

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-263/85025(DRS)

Docket No. 50-263

License No. DPR-22

Licensee: Northern States Power Company  
414 Nicollet Mall  
Minneapolis, MN 55401

Facility Name: Monticello Nuclear Generating Station

Inspection At: Region III Office, Glen Ellyn, IL

Inspection Conducted: December 23, 1985

Inspector: *W. G. Guldemon*  
W. G. Guldemon

12-27-85  
Date

Approved By: *Luis A. Reyes*  
Luis A. Reyes, Chief  
Operations Branch

12-27-85  
Date

Inspection Summary

Inspection on December 23, 1985 (Report No. 50-263/85025(DRS))

Areas Inspected: Special safety inspection to followup on unresolved items previously identified in Inspection Report No. 50-263/84-26(DRS). The inspection involved a total of eight inspector-hours by one NRC inspector in the Region III office.

Results: In the area inspected, one violation was identified (failure to determine as found containment leakage - Paragraph 2).

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## DETAILS

### 1. Persons Contacted

#### Northern States Power Company

- \*W. Shamla, Plant Manager
- \*B. Day, Superintendent of Operations Engineering
- \*D. Nevinski, Plant Superintendent of Engineering and Radiological Protection

#### NRC

- \*D. Boyd, Chief, Projects Section 2D
- \*P. Hartman, Senior Resident Inspector

\*Denotes personnel at the exit teleconference of December 23, 1985.

### 2. Followup of Previously Identified Unresolved Items

During an inspection of Containment Integrated Leak Rate Testing (CILRT) activities performed in 1984 two issues were identified requiring NRC resolution as to their enforceability. These issues, documented in Inspection Report No. 50-263/84-26(DRS), involved the licensee's failure to vent and drain certain non-seismic Class 1 systems which penetrated the containment boundary prior to the performance of a CILRT (Unresolved Item No. 50-263/84-26-01) and the failure to determine as found containment integrated leakage (Unresolved Item 50-263/84-26-07).

These two issues were referred to the NRC Enforcement Staff of the Office of Inspection and Enforcement on April 26, 1985 with a request to determine whether the failure to conduct the subject activities constituted violations of NRC requirements. In October 1985 the Director of the Enforcement Staff responded to the Region III request with the following positions:

- a. The requirement to vent and drain non-seismic piping systems is not sufficiently explicit in 10 CFR Part 50, Appendix J alone to warrant direct enforcement action. While internal NRC guidance specifies such venting and draining, if that guidance has not been formally transmitted to all licensees, it does not constitute a basis for a violation.
- b. The requirement to determine the as found containment integrated leakage is sufficiently explicit in 10 CFR Part 50, Appendix J to warrant a violation when such a determination is not made.

Based on these positions, Unresolved Item 50-2763/85026-01 is no longer being considered a potential violation; however, Unresolved Item No. 50-263/84-26-07 is considered a violation (50-263/85026-01(DRS)).

By letter dated April 12, 1985, which transmitted Inspection Report No. 50-263/84-26(DRS) to the licensee, the licensee was requested to:

- a. Provide a list of the systems penetrating containment which were not vented and drained outside containment for the 1984 CILRT with the justification used to not vent and drain these systems.
- b. Provide the 1984 CILRT as found results.

The licensee's response, dated May 24, 1985, provided the requested information. With respect to Item a. above the licensee indicated that past practice was to vent only the reactor coolant system to the containment atmosphere. This practice was based on the premise that piping outside containment would remain intact following an accident. To address venting and draining concerns for the 1984 test, the licensee added a penetration vent penalty to the 95 percent upper confidence level CILRT results. This penalty included all ECCS, non-ECCS, seismic, and non-seismic systems that were not vented during the CILRT. This adequately resolved inspector concerns with respect to the 1984 CILRT. With respect to future CILRTs, the licensee committed to revise the test procedure to address venting and draining non-seismic systems outside containment. Based on this commitment, Unresolved Item No. 50-263/84-26-01 is considered closed.

With respect to Item b. above, the licensee referenced their March 29, 1985 CILRT report. In addition, the licensee committed to revise their procedure prior to the next CILRT to require the determination of the as found containment integrated leakage rate. These actions are acceptable. Unresolved Item No. 50-263/84-26-07 is considered closed, and no further response is required to Violation No. 50-263/85025-01(DRS).

### 3. Exit Interview

The inspector telephonically contacted the licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on December 23, 1985. The inspector discussed the purpose and scope of the inspection and the findings.

The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any documents/processes as proprietary.