May 24, 2000

Mr. M. Wadley President, Nuclear Generation Northern States Power Company 414 Nicollet Mall Minneapolis, MN 55401

SUBJECT: NRC EMERGENCY PREPAREDNESS INSPECTION REPORT 50-263/2000011(DRS)

Dear Mr. Wadley:

On May 12, 2000, the NRC completed a baseline inspection at your Monticello Nuclear Generating Plant. The results of this inspection were discussed with Mr. M. Hammer and other members of your staff on May 11, 2000. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to emergency preparedness and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel. Specifically, this inspection focused on the implementation of your emergency preparedness program. In addition, we reviewed your staff's evaluation of the performance indicators for the Emergency Preparedness cornerstone.

Based on the results of this inspection, the NRC did not identify any issues which were categorized as being of risk significance.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room and is available on the NRC Public Electronic Reading Room (PERR) link at the NRC homepage, http://www.nrc.gov/NRC/ADAMS/index.html.

M. Wadley

We will gladly discuss any question you have concerning this inspection.

Sincerely,

/RA/

Wayne Slawinski, Acting Chief Plant Support Branch Division of Reactor Safety

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

Enclosure: Inspection Report 50-263/2000011(DRS)

cc w/encl: Site General Manager, Monticello Plant Manager, Monticello S. Minn, Commissioner, Minnesota Department of Public Service We will gladly discuss any question you have concerning this inspection.

Sincerely,

/RA/

Wayne Slawinski, Acting Chief Plant Support Branch Division of Reactor Safety

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

Enclosure: Inspection Report 50-263/2000011(DRS)

cc w/encl: Site General Manager, Monticello Plant Manager, Monticello S. Minn, Commissioner, Minnesota Department of Public Service

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: License No:	50-263 DPR-22
Report No:	50-263/2000011(DRS)
Licensee:	Northern States Power Corporation
Facility:	Monticello Nuclear Generating Plant
Location:	2807 West Highway 75 Monticello, MN 55362
Dates:	May 8-12, 2000
Inspector:	Donald E. Funk Jr., Emergency Preparedness Analyst
Approved by:	Wayne Slawinski, Acting Chief, Plant Support Branch Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety

Radiation Safety

Safeguards

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational
- Physical Protection

• Public

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

SUMMARY OF FINDINGS

Monticello Nuclear Generating Station NRC Inspection Report 50-263/2000011(DRS)

The report covers a 1-week period of announced inspection by a regional Emergency Preparedness Analyst. This inspection focused on the implementation of the emergency preparedness program, and included a review of the licensee's three performance indicators (PIs) associated with emergency preparedness.

REACTOR SAFETY

Cornerstone: Emergency Preparedness

• There were no findings identified and documented during this inspection.

Performance Indicators Verification

• Alert and Notification System (ANS) Reliability, Emergency Response Organization (ERO) Drill Participation, and Drill/Exercise Performance (DEP) Indicators. The inspector verified that, with minor exceptions, the licensee had acceptably gathered information and reported these three Performance Indicators, which were in the green band (Sections 20S4 and 4OA5).

Report Details

1. **REACTOR SAFETY**

Cornerstone: Emergency Preparedness

1EP2 Alert and Notification System Testing

a. Inspection Scope

The inspector discussed the design of the equipment for alert and notification system (sirens) testing with the licensee, and reviewed the procedure for and frequency of system testing. Reviews were also conducted of siren testing and related corrective action documentation, and a siren cancel test was observed. The statistics gathered to determine overall siren reliability were also reviewed.

b. Observations and Findings

There were no findings identified and documented during this inspection.

1EP3 Emergency Response Organization Augmentation Testing

a. Inspection Scope

The inspector reviewed the quarterly augmentation test procedure, augmentation call lists, results from augmentation tests, and the licensee's analysis of test results. The ERO augmentation test for the second quarter 2000 was observed. Corrective actions related to augmentation testing were reviewed to ensure that they were properly tracked and action taken as appropriate.

b. Observations and Findings

There were no findings identified and documented during this inspection.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector interviewed members of the emergency planning staff and reviewed the licensee's self assessments, audits, corrective action program procedures, and condition reports (CRs) concerning the emergency preparedness program for 1999 and 2000 through the date of the inspection. In addition, the inspector reviewed corrective action documentation concerning emergency preparedness or related activities, which had been initiated since January of 1999. The inspector verified that the licensee's most recent evaluation of the emergency preparedness program was adequate.

b. Observations and Findings

There were no findings identified and documented during this inspection.

2OS4 Performance Indicator (PI) Verification

a. <u>Inspection Scope</u>

The inspector verified the licensee's system for identifying the data utilized to determine the values for the three performance indicators for emergency preparedness; specifically, the Alert and Notification System (ANS), Emergency Response Organization (ERO) Drill Participation, and Drill and Exercise Performance (DEP). The procedure for emergency preparedness performance indicator data gathering was reviewed and discussed with the licensee, and documentation relative to the raw data for each indicator was evaluated. Current and historical records for each performance indicator were reviewed. Simulator training, siren testing, and maintenance, and drill/exercise records were also reviewed. The methodology for determining simulator training "opportunities" was reviewed and discussed.

b. Observations and Findings

The inspector identified several minor discrepancies with PI data: during the October 6, 1999 monthly ANS siren test a "stand under" siren verification determined that the specific siren did not sound, however, it was not listed as a failure; the first quarter 2000 ERO Drill Participation calculation failed to list a key responder, and; the DEP indicator only took credit for three opportunities associated with a General Emergency when Nuclear Energy Institute (NEI) 99-02 guidance indicated that four performance opportunities existed. These errors would not have resulted in the PI crossing a threshold reported by the licensee, which are presently within the green response band.

There were no findings identified and documented during this inspection.

4 OTHER ACTIVITIES

40A4 Other

a. Inspection Scope

The inspector toured the Technical Support Center, Operations Support Center, Emergency Operations Facility and evaluated the adequacy of these facilities to support emergency response operations.

b. Observations and Findings

There were no findings identified and documented during this inspection.

4OA5 <u>Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting</u> <u>Process"</u>

a. Inspection Scope

The inspector reviewed the data collecting and reporting process for the ERO Drill Participation PI. Included was a review of indicator definitions, data reporting elements, calculation methods, definition of terms, procedures and instructions, and clarifying notes used by the licensee to ensure consistency with industry guidance document NEI-99-02. This review was conducted in conjunction with the performance indicator verifications documented in section 2OS4 of this report. The following procedures and instructions were reviewed:

- Administrative Work Instruction (AWI) 4 AWI-04.08.11, Revision 1 "NRC Performance Indicator Reporting"
- Maintenance Training Center Procedure (MTCP) 06-09, Revision 1 "Emergency Plan Performance Indicator Program"

b. Observations and Findings

The AWI provided adequate guidance for the compilation of data, definitions of terms and requirements for data reporting, and the content and development of departmental procedures required to support PI data gathering. The inspector also determined that the MTCP provided guidance consistent with NEI-99-02, with minor exceptions for the ANS and ERO PI's. Specifically, the section on ANS failed to identify what test is used to calculate the PI, and the ERO section failed to specify that the indicator is calculated as measured on the final calendar day of the quarter using the last revision of the ERO listing. The inspector also noted that the procedure lacked guidance for determining in advance which drills, exercises and other performance enhancing experiences in which DEP opportunities will be formally assessed and documented for NRC review. The licensee acknowledged the inspectors observations and planned to re-evaluate the procedures.

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the inspection results to members of licensee management on May 11, 2000. The licensee acknowledged the findings presented and did not identify any information discussed as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

<u>Licensee</u>

M. Hammer, Site General Manager

L. Hoskins, Senior Quality Assurance Specialist

T. LaPlant, Superintendent, EP & General Training

B. Leyk, Emergency Planner/Instructor

M. Offerdahl, Emergency Planner

G. Holthaus, Emergency Planner/Instructor

A. Ward, Training Manager

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None.

<u>Closed</u>

None.

Discussed

None.

INSPECTION PROCEDURES USED

71114.02	Alert and Notification System Testing
71114.03	Emergency Response Organization Augmentation Testing
71114.05	Problem Identification and Resolution Program
71151	Performance Indicator Verification
TI 2515/144	Performance Indicator Data Collecting and Reporting Process Review

LIST OF ACRONYMS USED

- ANS Alert and Notification System
- AWI Administrative Work Instruction
- CR Condition Report
- DEP Drill and Exercise Performance
- DRS Division of Reactor Safety
- ERO Emergency Response Organization
- MTCP Monticello Training Center Procedure
- NEI Nuclear Energy Institute
- NRC Nuclear Regulatory Commission
- PANS Public Alert Notification System
- PERR Public Electronic Reading Room
- PI Performance Indicator

LIST OF DOCUMENTS REVIEWED

Assessments and Audits

04/17 - 19/2000 Monticello EP Self-Assessment

Northern States Power Company Internal Audit Report, Generating Quality Services AG 2000-S-1, "Emergency Preparedness (10 CFR 50.54(t)," dated April 28, 2000

Northern States Power Company Internal Audit Report, Generating Quality Services AG 1999-S-1, "Emergency Preparedness (10 CFR 50.54(t)," dated May 13, 1999

Monticello Emergency Plan Exercise Critique Report Conducted June 22, 1999, dated September 10, 1999

Miscellaneous

Emergency Alert Notification Systems Test Results for Calendar Year 1999 to May 2000 Performance Indicator Emergency Preparedness Worksheets for the third and fourth quarter 1999 and first quarter 2000

Training/Exercise Attendance Records

Public Alert Notification Systems (PANS) Fixed Siren Trend Reports for the third and fourth quarter 1999 and first quarter 2000

May 8, 2000 memorandum, May 5, 2000 Integrated Planning Committee Meeting Minutes May 8, 2000 Issues Tracking Statistics for Open Condition Reports and Actions

Condition Reports (CR)/Action Items

19991893; 19992271; 19992272; 20000415; 20001131; 20001305; 20001784; 20001785; 20001850; 20001851; 20001852; 20001854;

Procedures

4 AWI-04.08.11, Revision 1, "NRC Performance Indicator Reporting"
4 AWI-10.01.03, Revision 12, "Condition Report Process"
MTCP-06-09, Revision 1, "Emergency Plan Performance Indicator Program"
1359, Revision 3, "PANS Weekly Cancel Signal Test"
1409, Revision 3, "PANS Monthly Siren Activation Testing"
5790-001-01, Revision 19, "Emergency Response Organization"
5790-102-02, Revision 22, "Monticello Emergency Notification Report Form"