LICENSE AMENDMENT
RELATED TO TECHNICAL SPECIFICATIONS ADMINISTRATIVE CONTROLS (TAC
NOS. M95130, M95131, AND M95709)

Dear Mr. Anderson:

By letter dated April 19, 1996, Northern States Power Company (NSP) submitted a proposed change (Revision 20) to NSP's Operational Quality Assurance Plan (OQAP) for the Monticello and Prairie Island sites. The letter noted that the proposed changes to NSP's OQAP supported the Prairie Island December 14, 1995, license amendment request for revising the Technical Specifications (TS) administrative controls section to achieve conformance with NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1.

During the course of our preliminary review, we held a teleconference with Mr. Dale Vincent of NSP on September 17, 1996. We informed Mr. Vincent that Revision 20 to NSP's OQAP did not adequately support the license amendment request for revising the TS for the following reasons: (a) Section 6.2, "Review and Audit," deleted text under proposed Section 6.4, "Procedures" (currently Section 6.5 "Plant Operating Procedures"), and Section 6.6, "Plant Operating Records," have not been relocated to the OQAP, and (b) it was not clear from Appendix D, "Revision 20 Change Summary," to Revision 20 of the OQAP that the OQAP submittal conformed with the guidance in Generic Letter (GL) 88-12, "Removal of Fire Protection Requirements from Technical Specifications," dated August 2, 1988.

We also emphasized that relocations of QA-related provisions from TS to the OQAP should, to the extent practical and consistent with the licensing bases of the facility, conform to the guidance provided in GL 95-06, "Changes in the Operator Licensing Program," and in NUREG-1431, Revision 1. You should explicitly address any deviations from these documents.

In this case, the text in the proposed subsection 6.4.B of Section 6.4, "Procedures," of the TS license amendment request does not conform to the textual guidance provided in subsection 5.4.1.b of Section 5.4, "Procedures," in NUREG-1431. As written, your emergency operating procedures would not implement the requirements of both NUREG-0737 and Supplement 1 to NUREG-0737 as specified in NUREG-1431. Unless Northern States provides adequate justification for this omission, the TS amendment request would have to be amended.

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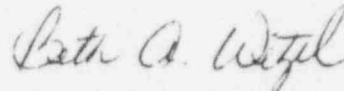
Roger O. Anderson

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Therefore, we request that Northern States revise the QQAP and the TS amendment request, as appropriate, to address these issues and that the QQAP be resubmitted and the TS amendment request be supplemented accordingly.

If you have any questions regarding this review, please contact me at (301) 415-1355.

Sincerely,



Beth A. Wetzel, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-282, 50-306, and 50-263

cc: See next page

Roger O. Anderson

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Original Signed By:

Beth A. Wetzel, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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Northern States Power Company

cc:

Mr. Roger O. Anderson, Director
Licensing and Management Issues
Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401

J. E. Silberg, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington DC 20037

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
2807 W. County Road 75
Monticello, Minnesota 55362

Plant Manager
Monticello Nuclear Generating Plant
ATTN: Site Licensing
Northern States Power Company
2807 West County Road 75
Monticello, Minnesota 55362-9637

Robert Nelson, President
Minnesota Environmental Control
Citizens Association (MECCA)
1051 South McKnight Road
St. Paul, Minnesota 55119

Commissioner
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55119

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Commissioner of Health
Minnesota Department of Health
717 Delaware Street, S. E.
Minneapolis, Minnesota 55440

Darla Groshens, Auditor/Treasurer
Wright County Government Center
10 NW Second Street
Buffalo, Minnesota 55313

Monticello Nuclear Generating Plant
and Prairie Island Nuclear
Generating Plant

Kris Sanda, Commissioner
Department of Public Service
121 Seventh Place East
Suite 200
St. Paul, Minnesota 55101-2145

Adonis A. Neblett
Assistant Attorney General
Office of the Attorney General
455 Minnesota Street
Suite 900
St. Paul, Minnesota 55101-2127

Site General Manager
Prairie Island Nuclear Generating
Plant
Northern States Power Company
1717 Wakonade Drive East
Welch, Minnesota 55089

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
1719 Wakonade Drive East
Welch, Minnesota 55089-9642

Mr. Jeff Cole, Auditor/Treasurer
Goodhue County Courthouse
Box 408
Red Wing, Minnesota 55066-0408

Site Licensing
Prairie Island Nuclear Generating
Plant
Northern States Power Company
1717 Wakonade Drive East
Welch, Minnesota 55089