

NOTICE OF VIOLATION

Northern States Power Company
Monticello Station

Docket No. 50-263
License No. DPR-22

During an NRC inspection conducted on November 18, 1996, through January 8, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600 (60 FR 34381; June 30, 1995), the violations are listed below:

- I. 10 CFR 50.59 (a)(1) stated, in part, that the holder of a license authorizing operation of a production facility may make changes in the facility as described in the safety analysis report without prior Commission approval unless the proposed change involves a change in the technical specifications incorporated in the license or an unreviewed safety question.

10 CFR 50.59 (b)(1) stated, in part, that the licensee shall maintain records of changes in the facility. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above:

- a. On August 14, 1996, during closeout of Design Change Package # 85M042, "RHR System Pressure Upgrade Modification," Revision 1, the safety evaluation failed to provide the bases for the determination that the physical plant changes, that were not returned to their original values following the modification's cancellation, did not involve an unreviewed safety question.
- b. On October 23, 1996, Safety Review Item 96-016, "1996 FOI Identified USAR Changes," Revision 0, Addendum 4, failed to provide the bases for the determination that each change identified in the safety review item did not involve an unreviewed safety question.

This is a Severity Level IV violation (Supplement 1).

- II. 10 CFR Part 50, Appendix B, Criterion III, "Design Control," states, in part, that measures shall provide for verifying or checking the adequacy of the design, and that changes shall be subject to design control measures commensurate with those applied to the original design.

Contrary to the above:

- a. On March 14, 1996, changes were made to General Electric Calculation, EqDE-34-0687, "Core Spray System Operational Capability Report," and these changes were not commensurate with those applied to the original design. Changes were "pencilled-in" on a copy of the calculation, the "revised" calculation was not entered into the document control system, and a record of the "revised" calculation was not identifiable or retrievable within the quality assurance records system.

- b. On June 24, 1996, calculation CA-96-090, "Evaluation of ECCS Net Positive Suction Head," Revision 0, was approved although the design verification activities were not adequate. The calculation reached an incorrect conclusion as to the amount of available net positive suction head because the vapor pressure value used in the calculation for water at 191°F was incorrect.
- c. On December 6, 1996, calculation CA-96-166, "Drywell Flooding Evaluation for Post DBA LOCA," Revision 0, was approved to resolve non-conservative and non-verified assumptions contained in calculation CA-93-056 "Suppression Pool Drawdown Calculation." The verification for the 1996 calculation was not adequate in that the calculation still contained non-verified, non-conservative assumptions.
- d. On May 19, 1995, calculation CA-94-20, "RHR/RHR Service Water Heat Exchanger Performance," Revision 1, was approved although the design verification activities were not adequate. The verification consisted of confirming that a computer could perform mathematical computations rather than verifying that the formulae input to the computer were accurate.

This is a Severity Level IV violation (Supplement 1).

- III. 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," states, in part, that a test program shall be established to assure testing is performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in design documents. Test results shall be documented and evaluated to assure test requirements have been satisfied.

Contrary to the above:

- a. On March 16, 1995, surveillance procedure 1136, "RHR Heat Exchanger Efficiency Test" was revised such that the acceptance limits contained in design documents were no longer incorporated into the surveillance procedure. Specifically, the procedure was revised to incorporate a heat exchanger area not contained in any design document.
- b. On March 23, 1995, surveillance procedure 1136, "RHR Heat Exchanger Efficiency Test," Revision 15, was signed by the shift engineer as complete without the test results being evaluated to assure test requirements were satisfied. The "HXPERF" computer program output sheets, showing that the test results were acceptable and required by the procedure to be attached, were dated October 22, 1996, and were based on Revision 1 of the computer program rather than on Revision 0 as specified by the test procedure.

This is a Severity Level IV violation (Supplement 1).

Pursuant to the provisions of 10 CFR 2.201, Northern States Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the Monticello Nuclear Generating Plant, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Lisle, Illinois
this 20th day of February 1997